

SEARCHABLE INDEX-DIGEST OF ALL FORMAL BOARD OF ETHICS ADVISORY OPINIONS

UPDATED JUNE 17, 2025

One of the most important functions of the Board of Ethics is guiding and advising people on complying with the City's ethics, campaign financing, and lobbying laws, and handling potential conflicts of interest responsibly. Our advice is rendered **formally**, in written opinions signed by the Board Chair or Executive Director, on average about 25 times each year, and **informally**, about 4,000 times each year, by email, telephone, or in person.

The Board has the power and duty to issue advisory opinions only to current or former City employees or officials, or vendors or lobbyists or others subject to the Ordinance (or their attorneys). **The Board does not have the authority to issue advisory opinions to members of the public or the media unless they are personally involved in the situation.**

As required by the City's Governmental Ethics Ordinance, all advisory opinions are **confidential**. The Board is not authorized to disclose the names of persons who requested or are involved in any opinion without their express consent, or as provided by law.

The Board is authorized to render confidential advice and guidance only as to situations that have not yet occurred. If the Board is informed of conduct that could constitute a past violation of the Ordinance, then the Board must determine whether that conduct appears to have constituted a violation, and then whether that violation was minor or non-minor. If the Board concludes that the apparent past violation was minor, it advises the person confidentially in a letter of admonition. But, if the Board concludes that the apparent past violation was not minor, it advises the person that they may self-report to the Inspector General's Office within 14 days. If they do not do so, the Board shall make the report.

Board advisory opinions are important educational tools. The law requires the Board to make its **formal** opinions available to the public, but in a way that preserves the confidentiality of all persons involved. This is a common practice among governmental ethics commissions in the United States and Canada. Thus, we publish **redacted advisory opinions**. All redacted formal opinions have always been available in paper, and, for the last 10 years, on our website.

Since 1987, when Mayor Washington and the City Council established the Board (in 1986, an Executive Order Board was established, which issued formal opinions, also included here) the Board has issued **nearly 925 formal** opinions. This is in addition to **tens of thousands issued informally** in that time. As the Ordinance and our Board members (appointed by Mayors Washington, Sawyer, Daley, Emanuel and Lightfoot), have changed, so the Board has kept up with new opinions interpreting the law. The Board has been building a large body of law – a legal system in itself. These opinions are a testament to the hard work our members and staff have done to help people avoid ethics problems. This critical function is all-too-often ignored – attention is focused more on the few people who do not seek our advice, then find themselves under investigation. That is unfortunate.

We hope this resource proves useful – and sheds light on our day-to-day, under-the-radar work. Please contact us for assistance with a search, or with suggestions for improving this resource. Our staff is happy to help.

This **searchable** index-digest summarizes and shows **every formal opinion** issued or approved by the Board of Ethics since 1986.

The far-left column shows the **case number** and a **link to the opinion's full text** from our website.

The remaining columns show **the topic(s) addressed in the opinion, a brief summary of the opinion, and keywords**. Particularly significant, precedential cases are identified as such in the brief summary column.

All opinions are also listed and linked to from this page, where they are all listed by topic:

https://www.cityofchicago.org/city/en/depts/ethics/auto_generated/reg_archives.html

The most efficient way to search for and read opinions relevant to your interests is to use the search function on your keyboard: Control < F. On an Apple machine, this is Command < F. We suggest using keywords, like “contract management authority,” or “gifts.”

Depending on your browser, you may need to hit control<click to open the full text of any opinion.

DISCLAIMER: These opinion summaries are intended for educational and research purposes only. In the event of a discrepancy between a summary and the actual text of an opinion or a provision in the Municipal Code, the actual text of the opinion or Code controls. Only those persons involved in the actual opinions may rely on them in the event of an investigation. For definitive guidance, City employees and officials and others subject to the Ordinance are advised to seek confidential advice from the Board of Ethics.

FORMAL ADVISORY OPINION NUMBER	TOPIC(S)	BRIEF SUMMARY OF OPINION	KEYWORDS
86002.A https://www.chicago.gov/content/dam/city/depts/ethics/general/AOPostEmploy/86002.A.pdf	Post-employment	<p>This is a significant, precedential case. The Board determined that Executive Order 86-1 prohibited a former employee of the Office of Cable Communications from representing a new employer (a cable franchisee) on certain matters covered by the new employer's franchise agreement, including compliance with affirmative action and M/WBE compliance, but not from any cable-related activity for one year. Specifically, the Board noted that "aware of the record-keeping systems and procedures of an agency constitutes 'special knowledge or other special advantages not available to the public or experts in the field' of cable communication' ... Accordingly, we conclude that [the former employee's] participation in the institutional activities of the Office of Cable Communication and the Cable Commission should not preclude [the former employee] from representing a cable franchisee in such matters as application to other City agencies for permits, licenses, or other governmental evidences of permission, necessary to construct and implement the franchisee's cable television system."</p> <p>The Board also cited the definition of "personal and substantial participation" in Executive Order 86-1: "greater than</p>	Executive Order 86-1; post-employment; Office of Cable Communications; Cable Commission; franchise; M/WBE; personal and substantial participation; participated personally and substantially; one year subject matter prohibition; special knowledge; knowledge of a City department's operations; knowledge available to experts in the field; City permits or licenses

		minimal participation ... through which the person acquired information, special knowledge or other special advantage not generally available to the public or experts in the field.”	
86006.I https://www.chicago.gov/dam/city/depts/ethics/general/AO Interest CityBusiness/86006.I.pdf	Financial Interest in City Business	The Board determined that an appointed official was in violation of Executive Order 86-1 because the official had a contract with a City agency. The Board advised the official either to resign or cancel the City contract.	Appointed official; contract with the City; violation; financial interest in a City contract, work or business; corrective action; resign; cancel the contract; Executive Order 86-1
86008.A https://www.chicago.gov/content/dam/city/depts/ethics/general/AO ApptOfficials/86008.a.pdf	Financial Interest in City Business; Relationship to Other Laws	The Board determined that Executive Order 86-1 did not prohibit City departments from making or enacting rules that were stricter than the Order, and thus that a City’s department rule prohibiting loans to City employees was not precluded by the Order.	More stricter rules; departments may enact more restrictive rules or policies; loans to City employees; supplemental; power of any City department or City Council to adopt more restrictive rules Executive Order 86-1
86011.A https://www.chicago.gov/dam/city/depts/ethics/general/AO Outside Employment/86011.A.pdf	Non-profit Board Service	This is a significant, precedential case. The Board determined that, under Executive Order 86-1, a City employee was not prohibited from serving as an unpaid board member of a non-profit social service agency that received funding from the City’s Department of Human Services. The Board’s rationale was that the employee had no involvement in any City funding decisions affecting the non-profit, or over the monitoring process. The Board cautioned the employee to keep all governmental and board activities “entirely separate.”	Non-profit board service; non-profit; Department of Human Services; board of trustees; board of directors; economic interest; financial interest; keep government and volunteer activities entirely separate; Executive Order 86-1

		Note: the opinion discusses the concepts of economic and financial interest, concluding that the employee had neither.	
86018.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_Employ_Relatives/86018.A.pdf	Employment of Relatives or Domestic Partners	This is a significant, precedential case. The Board recommended to a City department that it not have one of its employees draft up plans and specifications for a project when there was a possibility that a company employing the brother of the City employee would bid on it. The Board stated that it “sees this set of circumstances as presenting the potential for conflict of interest. In the spirit of the Executive Order, the Board recommends assigning the preparation of these bid specifications to some else, if there is any reasonable way to do so.”	Executive Order 86-1; brothers; sibling; employment of relatives; nepotism; appearance of impropriety; contract bid by a company employing a relative; family member; contract management authority; preparation of specifications; doing City work; conservative advice
86019.A https://www.chicago.gov/dam/city/depts/ethics/general/AO Interest CityBusiness/86019.A.pdf	Financial Interest in City Business	<p>The Board determined that Executive Order 86-1:</p> <p>(i) did not prohibit businesses owned by City employees from being certified as minority/woman/disability-owned business enterprises (“MBE/WBE”);</p> <p>(ii) did prohibit such businesses from being awarded City contracts;</p> <p>(iii) this prohibition included contract wholly or partially state or federal funded, if any payment was made from the City treasury or authorized by City ordinance; and</p> <p>(iv) did not prohibit these businesses certified as MBE/WBE by the City. From</p>	Executive Order 86-1; City employee-owned businesses; certification by the City as an MBE/WBE was not prohibited by the Executive Order; City contracts with businesses were prohibited; City employee-owned businesses not prohibited from contracting with other governmental entities

		contracting with other governmental entities.	
86020.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_GiftsTravel/86020.A.pdf	Gifts	The Board determined that a City employee could accept a product on behalf of the City, provided it was kept in the employee's office, and disclosed to the Board of Ethics. The Board suggested that the employee mark the item as City property.	Executive Order 86-1; gift to the City; gift accepted on the City's behalf; clock; report to Board of Ethics; Comptroller; inventory
86022-23.D https://www.chicago.gov/dam/city/depts/ethics/general/AO_GiftsTravel/86022-23.D.pdf	Gifts	The Board determined that a gift from a foreign delegation – a necktie – was not inappropriate or prohibited by the Ordinance, and advised the City employee to whom it was offered that the employee could keep it or otherwise dispose of it as the employee saw fit.	Gift; necktie; foreign delegation; appropriate; keep the gift; Executive Order 86-1
86025.I https://www.chicago.gov/dam/city/depts/ethics/general/AO_RepresentingOthers/86025.I.pdf	Representation of Other Persons	The Board denied reconsideration of a determination that an appointed official was required to cease representing clients before a City board. The Board stated that, once the new Governmental Ethics Ordinance would take effect, it may change the ability of the official to represent such clients, but its effect was prospective, and the Board's determination was made under Executive Order 86-1, which governed at the time of actions that had already occurred.	Executive Order 86-1; appointed official; representation of clients before City agencies; prospective effect of new Governmental Ethics Ordinance
86026.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_GiftsTravel/86026.A.pdf	Travel	The Board determined that an employee's travel to Washington to attend the National Women's Forum was not prohibited by Executive Order 86-1, because the company inviting the employee had no existing contracts with the City that might create the appearance	Travel; Executive Order 86-1; National Women's Forum; Washington; appearance of impropriety; no contracts with the City

		of impropriety, and was making a contribution to the conference rather than a gift to the City employee.	
86028.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_GiftsTravel/86028.A.pdf	Gifts	The Board concluded it that it could not establish a dollar threshold below which gifts need not be reported or inventoried. The Board's opinion was that all gifts need to be reported.	Reporting gifts; dollar threshold; no minimum threshold
86029.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_InterestCityBusiness/86029.A.pdf	Financial Interest in City Business	The Board determined that a Chicago Police Officer who served as treasurer of a family-owned business was not in violation of the Ordinance, and nothing in the Ordinance prohibited the firm from contracting with the City, because the Police Officer did not have a financial interest in the business and was not a paid employee of it.	Financial interest; Chicago Police Officer; not an employee; Treasurer of a family-owned business; not prohibited from contracting with the City
86030.I https://www.chicago.gov/dam/city/depts/ethics/general/AO_PostEmploy/86030.I.pdf	Post-employment	The Board determined that Executive Order 86-1 did not prohibit a former City employee from receiving a City contract 11 months after leaving City employment. The Board noted that there appeared to be no favoritism, since bids were sealed and there was no reason to suspect that the former employee had information on the specifications that was greater than any competitor's.	Post-employment; Executive Order 86-1; contract with a former City employee; favoritism; sealed bid; inside knowledge
86031.I https://www.chicago.gov/dam/city/depts/ethics/general/AO_GiftsTravel/86031.I.pdf	Gifts	The Board determined that: (i) the Ordinance did not prohibit a City employee from keeping a plaque received as an award in recognition of the employee's public service; (ii) gifts of get well card and flowers were acceptable as being given as simple acts of kindness; but (iii) that figurines and a crystal vase	Investigation; gifts; appearance of impropriety; inexpensive gifts; flowers; get well cards; plaque publicly presented in recognition of public service; figurines; crystal vase; money for advice or assistance

		from the employee's staff were not explicitly allowed, and were not inexpensive gifts, but that the Board would not further investigate the matter because there was no indication that the gifts were given in return for advice or assistance regarding City business. The Board stated that its decision to end its investigation was not meant to condone the employee's acceptance of these gifts, and that it created an appearance of impropriety.	
87002.I https://www.chicago.gov/dam/city/depts/ethics/general/AO_GiftsTravel/87002.I.pdf	Gifts	The Board determined that employees' acceptance of a \$500 cash prize was not prohibited by Executive Order 86-1, but that the acceptance of any gifts from City contractors or vendors gives rise to an appearance of impropriety. The Board also considered the not-yet effective Governmental Ethics Ordinance and recommended that the employees return the \$500 cash prizes.	Cash prizes; \$500; City contractor; City vendor; appearance of impropriety; Executive Order 86-1
87005.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_OutsideEmployment/87005.A.pdf	Outside Employment	The Board determined that a City employee's outside position with a suburban municipality would not be prohibited by Executive Order 86-1, as long as the employee did not participate in any contract negotiations between the City and suburban government. The Board also recommended that the employee not engage in any activities on behalf of the suburban municipality during scheduled City work hours.	Outside employment; secondary employment; employee of a suburban municipality; other governmental employers; recusal; impermeable ethical screen; Executive Order 86-1
87008.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_ConflictsOfInterest/87008.A.pdf	Conflicts of Interest/Improper Influence; Campaign Financing	The Board determined that Executive Order 86-1 did not prohibit an employee from participating in a City decision regarding a project, where the employee's husband had a limited	\$500 campaign contribution; husband's limited partnership interest in a subsidiary of a City contractor; contribution from an executive of the parent company; recusal; appearance of impropriety

eral/AO Conflict OfInterest/87008.A.pdf		<p>partnership interest in the subsidiary of a company, and one of the company's executives gave her a \$500 campaign contribution, and the company was a principal in the project. The Board reasoned that neither her acceptance of the contribution, nor her husband's limited partnership interest, constituted an interest that would have required recusal, and noted that the subsidiary in which her husband maintained the limited partnership interest was not involved in the project.</p> <p>However, the Board did advise her that it was concerned with the appearance of impropriety, despite the fact that no actual impropriety may have occurred.</p>	
87014.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_PostEmploy/87014.A.pdf	Post-employment	<p>The Board determined that a former employee was in violation of either Executive Order 86-1 or the Ordinance, by working as an engineer for a firm that was working on the Chicago-DuPage Water Commission contract, although the Board did advise the former employee to avoid work on matter of water supply for one year, and permanently avoid work on the Chicago-DuPage contract.</p>	Post-employment; work with a City vendor; water supply; Chicago-DuPage water contract; permanent prohibition
87016.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_PostEmploy/87016.A.pdf	Post-employment	<p>The Board advised a departing City employee that the employee had exercised contract management authority with respect to a Gay-Lesbian organization's City contract, and therefore would be permanently prohibited from assisting the organization with respect to its contractual relationship with the City, but that this did not prohibit the employee from accepting employment with the</p>	Impermeable ethical screen; Gay and Lesbian organization; contract management authority; Executive Order 86-1; permanent prohibition; work with an organization to fulfill its contractual obligations to the City

		organization, provided that the employee and prospective employer could assure the Board that the employee would not be involved with transactions related to the City.	
87018.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_PostEmploy/87019.A.pdf	Post-employment	The Board determined that a former employee who left City service prior to the effective date of the Governmental Ethics Ordinance (August 1, 1987) was subject to the Ordinance's post-employment provisions.	Executive Order 86-1; Governmental Ethics Ordinance; effective date; who is subject to the Ordinance; employees who left City service prior to the Ordinance's effective date
87019.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_GiftsTravel/87019.A.pdf	Travel	The Board determined that delegation of City officials was not prohibited from accepting travel expenses from an airline to fly on an inaugural flight to Korea and attend official events there that would promote trade and cultural exchange. The Board's rationale was that the trip constituted reasonable hosting furnished in connection with public events, appearances or ceremonies reasonably related to City business.	Executive Order 86-1; travel inaugural flight; Korea; cultural exchange; public events; public ceremonies; reasonable expenses; airline
87020.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_InterestCityBusiness/87020.Q.pdf	Sister Agencies; Financial Interest in City Business	<p>This is a significant, precedential case. A City employee was advised that the Ordinance did not prohibit the employee or a business owned by the employee from entering into contracts with "sister agencies" like the Chicago Transit Authority, Board of Education, or Chicago Housing Authority, because those agencies' contracts are not paid with funds belonging to or administered by the City.</p> <p>The employee was also advised that there are no restrictions on an employee's</p>	Financial interest in any City contract, work or business; sister agencies; CTA; CHA; Board of Education; CPS; not City agencies; contracts not paid with funds belonging to or authorized by the City; certification as an MBE/WBE not prohibited

		right to obtain certification as an MBE/WBE for a business the employee owns.	
87021.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_GiftsTravel/87021.A.pdf	Travel	The Board determined that a City employee in the Department of Aviation was prohibited from accepting expenses to attend the Tenth Pan American games in Indianapolis. The expenses were considered a gift, and the company offering the expenses maintained an account with the department. The Board also concludes that participating in a seminar to introduce and explore new communications technologies during the games did not constitute official City business.	Travel; Tenth Pan American Games; Indianapolis; Department of Aviation; paid by a person with an economic interest in a specific City business transaction; prohibited; seminar did not constitute official City business
87022.D https://www.chicago.gov/dam/city/depts/ethics/general/AO_GiftsTravel/87022.D.pdf	Gifts	The Board advised that the Ordinance did not technically prohibit the Columbia Yacht Club from offering complimentary associate memberships to City employees and officials, worth about \$710, because there was no evidence of any mutual understanding between the Club and City employees or official that would confirm the existence of a <i>quid pro quo</i> agreement, but the Board expressed its opinion that such an agreement may be inferred by the public, and as a result of this appearance of impropriety, recommend that the Club refrain from offering complimentary memberships to public officials in a position to make decisions regarding the Club's interests in City business. The Board also noted that any City personnel who accepted such memberships would need to disclose them on their annual Statements of Financial Interests.	Columbia Yacht Club; complimentary memberships; \$710; appearance of impropriety; <i>quid pro quo</i> ; public might infer an agreement

<p>87023.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO Interest CityBusiness/87023.A.pdf</p>	<p>Financial Interest in City Business</p>	<p>The Board determined that Executive Order 86-1 did not prohibit the wife (a professional artist) of an employee in the Department of Cultural Affairs from applying for and receiving a \$1,500 grant from the Community Arts Assistance Program. The basis for the holding was that the husband did not participate in the grant process, the grant was only for \$1,500 (below the threshold of \$2,500 per year for a financial interest), and the wife's profession was independent. The Board advised the employee that he could not in any way use his City position to assist his wife or disclose any non-public information to his wife.</p>	<p>Financial interest in any City work; Department of Cultural Affairs; \$1,500 grant; professional artist; Community Arts Assistance Program; employee could not participate in the grant process; confidential information; spouse's independent business</p>
<p>87026.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO Outside Employment/87026.A.pdf</p>	<p>Outside Employment</p>	<p>The Board determined that a City Planner was not prohibited from working a second job as a real estate agent, but was subject to prohibitions, including money for advice, use or disclosure of confidential information, and representing any client in City proceedings or transactions.</p>	<p>Outside employment; second job; City Planner; real estate agent; representation; solicitation or receipt of money in return for advice or assistance concerning City business</p>
<p>87028.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO Interest CityBusiness/87028.A.pdf</p>	<p>Financial Interest in City Business; Appointed Officials</p>	<p>The Board determined that Executive Order 86-1 prohibited an appointed official from obtaining a City contract, because the contract was "intimately related" to the work of the official's City commission, and thus would constitute a prohibited financial interest in a City contract. The official was advised to choose between resigning from the City commission or foregoing the contract.</p>	<p>Appointed official; financial interest in any City contract, work or business; wholly unrelated; intimately related; Conversion Commission</p>
<p>87029.A</p>	<p>Financial Interest in City Business</p>	<p>The Board determined that employees of the Department of Housing who met the established criteria were not prohibited</p>	<p>Financial interest in any City contract, work or business; grants from the Department of Housing; not an absolute provision; \$5,000</p>

https://www.chicago.gov/dam/city/depts/ethics/general/AO Interest CityBusiness/87029.A.pdf		<p>from applying for or receiving grants from the Department, but that they were subject to the Ordinance's limitation of \$5,000. The \$2,500 threshold, the Board concluded, applied to sources of income that produce a repetitive income stream, like dividends or annual rental income, and the 10% threshold referred to ownership of stock.</p> <p>Note: the thresholds were amended in 2012: any ownership interest worth more than \$1,000 now qualifies as a financial interest. See <i>also</i> Case No. 87035.A.</p>	
<p>87031.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO Outside Employment/87031.A.pdf</p>	<p>Political Activity; Elected Officials; Outside Employment</p>	<p>The Board recognized that, at the time of its opinion, it was not authorized to make official determinations regarding the Governmental Ethics Ordinance, but nonetheless gave its informal opinion that the Ordinance would not prohibit an alderman from receiving compensation for consulting services rendered by the alderman to a congressional candidate, but would: (i) prohibit the alderman from making or participating in City decisions or actions with regard to the person paying the alderman; (ii) prohibit the alderman from receiving compensation in exchange for advice or assistance on matters concerning City business; and (iii) prohibit the alderman from using or disclosing confidential information.</p> <p>The Board also recognized that Mayoral Executive Order 86-1 did not cover the conduct of elected officials, or persons such as ward committeemen, whose</p>	<p>Political consulting; alderman; second job; political advice; candidate for Congress; outside employment; secondary employment; conflicts of interest; confidential information; Executive Order 86-1; authority of the Executive Order Board</p>

		positions are not with a specific City agency.	
87033.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_PostEmploy/87033.A.pdf	Representation of Other Persons; Post-employment	The Board advised an appointed official that representing a real estate developer in a proposal to have a building designated as a landmark would seem to violate the Ordinance's post-employment restrictions, given the official's previous involvement with the Landmarks Committee, and the Board advised the official to decline the representation.	Real estate developer; appointed official; post-employment; subject matter; landmarks; Landmarks Committee; representation
87034.A https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_ElectOfficials/87034.A.pdf	Representation of Other Persons; Appointed Officials; Elected Officials; Post-employment	<p>This is a significant, precedential case. The Board discussed the representation and post-employment provisions under Executive Order 86-1, the then-new Governmental Ethics Ordinance, and the recommendations made in the Sullivan Report.</p> <p>The Board first noted that the Executive Order prohibited appointed officials from representing any person before any City agency if the action was non-ministerial, whereas the new Ordinance allowed such representation if "wholly unrelated" to the appointee's City board or commission's work. The Board determined to apply the later, more lenient standard, and requested more information from the requestor to make that determination.</p> <p>The Board next discussed the post-employment provisions. The requestor was a former alderman, and the Board determined that, as an alderman, the requestor had not been personally and substantially involved with the subject matter of parking meters – stating that</p>	Representation of other persons; appointed officials; wholly unrelated representation permitted; former alderman; post-employment; revolving door; parking meters; an alderman's vote on a matter does not constitute personal and substantial participation in the matter; merely voting on a matter; City Council member's vote; Sullivan Report

		<p>“merely voting as a member of City Council on matters related to public parking does not constitute ‘personal and substantial involvement.’”</p> <p>Finally, the Board noted that the Sullivan Report recommended that legislative branch officers and employees be excluded from the Ordinance’s post-employment provisions, thus, if that recommendation were enacted, this former alderman would not be subject to the post-employment restrictions. Note: this recommendation was not enacted.</p>	
<p>87035.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO Interest CityBusiness/87035.A.pdf</p>	<p>Financial Interest in City Business; Appointed Officials; Relationship to Other Laws</p>	<p>The Board determined that City employees may participate in the Façade Rebate Program and receive grants in amounts up to \$5,000, whereas appointed officials may participate to the same degree as any eligible member of the public as long as the grant is wholly unrelated to the official’s City responsibilities. The Board also noted that the Department administering the program may enact rules that are more stringent than those in the Ordinance. See <i>also</i> Case No. 87029.A.</p>	<p>Financial interest in any contract, work or business of the City; Façade Rebate Program; Chicago Police Officer; Department of Planning and Development; eligible programs; \$5,000; Department’s own rules; more stringent; grants</p>
<p>87038.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO GiftsTravel/87038.A.pdf</p>	<p>Gifts</p>	<p>This is a significant, precedential case. The Board determined that Executive Order 86-1, specifically the language prohibited any gift based on a mutual understanding, prohibited members of the Cable Commission from accepting free cable service from cable grantees if based on an explicit or implicit understanding that the Commissioner’s official actions or decisions would be influenced; it requires a <i>quid pro quo</i></p>	<p>Gift; mutual understanding; explicit or implicit; Executive Order 86-1; Cable Commission; Cable Ethics Ordinance; <i>quid pro quo</i>; appearance of impropriety; gift of free cable installation; cable grantees; cable franchisees</p>

		<p>transaction. However, the Board recommended extreme caution in accepting persons who have an economic interest in City business, due to the potential for the appearance of impropriety. The Board noted that, although it no authority to make a determination under the then-new Ethics Ordinance, the Ordinance would prohibit this because the gift would be worth in excess of \$50. The Board also stated that it had no authority to interpret the City's Cable Ethics Ordinance.</p>	
<p>87040.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO_Employ_Relatives/87040.A.pdf</p>	Employment of Relatives or Domestic Partners	<p>The Board determined that the Ordinance did not prohibit a relative of a supervisory, administrative or executive City employee from seeking employment with the same department, but that the supervisory City employee was prohibited from attempting to influence the decision and personally exercising discretion in determining whether the relative would be employed by the City.</p>	Employment of relatives; hiring; two relatives working in the same department; influence in the decision to hire one's relative is prohibited; nepotism; family member; siblings; supervisory, administrative; executive City employee
<p>87041.I</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO_ConflictOfInterest/87041.I.pdf</p>	Conflicts of Interest/Improper Influence	<p>The Board determined that a City employee did not violate Executive Order 86-1 by reviewing a proposal submitted to the City by a corporation whose stock the employee owned, as the stock was publicly traded, and the employee owned less than 1% of its outstanding stock, but advised that the employee should have informed the department or requested an advisory opinion from the Board to forestall or minimize the appearance of impropriety.</p>	Ownership of common stock; less than 1%; participating in a City decision affecting a company who stock is owned by a City employee; publicly traded stock; economic interest; financial interest
87043.A	Outside Employment	<p>The Board determined that an employee of the Department of Revenue was not prohibited from doing bookkeeping tax</p>	Outside employment; second job; Department of Revenue; bookkeeping; tax preparation; representation; confidential

https://www.chicago.gov/dam/city/depts/ethics/general/AO_OutsideEmployment/87043.A.pdf		<p>preparation work for private clients, but was subject to restrictions, including the money for advice prohibition, the use or disclosure of confidential prohibition, and the representation of others prohibition.</p> <p>The Board also pointed out that each City department may adopt more restrictive rules, especially with respect to outside employment.</p>	<p>information; receipt of money in return for advice or assistance concerning City business</p>
<p>87044.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO_RepresentingOthers/87044.A.pdf</p>	<p>Representation of Other Persons</p>	<p>A former alderman and current appointed member of a City commission was advised that the Ordinance did not prohibit the representation of clients in a response to a request for proposals (RFP) from the Department of Aviation for an ice cream concession, or in the process to request certification as a Woman-owned business (WBE).</p> <p>Note: the opinion does treat the former alderman as subject to the post-employment restrictions, unlike Case No. 87047.A, involving the same former alderman.</p>	<p>Former alderman; appointed official; sale of City real estate; wholly unrelated; representation of ice cream concessionaire at airport; WBE certification; post-employment</p>
<p>87046.A</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_OutsideEmployment/87046.A.pdf</p>	<p>Outside Employment; Lobbyist Regulation and Disclosure; Appointed Officials; Representation of Other Persons</p>	<p>This is a significant, precedential case. The Board determined that a member of the Mayor's Advisory Commission for Revising the Building Code was not prohibited from representing clients before the Department of Buildings, or from engaging the private practice of architecture or construction contracting, as the Board concluded that these are wholly unrelated to each other. The Board stated: "It is the opinion of the Board of Ethics that [the official] is not prohibited from representing the owner of a building</p>	<p>Building Code; architect; construction contractor; Member of Mayor's Advisory Commission for Revising the Building Code; private practice; wholly unrelated; representing clients in Building Code matters; revising a City Code; representation; money for advice or assistance; advocating revisions of a code on behalf of a private client is prohibited</p>

		<p>in the submittal of drawings for Building Code approval, or from rendering advice to clients regarding an interpretation of the Building Code as it presently, exists since such advice and assistance is wholly unrelated to [the official's] duty to make recommendations regarding revisions to the Building Code. In reaching this conclusion, the Board hereby holds that rendering assistance or interpreting a City as it exists in present form is an act which is wholly unrelated to making non-binding recommendations as to how a City Code should be revised." The Board also held that representing clients who submit drawings for Building Code approval will note the representation section as long as that representation does not include advocating revisions to the current Building Code.</p>	
<p>87047.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO_RepresentingOthers/87047.A.pdf</p>	Representation of Other Persons	<p>A former alderman and current member of a City commission was advised that neither Executive Order 86-1 nor the Ordinance prohibited the proposed representation of a client in the purchase of City-owned property, s the matter was wholly unrelated to the former alderman's duties on the City commission to which the former alderman was appointed. See <i>also</i> Case 87044.A.</p> <p>Note: the former alderman was considered as an appointed official, and not subject to the post-employment restrictions.</p>	Former alderman; appointed official; sale of City real estate; wholly unrelated; representation of purchasers; post-employment restrictions not applicable
87049.Q	Gifts	A City employee was advised that the Ordinance did not prohibit acceptance of	Educational travel; seminar; municipal debt; public finance officials; a public event; other

https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec%20Chairs/4-15-12/87049.Q.pdf		<p>expenses to attend a seminar on public debt, offered by the seminar's co-sponsor. The seminary was related to the City employee's job, and was public, insofar as other government officials would attend, and the expenses were to be paid by the seminar's sponsor.</p>	<p>public officials attending makes it a public event; expenses paid by the event's sponsor</p>
<p>87051.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO_GiftsTravel/87051.A.pdf</p>	<p>Travel</p>	<p>Staff confirmed the Board's decision that Executive Order 86-1 did not prohibit a high-ranking City employee from attending an Airport Conference that attracts major airport financiers. The invitation was extended by a bond firm that did not have any business before the City, though it had in the past. The Board's conclusion was based on the facts that: (i) the conference was related to official City business; (ii) the conference was "public" in that other major airport financiers were invited; and (iii) the expenses were reasonable.</p> <p>The case is notable for its construction of the term "public" to include an event attended by officials from other governmental entities.</p>	<p>Travel; reasonable hosting; airport financiers; airport financing conference; paid by a bond underwriter; public event means attended by other government employees; reasonable expenses; educational travel; public; meaning of public event; related to official City business</p>
<p>87052.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO_ConflictOfInterest/87052.A.pdf</p>	<p>Conflicts of Interest/Improper Influence</p>	<p>This is a significant, precedential case. The Board determined that Executive Order 86-1 did not prohibit a City official from accepting contributions on behalf of two non-profit organizations on whose boards the official sat, from individuals who had an economic interest in matters pending before the official's City agency, but the Board advised that such actions ought to be avoided. While the contributions did not represent a personal pecuniary interest to the official, and the</p>	<p>Solicitations on behalf of a third-party organization; solicitations from persons seeking City business; solicitations on behalf of a charity; solicitation from a contractor; charitable donation; in a position to affect the donor's business</p>

		<p>official's City actions did not benefit the organizations on whose boards the official sat, the Board was concerned that solicitations from individuals who might come before the official's City agency would be similar to other prohibited actions, and might be perceived as involving a mutual understanding and an appearance of impropriety, if there had been a solicitation made the person solicited had responded either positively or negatively. See <i>also</i> Case No. 09034.A.</p> <p>Note: in 2013 the Ordinance was amended to include an explicit prohibition against soliciting contributions on behalf of a third party from persons who, the soliciting employee or official knows, are seeking City action and the soliciting employee or official can directly affect the outcome of that action.</p>	
87053.D https://www.chicago.gov/dam/city/depts/ethics/general/AO_ConflictOfInterest/87053.D.pdf	Conflicts of Interest/Improper Influence	The Board determined that a City employee whose mother owned less than 1% of the common stock of a company that was going to enter into a contract on which the employee would work was not required to recuse from that contract, because the employee did not have a financial interest in the contract. The Board nonetheless commended the employee. See <i>also</i> Case No. 05025.Q.	Ownership of stock; common stock; financial interest; less than 1% of a publicly traded company's outstanding stock; recusal; commendable to recuse; mother
87057.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_ConflictOfInterest/87057.A.pdf	Employment of Relatives or Domestic Partners	This is a significant, precedential case. The Board determined that the Ordinance does not prohibit relatives of City employees or officials from obtaining City contracts or participating in City set-aside contract procurement programs but does	Employment of relatives; relative's company; bidding on or receiving City contracts; set-aside procurement programs; contract management authority; in any way assist a relative in obtaining a City contract; confidential information; relative's company

eral/AO Employ Relatives/87057.A.pdf		<p>prohibit City employees themselves from participating in their own names or in the names of another in such contracts. The Board noted that a City employee whose relatives or their companies bid on or received such contracts is prohibited from in any way using the employee's City position to assist the relative or company in obtaining the contract, or from exercising contract management authority over such contract, or from using or disclosing confidential information to attempt to assist the relative.</p>	<p>not prohibited from bidding on or receiving a City contract</p>
<p>87058.Q</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec%20Chairs/4-15-12/87058.Q.pdf</p>	<p>Travel</p>	<p>The Board determined that a high-ranking City official was prohibited from accepting a trip on an inaugural flight to a foreign country, the expenses for which would have been paid by a company that the official's City department regulated. The rationale was the trip was not in any way related to official City business. Cf. Case No. 87120.A.</p>	<p>Travel; inaugural flight; foreign country; gift; company regulated by the City; prohibited travel</p>
<p>87061.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO_CampFinancing/87061.a.pdf</p>	<p>Campaign Financing</p>	<p>The Board Chair and staff determined that a political action committee (PAC) whose members included several City employees was not technically prohibited from hosting a fundraiser for then Mayor Harold Washington on a yacht owned by an individual with a City contract, but recommended that it happen, because it would appear to be quite similar from action that were not allowed and contrary to the interests of the general public. The Board also recommended that members of the PAC not solicit contributions from individuals with City contracts with departments employing them, and the</p>	<p>Campaign contributions; political contributions; political action committee; PAC; yacht; solicitation of political contributions; persons doing or seeking to do business with the City; \$1,500; City contractors; hosting a fundraiser; appearance of impropriety; Mayor Harold Washington; compel; coerce; interlocutory opinion; subject to the full Board's approval</p>

		<p>PAC not accept contributions in excess of \$1,500 from any City contractors.</p> <p>Note: the Ordinance was amended to prohibit any City employee or official from knowingly soliciting any political contribution from a person doing or seeking to do City business after this opinion was issued (although candidates may solicit such contributions, subject to other restrictions in the Ordinance).</p> <p>The opinion was issued prior to consideration by the entire Board and was subject to the entire Board's approval.</p>	
<p>87062.E</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO_SF1/87062.E.pdf</p>	Statements of Financial Interests	<p>The Board determined that the Commission for Health Planning and Resource Development was not solely advisory, and thus its members were required to file annual Statements of Financial Interests. The Board focused on the facts that the Commission had the responsibility for approved all of its own contracts and was authorized to employ consultants and contract with entities and individuals to aid in the performance of its functions. Thus, it was not solely advisory, but instead had the authority to enter into contracts or make expenditures other than those incurred for research purposes.</p>	<p>Statements of Financial Interests; appointed officials; Commission for Health Planning and Resource Development; solely advisory; not solely advisory; authority to enter into binding contracts; employ consultants; approve its own contracts</p>
<p>87063.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO_SF1/87063.A.pdf</p>	Lobbyist Registration and Disclosure; Attorneys	<p>The Board advised an associate in a law firm that, due to the inability of the associate to access certain information about client fees or expenditures, the Board would no longer require associates in law firms to register as lobbyists, but</p>	<p>Attorneys; lobbyists; associates in law firms; partners in law firms; entity registration; client expenditures; client compensation</p>

eral/AO Lobby/87063.A.pdf		<p>that the firm could file one single registration, listing each attorney who lobbied and providing client compensation and expenditure information in the aggregate.</p> <p>Note: this case has been superseded. The Board no longer has entity registration.</p>	
<p>87064.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO_GiftsTravel/87064.A.pdf</p>	<p>Gifts; Elected Officials</p>	<p>A City department was advised that the Ordinance did not prohibit aldermen from accepting skybox tickets to see a professional baseball game and a boxed lunch, or a special exhibition at the ballpark, all in conjunction with a “Say No to Drugs” campaign to honor Chicago Public School students. The Board’s rationale was that each event was worth less than \$50 to each recipient.</p>	<p>Alderman; skybox; Say No to Drugs; Chicago Public Schools; attendance at a baseball game; \$50; complimentary tickets</p>
<p>87065.Q</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec%20Chairs/4-15-12/87065.Q.pdf</p>	<p>Travel</p>	<p>A City employee was advised that travel expenses to a corporation’s California headquarters for training was not prohibited. Officials from other cities were also invited. The opinion’s rationale was that the educational session was considered official City business, and was related to the employee’s job, the expenses were reasonable, and officials from other cities were also invited.</p>	<p>Travel; reasonable expenses; paid by a corporation; educational travel; California; one day; officials from other governmental units invited</p>
<p>87067.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO_ConflictOfInterest/87067.A.pdf</p>	<p>Conflicts of Interest/Improper Influence; Appointed Officials; Relationship to Other Laws; Special Services Areas</p>	<p>The Board determined that, because the enabling ordinance of a City commission required that two members of the commission specifically be lessees of property in the area, and that the Executive Director of a local private business serve as well, these members would effectively be disenfranchised were they required to recuse from voting on</p>	<p>Interest distinguishable from that of the general public; enabling ordinance; SSAs; Special Services Areas; relationship to other laws; local business owners; recusal; superseded by enabling ordinance; ex officio; property owners; lessees; recuse; appointed officials; voting on matters that could substantially affect their private economic interests</p>

		<p>matters that could substantially affect their private economic interests.</p> <p>The Board cited the Relationship to Other Law provision, which states that nothing in the Ordinance intended to repeal or is to be construed as repealing in any way the provisions of any law or ordinance.</p> <p><i>Cf.</i> Case Nos. 87079.A.; 05031.CNS</p>	
<p>87072.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO Interest CityBusiness/87072.A.pdf</p>	Financial Interest in City Business	<p>The Board determined that City employees and officials may purchase property in a Scavenger Sale, as it constitutes the purchase of property pursuant to a process of public notice followed by competitive bidding.</p>	Financial interest in the purchase of City property; public notice followed by competitive bidding; Scavenger Sale; Section 235 of the Revenue Act; Scavenger Act
<p>87073.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO Lobby/87073.A.pdf</p>	Lobbyist Registration and Disclosure	<p>The Board determined that a lobbyist who represented clients pursuant to retainer agreements that did not stipulate an hour wage, the lobbyist must aggregate all compensation in order to determine whether the compensation threshold of \$5,000 that required registration was met. The Board also advised that the lobbyist should pro-rate the fee, considering the time spent in discussions with City officials as well as preparatory activities such as research and consultations that are directly related to influencing City actions as part of lobbying-related compensation.</p> <p>The Board also advised the firm to make a “good faith estimate” of the amount of compensation received and expenditures</p>	Lobbyist registration; activity reports; estimates of lobbying-related compensation and expenditures; good faith estimates

		made for lobbying-related activities and print on the activity report “the number provided in this section are estimates.” Note: the Ordinance no longer has a compensation or expenditure threshold above which a person must register as a lobbyist; now all persons who lobby must register regardless of compensation or expenditures.	
87076.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_GiftsTravel/87076.A.pdf	Gifts	This is a significant, precedential case. The Board determined that the Department of Public Health could solicit and accept gifts such as soft drinks, t-shirts, and refreshments from sponsors, local businesses, for the annual event for City employees and their families called “Chicago Runs for Health.” These gifts were not solicited by any City employees or officials in a personal capacity, but as gifts to the City, and must be reported as gifts to the City to the Board of Ethics and the Comptroller.	Gifts; solicit gifts on behalf of the City; Chicago Runs for Health; Department of Public Health; in-kind donations; t-shirts; soft drinks; reported to the Board of Ethics and Comptroller; gifts to the City
87077.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_InterestCityBusiness/87077.A.pdf	Financial Interest in City Business	<p>This is a significant, precedential case. The Board determined that the Ordinance does not, <i>per se</i>, prohibit a company owned by the daughters of a City employee from bidding on or receiving City contracts, and that, “as a general rule, financial interests maintained by the children of City employees will not automatically be attributed to the City employee solely as a result of the familial relationship.”</p> <p>But, the Board held, the Ordinance does impose significant, precedential restrictions, and that the company’s financial interest in City business would</p>	Financial interest; financial interest in any City contract, work or business; company owned by a relative of a City employee; independent occupation, business or profession; equity interest; equity investment; daughter; debt relationship; promissory note; at or above market rate interest; financial interest of a relative attributable to a City employee; in the name of another; family member; familial relationship

		<p>be attributable to the employee (and thus violate the Ordinance) if: (i) the City employee may not financially support the company; (ii) the City employee contributes significantly or regularly to the management of the corporation; (iii) the employee exercises indirect or direct control over the corporation; or (iv) if the City employee makes an equity investment in the company, or its equivalent, though the Board noted that money loaned to the daughters, if formally secured by a promissory note which stipulates that the borrowed funds must be paid at an interest rate at or above the current market rate, would not itself constitute an equity interest.</p>	
<p>87078.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO_GiftsTravel/87078.A.pdf</p>	<p>Gifts; Elected officials</p>	<p>This is a significant, precedential case. The Board determined that an alderman was not prohibited from accepting tickets to a professional baseball game, from the team, for distribution to Little League teams in the ward, provided that the team did not have any contracts with the City which the official was in a position to substantially affect. The Board also advised the alderman that the tickets would not be acceptable if there was an explicit or implicit understanding that the alderman's votes or judgments would be influenced thereby. The Board stated that "it is clear that the tickets are not being offered to you on the basis of some understanding that your official actions would favor the club," but that "a factor any official should consider before accepting a gift concerns the public's perceptions and the possibility that</p>	<p>Baseball tickets; distribution to Little League teams; alderman; appearance of impropriety; credit for suggesting a charitable donation; actual impropriety; public perception; \$50 limit</p>

		<p>accepting gifts of significant, precedential value will give rise to the appearance of impropriety even if no actual impropriety has occurred.” Thus, the Board suggested that, in order to avoid the appearance of impropriety, the alderman receive only up to \$50 worth of tickets, and that, “by doing this you will clearly be within the bounds of the Ordinance regardless of whether or not you are in a decision-making position with respect to any economic interest of the [team].”</p> <p>Finally, the Board suggested that, in the future, the alderman consider having the team distribute the tickets directly to the Little League players, with attribution given to the alderman for suggesting these donations, as there would be nothing in the Ordinance prohibiting that, and the donations would not be subject to a \$50 limit.</p>	
<p>87079.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO_ConflictOfInterest/87079.A.pdf</p>	<p>Conflicts of Interest/Improper Influence; Appointed Officials</p>	<p>This is a significant, precedential case. The Board determined that the owner of a private limousine service was not prohibited from serving on the Chicago Tourism Council, as the Ordinance prohibits officials from taking part in City decisions that will have a foreseeable effect on their private interests, but is not intended to bar persons with an economic interest in a general area, like tourism from providing expertise and experience to the City in the same area. The limousine service owner would be required to recuse from City decisions that would have a foreseeable effect upon his or her economic interests, that is,</p>	<p>Interest distinguishable from that of the general public; conflict of interests; appointed officials; recusal; effect on one’s private interests; a business area generally; foreseeable effect; tourism</p>

		“decision directed towards [the official’s] specific business or limousine services generally.” Cf. Case Nos. 87067.A; 05031.CNS.	
87080.A https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_OutsideEmployment/87080.A.pdf	Outside Employment; Appointed Officials; Conflicts of Interest/Improper Influence	The Board generally advised a City department that members of the Commission on Animal Care and Control were not prohibited from having primary employment and representing perspectives of businesses like their private businesses. For example, a member could be a veterinarian who owns a hospital that is inspected by the City. The Board stated that, “as long as the members of the Commission on Animal Care and Control continue to avoid participating in decisions which affect their private economic interests, such dual roles ... are proper under the Ethics Ordinance.” Cf. Case Nos. 87067.A; 87079.A; 05031.CNS.	Interest distinguishable from that of the general public; conflict of interests; appointed officials; recusal; effect on one’s private economic interests; Commission on Animal Care and Control; veterinarian; veterinary hospital; external employment
87081.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_OutsideEmployment/87081.A.pdf	Outside Employment	The Board determined that a City attorney was not prohibited from advising clients, design professionals, regarding requirements of a City code; the attorney’s City work was prosecuting people under a City code. The Board expressed its concern that this would give rise to an appearance of impropriety and recommended that the attorney decline the outside employment. The Board also advised the attorney that, if any case involving the project worked on by the clients came before the attorney’s department, recusal would be required.	Outside employment; City code; City building project; attorney; code prosecutions; wholly unrelated; appearance of impropriety; design professionals; decline the secondary employment
87082.E	Statements of Financial Interests	The Board determined that the Advisory Commission Board on Cultural Affairs was solely advisory, and thus its	Statements of Financial Interests; appointed officials; Advisory Board on Cultural Affairs; solely advisory; not solely advisory; authority

https://www.chicago.gov/dam/city/depts/ethics/general/AO_SFI/87082.E.pdf		members were not required to file annual Statements of Financial Interests.	to enter into binding contracts; employ consultants; approve its own contracts
87083.E https://www.chicago.gov/dam/city/depts/ethics/general/AO_SFI/87083.E.pdf	Statements of Financial Interests	This is a significant, precedential case. The Board determined that the Private Industry Council of Chicago is not a City agency, and thus its members are not required to file annual Statements of Financial Interests. The Board stated that, in order for an agency to qualify as a unit or division of the government of the City, it must either be financed primarily through the City budget, or created by City ordinance, or its members must be subject to confirmation by the City Council. The PIC was funded primarily through state and federal sources, was not created by City ordinance, and its appointed members were not subject to confirmation by the City Council.	Private Industry Council of Chicago; PIC; Statements of Financial Interests; appointed officials; City agency; not a City agency; qualify as a unit or division of the government of the City; either be financed primarily through the City budget, or created by City ordinance, or its members must be subject to confirmation by the City Council
87084.E https://www.chicago.gov/dam/city/depts/ethics/general/AO_SFI/87084.E.pdf	Statements of Financial Interests	The Board determined that the Chicago Tourism Council was solely advisory in nature, and thus its members were not required to file annual Statements of Financial Interests. However, the Board of Directors of the Chicago Tourism Council did retain the authority to make binding contracts and were required to file.	Chicago Tourism Council; solely advisory; Statements of Financial Interests; authority to enter into contracts; Board of Directors of Chicago Tourism Council
87085.E https://www.chicago.gov/dam/city/depts/ethics/general/AO_SFI/87085.E.pdf	Statements of Financial Interests	The Board determined that the Chicago Community Development Advisory Committee was solely advisory in nature, and thus its members were not required to file annual Statements of Financial Interests.	Chicago Community Development Advisory Committee; solely advisory; Statements of Financial Interests; authority to enter into contracts; Board of Directors of Chicago Tourism Council

<p>87086.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO_Outside_Employment/87086.A.pdf</p>	<p>Outside Employment; Fiduciary Duty; Conflicts of Interest/Improper Influence</p>	<p>This is a significant, precedential case. A City employee as advised that the employee's assistant was prohibited from having outside employment assisting private clients in completing applications because it would involve providing services for pay which are similar if not identical to what the assistant provide to the public, free of charge, as part of City employment. It would violate the money for advice provision of the Ordinance, and possibly violate the Ordinance's fiduciary duty provision, because the employee would have the opportunity to recommend that the public obtain assistance through private consulting services rather than from the City, even though the Board had no reason to conclude that the employee had any intention of using City employment to promote private interests. "In accepting outside employment, it is not prudent to intentionally create a situation in which conflicts of interests can arise." The Board also stated that the Ordinance did not prohibit this employee from performing these services, free of charge, after working hours.</p>	
<p>87088.E</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO_SFI/87088.E.pdf</p>	<p>Statements of Financial Interests</p>	<p>After reviewing Executive Order 87-2, the Board determined that the Advisory Council on the Chicago Housing Authority was solely advisory in nature, and thus its members were not required to file annual Statements of Financial Interests.</p>	<p>Advisory Council on the Chicago Housing Authority; solely advisory; Statements of Financial Interests; authority to enter into contracts; Executive Order 87-2</p>

87090.E https://www.chicago.gov/dam/city/depts/ethics/general/AO_SFI/87090.E.pdf	Statements of Financial Interests	The Board determined that the Mayor's Advisory Committee for Revising the Building Code was solely advisory in nature, and thus its members were not required to file annual Statements of Financial Interests.	The Mayor's Advisory Committee for Revising the Building Code; solely advisory; Statements of Financial Interests; authority to enter into contracts
87092.E https://www.chicago.gov/dam/city/depts/ethics/general/AO_SFI/87092.E.pdf	Statements of Financial Interests	The Board determined that the Mayor's Advisory Commission on Women's Affairs was solely advisory in nature, and thus its members were not required to file annual Statements of Financial Interests.	solely advisory; Statements of Financial Interests; authority to enter into contracts; the Mayor's Advisory Commission on Women's Affairs
87093.E https://www.chicago.gov/dam/city/depts/ethics/general/AO_SFI/87093.E.pdf	Statements of Financial Interests	The Board determined that the Economic Development Commission was not solely advisory in nature, and thus its members were required to file annual Statements of Financial Interests. The Board's decision was based on the fact that the Commission's budget included an appropriation of \$200,000 to be used to retain the Economic Development Foundation; this constituted the ability to enter into binding contracts.	Economic Development Commission; solely advisory; Statements of Financial Interests; authority to enter into contracts; contract to retain the Economic Development Foundation
87096.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_Employ_Relatives/87096.A.pdf	Employment of Relatives or Domestic Partners; Elected Officials	The Board determined that the Ordinance does not prohibit an alderman from hiring a sister-in-law as a member of the alderman's personal staff, nor does it prohibit one's alderman's sister-in-law from being hired by another alderman to work on a City Council committee. The Board noted that the Ordinance's definition of "relative" does not include sisters-in-law, and also that, even if the person in question did fall into the	Aldermen; relatives; sister-in-law; definition of relative; alderman's personal staff; City Council Committee staff; advocate for the hiring of; hire a relative in exchange for the hiring of another's relative; nepotism

		Ordinance's definition of relative, she could still be hired as a member of her relative-alderman's personal staff, but that the alderman would be prohibited from advocating for employment for a relative to serve on a Council Committee's staff, and the Ordinance prohibits one alderman from hiring a relative of another in exchange for the employment of that first alderman's own relative.	
87099.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_PostEmploy/87099.A.pdf	Post-employment	The Board determined that a departing City employee could enter into a contract with the employee's former City department (the Department of Special Events) to perform services on the department's food drive program. The basis for the Board's determination was that the employee had not had "substantial involvement" in the subject matter, which would require the employee to coordinate the collection and distribution of canned goods and other donations for the food drive. The employee's work on this program consisted merely of setting up displays in City Hall and the Merchandise Mart advertising this program.	Post-employment; participated personally and substantially in the subject matter; Office of Special Events; food drive; technical assistance; contract with one's former City department; set up stages, chairs and tents; substantial participation; set up displays in City Hall and the Merchandise Mart
87100.E https://www.chicago.gov/dam/city/depts/ethics/general/AO_SFI/87100.E.pdf	Pension Funds; Statements of Financial Interests	The Board determined that the Retirement Board of Chicago Policeman's Annuity and Benefit Fund was a state-chartered agency, and not a City agency, and thus its members were not required to file an annual Statement of Financial Interests.	Pension fund; not a City agency; established by state charter; Retirement Board of Chicago Policeman's Annuity and Benefit Fund
87101.A	Lobbyist Registration and Disclosure	This is a significant, precedential case. The Board determined that: (i) if a paid	Building Code; sponsoring amendments to the Building Code; submitting amendments

https://www.chicago.gov/dam/city/depts/ethics/general/AO_Lobby/87101.A.pdf		<p>employee of a firm sponsors and submits proposed changes to the City's Building Code, then he or she is lobbying, even if the changes are technical, not intended to benefit a particular client, but are in the public interest; (ii) the employee's discussions with City personnel with respect to clarifying the proposed legislation is not lobbying unless it advocates a particular position on behalf of a client of the firm; and (iii) if, in representing clients before a City board, the firm's employee attempts to convince City personnel to adopt an alternative interpretation of the Building Code, then that activity would be lobbying. <i>Cf.</i> Case Nos. 97055.A; 02013.A.</p>	<p>to the Building Code; lobbying; what is lobbying; legislative action; administrative action; requests for information as lobbying;</p>
<p>87102.E</p> https://www.chicago.gov/dam/city/depts/ethics/general/AO_SFI/87102.E.pdf	<p>Statements of Financial Interests</p>	<p>The Board determined that the Chicago Advisory Council on Disability was solely advisory in nature, and thus its members were not required to file annual Statements of Financial Interests.</p>	<p>solely advisory; Statements of Financial Interests; authority to enter into contracts; Chicago Advisory Council on Disability</p>
<p>87103.E</p> https://www.chicago.gov/dam/city/depts/ethics/general/AO_SFI/87103.E.pdf	<p>Statements of Financial Interests</p>	<p>The Board determined that the Mayor's Advisory Committee on Asian American Affairs was solely advisory in nature, and thus its members were not required to file annual Statements of Financial Interests.</p>	<p>solely advisory; Statements of Financial Interests; authority to enter into contracts; Chicago Advisory Council on Aging</p>
<p>87104.E</p> https://www.chicago.gov/dam/city/depts/ethics/general/AO_SFI/87104.E.pdf	<p>Statements of Financial Interests</p>	<p>The Board determined that the Chicago Advisory Council on Aging was solely advisory in nature, and thus its members were not required to file annual Statements of Financial Interests.</p>	<p>solely advisory; Statements of Financial Interests; authority to enter into contracts; Mayor's Advisory Committee on Asian American Affairs</p>

eral/AO SFI/8710 4.E.pdf			
87105.E https://www.chicago.gov/dam/city/depts/ethics/general/AO_SFI/87105.E.pdf	Statements of Financial Interests	<p>The Board determined that the Mayor's Advisory Commission on Latino American Affairs was solely advisory in nature, and thus its members were not required to file annual Statements of Financial Interests.</p> <p>The Board discussed the fact that the Commission anticipated making expenditures in connection with hosting the 1988 National Conference of Latino Elected and Appointed Officials (NALEO), but concluded that such expenditures were for the purposes of research in connection with its advisory functions</p>	solely advisory; Statements of Financial Interests; authority to enter into contracts; Mayor's Advisory Commission on Latino Affairs; expenditures necessarily incurred for research in connection with advisory functions; NALEO; National Conference of Latino Elected and Appointed Officials
87106.E https://www.chicago.gov/dam/city/depts/ethics/general/AO_SFI/87106.E.pdf	Statements of Financial Interests	The Board determined that a non-salaried appointee of the Board of Health was required to file an annual Statement of Financial Interests, and that, as an appointed official, it was expected that the individual would not receive a salary, but the criteria for determining whether appointed officials does not depend on pay or salary, but whether they serve on a board or commission that wholly advisory in nature. The Board of Health is wholly advisory in nature.	Appointed officials; Statements of Financial Interests; wholly advisory; criteria for filing; salary or compensation is irrelevant for appointed officials; Board of Health
87107.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_PostEmploy/87107.A.pdf	Post-employment	The Board determined that the Ordinance prohibited a recently retired City employee from contracting with the employee's former department for one year until after the former employee's effective termination of City employment, because the project involved the same subject matter in which the former	Post-employment; consulting agreement between the City and a former employee; independent contractor; City seeks the service of the former employee; subject matter; retiring City employees or officials; revolving door

		<p>employee had been personally and substantially involved.</p> <p>Note: this case was superseded by the Board's opinion in Case No. 93018.A.</p>	
<p>87112.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO_Outside_Employment/87112.A.pdf</p>	Outside Employment	<p>The Board determined that the Ordinance did not prohibit an employee of the Department of Public Health from serving on a member of the Illinois State Medical Disciplinary Commission. Members received a stipend. The employee would not be required to represent individuals before any City department and would not be involved in transactions with the City. The Board advised the employee of the money for advice and representation prohibitions, and that, if the income from membership exceeded the threshold (then \$2,500 per year) it would need to be reported on the annual Statement of Financial Interests.</p>	<p>Outside employment; Illinois State Medical Disciplinary Commission; medical malpractice investigations; representation of persons before the City; confidential information; solicit or receive any money or thing of value in return for advice or assistance on matters concerning City business; physician; Department of Public Health; physician; Department of Public Health</p>
<p>87113.Q</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec%20Chairs/4-15-12/87113.Q.pdf</p>	Gifts	<p>The Board advised a City department that its employees were not prohibited from accepting items of nominal value (less than \$10), as long as the aggregate value to any employee from any donor did not exceed \$50, the gifts were not in cash or its equivalent, and there was no attempt to influence City decisions. The department was also advised that certain items could be accepted as gifts to the City, if disclosed.</p>	<p>Gifts; non-cash gifts of nominal value; nominal value; less than \$10; gifts accepted on behalf of the City</p>
<p>87116.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/gen</p>	Lobbyist Registration and Disclosure; Attorneys	<p>The Board determined that: (i) an attorney who represents a client before the Zoning Board of Appeals is not thereby a lobbyist because this Board is not an "executive department" and this action is not "administrative lobbying"; (ii) an attorney</p>	<p>Attorneys; lobbying; lobbyist; representing clients in a formal, adversarial hearing; Zoning Board of Appeals; executive department; administrative lobbying; Board of Ethics; on behalf of any person other than</p>

eral/AO Lobby/87116.A.pdf		<p>who argues a position before the Board of Ethics is likewise not thereby lobbying, because the Board is not an “executive department,” and this activity is not an attempt to influence an “administrative action” and (iii) even if the Board of Ethics were an “executive department,” this activity would still not constitute lobbying because the firm was representing itself in trying to influence decisions of the Board of Ethics.</p> <p>Note: the Ordinance no longer distinguishes between “executive” and non-executive departments, although the activity in (i) above may not constitute lobbying because representing clients before the Zoning Board of Appeals could constitute representing clients in a formal, adversarial hearing.</p>	<p>himself, or as any part of his duties as an employee of another</p>
<p>87118.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO_GiftsTravel/87118.A.pdf</p>	<p>Gifts</p>	<p>This is a significant, precedential case. The Board determined that the Ordinance does not prohibit City employees and official from accepting \$50 US Savings Bonds offered by HMOs as enrollment incentives. The Board first concluded that, although the retail price of a \$50 bond was \$25, and thus, if a gift, would be permitted, as it was under \$50, these bonds were not gift. The reason: gift was defined as “anything given without consideration or expectation or return.” These bonds were clearly provided in consideration of City employees’ and officials’ decision to enter into a contract with the HMO. Moreover, the Board determined that the decision to enter into a contract with a particular HMO by a City</p>	<p>Gifts; what is a gift; given without expectation of return or consideration; sales incentive; \$50 US Savings Bonds; health insurance; HMOs; personal decision versus City decision; decision concerning City business; mutual understanding; City employee’s choice of insurance plans not a City decision; City contractual agreement to pay HMOs</p>

		<p>employee or official was not a “decision concerning City business,” but a personal decision. While the contract between the City and the HMOs constitutes City business, the individual decisions made by City personnel to join an HMO do not affect the terms of the City’s contractual agreement to pay the HMOs a set premium for each enrolling City person.</p>	
<p>87120.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO_GiftsTravel/87120.A.pdf</p>	Travel	<p>The Board determined that a high-ranking City official was not prohibited from accepting airfare and other reasonable travel expenses from a major airline that was celebrating its inaugural flight between Chicago and a sister City. The Board’s rationale was based on the fact that the official would be participating in public events in the sister City with other high-ranking officials, designed to foster trade and cultural exchange.</p> <p>The Board noted that public officials may not accept hosting and travel expenses unless the benefits meet the conditions in the opinion.</p>	<p>Inaugural flight; sister City; cultural exchange; public officials; reasonable means not exceeding what is necessary to achieve the stated business purposes of the trip; airline; host; public appearance; related to official City business</p>
<p>88005.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO_GiftsTravel/88005.A.pdf</p>	Gifts	<p>This is a significant, precedential case. The Board determined that: (i) it was appropriate for a City official to turn over to the City Comptroller’s office a black and white TV received from an insurance company; and (ii) it was not advisable for the official to accept 56 movie passes from a national cinema chain, even though acceptance did not clearly violate the Ordinance, but might create the appearance of impropriety, even though such passes were given as a “courtesy” to public officials without an</p>	<p>Gifts; appearance of impropriety; abundance of caution; movie passes; cinema passes; museum pass; insurance company, black and white TV; more than \$50; mutual understanding</p>

		<p>attempt to influence any specific decisions or actions; and (iii) it was not advisable for the official to accept a guest pass to eight (8) Chicago Museums.</p> <p>The Board discussed the appearance of impropriety standard at length, and wrote that “Despite the fact it might not technically violate any of the fits provisions of the Ordinance for you to accept the Cinema tickets or the guest pass from Chicago museums, there are good reasons why you should return these items or should at the very least limit your use of them [to be the gift limit of \$50). It is reasonable to expect that certain circumstances could arise in which you would be in a position to further the interests of one of both of the donors through your governmental actions ... it is possible that after giving you certain benefits, a donor could approach you to request that you initiate some legislative activity favorable to its business interest ... your acceptance of a gift now, from a persons or entity who stands to benefit from your governmental actions and influence in the future may give the appearance of an improper understanding ... or, at the very least, may create the impression that you will be predisposed to make governmental decision which further the private economic interests of the donor.”</p>	
88006.A https://www.chicago.gov/dam/city	Non-profit Board Service; Outside Employment	This is a significant, precedential case. The Board determined that a high-ranking City employee was not prohibited from serving as the treasurer of a non-profit	Non-profit board service; treasurer; City delegate agency; not in a position to make or participating in making City decisions about

/depts/ethics/general/AO Outside Employment/88006.A.pdf		<p>organization that received Community Development Block Grant Funds (CDBG) from the City was not prohibited from accepting this volunteer position. The Board noted that that the employee was not in a City position in which the employee would have make or participate in making CDBG funds by the organization and would have no economic or financial interest in it (because the position was voluntary).</p>	<p>the non-profit; CDBG funds; Community Development Block Grant</p>
<p>88008.D</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO_GiftsTravel/88008.D.pdf</p>	<p>Gifts</p>	<p>The Board acknowledged to a City official that official's disclosure of a gift that was then donated to a food pantry. The Board advised the official that personal gifts could be accepted from City contractors as long as: (i) the aggregate value of such items from any single donor did not exceed \$50; (ii) the gift was not cash or its equivalent; (iii) there were no circumstances suggesting any attempt to improperly influence City decisions.</p> <p>The Board stated that generally, personal gifts worth \$50 or more should be returned to the donor. However, it is appropriate to donating perishable items to a non-profit, as this is expedient and proper, and that best practice is to send the donor a copy of the donation letter so as to avoid similar situations in the future.</p>	<p>Gifts; improper gifts; donate to charity; donate to a non-profit; worth more than \$50; no cash or cash equivalent; mutual understanding; proper and expedient way to handle gifts</p>
<p>88010.D</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO_GiftsTravel/88010.D.pdf</p>	<p>Gifts</p>	<p>This is a significant, precedential case. The Board acknowledged a disclosure sent by a City employee of acceptance of a gift on behalf of the City but advised the employee that it is not proper to then donate the gift to another individual. Instead, any item accepted on behalf of</p>	<p>Gifts; improper gifts; accepting a gift on behalf of the City; gift on behalf of the City; inventory of City property; inappropriate to give to another individual; worth more than \$50; no cash or cash equivalent; mutual understanding; request an advisory opinion</p>

		<p>the City becomes an item of City property, and it is inappropriate to personally donate such items in the recipient's own name without first receiving approval from the City Comptroller.</p> <p>The official was also advised that any questionable gift should be either returned, or the recipient should request an advisory opinion from the Board before accepting the benefits.</p>	
88013.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_Lobby/88013.A.pdf	Lobbyist Registration and Disclosure	<p>The Board determined that attorney from a law firm that represented clients before the Zoning Administrator, City Council's Zoning Committee, and Department of Revenue would be required to register as lobbyists if their compensation from activities totaled \$5,000 or more in a year, but would not need to register if their compensation or expenditures exceeded more than \$5,000 for activities before the Zoning Board of Appeals.</p> <p>Note: this case was superseded by later amendments that exempted from the definition of lobbying attorneys representing clients in public, adversarial hearings or proceedings.</p>	Lobbyists; activities constituting lobbying; administrative lobbying; executive lobbying; representing clients in proceedings; Zoning Board of Appeals; Zoning Administrator; City Council Zoning Committee; Department of Revenue;
88014.E https://www.chicago.gov/dam/city/depts/ethics/general/AO_SFI/88014.E.pdf	Statements of Financial Interests; Appointed Officials	The Board determined that member of the Chicago Public Library Board must file Statements of Financial Interests.	Not solely advisory; appointed officials; Chicago Public Library Board; Statements of Financial Interests
88016.A	Financial Interest in City Business;	This is a significant, precedential case. The Board determined that: (i) the	Financial interest in City business; independent occupation, business or

https://www.chicago.gov/content/dam/city/depts/ethics/general/AO InterestCityBusiness/88016.A.pdf	Employment of Relatives or Domestic Partners	<p>professional artist-wife of an employee of the Department of Cultural Affairs could participate in a program operated by the Department to sell her artwork. The Board reasoned that the wife's business was her independent occupation, business or profession, and cautioned the employee-husband that he could not exercise contract management authority with respect to the program in which his wife would participate; but (ii) the wife was prohibited from participating in a departmental program that would be supervised by Cultural Affairs employee who would be directly reporting to the husband, because he would be exercising contract management authority with respect to the program. The Board did not consider whether the employee could sufficiently recuse himself from his responsibilities.</p>	<p>profession of a spouse; artist; Department of Cultural Affairs; sell artwork; professional artist; recuse; nepotism; contract management authority</p>
<p>88017.A</p> https://www.chicago.gov/dam/city/depts/ethics/general/AO_Employ_Relatives/88017.A.pdf	Employment of Relatives or Domestic Partners	<p>The Board determined that a private business owner was not prohibited from submitting a business proposal to an alderman (to provide temporary employment or personal services to the City), even though the businessperson's husband was employed by the City. The husband did not have an ownership interest in the company, nor have any role in introducing the businessperson to the alderman, not assist with the proposal or in negotiations with the alderman. The business constituted the wife's independent occupation business or profession; thus the husband would not be in violation of the conflict of interest or</p>	<p>Spouse's business; independent occupation, business or profession; spouse who works for the City; recuse; not assist the spouse's business; economic interest; financial interest; contract management authority; nepotism; relatives</p>

		financial interest in City business provision.	
88019.A https://www.chicago.gov/content/dam/city/depts/ethics/general/AO-Attorneys/88019.pdf	Attorneys; Lobbyist Registration and Disclosure; Post-employment	<p>This is a significant, precedential case. The Board determined that a former researcher for a City Council Committee, who also was an attorney, and had left City service 10 months prior to requesting the opinion, was prohibited from representing a non-profit client before the City, including the City Council in Community Development Block Grants (CDBG).</p> <p>The opinion contains interesting discussions of the one-year subject matter ban [the Board opined that working on CDBG grants, especially before City Council, was a subject matter], and of the purposes of the post-employment provisions and the idea of impermeable ethical screens. Plus, there is recognition by the Board that, often, staff [or Board members] must make decisions on its own, given time pressures, and must use their best judgment.</p> <p>Overall, great case – worth reading and re-reading and re-re-reading.</p>	
88022.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_Outside_Employment/88022.A.pdf	Conflicts of Interest/Improper Influence; Political Activity; Representation of Other Persons; Elected Officials; Outside Employment	<p>This is a significant, precedential case. The Board determined:</p> <p>(i) that an alderman is not prohibited from assisting a firm or entity or person in obtaining City business (the advice was rendered directly to an alderman who had explained that as an elected official the alderman was frequently asked to contact other City officials and employees on</p>	<p>Constituent services; elected officials; alderman; appear without compensation before any City agency on behalf of his constituents in the course of his duties as an elected official; help businesses; money for advice; may not solicit or receive anything of value, including a political or campaign contribution, or compensation or income, in return for giving advice or assistance on matters concerning the operation or business</p>

behalf of person seeking contracts or business relations with City agencies, including those seeking contracts for concessions at City festivals) as long as the alderman derived or received **no** income or compensation from the matter, **including political contributions**, and the alderman was not seeking some kind of personal benefit or advantage in return for such assistance. The Board construed the phrase “nothing ... shall preclude any elected official from appearing without compensation before any City agency on behalf of his constituents in the course of his duties as an elected official” to include contacting City personnel on behalf of persons seeking the alderman’s assistance in obtaining City business or who seek a remedy for what they perceive to be unfair treatment by a City agency. This also means that gifts, favors, contributions, or other things of value could not be accepted either prior or subsequent to the any assistance provided, if offered in return for the assistance.

(ii) that City employees could participate in the alderman’s political campaign, in that there was nothing in the Ordinance that per se prohibited it, provided: (i) this political activity was not performed during compensated time or on or with City property (such activity would violate the fiduciary duty and City property provisions of the Ordinance); and (ii) no City employee was coerced, intimidated, or in some sense completed by another

of the City; representation; representation of businesses; lobbying; political activity; City time or City property; compensated time; coerced; intimidated; compelled; must be voluntary

		<p>employee or official to participate. That is, all political activity “must be voluntary.” The alderman was not in violation of the Ordinance by allowing City employees to participate in the campaign, as long as these elements were satisfied.</p>	
<p>88023.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO_Lobby/88023.A.pdf</p>	<p>Lobbyist Registration and Disclosure; Attorneys</p>	<p>The Board determined that an attorney/law firm whose sole representation of clients has been in litigation involving the City as a co-defendant was not required to register as a lobbyist. The Board stated that a major purpose of lobbyist registration is to provide information to the public which would not otherwise be accessible, but that attorneys who file a formal appearance in a court of law do as a matter of public record. However, an attorney who attempts to influence the Law Department’s decisions as to a matter that is not being litigated in court must register, the Board said.</p>	<p>Attorneys; lawyers; lobbyists; lobbyist registration; litigation; open court; formal appearance; purpose of the lobbyist registration provisions; representing clients in a formal adversarial hearing</p>
<p>88025.Q</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_Lobby/88025.q.pdf</p>	<p>Lobbyist Registration and Disclosure</p>	<p>A non-profit federation was advised that it needed to make a good faith estimate of its members to see whether their total compensation for lobbying City employees and official aggregated \$5,000 or more.</p> <p>Note: this case was superseded by 2000 amendments to the Ordinance.</p>	
<p>88030.Q</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/AO</p>	<p>Lobbyist Registration and Disclosure</p>	<p>A cable company that appeared before the Office of Cable Communications was not lobbying, because that office was not considered an “executive department,” and thus could not engage in “administrative actions.” However, those cable companies could be lobbying if they</p>	<p>Lobbying; lobbyist; not lobbying; administrative action; executive department; legislative action; cable TV; cable companies; cable franchisees</p>

Lobby/88030.q.pdf		engaged in these activities before the City Council, as that could be considered “legislative action.” Note: this case was superseded by later Board decisions.	
88031.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_SFI/88031.A.pdf	Statements of Financial Interests	The Board determined that filers of Statements of Financial Interests: (i) must disclose the name of any common stock of a public company sold in the previous year from a capital gain in excess of \$5,000 was realized – even though they do not have a financial interest in the company; and (ii) the Ordinance requires disclosure only of single transactions from which capital gains of \$5,000 were realized – thus three (3) sales of \$1,700 of the same asset would not need to be disclosed. See <i>also</i> Case No. 88032.A.	Statement of Financial Interests; capital gain; shares of a publicly owned company; common stock; publicly traded stock; financial interests; less than 1% of a public company’s outstanding stock; less than .5% of a public company’s outstanding stock; single sale; single transaction
88032.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_SFI/88032.A.pdf	Statements of Financial Interests	This is a significant, precedential case. The Board determined that filers of Statements of Financial Interests must disclose the name of any common stock of a publicly-traded company that they sold in the previous year and from which sale they realized a capital gain of \$5,000 or more, even though they would not have a financial interest in that company, and would not need to disclose that interest in other questions on the form that refer to financial interests, e.g. in persons conducting business in or doing business with the City. See <i>also</i> Case No. 88031.A.	Statement of Financial Interests; capital gain; shares of a publicly owned company; common stock; publicly traded stock; financial interests; less than 1% of a public company’s outstanding stock; less than .5% of a public company’s outstanding stock
88033.Q https://www.chicago.gov/content/dam/city/depts/et	Lobbyist Registration and Disclosure	A company that employed lobbyists was advised that it should make a good faith estimate of its employees’ lobbying-related compensation for lobbying before the City, especially as part of larger	Lobbyists; compensation or expenditures; good faith estimate

hics/general/AO Lobby/88033.q.pdf		lobbying efforts before other levels of government.	
88034.A https://www.chicago.gov/dam/city/depts/ethics/general/AO Interest CityBusiness/88034.A.pdf	Financial Interest in City Business	After considering the evidence presented by a City employee in an informal hearing before a Board subcommittee, the Board determined that a company 45% owned by the employee's husband was prohibited from entering into a \$35,000 contract with a City department, as it would constitute a prohibited financial interest in City business for the employee.	Spouse's business; financial interest; parking contract
88036.A https://www.chicago.gov/dam/city/depts/ethics/general/AO SFI/88036.A.pdf	Statements of Financial Interests	<p>The Board determined that a filer who owns a financial interest in real estate (located in the City, other than the principal place of residence) that is held in a trust must disclose this interest by disclosing the trust number, the name and address of the trust, and the location of the real estate by both street number and legal description.</p> <p>Note: the Ordinance was amended in 1989 so that the filer could disclose either the street address or the legal description of the real estate, and need not disclose the number and trustee of the real estate trust.</p>	Statement of Financial Interests; financial interest in real estate; real estate owned by a trust; the identity of any financial interest in real estate located in the City, other than the principal place of residence of the reporting individual, and the address or, if none, the legal description of the real estate, including all forms of direct or indirect ownership such as partnerships or trusts of which the corpus consists primarily of real estate
88037.D https://www.chicago.gov/dam/city/depts/ethics/general/AO GiftsTravel/88037.D.pdf	Gifts	The Board determined that a Chicago Police Officer was not prohibited from accepting an award from a Chicago travel promotion office consisting of hotel accommodations, dinner, tickets to a play, and souvenir clothing, for personifying the "welcome image" of the City. The Board reasoned that this was an award publicly presented in	Gifts; award; Chicago area travel; travel bureau; visitors' bureau; awards publicly presented in recognition of public service

		<p>recognition of public service, and therefore explicitly acceptable.</p> <p>Note: in 2012, this provision of the Ordinance was amended such that City employees and officials may accept awards presented in recognition of public service only if the awards are not in cash or cash equivalents.</p>	
<p>88039.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO_GiftsTravel/88039.A.pdf</p>	Gifts	<p>This is a significant, precedential case. The Board determined that Ordinance does not prohibit City employees or officials from receiving discounts on automobile or car purchases from dealers, and that these discounts are sales promotions, not gifts, and need not be disclosed on the annual statement of financial interests, provided: (i) similar discounts are equally available to most other persons (a discount or a special benefit that is significantly greater than that afforded to other persons under similar circumstances, or where there is evidence that the discount was offered in an attempt to influence the City person's governmental decisions are prohibited); (ii) if the discount is more than \$500 above what other person receive in similar buying situations, it would be required to be reported on the annual statement of financial interests.</p>	<p>Preferential treatment; car discount; automobile discount; buy a car; sales promotion; discount equally available to most other persons; \$500 or more; report on the Statement of Financial Interests; attempt to improperly influence the recipient's governmental decisions; usual discounts; customary to pay less than the sticker price</p>
<p>88040.E</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO_SFI/88040.E.pdf</p>	Statements of Financial Interests	<p>The Board determined that members of the Commission on Animal Care and Control must file Statements of Financial Interests, because the Commission is not solely advisory.</p>	<p>Solely advisory; appointed officials; Commission on Animal Care and Control; not solely advisory; power to make binding decisions; enter into contracts; make expenditures other than expenditures incurred for research purposes</p>

<p>88044.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO_Lobby/88044.A.pdf</p>	<p>Lobbyist Registration and Disclosure</p>	<p>The Board determined that cable companies engaging in activity before the Office of Cable Communications were not required to register, because that Office was not an “executive department.” However, engaging in this activity before the City Council is trying to influence legislative action and thus constitutes lobbying. The Board noted that not every communication with an alderman is lobbying discussing consumer service in the ward is not.</p> <p>Note: this case was superseded by later Board opinions. See also Case No. 88030.Q.</p>	<p>Lobbying; lobbyist; Cable companies; Office of Cable Communications; executive department; legislative action; administrative action; communications with aldermen; discussing consumer service in the ward; not lobbying</p>
<p>88045.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO_CampFinancing/88045.a.pdf</p>	<p>Campaign Financing; Political Activity</p>	<p>The Board determined that selling tickets to a political fundraising event constitutes political activity, and also soliciting political contributions, and that this activity was permissible, provided that: (i) this activity was not performed during City time, or with or on City property or resources; (ii) no City employee was coerced, intimidated, or compelled by another employee or official to participate; (iii) there was no mutual understanding between the contractor and employee that the employee's City decisions would be influenced; and (iv) the contributions were not given or received in exchange for advice or assistance concerning City business. See also Case nos. 88052.A;</p> <p>Note: this case was superseded by 1990 amendments to the Ordinance that prohibit any City employee or official from</p>	<p>Selling tickets to a political fundraiser; campaign contribution; political contribution; soliciting political contributions; knowingly solicit or accept a political contribution from a person doing business with the City; City property; political activity</p>

		knowingly soliciting a political contribution from any person doing business with the City (except that candidates or elected officials may make such solicitations for their own candidacies, subject to the provisions against soliciting or accepting anything based on a mutual understanding that City decisions would be affected, and subject to the \$1,500 contribution limitation.	
88046.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_GiftsTravel/88046.A.pdf	Gifts	<p>This is a significant, precedential case. The Board determined that a City employee who received a gift of jewelry worth \$800 during a birthday party for the employee held at a private club should return the gift. The giver was a friend of an invited guest, and a building contractor that had contracts with the employee's City department.</p> <p>The Board stated that, even though the employee "made it clear that the gift ... did not involve any mutual understanding ... the particular circumstances of this case could reasonable be construed as involving some effort to improperly influence governmental actions ... or as involving some implicit understanding."</p>	Appearance of impropriety; jewelry; \$800; birthday party; friend of an invited guest; explicit or implicit mutual understanding; might be interpreted; building contractor with contracts with the City
88047.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/Board%20of%20Elections%20Commissioners/88047Q.pdf	Attorneys; Board of Election Commissioners	The Board determined that the Chicago Board of Election Commissioners is not a City agency, as it was created by state statute. Thus, the Governmental Ethics Ordinance does not apply to it or its employees, and its employees need not file Statements of Financial Interests.	Chicago Board of Election Commissioners; CBEC; created by state statute; not a City agency

<p>88051.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO_SFI/88051.A.pdf</p>	<p>Statements of Financial Interests</p>	<p>The Board determined that a filer of Statement of Financial Interests must disclose the identity of real estate owned in the City if the filer has a financial interest in the real estate (i.e. an ownership interest that yields the filer in excess of \$2,500 in income, under the law then in effect, but as of 2013, worth in excess of \$1,000).</p>	<p>Statement of Financial Interests; disclosure of real estate owned in the City other than the principal place of residence; more than \$2,500 in income; rental income; in excess of \$2,500 in income; more than \$1,000</p>
<p>88052.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO_PolActivity/88052.A.pdf</p>	<p>Political Activity</p>	<p>The Board, addressing the question “would it be a violation of the Ordinance if a person seeking a City contract ‘got the squeeze put on him’ to contribute to a political campaign chest by an official or employee who had the authority to choose the contract,” determined that there was no explicit section in the Ordinance that would have prohibited a City employee or official from compelling, coercing or intimidating a City contractor into making a political contribution – however: City employees and official were prohibited from soliciting or accepting contributions: (i) in exchange for advice or assistance concerning City business; (ii) based on a mutual understanding that City decisions would be affected thereby. See <i>also</i> Case No. 88045.A.</p> <p>Note: this case was superseded by 1990 amendments to the Ordinance that prohibit any City employee or official from knowingly soliciting a political contribution from any person doing business with the City (except that candidates or elected officials may make such solicitations for</p>	

		their own candidacies, subject to the provisions against soliciting or accepting anything based on a mutual understanding that City decisions would be affected, and subject to the \$1,500 contribution limitation.	
88054.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_RepresentingOthers/88054.A.pdf	Representation of Other Persons; Attorneys	The Board determined that an attorney about to begin City employment would be prohibited from representing clients before City agencies, including bond underwriters, or from receiving or deriving any income from such representation. However, the Board also determined that the attorney was entitled to full compensation for all such work performed prior to joining the City, and that the attorney's former law firm could take on such representation, provided that the City employee received no compensation from such representation and the attorney's name was removed from the firm's name. <i>See also</i> Cases. 97026.A; 16005.A.	Attorney; lawyer; legal fees; derive or receive income or compensation; bond underwriters; fees earned prior to commencing City employment; law firm name; representation of persons before the City
88056.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_PostEmploy/88056.A.pdf	Post-employment	<p>The Board determined that a departing City employee was prohibited from contracting with the City to offer the same services the employee performed during City employment.</p> <p>Note that this case was superseded by Case No. 93018.A</p>	Departing City employee; independent contractor of the City; one-year subject matter prohibition; hired by the City; vouchered employee
88058.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_PostEmploy/88058.A.pdf	Post-employment	The Board determined that a former employee was not prohibited from becoming a City subcontractor, providing design recommendations to an architectural and engineering firm regarding the use of space for a new City facility. The Board's determination was	Post-employment; one-year subject matter prohibition; work on a specific City facility; subject matter; providing design recommendations; use of interior space; utilization of space; participated personally and substantially in the subject matter of the transaction; specific City building

		<p>based on the fact that the employee's City position did not involve developing physical plans for this facility. Thus, the employee had not been personally involved the subject matter of the transaction.</p> <p>The case has a good discussion of "subject matter."</p>	
<p>88059.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO_PostEmploy/88059.A.pdf</p>	Post-employment	<p>The Board determined that a former City employee in the Bureau of Parking was: (i) prohibited for one year from negotiating or managing any City contract involving the same area in the Bureau in which the employee had worked; (ii) not restricted from assisting or representing a new employer in marketing and managing its services to City agencies whether the services offered concern processing a particular contract, and collecting fines for that type of violations; but (iii) was subject to a one-year subject matter prohibition, having served as a manager in the Bureau, and that the employee's supervisory authority over the purchase, maintenance and collection in certain areas constitutes personal and substantial level of involvement in those subject matters. The former employee was also advised of the prohibition on using or disclosing confidential information.</p>	Post-employment; one-year subject matter prohibition; Bureau of Parking; supervisory authority; participated personally and substantially in the subject matter of the transaction
<p>88060.Q</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec</p>	Travel	<p>This is a significant, precedential case. A high-ranking City official was advised that there was no violation of the Ordinance when the official, together with other City employees and officials, took a trip to foreign country, paid by a marketing</p>	Foreign travel; reasonable hosting; meeting with other governmental officials; local expenses; ceremonies; dignitaries; paid by a marketing council; public event; public appearance; waste management system

k%20Chairs/4-15-12/88060.Q.pdf		council, to tour waste management systems facilities in that country and meet with government agencies and officials there. The trip was held to be a “public event,” and accepting expenses paid by local governmental entities was also acceptable as reasonable hosting.	
88061.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_SF/88061.A.pdf	Statements of Financial Interests	The Board determined that a City employee, who also had a part-time job as an insurance agent, must disclose on the Statement of Financial Interests the name of the insurance company, if the compensation received from it exceeded \$2,500, and the name of any insured from whom commissions were generated in excess of \$5,000 if the insured did business with the City.	Disclosure of outside income; Statement of Financial Interests; insurance salesman; insurance company; insurance salesperson
88064.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_CampFinancing/88064.a.pdf	Campaign Financing	The Board determined that a firm that had a contract with the City in the form of an option to purchase City land was subject to the \$1,500 yearly contribution limitation, because an option to buy is a contractual right, and constitutes a binding agreement between the parties. Thus, if the option contract was worth more than \$10,000 and was in effect during the previous four (4) years, the person or firm with that contract is subject to the contribution limitations.	Option to purchase City land; contract; doing business with the City in the previous four years; option to buy City real estate; binding contract; valid agreement
88065.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_ConflictOfInterest/88065.A.pdf	Conflicts of Interest/Improper Influence; Attorneys; Appointed Officials	The Board determined that an incoming appointed official, an attorney, was prohibited from representing clients before the City board on which the official served – as was the official’s law firm, and, if either the official or firm represented a client before a related City board or commission, the official would need to resign from the City board.	Appointed official; lawyer; attorney; representation of clients before one’s own City board or commission; representation of clients before other City boards or commissions; wholly unrelated; recusal; receive or derive income or compensation

		Note: this case was superseded by Case nos. 89091.A and 91041.A.	
88066.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_PostEmploy/88066.A.pdf	Post-employment	The Board determined, after considering the evidence presented, that a former employee had not participated personally and substantially in the subject matter of a contract on which the former employee submitted a bid, and thus was not prohibited from receiving the contract if the bid were successful.	Post-employment; subject matter; participated personally and substantially in the subject; contract bid; bid not prohibited
88069.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_InterestCityBusiness/88069.A.pdf	Financial Interest in City Business	<p>This is a significant, precedential case. The Board determined that a company that was 100% owned by the spouse of a City employee could apply for and receive a \$25,000 City loan to open a franchise. The Board reasoned that the wife's business constituted her "independent occupation, profession or employment," and thus would not be considered a prohibited financial interest for the husband.</p> <p>The key factors the Board considered: (i) the husband worked for a different City department than the one granting the loan; (ii) the husband was not a paid or unpaid employee of the wife's company, and would hold no office or position in it; but (iii) the husband was participating in the franchisor's training program so he could be prepared in the event of an emergency; and (iv) the wife was the sole signatory on the company's bank account, franchise agreement, and sublease for space.</p>	Financial interest in City business; \$25,000 loan from the City; franchise; husband; participate in the franchisor's training program; independent occupation, profession or employment of the spouse; control of the business; signatory of a lease; signatory of a franchise agreement; signatory on a bank account; irregular involvement by the City employee in the spouse's business; financial or legal control

		<p>The Board opined that “so long as [your husband] continues to have no [financial or legal control over your business] his irregular involvement in the operation of [your business] will not prevent classification of the business as your “independent” occupation for purposes of the Ethics Ordinance.”</p>	
<p>88070.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO_GiftsTravel/88070.A.pdf</p>	<p>Gifts; Elected Officials</p>	<p>The Board determined that an alderman who received a season-long pass from a Chicago professional athletic team should limit her or her use so that the market value of benefits does not exceed \$50 per year. The Board’s rationale was that, under a broad interpretation of the Ordinance, the team may be said to have an economic interest in a transaction with the City because of current financial negotiations, and an alderman could substantially affect the donor’s transactions with the City by influencing legislation, and the gift is potentially worth more than \$50 to each recipient.</p> <p>The Board also determined that the balance of the passes could be returned or donated to a charity. <i>See also</i> Case 10021.A.</p>	<p>Gifts; season pass; professional sports team; limit to \$50 per year; broad interpretation of the Ordinance; sports tickets; special access; divisibility of a gift</p>
<p>88074.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO_GiftsTravel/88074.A.pdf</p>	<p>Gifts</p>	<p>The Board advised a group of City employees and officials that they should decline the offer from a beef processing company seeking a waiver of City beef grading regulations of either a free steak dinner or a trip to another state to view the company’s beef processing facility of a company. The Board reasoned that acceptance of dinner could implicitly signal acceptance of the company’s</p>	<p>Gifts; steak dinner; beef processing company seeking a waiver; reasonable hosting; furnished in connection with public events, appearances or ceremonies related to official City business; official City business; implicit mutual understanding</p>

		position regarding the waiver and create the appearance of impropriety. It also reasoned that, although the trip would be considered official City business, it would not be open to the public and thus not a “public event, appearance or ceremony” so as to fit into the exception in the gift provisions.	
88077.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/AO-SisterAgencies/88077.Q.pdf	Sister Agencies	An employee of the Board of Education was advised that: (i) the Ordinance did not prohibit Board of Education employees from having employment or contracting with the City; (ii) no provision in the Ordinance prohibits former employees of governmental agencies such as the Board of Education from having business relations or seeking employment with the City; the Chicago Park District, Chicago Transit Authority, and Board of Education are not chartered as City agencies and not subject to the City's Governmental Ethics Ordinance; this Board of Education may be subject to other laws or rules.	Sister agency; not City agencies; not subject to the Governmental Ethics Ordinance; Chicago Transit Authority; Chicago Park District; Chicago Public Schools; outside employment; contracting with the City
88078.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_OutsideEmployment/88078.A.pdf	Outside Employment	The Board advised a City department that the Ordinance did not prohibit its employee from maintaining outside practices as real estate agents, but: (i) employees would need to recuse themselves from any transactions involving property in which their real estate companies had any monetary interest; (ii) these employees must disclose their interest in any property that the department was dealing with, to the department head and the Board of Ethics; (iii) these employees could not give their outside employers or clients advice or assistance related to City business; (iv)	Outside employment; outside employment; second job; real estate agent; City records; money for advice or assistance related to the business of the City; appearance of impropriety

		they would need to be put on notice that use of City phones, office equipment, etc. to further their real estate activities was prohibited; and (v) to be aware of the appearance of impropriety.	
88079.A https://www.chicago.gov/dam/city/depts/ethics/general/AO Interest CityBusiness/88079.A.pdf	Financial Interest in City Business	<p>After examining tax returns and corporate documents provided by a City employee, the Board determined that the City employee, who served as the unpaid treasurer of a family business that held City contracts, did not have a prohibited financial interest in the company's City contracts. The Board focused on the facts that the employee received not compensation or other direct or indirect financial benefits from the company, maintained no ownership interest in it, and was not entitled to receive any financial benefits in the future from it.</p> <p>However, the Board cautioned the employee to be aware of the appearance of impropriety and that the employee could not make or participate in any City decisions concerning the family business, nor use or divulge confidential information.</p>	Financial interest in City business; family-owned business; treasurer; City contracts; no ownership interest; in the name of another; no direct or indirect financial benefits; appearance of impropriety; confidential information; make or participate in the making of City decisions
88080.A https://www.chicago.gov/content/dam/city/depts/ethics/general/AO CampaignFinancing/88080.a.pdf	Campaign Financing; Political Activity	The Board determined that aldermen may use the Directory of Minority and Women Businesses, provided that: (i) this political activity is not performed during City time, or with or on City property; (ii) there is no implicit or explicit mutual understanding between the alderman and company that the alderman's City actions would be influenced thereby; and (iii) that the alderman may not solicit or accept a	Political activity; use of MBE/WBE Directory; political fundraising purposes; no mutual understanding

		political contribution in return for advice or assistance concerning City business.	
88081.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_GiftsTravel/88081.A.pdf	Gifts	The Board determined that a City employee who received two tickets from a professional Golf Tournament Committee (normally obtained by a \$125 donation) should return the tickets or make a donation comparable to the tickets' value (\$125). The Board reasoned that, even though the tickets were not prohibit (the Tournament Committee had no City business that the City employee could affect), the Board had adopted a policy of recommending that City employees and official not accept any gift or benefit worth more than \$50, and thereby avoid any real or potential violations of the Ordinance and prevent actions which might be interpreted as unethical conduct.	Tickets' sports tickets' worth \$125; Professional Golf Tournament; Country Club; pay face value; \$125; Board's general advice not to accept gifts worth more than \$50; appearance of impropriety
88084.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_PostEmploy/88084.A.pdf	Post-employment	The Board advised a high-ranking City employee in the Department of Aviation generally on the post-employment restrictions, were the employee to go into aviation consulting. The prohibitions included a one-year subject matter prohibition that would presumably include advising Chicago airports relating to present polices and future development, and if any transaction involves decisions concerning the operation and development of Chicago airports in which the employee participated. The Board also advised the employee of the permanent prohibition as to contract which the employee helped formulate, evaluated, negotiated or in any way supervised during City employment, including City positions occupied prior to	Post-employment; one-year subject matter prohibition; contract management authority; general advice; subject matter; Department of Aviation; operation and development of Chicago's airports

		the employee's work with the Department of Aviation.	
88087.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_Outside_Employment/88087.A.pdf	Outside Employment	<p>The Board determined that a City employee, a building supervisor, was not prohibited from selling insurance for an insurance that had a contract to sell insurance policies to City employees as part of the City's benefits program, provided: (i) the employee did not attempt to solicit any business from employees in the same department; (ii) did not perform this outside employment during regularly scheduled working hours; (iii) did not in any way attempt to use the City title or status to obtain a benefit for the company. The Board concluded that the employee's City work as a building supervisor was wholly unrelated to selling insurance.</p>	Outside employment; outside employment; money for advice; selling insurance for a company under contract with the City; not solicit co-workers; building department supervisor
88088.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_Interest_CityBusiness/88088.A.pdf	Financial Interest in City Business; Minor Violations	<p>The Board determined that a City employee, who was a signatory on two City contracts on his behalf of his church, to secure federal funds for the church, and who received a salary paid from the church's general funds, had a prohibited financial interest in the City contracts, because the church failed to separate these funds from church funds. The Board advised that the church avoid commingling City-administered funds from church operating funds, and that it creates a separate community foundation, which would be the signatory on all City contracts. The Board determined that the current violation was "technical," and that, if the church performs according to the Board's advice, no sanctions would be incurred. "The Board of Ethics seeks to encourage</p>	Financial interest in City business; church funds; minister; paid a salary by the church; City contracts; commingling of City loan and operating funds; technical violation; purpose of Board advice

		<p>behavior in conformance with the Governmental Ethics Ordinance without punitive sanctions when possible. This amended decision allows more efficient compliance with the Ordinance regulations.”</p> <p>Cf. Case nos. 91072.A; 02024.A.</p>	
<p>88089.E</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO_SFI/88089.E.pdf</p>	Statements of Financial Interests	The Board concluded that the Chicago Commission on Women was solely advisory and thus its members were not required to file a Statement of Financial Interests.	Solely advisory; Chicago Women's Commission; Chicago Commission on Women; created by Executive Order
<p>88091.Q</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_InterestCityBusiness/88091.Q.pdf</p>	Financial Interest in City Business	The Board advised a City department that it had a closed a case involving newspaper reports and a complaint that an employee of the Chicago Police Department owned a company that had several “sizeable” City contracts to provide security services. The Board noted that such an allegation, if proven, would constitute a violation of the financial interest in City business provision of the Ordinance, but that records from the Department of Procurement Services showed that the company had not received any City contracts since the passage of the Ethics Ordinance, and that a separate investigation revealed no misconduct on the part of the Police employee.	Dismissed complaint; Chicago Police Department employee; security services; City contracts; no violation; financial interest in City contracts; ownership of a business with City contracts
<p>88092.A</p> <p>https://www.chicago.gov/dam/city</p>	Gifts	The Board determined that it was appropriate for a City department to accept \$12,000 in used computer equipment from a company that had no	Gifts to the City; report to the Comptroller; report to the Board of Ethics \$12,000; used computer equipment; economic interest in a specific City business transaction

/depts/ethics/general/AO_GiftsTravel/88092.A.pdf		<p>business with the City department, provided that the gift was reported to the Board and City Comptroller.</p> <p>Note the Board seems to base its decision in part on the fact that there were no transactions pending that could affect the donor's economic interests. Under 2012 amendments to the Ordinance, a City employee or official may accept a gift upon behalf of the City even under such circumstances.</p>	
88099.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_OutsideEmployment/88099.A.pdf	Outside Employment	The Board determined that a Department of Public Health employee responsible for inspections related to safe food distribution was not prohibited from accepting a position with a firm that produced food festivals, because the firm had no festivals that would take place in the City of Chicago, had none in the past, and no plans to obtain any contracts with the City. However, the employee was also advised that, if the firm did decide to seek City contracts, the outside position be terminated.	Outside employment; outside employment; second jobs; food inspections; Chicago Department of Public Health; Summer food festivals; City festivals; food festivals outside the City limits; money for advice; outside employer seeking City contracts
88103.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_SFI/88103.A.pdf	Elected Officials; Statements of Financial Interests	The Board determined that an individual employed by a Council that was not part of City government, and who was not paid by the City and who did not occupy a position in the City budget or receive City benefits, was not a City employee or official and thus not required to file a Statement of Financial Interests.	City employee; City official; not required to file a Statement of Financial Interests; did not occupy a position in the City budget; not paid by the City; City benefits
88104.Q https://www.chicago.gov/content/dam/city/depts/et	Gifts	A City employee was advised that the Ordinance did not prohibit acceptance of an invitation to participate in a conference on public transportation, as it appeared to be a public event concerning official City	Reasonable hosting; furnished in connection with public events; related to City business; furnished by the sponsor; public transportation conference; educational conference

hics/general/Dec k%20Chairs/4-15- 12/88104.Q.pdf		business and was offered by the conference's sponsor.	
88105.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_GiftsTravel/88105.A.pdf	Gifts	The Board advised the Department of Consumer Services and growers at the Farmer's Markets that: (i) growers are prohibited from giving any gifts, regardless of value, based on any assumption that the gift would influence the recipient to give the grower special treatment, privileges or use of City property; (ii) growers are under no obligation to give any gifts to City personnel, and should refuse to give gifts solicited by City employees; (iii) any gifts given by growers must be completely voluntary and less than \$50; (iv) no employee should solicit any gift from a grower; (v) no employee is compelled to give special treatment to growers that give unsolicited gifts; (vi) City employees who believe that a gift they have already received now comes with a request for a favor should report it to the Board; and (vii) employees found in violation of the Ordinance are subject to employment sanctions.	Gifts; solicitation of gifts; Farmer's Markets' gifts from farmers; growers; Department of Consumer Services; special treatment prohibited; favors; mutual understanding; summer interns; appearance of impropriety
88106.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_OutsideEmployment/88106.A.pdf	Non-profit Board Service; Outside Employment	The Board determined that a City employee was not prohibited from serving as a board member of an organization that applied for Community Development Block Grant (CDBG) funds from the Mayor's Office of Employment and Training, and went through the various prohibitions, including representation of other persons; conflicts of interest,	Non-profit board service; restrictions; representation; Community Development Block Grant; CDBG; delegate agency; volunteer

		improper influence, and financial interest in City business See <i>also</i> Case No. 88006.A.	
88107.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec%20Chairs/4-14-12/88107.Q.pdf	Post-employment	A departing City employee, a contract administrator, was advised generally of the Ordinance's post-employment restrictions.	Post-employment; subject matter; participated personally and substantially in the subject; business transaction involving the City; general advice; contract administrator
88111.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_Outside_Employment/88111.A.pdf	Outside Employment	<p>The Board determined that a City employee would be prohibited from receiving compensation from a radio station for hosting a radio show in which discussion of current events, including those pertaining to City government, would be "a central feature" of the show.</p> <p>The Board's rationale was that the Money for Advice provision would be interpreted to prohibit the employee from discussing any information about City government, if: (i) the employee were to give advice or assistance on matters concerning City business to listeners; (ii) the employee received compensation for providing such advice or assistance; and iii) the advice or assistance was in some way related to the employee's City duties – and that discussing information about the City as a talk show host would do all three. The Board also advised the employee of the conflict of interests provision, which prohibited the employee from making or</p>	Outside employment; outside employment; second job; radio talk show host; money for advice; receive any money or anything of value in return for giving advice or assistance on matters concerning the business of the City; wholly unrelated

		participating in any City decisions affecting the station.	
88113.A https://www.chicago.gov/content/dam/city/depts/ethics/general/AO-Attorneys/88113.pdf	Conflicts of Interest/Improper Influence; Employment of Relatives or Domestic Partners	This is a significant, precedential case. The Board determined that the Ordinance did not prohibit a situation where the wife of a Deputy Commissioner in the Department of Economic Development was a partner in a law firm hired by a developer with whom the Deputy was negotiating regarding creating an industrial park in the City. The Board stressed that the spouse/attorney was not involved in the transaction, and her practice area was in an unrelated area, nor was the spouse/attorney an employee of the developer with whom the Deputy was negotiating. The opinion states that the Deputy could not be said to have an economic or financial interest in the negotiations with the City purely by virtue of his wife's employment with a law firm whose other member represent clients before the City.	Contract management authority; spouse; husband; wife; Deputy Commissioner; employee's spouse employed by a law firm negotiating with a City employee; real estate development; nepotism; relative; independent occupation, business or profession; industrial park; attorney
88114.A https://www.chicago.gov/content/dam/city/depts/ethics/general/AO-OutsideEmployment/88114.A.pdf	Non-profit Board Service	The Board determined that a District Library Chief for the Chicago Public Library was not prohibited from accepting a volunteer position with an outside board of company that had a contract with the Library to furnish books to the new Chinatown branch,, and could accept reasonable travel expenses from the company to attend board meetings, but that it would need to be limited to \$5,000 per year, and was also advised of the restrictions against using or disclosing confidential information or receiving money or anything of value in return for providing assistance about City business,	Outside employment; outside employment; second job; travel to board meetings; serving on the board of a vendor; non-profit; Chicago Public Library; economic interest; money for advice; Chinatown Library branch; conflicts of interest; money for advice

		<p>and of the conflicts of interest provision, which prohibited the Librarian from participating in or attempting to influence any City decisions, as the travel expenses were considered an “economic interest.”</p> <p>Note: this case was superseded by later travel cases, in which reasonable travel reimbursements are not considered an “economic interest” or income or compensation.</p>	
<p>88117.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO_ConflictOfInterest/88117.A.pdf</p>	Conflicts of Interest/Improper Influence	<p>The Board determined that a City employee, who had once worked for the Department of Consumer Services, and who filed a complaint for consumer fraud against a car dealer for false advertising, would not violate the Ordinance by settling the matter with the car dealer, because any citizen of the City could request an investigation from the department. Moreover, the car dealer was unaware of the employee’s City position.</p>	Benefit available to all residents or citizens of the City; consumer fraud; car dealer; false advertising; conflict of interests; settlement of a lawsuit; improper influence; misuse of City position
<p>88118.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO_InterestCityBusiness/88118.A.pdf</p>	Financial Interest in City Business	<p>The Board gave general advice that City employees and officials are subject to the restrictions on having a financial interest in any City business –and this could include owning stock in a company that has City contracts if the ownership percentage of the stock ownership, multiplied by the amount of City contracts, exceeds the limitations in the definitions. The Board also stated that these limits are “absolute”: they apply regardless whether the City employee takes part in decisions that create the financial interest.</p>	Financial interest in a City contract, work or business; City contracts; stock ownership

		Note: the opinion is general and does not discuss the exemption for ownership of less than 1% (as of 2015, less than ½ of 1%) of the outstanding shares of a publicly-traded company.	
88119.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_RepresentingOthers/88119.A.pdf	Representation of Other Persons	<p>A member of a City board, an architect, was advised that, given the fact the board on which the official served paid a stipend, the official was considered an employee for purposes of the Ordinance, and thus prohibited from representing architectural clients before other City boards and commissions.</p> <p>Note: this case was superseded by Case No. 02041.A.</p>	Appointed official; wholly unrelated; architect; representation of other persons; stipend; City employee
88122.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_OutsideEmployment/88122.A.pdf	Non-profit Board Service; Outside Employment; Fiduciary Duty; City Property	<p>This is a significant, precedential case. The Board determined that the Ordinance did not prohibit a non-profit organization for which a City employee volunteered from naming the employee as the government employee of the month, and including the employee's name and City title in a letter to professional people in the City, inviting them to a social function. The Board's opinion was based on the following: (i) no City stationery or other City resources would be used; (ii) the function would not take place during working hours; (iii) the employee would receive no compensation; and iv) none of the invitees were under the employee's supervision.</p> <p>The Board also determined that the Ordinance prohibits a City employee or official from obtaining a list of names and addresses of persons who would be</p>	Service on the board of a non-profit; not-for-profit organization; use of one's City title; use of one's name; employee of the month; membership event; City stationery; City letterhead; receive or derive compensation; other employees under the employee's supervision; use of lists of City personnel; access to lists of City personnel; proper use of lists of City personnel; advancing the interests of a third party; City property; unauthorized use of City property

		<p>contacted by the non-profit. It stated that “it would not be permissible under the Ethics Ordinance for you or any other City employee to assist non-City organization such as [this non-profit] in obtaining a list of names and addresses of City personnel. Any such list obtained through City agencies would be considered property of the City. And, any use of this property by City employees or officials to further the interest of those outside the City could be interpreted as unauthorized use of City property ... For this reason and in order to respect the privacy rights of City personnel, we believe that City employees should not attempt to supply a list of City employees obtained through the office or personnel or some other City agency. It would be allowable for you to suggest to your organization, the names of individual City employees who you think would be interested in membership.” See <i>also</i> Case No. 12060.I.</p>	
88124.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_ConflictOfInterest/88124.A.pdf	Conflicts of Interest/Improper Influence; Appointed Officials; Financial Interest in City Business	The Board determined that an appointed official who owned an architectural firm that was part of a joint venture bidding on a large City construction project was not in violation of the Ordinance because the project was wholly unrelated to the work of the official’s City board. The basis of the holding was that no property involved in or adjacent to the construction site would require review by the official’s City board. See <i>also</i> Case nos. 94001.A; 12048.A.	Appointed officials; wholly unrelated; construction projects; joint venture; architect; architectural firm; financial interest in a City contract; representation;
88125.A	Non-profit Board Service; Representation of	This is a significant, precedential case. The Board determined that a City employee who served as President of a	Non-profit; not-for-profit; volunteer; representation of third parties; signing documents to be submitted to the City;

https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_OutsideEmployment/88125.A.pdf	Other Persons; Fiduciary Duty	<p>non-profit organization involved in neighborhood improvement, and which was going to apply to the City for a Community Development Block Grant (CDBG), could continue to serve (and receive reimbursements for cab fare), but: (i) was prohibited from representing the organization in transactions before the City, including contacting City employees or officials, in person or by phone, to promote the interests of the organization, or from signing proposals, such as CDBG proposals, submitted to City agencies; and (iii) attempting to use a City title to obtaining some special or undeserved advantage for any person or group, or use the City position or powers to influence City decisions affecting the organization.</p> <p>The Board noted that the Ordinance did not restrict the employee's right as a private citizen to contact City officials or employees as an individual, to discuss City actions which may affect the employee or community, but does prohibit the employee from using the title as President of the community organization in efforts to influence such City decisions.</p>	neighborhood improvements; Community Development Block Grant; CDBG; cab fare; promote the interests of a third party; rights as a private citizen; board member; officer of a non-profit; President; board member
88128.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_PostEmployment/88128.A.pdf	Post-employment	The Board determined that a departing City employee who had worked extensively with concessionaires was not prohibited from accepting employment with a firm that performed consulting service for the employee's former department, but that the employee would be: (i) prohibited for one year from assisting or representing a new employer on transactions concerning the use of	Post-employment; subject matter; participated personally and substantially in the subject; business transaction involving the City; general advice; concessionaires

		concessionaires by the City department; and (ii) prohibited from assisting or representing a new employer on contracts over which the employee exercised management authority.	
88129.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_Outside_Employment/88129.A.pdf	Outside Employment; Financial Interest in City Business; Fiduciary Duty	This is a significant, precedential case. The Board determined that a City employee, a photographer, was prohibited from taking on photography jobs with other City departments unless the photographer's compensation from those jobs totaled less than the threshold for a financial interest in a City contract or City business. The employee was also advised that the City's Personnel Rules require approval from the department head prior to engaging in outside or outside employment. The Board also determined that the fiduciary duty provision prohibited the photographer from rendering private photography services to other City departments during regular working hours.	Outside employment; outside employment; second job; photographer; contract with other City departments; prohibited financial interest in City business or a City contract or City work; \$1,000
88134.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_GiftsTravel/88134.A.pdf	Travel	This is a significant, precedential case. The Board determined that: (i) a high-ranking City official who accepted travel expenses to a foreign country to attend a sporting event and meet with government officials from that country was not required to disclose this on the annual Statement of Financial Interests because it was not a gift; (ii) awards, commercially reasonable loans, political contributions, and reasonable hosting (including travel) are not gifts and need not be reported as such; (iii) these could be considered gifts if they do not meet the criteria stated in the Ordinance, then they are gifts, and	Foreign travel; high-ranking official; reasonable hosting; Statement of Financial Interests; meetings with foreign government or business officials; public appearance or ceremony related to official City business; trip; not a gift; reasonable; anything of value

		<p>would be prohibited if they exceed the monetary limitations; and (iv) meeting with governmental and business officials in the foreign country was directly related to the official's responsibilities and met the conditions of the reasonable hosting exception.</p> <p>The Board also counselled the official on a critical point: if there is any question about the Ordinance's applicability to travel arrangements, it is desirable for the official's office to seek an advisory opinion prior to accepting travel.</p> <p>Note: 2012 amendments to the Ordinance require reporting to the Board of Ethics of travel expenses paid by third parties, within 10 days of the completion.</p>	
<p>88138.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO_GiftsTravel/88134.A.pdf</p>	Conflicts of Interest/Improper Influence	<p>The Board determined that a City employee did not violate the Ordinance by assisting a company that was requesting MBE recertification (for no fee) even though the employee was handling the file, though the situation created a serious appearance of impropriety. The basis for the decision was that the employee had no economic interest in the company or its City request.</p> <p>The Board recommended that the City impose rules requiring City employees to disclose persons for whom they were performing volunteer work, so that they could be screened from making decisions affecting such persons in their City positions.</p>	No economic interest; receive or derive income or compensation; volunteer work; person seeking City action; appearance of impropriety

<p>88142.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO_RepresentingOthers/88142.A.pdf</p>	<p>Representation of Other Persons; Appointed Officials</p>	<p>This is a significant, precedential case. The Board determined that an appointed official, a member of the Head Start Advisory Committee, violated the Ordinance's representation of other persons provision by assisting the official's company (of which the official was an owner) in preparing a grant proposal and submitting it to the City's Department of Human Services, because the official would receive or derive income or compensation from it. The Board concluded that, even though the official resigned from the Board, the department was still prohibited from awarding the contract to the now-former official's firm because the contract would be awarded based on a violation of the Ordinance.</p> <p>The Board wrote: "The intent of the [representation of other persons] section is to prevent City personnel from using their special access to the City for their private benefit. It is the Board's conclusion that this harm would not be avoided by awarding [the former official], now resigned, a contract which was itself the result of a process into which he had improper access. Under those circumstances, he would still derive an unfair advantage as a result of his previous association with the City."</p>	<p>Representation; appointed official; Head Start Advisory Committee; assist one's company in preparing documents to be submitted to the City; past violation; wholly unrelated; resignation; effect of resignation; contract award would be prohibited; receive or derive income or compensation</p>
<p>88144.A</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/AO</p>	<p>Non-profit Board Service; Confidential Information;</p>	<p>This is a significant, precedential case. The Board determined that a high-ranking City employee was not prohibited from serving as an unpaid trustee of a major Chicago cultural institution, provided the employee: (i) disclose potential conflicts</p>	<p>Non-profit; not-for-profit; unpaid; volunteer; trust; Chicago cultural institution; recuse at both ends; fiduciary duty; conflict of fiduciary duties; confidential information; representation of third parties; appearance of impropriety; appearance of favoritism; non-</p>

OutsideEmployment/88144.A.pdf	Fiduciary Duty; Representation of Other Persons	<p>of interest to both the institution and the City, (ii) recuse completely from discussions and decisions on issues in the both the City employee's own department pertaining to the institution, and as a trustee; (iii) not disclose confidential information gained in the course of the employee's City employment; and (iv) not represent the institution before the City.</p> <p>The opinion has an extensive discussion of fiduciary duty, appearance of impropriety or favoritism, and representation, and the purposes of each provision.</p>	ministerial action; exercise of discretion; spokesperson; purpose of the fiduciary duty provision; purpose of the representation provision
88148.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec%20Chairs/NerFid/88148.Q.pdf	Outside Employment	<p>A City employee was advised that the Ordinance did not prohibit outside employment with a corporation that was a City vendor, to assist the corporation in preparing MBE (minority owned business enterprise) documents to governmental other than the City, but that the employee was prohibited from representing the outside employer in any transactions before the City, soliciting or receiving any money or thing of value in return for giving advice concerning City business, and from using or disclosing confidential information or using City property.</p> <p>This is a standard outside employment opinion.</p>	Outside employment; second job; assisting in preparing MBE documents; MBE; minority owned business enterprise; money for advice; working for a City contractor; working for a City vendor; outside employment with a City contractor
88153.A https://www.chicago.gov/dam/city/depts/ethics/gen	Travel	The Board determined that a high-ranking City employee who served as an unpaid director of a non-profit organization that received funding from the employee's City department could accept reasonable	Travel; acceptance of award; mutual understanding; appearance of impropriety; service as a board member on a non-profit association; reasonable travel expenses;

eral/AO GiftsTravel/88153.A.pdf		<p>travel expenses from the non-profit to attend a ceremony and accept a beautification award from the non-profit, as there was no evidence that there was any attempt to influence the City employee's judgments by the travel.</p> <p>The Board noted that it would address the City employee's Board service separately, however, as it did raise appearance of impropriety concerns.</p>	<p>beautification; representation of other persons</p>
<p>88156.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO Interest CityBusiness/88156.A.pdf</p>	<p>Financial Interest in City Business</p>	<p>The Board determined that a City employee violated the Ordinance by owning 50% of a business (the other 50% was owned by the employee's spouse) that received \$278,000 in City contracts, including contracts from the employee's own department, and by drawing a salary from that company. The Board recommended that the City take appropriate disciplinary action with respect to the employee. However, records showed that the employee had transferred all 50% of the ownership stake back to the spouse, and no longer played a role in the company's operation. Thus, the Board concluded, future City contracts would not be prohibited, but recommended that they not be with the City employee's department.</p>	<p>Financial interest in City business; business owned 50% by a City employee; transfer of ownership in the business; \$278.000 in City contracts; violation; penalties for violation; employment sanctions</p>
<p>88159.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO GiftsTravel/88159.A.pdf</p>	<p>Gifts</p>	<p>The Board issued a general opinion that honoraria are prohibited, if related to City business and for speeches or seminars rendered during regular City business hours. This would constitute a private benefit.</p>	<p>Honoraria; honorarium; generally prohibited; fiduciary duty; money for advice; double-dipping;</p>

		Note that, in 2012, the Ordinance was amended to explicitly prohibit City employees or officials from accepting any honoraria for speeches, etc. related to their City responsibilities.	
88167.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_CampaignFinancing/88167.q.pdf	Campaign Financing	<p>A City contractor was advised that, under certain circumstances, it may contribute up to \$3,000 in a single reporting year to a candidate for elected City office.</p> <p>Note: this opinion was superseded by Case No. 90067.A, and by the fact that City elections no longer have primaries and general elections, but only one consolidated Municipal Election. 2012 amendments to the Ordinance reflect that the limit is now \$1,500 per year to any candidate for elected City office, or elected official from those persons subject to the limitation.</p>	
88168.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_OutsideEmployment/88168.A.pdf	Outside Employment; City Property	<p>This is a significant, precedential case. The Board determined that a plumber was not prohibited from operating a sewer repair business during off-City hours, but advised the plumber: (i) that the Ordinance prohibited receiving income or compensation for repairs that were the City responsibilities (under the Money for Advice prohibition); and (ii) the Ordinance's City property prohibition did not restrict the plumber from intercepting radio transmissions between sewer repair crews and the City dispatcher, because these were transmitted over public air waves and thereby placed in the public domain;</p>	<p>Outside employment; outside employment; ownership of a sewer repair business; confidential information; public radio transmissions; public airwaves; plumber; sewer repair crews; intercept radio broadcasts; unauthorized use of City property</p>
89005.A	Campaign Financing	<p>This is a significant, precedential case. The Board determined that: (i) a firm,</p>	<p>Campaign financing; lease property; senior executives; City contractor; person; City;</p>

https://www.chicago.gov/content/dam/city/depts/ethics/general/AOCampaignFinancing/89005.a.pdf		<p>person or corporation that leases property from the City is subject to the \$1,500 per year/per candidate campaign or political contribution limitations if the lease is for an amount greater than \$10,000 per consecutive twelve-month period, as a lease is a contract; and (ii) a senior executive of a corporation or firm which is the named contractor in a lease agreement is not thereby subject to the \$1,500 per year/per candidate campaign or political contributions for contributions made from the individual's own personal funds, nor is that individual's contributions aggregated with the corporation's contributions, unless the individual is either a named party to the lease, or has a financial interest in the lease.</p> <p>Note: this second determination was later superseded by 1989 amendments to the Campaign Financing Ordinance, which removed the phrase "no person who has had a financial in "... any City contract within the preceding four years shall make contributions in an aggregate amount exceeding \$1,500 to ..."</p>	<p>contract; lease; agreements; payments from City Treasury; ordinance; services or goods; payment of funds; administered by the City; personal finances; party to City contract; financial interest in a City contract; name of true donor; reimbursed</p>
<p>89006.A</p> https://www.chicago.gov/dam/city/depts/ethics/general/AOPolActivity/89006.A.pdf	<p>Political Activity</p>	<p>This is a significant, precedential case. The Board addressed the issue of <u>coercion</u>. A Board investigation showed that City employees were asked by their superior to attend a meeting at which they were encouraged to support a political campaign. The Board concluded "that there is a high probability that solicitations of campaign contributions under such circumstances are inherently coercive. Therefore, in cases like this, it is our policy</p>	<p>Campaign financing; coerce; coercion; supervisors; direct reports; political contribution; campaign contribution; political activity; fundraising; tickets; pledge cards; solicitation; attendance not required; volunteer; using City employees; presumption; rebuttable presumption; inherently coercive; voluntary; burden of proof; shifting of burden of proof to supervisor</p>

		<p>to presume that City employees who make contributions are coerced, compelled or intimidated to do so. The Board's presumption regarding coercion will be rebutted only by a convincing showing that the employees acted voluntarily."</p> <p>In this case, the Board determined, based on the facts learned, that this presumption of coercion was rebutted and no violation of § 2-156-140(a) was cited.</p> <p>The language regarding the Board's interpretation of coercion also was used in a campaign financing case. See <i>also</i> Case No. 90068.A, involving a company's bundling of employee's personal contributions to a City candidate. That opinion states: "With regard to coercion, we emphasize that the Board always views mere encouragement by superiors to their employees to make political contributions as coercive, unless evidence to the contrary is provided." (emphasis in original).</p>	
<p>89010.A</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/AOCampaignFinancing/89010.a.pdf</p>	Campaign Financing; Pension Funds	<p>This is a significant, precedential case. The Board determined that a firm in which two Pension Funds invested funds was not doing business with the City because the City's four (4) Pension Funds are independent, non-City bodies. Thus, contracts with these Funds are not City contracts, and persons who have contracts with these Funds are not thereby subject to the contribution limitations in the City's Campaign</p>	<p>Pay-to-play; pension advisors; pension funds; MEABF; not a City agency; Illinois Pension Code; not part of the government of the City; state law; Policemen's Pension Fund; Firemen's Pension Fund; Laborers' Pension Fund; body politic and corporate; created by the legislature of the State of Illinois for the benefit or employees of any City, municipal corporation or body politic and corporate; ex officio; offer of pension fund; political action committees; political committees of an elected official</p>

		Financing Ordinance. See <i>also</i> Case No. 141280.A.	
89018.A https://www.chicago.gov/content/dam/city/depts/ethics/general/Decision%20Chairs/LXIV/89018.A.pdf	Representation of Other Persons; Confidential information; Non-profit Board Service	<p>The Board determined that the representation provision prohibits City employees or elected officials from signing documents on behalf of, or allowing their names to appear as a representative of, a private person, here a 501(c) (3) foundation affiliated with a City department, in documents submitted to the City.</p> <p>The Board also discussed that fact that a City employee and other members of the foundation maintained dual membership in a City board and in a private foundation aligned with that board and noted that foundation's by-laws involved an inherent violation of the Ordinance. The Board of Directors of the foundation was identical to the membership of the City board. The purpose of the foundation was to effect the programs of the City board and receive grants from private foundations for City research projects. This relationship put City board members in a position of appearing on foundation contracts with the City as a representative of both parties.</p>	Representation; signing documents to be submitted to a City department; signing contracts; 501(c)(3); non-profit; not-for-profit; by-laws; service on an outside board; dual membership; confidential information; inherent conflict of interests
89021.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_PostEmployment/89021.A.pdf	Post-employment	The Board determined that a Deputy Corporation Counsel in the Law Department who was terminating City employment, but who had been working a project for the City and argued that the City lost up to \$25,000,00 million of the project was not completed, would be prohibited by the Ordinance's one year subject matter restriction from assisting or	Post-employment; departing City employee contracting with the City; one-year subject matter prohibition; City department wishes to retain the services of a former employee; six (6) point test; emergency exception to the post-employment restrictions

		<p>representing the City in this matter, unless the following six (6) conditions were met:</p> <ul style="list-style-type: none"> (i) the departing employee began working on the subject matter prior to contemplation of terminating City employment; (ii) the project's completion is less than 90 days away; (iii) the former employee assists only the City, that is, cannot represent or assist a consultant or other corporate entity; (iv) the project administrator attests to the necessity for the employee's continue work on the project; (v) the former employee's participation benefits the City and does not conflict the post-City employment; and (vi) the compensation is rationally related to the work to be performed <p>Note: the Board refined the law on this issue in Case No. 93018.A.</p>	
<p>89022.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO_Lobby/89022.A.pdf</p>	<p>Lobbyist Registration and Disclosure; Attorneys</p>	<p>The Board determined that "lobbying," "lobbyist," or "lobby" do not include attempts to influence governmental decisions in the context of established procedures of judicial or quasi-judicial proceedings.</p> <p>NOTE: In this case, the Board replaced its 'agency-based' understanding of "administrative action" lobbying with one based on function. If the appearance 'is made in connection with a typical adjudication, it would not constitute administrative lobbying.'</p>	<p>definition of lobbyist; lobbying; lawyers; attorneys; administrative action; legislative action; quasi-judicial procedures; good faith estimates; lump- sum payments; public appearances; revised definition of administrative action; adjudication; broad impact; rulemaking; policy decision</p>

<p>89026.Q</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec%20Chairs/4-15-12/89026.q.pdf</p>	<p>Travel</p>	<p>A City employee was advised that the Ordinance does not prohibit a City department from reimbursing its employees for expenses reasonable necessary for carrying out their official duties and responsibilities, and the Ordinance’s restrictions concerning travel concern primarily travel and hosting expenses provided by non-City sources (or “third party sources”).</p>	<p>Travel expenses paid by the City itself; not governed or regulated by the Governmental Ethics Ordinance; travel paid by non-City sources; third party sources</p>
<p>89058.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO_PostEmploy/89058.A.pdf</p>	<p>Post-employment</p>	<p>This is a significant, precedential case. The Board determined that a former employee who had been responsible for garbage collection and solid waste disposal City wide was prohibited for one year not only from signing any City contract that the post-City might enter within one year of the last date of City employment, but also prohibited from assisting the new employer in the contracting process in any way for one year. Assisting or representing includes helping a new employer or client to seek a contract, as well as to manage such a contract.</p> <p>The opinion states that “the intent of this section is to provide a one-year period in which the ex-employee’s relationships with his former associates in City government can cool. The Ordinance deems the ex-employee to have an unfair advantage over other members of the public in dealing with the City until the one-year period has run its course. Accordingly, the intent of [this Section] would be thwarted if ex-employees were allowed to enter into negotiations with the</p>	<p>Post-employment; one-year subject matter prohibition; “assist or represent”; includes helping a person to seek a contract at any time during the one year prohibition period; signing a contract; advising a new employer on the same subject matter</p>

		City government immediately after leaving their City job, even if no contract were signed during the proscribed period.”	
89060.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_Outside_Employment/89060.A.pdf	Outside Employment; Financial Interest in City Business	The Board determined that a City Police Officer was prohibited from receiving payment under a contract from a different City department for professional services the officer would render as part of an internship, the amount of the payment would constitute a prohibited financial interest in City business, in that it would exceed \$2,500 in a year – which was the then-in-effect monetary threshold.	Independent contract with the City by a City employee; financial interest in any City contract, work or business; Police Officer; student internship; \$2,500 or more in a year; threshold; \$1,000; compensation;
89061.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_GiftsTravel/89061.A.pdf	Travel	The Board determined that a City employee had not violated the Ordinance by accepting travel expenses to attend a job-related conference, even where the expenses were paid by a company that had had City contracts in the past, but that a City employee’s participation in trips or seminars hosted by person who have a potential interest in the actions of the City employee or official, or in the actions of other City departments, may give rise to an appearance of impropriety. The Board went through the requirements that the Ordinance imposed for acceptable business travel: (i) the expense need to be furnished in connection with a public event or ceremony; (ii) the event is related to official City business; (iii) the expenses do not exceed what is reasonably necessary to carry official obligations; (iv) the person paying the expenses is the event’s sponsor; (v) the donor is not anonymous and (vi) there is no mutual understanding between the offeror and	Travel expenses paid by a third party; conference; appearance of impropriety; travel by a City past contractor; conditions for acceptable travel

		City employee or official that the travel would explicitly or implicitly influence in the recipient's governmental decisions.	
89063.A https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_CampFinancing/89063.A.pdf	Campaign Financing	The Board determined that, if a partnership that has a contract with the City in its own name, the individual partners of the partnership may make contributions from their own assets, even if the partnership has already contributed the maximum amount allowed by the Campaign Financing Ordinance.	Campaign financing; political contributions; reimbursements by the partnership; individual contributions; \$1,500 limitation; reimburse; employees; officers; directors
89071.L https://www.chicago.gov/dam/city/depts/ethics/general/AO_Lobby/89071.L.pdf	Lobbyist Registration and Disclosure; Attorneys	<p>The Board determined that a law firm whose attorneys lobbied City officials and employees could not rely on attorney-client privilege or the code of professional responsibility as a justification to withhold disclosing, on the semi-annual lobbying activity report, the amount of compensation paid by the lobbying client to the lobbyist.</p> <p>The firm was told it was in violation and had to comply or pay the per diem penalty.</p>	Lobbying; lobbyist; lobbying activity reports; disclosure report of activity; attorney-client privilege; disclose amounts paid for lobbying; code of professional responsibility; Rules of Professional Conduct; lawyers; attorneys; client confidences; required by law; violation; penalty; compliance; fees paid to an attorney for lobbying; not protected by attorney-client privilege; Corporation Counsel; Law Department; required by law or court order; per diem fines; violation
89087.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_OutsideEmployment/89087.A.pdf	Non-profit Board Service; Outside Employment; Fiduciary Duty	This is a significant, precedential case. The Board determined that a City employee, who was the uncompensated President of a non-profit organization, would not be in violation of the Ordinance if the City awarded a contract to the organization, but that : (i) the employee could not use City employment to benefit the organization; (ii) could not use or disclose confidential information to benefit the organization; (iii) could not represent the organization before any City department or agency; (iv) could not	Volunteer board service; non-profit board of directors; City contract; representation; not-for-profit; fiduciary duty; Mayor's Office; Advisory Committee on Police Dispatch Policy; contract administration; Board may not rule on the appropriateness of the contract

		<p>negotiate this agreement on behalf of the organization or the City: (v) could not use the City position to influence City decisions; (vi) cannot represent company before City; (viii) cannot contact City people for the company; cannot sign such a contract; (ix) cannot allow use of his name in connection with obtaining the contract; (x) cannot disclose confidential information; or (xi) allowing the use of employee's name in connection with this contract.</p> <p>The Board also stated that questions concerning the overall appropriateness of the contract were beyond its jurisdiction, which was limited to determine the Ethics Ordinance would allow a City employee to service in any uncompensated capacity as president with a non-profit that would receive a City contract, and if so, the appropriate restrictions.</p>	
<p>89091.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO_RepresentingOthers/89091.A.pdf</p>	<p>Representation of Other Persons; Appointed Officials; Attorneys</p>	<p>This is a significant, precedential case. The Board determined that an appointed official, who was an attorney and partner in a law firm: (i) was prohibited from personally representing a client before a different City board, the that other Board's work was not wholly unrelated to the appointee's City service or the work of the board on which the official served; and (ii) but that other attorneys in the same law firm could represent clients before that other board, provided that the official did not in any way attempt to influence the outcome or receive money or anything else of value in return for advice or assistance on matter; and (iii) that the</p>	<p>Appointed officials; partner in a law firm; attorneys; lawyers; partners or associates of an appointed official; represent; have an economic interest in the representation of; derive income or compensation from the representation; wholly unrelated; definition of wholly unrelated; general interrelationship between the work of two City boards of commissions</p>

		<p>Ordinance did not prohibit the official from deriving income or compensation from other attorneys' representation in such matters.</p> <p>Note: the opinion has language describing what is not "wholly unrelated": (i) both the representation and the official' service on the commission or board involve the same subject matter; and (ii) there is a general interrelationship on this subject matter between the work of the two commissions</p>	
<p>89087.A</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_RepresentingOthers/89087.A.pdf</p>	<p>Representation of Other Persons; Fiduciary Duty; Outside Employment; Non-Profit Board Service; Confidential Information</p>	<p>This is a significant, precedential case. The Board determined that the Ordinance did not prohibit a City employee from serving as the President of a non-profit organization that contracts with the City, but went through the key restrictions: (i) he could not use his City position to influence City decisions that could affect the organization; (ii) he could not use or disclose confidential information to give an advantage to the organization; (iii) he could not represent the organization before any City agency, department, employee, or official.</p> <p>The Board construed the term "representation" to include negotiating with, contacting, in either in person or by phone or in writing, with City personnel to "promote the interests of the organization" or signing any proposals, contracts or other documents submitted to any City agency.</p>	<p>Outside board service; President of non-profit; contracting with the City; grant; confidential information; volunteer; representation; negotiate; contact either in person or by phone or in writing; promote the interests of; signing proposals, contracts or other documents submitted to any City agency</p>

<p>89094.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO_Employ_Relatives/89094.A.pdf</p>	<p>Employment of Relatives or Domestic Partners</p>	<p>This is a significant, precedential case. The Board determined that the Ordinance prohibits: (i) one relative from employing or advocating the employment of another in the department in which the first services, which includes the hiring of the relatives, or the attempt to influence decisions where the relative a job candidate; and (ii) the ongoing supervision of one relative by another ; but (ii) does not prohibit situations in which relatives work under the same or different supervisors, because there, each is being supervised or “employed” by a third party.</p> <p>The Board also pointed out that any department may adopt more restrictive rules, tailored to its needs, though it advised that such policies should be reviewed by the Corporation Counsel to ensure compliance with other applicable laws.</p>	<p>Nepotism; employ; employment of relatives; ongoing supervision; relatives may work side by side; supervision of a relative prohibited; hiring process; obtaining employment; domestic partner; attempting to influence hiring decisions; job candidate</p>
<p>89095.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO_Outside_Employment/89095.A.pdf</p>	<p>Outside Employment; Sister Agencies; Post-employment</p>	<p>The Board determined that a City employee who owned a public relations agency would be prohibited from bidding on or receiving any City contract that would yield the employee a financial interest in any City contract, work or business – but that this prohibition did not apply to non-City governmental entities such as the CTA, CHA, Board of Education, or Metropolitan Sanitary District. The Board also determined that, if the employee has been involved in any subject matters in which the employee’s firm might bid for City contract, then, were the employee to terminate City</p>	<p>Ownership interest in an outside business; public relations firm; bidding on a City contract; financial interest in any City contract, work or business; sister agencies; CHA; CTA; CPS; Metropolitan Sanitary District; one-year subject matter prohibition; post-employment</p>

		<p>employment, there would be a one-year subject matter prohibition.</p> <p>The opinion implicitly stands for the proposition that the Ordinance does not per se prohibit former employees or firms in which they have ownership or employment from bidding on City contracts.</p>	
<p>89097.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO_GiftsTravel/89097.A.pdf</p>	Gifts	<p>This is a significant, precedential case. The Board determined that a City employee, who was assigned a car by a City contractor for a particular City job, was not prohibited from purchasing the car from the City contractor, provided that the purchase was truly “arm’s length,” at fair market value. However, the Board strongly emphasized that, even if that were the case, the potential for the appearance of impropriety in this situation was considerable, and that any difference between that value and the purchase price would constitute a gift to the employee, and itself create an even greater appearance of impropriety and foster the impression that a City employee was benefitting from a person whose City business the employee could affect, through a discount not available to the public generally, and would invite the possibility of abuse, by for example, inviting contractors to attempt to manipulate the selection and sale of cars to City employee-buyers in order to “purchase favorable treatment.”</p> <p>The Board also noted that, under the Ordinance, it is clear that any personal</p>	<p>Cars; ability to purchase cars provided by City contractors; gift; fair market value; arm’s length; appearance of impropriety; difference between fair market value and actual price; purchase favorable treatment; City resources; using City property for personal gain</p>

		use by City personnel of such cars is prohibited, because the use of such cars is ultimately paid for out of City funds.	
89099.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_PostEmployment/89099.A.pdf	Post-employment	The Board determined that a recently retired City employee who had formed a concrete construction company (which had been certified as an MBE, and which had been approached by contractors, inquiring about potential subcontracts) was advised that the company would be prohibited for one year from bidding on and receiving City contracts that involved the same subject matter(s) in which the employee had participated, and that these restrictions applied even if the company were hired as a subcontractors on such projects.	One-year subject matter prohibition; post-employment; 50-50 Sidewalk Program; concrete construction; certified MBE; Minority Business Enterprise; participated personally and substantially in the subject matter; prime contractor; subcontractor; subcontracting
89100.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_SFI/89100.Q.pdf	Appointed Officials; Statements of Financial Interests	An appointed official was advised that the official must file a Statement of Financial Interests, because only members of those City boards that are solely advisory in nature, or have no authority to making binding decisions or enter into contracts need not file; and the Board of Health, on which the appointee served, have the authority to make contracts and promulgate rules having the force of law. Thus, it was not solely advisory in nature.	Board of Health; not solely advisory; authority to enter into contracts or make binding decisions; Statement of Financial Interests; appointed officials
89102.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_OutsideEmployment/89102.A.pdf	Non-profit Board Service; Outside Employment	The Board determined that a City employee was not prohibited from serving as a paid director of a bank that had no transactions with the City and was not financing transactions between its customers and the City and was not contemplating any such transactions. However, the Board advised the employee of the relevant restriction, including conflict of interests, improper	Dual employment; outside employment; compensated board of directors; bank; financial interest; doing business with the City; representation of other persons; confidential information

		influence, gifts, money for advice, representation, financial interest in any City contract, work or business, and confidential information.	
89103.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_Outside_Employment/89103.A.pdf	Attorneys; Outside Employment	<p>This is a significant, precedential case. The Board determined that a high-ranking City official was not prohibited from working part-time as an attorney for a local corporation, in which the official owned stock options (worth less than .001% of the company), even though the outside employer did business with the City, in the form of a franchise for a specific service within the City, and its sale of equipment and services to City government itself. The Board advised the official of the applicable restrictions, including: conflict of interests; improper influence (the official must recuse from any and all City decisions “touching upon” the outside employer’s interests); financial interest (note: the Board determined that the official did not have a financial interest in the company’s City business, as “simple salary and <i>de minimis</i> stock ownership with not give you such an interest”), but that the official did have a financial interest in the company itself</p> <p>Note: mere employment by a company no longer gives one a financial interest in it—a financial interest means an ownership interest.</p>	Attorneys; local corporation; City contractor; regulated by the City; outside employment; dual employment; second job; lawyers; financial interest in the outside employer; stock ownership; <i>de minimis</i> ; financial interest in any contract, work, or business of the City; outside employment with a City vendor; recuse; conflict of interests; improper influence; receive or derive any compensation or income
89104.A	Post-employment; Prohibited Conduct	The Board determined that a high-ranking City employee who was negotiating with a real estate firm to become a partner in it, after leaving City employment, and then	Appearance of impropriety; considering an offer of employment; negotiating with a potential employer; real estate development consulting services; design and construction

<https://www.chicago.gov/content/dam/city/depts/ethics/general/Decision%20Chairs/LXIV/89104.A.pdf>

to perform work in the area of land management consulting services, and which firm was bidding to be a subcontractor on a City contract, was subject to three significant, precedential prohibitions: (i) the employee was required to recuse from any and all City matters involving the firm, and not assist or advise or assist the firm on City matters in return for anything of value, such as future employment; (ii) after joining the new employer, the City employee would be prohibited for one-year from assisting the employer in any subject matter in which the employee was personally and substantially involved; (iii) permanently prohibited from working on any City contracts over which the employee had contract management authority over them during City tenure; and (iv) the prohibition on using or divulging confidential information.

The Board noted the appearance of impropriety that might occur but found no evidence that the employee had been negotiating with the firm on the basis that it might enable the employee to obtain a private advantage.

Note: in 2012, the Ordinance was amended to prohibit any City employee or official from negotiating the possibility of future employment with any person or firm that has a matter before that employee or official. Prior to that, the Board applied the money for advice provision to arrive at a similar result.

services; DED; Department of Economic Development; Local Neighborhood Associations; First Source grant standards; developer's selection of a contractor; look improper to joining a firm that is bidding for a contract with a developer that has a continuing relationship with the City department; prohibited conduct;

<p>89106.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO_GiftsTravel/89106.A.pdf</p>	<p>Travel</p>	<p>The Board advised a City employee that the Ordinance did not prohibit the employee from accepting reasonable travel expenses to attend an educational foundation's workshop, the fact that the employee had managed City contracts with this foundation in the past, and might in the future (though not at the present time). The employee also asked whether the foundation could compensate the employee for teaching the workshop. The Board advised that, if the employee accepted any payment, the employee would have to recuse in any future City decision involving the foundation. Because of the potential appearance of impropriety in this situation, the Board advised the employee not to accept any compensation.</p>	<p>Reasonable travel expenses paid by a sometime vendor; City contractor; workshop; teaching; private foundation; appearance of impropriety; recuse; received or derive any compensation; City vendor; travel expenses offered</p>
<p>89107.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO_PostEmploy/89107.A.pdf</p>	<p>Post-employment</p>	<p>The Board determined that a former high-ranking Department of Aviation employee was not prohibited from accepting a post-City position with an aviation consulting company that proved services to airlines with lease arrangements with the City, given that the former employee's future work would be limited to marketing services to airports outside of the Chicago area. The Board advised the former employee of the relevant restrictions, however, including the one year prohibition as to the operation or development of Chicago airports (among others); the permanent prohibition as to any City contracts managed by the former employee, and the prohibition on using or divulging confidential information.</p>	<p>Post-employment; former high-ranking Department of Aviation employee; consulting firm to the airlines; one-year subject matter prohibition; future work not involving the Chicago airports; impermeable ethical screens</p>

		Note: the Board implicitly accepted impermeable ethical screens in this case.	
89108.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_PostEmploy/89108.A.pdf	Post-employment	<p>This is a significant, precedential case. The Board determined that a departing high-ranking City employee, who was a registered architect and who dealt with zoning during City employment, and who wished to open an architectural/planning consultancy post-City, was subject to the following: (i) for one year, the employee could not negotiate on, testify regarding or otherwise advocate to any City agency an amendment of the Zoning Ordinance on behalf of a client, or render direct or indirect assistance to a client in securing approval of a zoning amendment, but was not prohibited from working as an architect on plans to be submitted to the City for approval, nor prohibited from certifying that building plans conform to applicable laws, but was prohibited for one year from attempting to influence in any way – beyond designing and drafting – City decisions regarding such plan and regarding the Zoning Ordinance.</p> <p>Note: the opinion contains important descriptive language regarding the purposes of the revolving door prohibitions in the Ordinance,</p>	<p>Post-employment; negotiate, testify or advocate for an ordinance amendment; approval of ordinance amendment; submit plans to City; certify conform to City law; confidential information; Zoning Ordinance; Zoning Committee of City Council; architect; part of the practice of architecture; submitting plans; zoning variances; zoning amendments; Planned Developments; intent of the one-year subject matter prohibition; preventing the appearance of abuse; subject matter of a business transaction; not just the content of a particular transaction, but the general area of City business in which the transaction occurs; architectural consultant; planning consultant; intent of the revolving door provisions; purpose of the post-employment provisions</p>
89109.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_InterestCityBusiness/89109.A.pdf	Financial Interest in City Business	<p>The Board determined that a City employee was not prohibited from applying for or receiving a grant from the City Façade Rebate Program, as long as the grant amount was less than \$5,000. See <i>also</i> Case No. 98035.A, decided under Executive Order 86-1.</p>	<p>Financial interest in any City contract, work or business; Façade Rebate Program; CDBG; Community Development Block Grant program; HUD; Department of Housing and Urban Development; \$5,000</p>

89110.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_Outside_Employment/89110.A.pdf	Outside Employment	The Board determined that a long-time, veteran librarian employed part-time by the Chicago Public Library was not prohibited from working for a consultant hired by the Library to conduct a study on library facilities and the homeless population, because the compensation the librarian would receive would be less than the threshold for a prohibited financial interest in any City contract, work or business.	Consulting agreement; second job; outside employment; Chicago Public Library; librarian; use of library facilities by the homeless population; financial interest in any contractor, work of business of the City
89111.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_GiftsTravel/89111.A.pdf	Travel	The Board determined that several City employees could accept reasonable travel expenses to attend a course sponsored and paid for by a vendor of the City for its government customers, including elected officials and department directors from other government units. The Board went through the requirements that the Ordinance imposed for acceptable business travel: (i) the expense need to be furnished in connection with a public event or ceremony; (ii) the event is related to official City business; (iii) the expenses do not exceed what is reasonably necessary to carry official obligations; (iv) the person paying the expenses is the event's sponsor; (v) the donor is not anonymous and (vi) there is no mutual understanding between the offeror and City employee or official that the travel would explicitly or implicitly influence in the recipient's governmental decisions.	Travel expenses paid by a third party; conference; appearance of impropriety; travel by a City contractor; conditions for acceptable travel; informational conference; other governmental officials and employees invited
89112.A	Travel	The Board determined that a high-ranking City employee could accept reasonable travel expenses from a City vendor; the	Travel expenses paid by a third party; conference; appearance of impropriety; travel by a City contractor; conditions for

https://www.chicago.gov/dam/city/depts/ethics/general/AO_GiftsTravel/89112.A.pdf		<p>vendor had organized and hosted a round table event attended by other governmental officials to develop a product in which the City might be interested. The Board again went through the conditions regarding acceptable travel: the expenses must be reasonable, paid by the sponsor of the event, “public,” and related to official City business.</p> <p>The Board noted that this event qualified as public, in that government officials from Illinois, South Carolina, Wisconsin and Indianapolis were also in attendance.</p>	<p>acceptable travel; informational conference; other governmental officials and employees invited; what is a “public” event; Wisconsin, State of Illinois; South Carolina; Indianapolis</p>
<p>89113.A</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/Decision%20Chairs/LXIV/89113.A.pdf</p>	<p>Political Activity</p>	<p>This is a significant, precedential case. The Board determined that an employee of the City’s Commission on Human Relations (CCHR), who was subject to a ban on participating in “political activity,” by CCHR’s enabling ordinance, but who was an intergovernmental affairs liaison for the City department was not prohibited from attending a dinner-fundraiser sponsored by a political group that focused on issues. The rationale for the decision was that attendance at the fundraiser (which the employee was provided gratis) was not considered ‘active participation’ in the event.</p> <p>Note: this case would be now decided the same way, but for different reasons, in light of a state law not in effect at the time this decision was rendered, namely the Illinois Local Governmental Employees Political Rights Act, 50 ILCS 135/1, <i>et seq.</i> See also Case Nos. 99029.A., 90014.A.</p>	<p>Definition of “political activity”; definition of “prohibited political activity”; attendance at a political fundraiser; free ticket; complementary ticket; gratis; non-partisan, issue-based political action committee; voter registration drive; no contribution; organize, sell tickets to, promote, or participate actively in a fundraising activity of a public officeholder, a candidate in an election, a political party, a political club, or a political organization; what is active participation; mere attendance at an event; part of one’s official City position; intergovernmental affairs liaison; official City responsibilities; issue-based advocacy group</p>

<p>89114.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO_GiftsTravel/89114.A.pdf</p>	<p>Gifts; Conflicts of Interest/Improper Influence; City Property</p>	<p>This is a significant, precedential case. A marketing/ad agency was advised that the Governmental Ethics Ordinance did not prohibit it from passing out its client's food product to Chicago Fire Department personnel and photograph them eating it, because neither the agency nor its client had any contracts or other matters before the Fire Department, and no Fire Department personnel had any monetary interest in the agency or the food manufacturer, and all the Fire Department personnel stood to gain is some publicity and a nominal amount quantity of free food.</p> <p>However, the Board noted – and this has been the touchstone for advice given by the Board in dozens of similar informal opinions over the years – this is a policy question and should be referred to those City officials responsible for press and public relations (such as the Mayor's Office and/or Law Department), and, either the City or any other department may have rules or policies stricter than those contained in the Ordinance.</p>	<p>Advertising; use of City employees or their likenesses in commercial advertising; policy question; City policy matter; Mayor's Office; Law Department; not a prohibited gift; food advertising; Chicago Fire Department; firefighters; fire houses; nominal quantity of food; imprimatur of the City</p>
<p>89119.A</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/memos/89119A.pdf</p>	<p>Post-employment</p>	<p>This is a significant, precedential case. The Board determined – and then reaffirmed (after a request for reconsideration) -- that a former high-ranking employee was permanently prohibited from representing clients before the City in a certain real estate development project, and that the form employee was also prohibited for one year from assisting or representing any new client or employer in any transaction</p>	<p>Department of Economic Development; CDDC; Commercial District Development Commission; ex officio, voting member of the CDDC; received regular, detailed reports; participated personally and substantially in the subject matter; personal and substantial; subject matter; subject matter as a single development project; intent of the post-employment provisions; intent of the revolving door provisions; department head; Commissioner; TIF developments; tax</p>

		<p>with the City involving economic development issues.</p> <p>The opinion also discusses the conditions under which a City employee may be held to have exercised contract management authority with respect to a contract that has not yet come into being at the time the employee leaves City employment, holding that “Contract management authority clearly includes activities related to the formulation of a contract. A finding that a person exercised such authority does not hinge on the single factor of whether or the not the contract actually came into being. The execution of a contract is not a condition precedent for finding that a person exercised contract management authority ... [if it were] there would be absurd results, and the post-employment provisions would be denied much of their intended effect.”</p>	<p>increment financing developments; industrial revenue bonds; land acquisition; kept well informed; proposal submitted after the employee left City employment; formulation of a City contract; contract not yet executed; post-employment; real estate; redevelopment</p>
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<p>89121.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO Interest CityBusiness/89121.A.pdf</p>	Financial Interest in City Business	<p>The Board determined that a City employee was prohibited from receiving loans from the Department of Housing's MULTI Loan Program. The loan would have been a \$200,000 second mortgage, which the employee was required to obtain in order to close on the purchase of a building put up for sale by the CHA (Chicago Housing Authority). The employee had already a first mortgage</p>	<p>Financial interest in any City contract, work or business; MULTI loans; Department of Housing; CHA; Chicago Housing Authority; CIC; Community Investment Corporation; \$200,000 loan; second mortgage;</p>

		from the Community Investment Corporation (CIC). The Board also determined that the Ordinance did not prohibit either of the transactions with the CHA or CIC, but the proposed second mortgage was well above the threshold amount for a prohibited financial interest.	
89122.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec%20Chairs/4-14-12/89122.Q.pdf	Post-employment	A departing employee was given general guidance on the post-employment provisions.	Post-employment; revolving door; general guidance
89123.I https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec%20Chairs/LXIV/89123.I.pdf	Representation of Other Persons; Appointed Officials	<p>The Board received a complaint (which cited a Chicago Tribune article) that an appointed official (the Chair of a City board) had derived an improper private benefit from the official's public office by purchasing property from the City, having it rezoned, and subsequently reselling it at a profit.</p> <p>The Board determined that: (i) it had no jurisdiction over the contracts at issue, which were entered into prior to the Ordinance's effective date, and the Ordinance cannot be applied retroactively; (ii) no investigation was warranted into the allegation that the official had violated the Ordinance by improperly representing the official's firm or interests before another City board or commission, since the matter of zoning or rezoning, or any appearances made by the official before the Departments of</p>	Appointed official; Department of Zoning; Department of Planning and Development; sale of City property; representation; wholly unrelated; ex post facto law; retroactive application of the Ordinance; complaint; reasonable cause to investigate; Chairman of City board or commission; abuse of public office for private benefit; construction contract

		Planning and Development or Zoning on the matter, were wholly unrelated to the work of City commission on which the official served.	
89124.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_Lobby/89124.A.pdf	Lobbyist Registration and Disclosure	<p>An organization that hired lobbyists was advised that Part III of the Lobbyist Disclosure Report required lobbyists to itemize each lobbying-related expenditure over \$250.</p> <p>The organization was also advised that, if its lobbyists and cooperated with City employees in lobbying Springfield or Washington, this activity would be considered lobbying unless the organization and the City independently reach the same position on an issue and then cooperated in lobbying Springfield or Washington. However, if the City's position and decision to lobby in Springfield or Washington was a result of advocacy by the organization, this would constitute lobbying.</p>	Lobbyist activity report; quarterly activity report; expenditures in excess of \$250; itemization; itemize; cooperation in lobbying efforts in Washington or Springfield; attempts to influence City legislative or administrative action; advocacy by the organization; independently reached City position to lobby
89126.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_Outside_Employment/89126.A.pdf	Outside Employment	This is a significant, precedential case. The Board determined that a Chicago Fire Department firefighter, who was also a sales representative for a company that manufactured Personal Distress Devices (PDDs), a company owned by the firefighter's spouse, would violate the Ordinance by: (i) approaching the Department regarding a possible sale, which would be prohibited representation; and (ii) advising the company about selling this equipment to the Department, as that would constitute receiving money for other things of value in return for providing advice of assistance regarding	Outside employment; outside employment; dual employment; second job; sales representative; salesperson; Chicago Fire Department; CFD; firefighter; PDD; Personal Distress Device; spouse; spouse's ownership; financial interest in any City contract, work or business; money for advice; confidential information; representation

		<p>the operation or business of the City (such business clearly not being wholly unrelated to the firefighter's City job).</p> <p>However, the Board also determined that the spouse's company could seek and receive a City contract, as it constituted the spouse's independent occupation, business or profession.</p> <p>Note: this last holding is superseded by subsequent Board decisions (see Case No. 91052.A) in that the firefighter's participation as a sales rep for the spouse's business would make this business not independent, and thus the firefighter's interest in a City contract would be the same as the spouse's.</p>	
<p>89127.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO_PolActivity/89127.A.pdf</p>	Political Activity	<p>The Board determined that a City employee, working in the Human Relations Commission (now the Chicago Committee on Human Relations, or CCHR), and who was, by that department's enabling ordinance, prohibited from engaging in political activity, prohibited from running for a parent position for the Local School Council (LSC).</p> <p>Note: this case was superseded: one month later, the case was reconsidered, as the relevant sections of the Municipal Code, including the relevant enabling ordinances of the Board of Ethics, CCHR, Inspector General, and Procurement Services) were amended to exempt the position of local school council representative from the prohibition on</p>	<p>Political activity; prohibited political activity; Local School Council election; member of Local School Council; not political activity; Board of Ethics; Chicago Commission on Human Relations; CCHR; Inspector General; Procurement Services; Law Department opinion</p>

		political activity. See also Case No. 89130.A.	
89129.A https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec%20Chairs/LXIV/89129.a.pdf	Statements of Financial Interests	The Board determined that the City's Bureau of Standards and Tests was not solely advisory in nature. Therefore, its appointed members must file annual Statements of Financial Interests.	Bureau of Standards and Tests; not solely advisory; authority to enter into contracts or make binding decisions; Statement of Financial Interests; appointed officials
89130.A https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec%20Chairs/LXIV/89130.A.pdf	Political Activity	<p>The Board determined that a City employee, working in the Human Relations Commission (now the Chicago Committee on Human Relations, or CCHR), and who was, by that department's enabling ordinance, prohibited from engaging in political activity, prohibited from running for a parent position for the Local School Council (LSC).</p> <p>Note: this case was superseded: one month later, the case was reconsidered, as the relevant sections of the Municipal Code, including the relevant enabling ordinances of the Board of Ethics, CCHR, Inspector General, and Procurement Services) were amended to exempt the position of local school council representative from the prohibition on political activity. See also Case No. 89127.A. This case file contains an opinion from the Law Department, which is posted along with the opinion.</p>	Political activity; prohibited political activity; Local School Council election; member of Local School Council; not political activity; Board of Ethics; Chicago Commission on Human Relations; CCHR; Inspector General; Procurement Services; Law Department opinion

89141.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec%20Chairs/4-15-12/89141.Q.pdf	Travel	A City employee was advised that another employee in the department could attend the meeting as described in Case No. 890111.A, and receive reimbursement for reasonable travel expenses. The inquiring employee explained that the attendance at the meeting was “imperative.” See Case No.89111.A.	Travel expenses paid by a third party; conference; appearance of impropriety; travel by a City contractor; conditions for acceptable travel; informational conference; other governmental officials and employees invited
89142.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_PostEmploy/89142.A.pdf	Post-employment; Attorneys	This is a significant, precedential case. The Board determined that a former City attorney participated personally and substantially in the People Mover contract at O’Hare, and with respect to various concession agreements, and thus was prohibited for one year from assisting a client – a rental car company – with respect to its concession agreement at O’Hare, even though the attorney had not worked on that particular concession agreement, but on others.	Post-employment; participated personally and substantially in the subject matter; car rental firm; reallocation of rental car facilities; relocation of rental agency at O’Hare Airport; concession agreement; Deputy Corporation Counsel; Law Department; Aviation; lawyer; attorney; People Mover contract; transactional work; subject matter; regulation and interpretation of various airport concession agreements; within the areas of responsibility
89143.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_SFI/89143.A.pdf	Statements of Financial Interests; Appointed Officials	The Board determined that nominees for positions subject to City Council confirmation must file their Statements of Financial Interests with the Board no later than the time when their names are submitted to City Council for consideration, and that that first-time appointed officials do not qualify for the FIS 30-day filing extension.	Statements of Financial Interests; appointed official; time for filing; submission of names to City Council; thirty-day extension; newly appointed official; filing requirements; boards and commissions; 30-day filing extension
89144.A https://www.chicago.gov/content/dam/city/depts/ethics/general/AO	Representation of Other Persons; Non-profit Board Service	The Board determined that nothing in the Ordinance prohibited a City employee from serving as an unpaid Vice President of a non-profit community organization, and that, at community meetings at which other City officials or employees are present, this employee may speak out	Officer of a non-profit organization; community-based organization; speaking up at a community meeting; representation; formal or informal proceeding or transaction before a City agency; Vice President; not-for-profit

OutsideEmployment/88144.A.pdf		<p>and represent the community or the organization, because such meetings were not, in the Board's view, formal or informal proceedings or transactions before any City agency.</p> <p>Note: since this time, City personnel serving as officers of non-profits have been advised more conservatively – that they may speak out at such meetings as <i>residents</i> or <i>members</i> of the organization, but <i>not</i> as <i>officers</i> of the organization.</p>	
<p>89145.Q</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/AOPolActivity/89145.q.pdf</p>	Political Activity	<p>A City high-ranking City employee was advised that another employee in the department did not violate the Ordinance by volunteering for a community organization that was working to implement passage of a statewide referendum, by soliciting signatures. The basis for the opinion was that the definition of political activity made no reference to activities as a member of a non-partisan community organization working on behalf of a referendum.</p>	<p>Political activity; prohibited political activity; referendum; passage of a referendum; volunteering; gathering signatures for a petition; non-partisan community organization; no violation</p>
<p>89146.Q</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/AOPolActivity/89146.q.pdf</p>	Political Activity	<p>A City employee was advised that it was not a violation of the Ordinance (not prohibited political activity) to work as an investigator for the Chicago Board of Election Commissioners, on uncompensated time. Investigators served as troubleshooters at election sites; the position was non-partisan. The basis for the opinion was that the definition of political activity states: “acting as a recorder, watcher ... or similar officer at the polls on behalf of a political party or candidate in an election,” but this was non-partisan activity.</p>	<p>Political activity; prohibited political activity; investigator for the Chicago Board of Election Commissioners; non-partisan position; definition of political activity; not a violation</p>

<p>89147.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO_ConflictOfInterest/89147.A.pdf</p>	<p>Conflicts of Interest/Improper Influence; Attorneys; Appointed Officials</p>	<p>This is a significant, precedential case. The Board determined that a law firm and an investment firm – both of which had partners who were recent appointees to the Police Board – could continue to do business with the City, because the business was wholly unrelated to the appointees' duties and responsibilities with the Police Board and thus would not give them a prohibited financial interest in any contract, work or business of the City.</p> <p>Moreover, the Board determined that the Police Board member who was an attorney was not prohibited from representing clients before City agencies or in judicial or quasi-judicial proceedings in which the City was an adverse party, as long as the matters were wholly unrelated to the work of the Police Board. The Board also determined that the member who was an investment banker could negotiate with the City on behalf of the firm to serve as an underwriter for equipment notes or bonds, because, although the Police Board approves the Police Superintendent's budget recommendations, it does not exercise discretion or make recommendations regarding police equipment purchases.</p>	<p>Police Board; appointed officials; wholly unrelated; investment banker; attorney; partner in a law firm; City contract; recusal; representation in wholly unrelated matters; judicial or quasi-judicial proceedings or cases; Police Superintendent; police equipment notes; financial interest in any contract, work or business of the City</p>
<p>89151.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO_PostEmployment/89151.A.pdf</p>	<p>Post-employment; Attorneys</p>	<p>The Board determined that a former City employee, who was an attorney, was not prohibited from representing clients in judicial and quasi-judicial tax assessment appeals, provided the former employee/attorney decline representation in cases in which the attorney had been counsel of record or with which the former</p>	<p>Post-employment; counsel of record in a judicial or quasi-judicial proceeding; participated personally and substantially in a judicial or quasi-judicial proceeding; Department of Revenue; tax assessments; had any contact or involvement whatsoever; litigator; litigation work</p>

		employee/attorney had had contact or involvement whatsoever while a City employee. Cf. Case No. 151698.A.	
89154.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_RepresentingOthers/89154Q.pdf	Representation of Other Persons; Appointed Officials; Attorneys	<p>A City appointed official who was an attorney was advised that, if the official were to decline compensation for serving on the City board represent clients in lawsuits against the City, as long as that representation was wholly unrelated to the work of the official's City commission.</p> <p>Note: the rationale of this decision was later superseded: it assumes that a board or commission member who receives compensation for such board service is an "employee," not an "appointed official" for purposes of the Ordinance. Cf. Case No.02041.A.</p>	Appointed official; employee; stipend for board or commission services; represent clients in judicial proceedings in which the City is a party and its interests adverse to the client; wholly unrelated
89155.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/Decision%20Chairs/June/89155.A.pdf	Conflicts of Interest/Improper Influence; Appointed Officials	A City official was advised that members of a City board were prohibited from participating in board decisions or other City matters in which they had some sort of personal monetary or economic interest. The opinion specifically notes that, if an accounting firm were to pay a law firm for the law firm's services, then any board member who has an economic or monetary interest in the law firm should recuse from any board decision regarding whether to retain the accounting firm's services.	Board or commission members; accounting firm; law firm; economic interest in the firm; recuse; distinguishable from the general public; codes of professional responsibility
89156.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec	Outside Employment	A clerical City employee was advised that the Ordinance did not prohibit outside employment doing clerical work with a City contractor; 50% of the company's business being its City contracts. The employee was advised of the money for advice prohibitions, as well as the	Outside employment; outside employment; dual employment; second job; clerical employment; secretarial work; administrative assistant; money for advice; City contractor

k%20Chairs/NerFid/89156.Q.pdf		prohibitions on using or divulging confidential or non-public information, and representation.	
89157.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/AOInterestCityBusiness/89157.Q.pdf	Financial Interest in City Business	A City employee was advised that the Ordinance did not prohibit applying for or receiving a grant from a City department for \$1,500, since this was below the threshold for a prohibited financial interest. Note: the threshold was lowered to \$1,000 in 2012.	Financial interest in any City contract, work or business; grant from a City department; applying for a grant; \$1,000; \$2,500; \$5,000
90012.A https://www.chicago.gov/content/dam/city/depts/ethics/general/Deck%20Chairs/LXIV/90012.a.pdf	Post-employment	<p>This is a significant, precedential case. The Board received a request from a departing City contracts administrator who wished to become a partner/owner in a heating and air conditioning (HVAC) business, asking whether the business could bid on City contracts. During the last year of the employee's City service, the employee had evaluated bids and recommended contract awards for equipment other than HVAC, but had previously (up until 18 months prior to requesting this opinion) supervised the heating and air conditioning commodity class of contracts, but, through the department's "buddy system," continued to work on HVAC contracts, as "understudy." Some of the HVAC contracts, however, were re-bid annually. The employee was a part-time employee during the final six (6) weeks of City employment.</p> <p>On these facts, the Board determined:</p>	part-time employment; bidding on City contracts; buddy system; understudy; contract administrator; annually re-bid contracts; same contract; that as to that contract; when is re-bid contract a different contract; one-year subject matter prohibition; subject matter; HVAC; heating and air conditioning contracts; purchases; commodity group; post-employment; when do the post-employment restrictions begin; last year of City employment or service; participated personally and substantially in the subject matter; contract management authority; signing contracts; recommending contract awards

		<p>(i) the Ordinance’s post-employment provisions applied to the employee’s work during the last six (6) weeks as a part-time employee;</p> <p>(ii) that the employee had participated personally and substantially in the City’s HVAC contracting and maintenance processes, and was thus subject to a one-year prohibition as to this subject matter, beginning on the employee’s final date of City employment (full- or part-time);</p> <p>(iii) even though the employee did not sign contracts during City employment, by recommending contract awards, the employee did exercise contract management authority over those contracts that ensued and thus was permanently prohibited from assisting a new employer or client or business in performing those contracts;</p> <p>(iv) contracts that were re-bid were considered new contracts, in that they had new specifications and went through a new evaluation process.</p>	
90013.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_CampFinancing/90013.A.pdf	Sister Agencies; Campaign Financing	<p>This is a significant, precedential case. The Board determined that, for purposes of the Governmental Ethics and Campaign Financing Ordinances, the following government agencies are not City agencies, and their employees or appointees are not subject to the City’s ordinances as employees or officials. The opinion explains the criteria for what makes a governmental body a “City agency”:</p>	<p>City agency; sister agency; what is a City agency; any commission or board created by ordinance with legal duties and responsibilities would qualify as a division of the government of the City; a commission or board created by state statute may or may not be a City agency, depending on the facts; Public Building Commission; PBC; Chicago Park District; Chicago Transit Authority; CTA; Regional Transportation Authority; RTA; Chicago Housing Authority; CHA;</p>

		<p>Public Building Commission: not a City agency;</p> <p>Chicago Park District: not a City agency;</p> <p>Chicago Transit Authority: not a City agency;</p> <p>Regional Transportation Authority: not a City agency;</p> <p>Chicago Housing Authority: not a City agency;</p> <p>Metropolitan Pier and Exposition Authority: not a City agency;</p> <p>Chicago Board of Education: not a City agency;</p> <p>Chicago Public Library: yes, a City agency.</p>	<p>Metropolitan Pier and Exposition Authority; McPier; Chicago Board of Education; Chicago Public Schools; CPS; Chicago Public Library; CPL</p>
<p>90014.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO_PolActivity/90014.A.pdf</p>	Political Activity	<p>The Board determined that a City employee who was subject to a ban on participating in “political activity” but who was an intergovernmental affairs liaison for the City department was not prohibited from attending a dinner-fundraiser sponsored by a political group that focused on issues. The rationale for the decision was that attendance at the fundraiser (which the employee was provided gratis) was not considered 'active participation' in the event.</p> <p>Note: this case would be now decided the same way, but for different reasons, in</p>	<p>Definition of “political activity”; definition of “prohibited political activity”; attendance at a political fundraiser; free ticket; complementary ticket; gratis; non-partisan, issue-based political action committee; voter registration drive; no contribution; organize, sell tickets to, promote, or participate actively in a fundraising activity of a public officeholder, a candidate in an election, a political party, a political club, or a political organization; what is active participation; mere attendance at an event; part of one’s official City position; intergovernmental affairs liaison; official City responsibilities; issue-based advocacy group</p>

		light of a state law not in effect at the time this decision was rendered, namely the Illinois Local Governmental Employees Political Rights Act, 50 ILCS 135/1, <i>et seq.</i> See also Case Nos. 99029.A., 89113.A.	
90016.A https://www.chicago.gov/content/dam/city/depts/ethics/general/Decision%20Chairs/LXIV/90016.A.pdf	Post-employment	<p>This is a significant, precedential case. The Board determined that a former high-ranking City employee had violated both of the Ordinance's post-employment prohibitions. The Board recommended that the Department of Planning & Development consider cancelling contracts and other permits and bringing a lawsuit for an accounting to recover pecuniary benefits realized by the former employee in violation of the Ordinance. The basis for the Board's determination was that the former employee and the employee's division had gathered significant, precedential information regarding an RFP (request for proposals) and negotiating with other City departments that had interests in the particular site, and during the first year of post-City career, had not only contacted the department about the status of the project, but had spoken on behalf of the developer at a pre-proposal meeting, and attended a City-sponsored community meetings held after bids on the RFP had been submitted.</p> <p>The same former high-ranking employee also was the subject of Case No. 90024.A and requested reconsideration of both cases. The Board denied the request and</p>	<p>Former high-ranking City employee; one year subject matter prohibition; TIF; tax increment financing; consultant; RFP; request for proposals; subject matter; participated personally and substantially in the subject matter; contact management authority; violation; revolving door; post-employment restrictions; file a lawsuit for an accounting and damages; cancellation of contracts; sanctions; penalties; TIF subsidy; attend meetings discussing TIF financing; reconsideration; imposition of sanctions; action for accounting; contact the former department regarding status inquiries; speak at community meetings</p>

		did not change its determinations in either case.	
90017.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_GiftsTravel/90017.A.pdf	Travel	This is a significant, precedential case. A high-ranking City official was advised that the Ordinance did not prohibit acceptance of a travel package offered for a two-day program from a national defense organization to civilian leaders; the sponsoring organization had no business before the City and was unrelated to the official's City position.	Travel; unrelated to City business or position; outside business, employment or community activities of the official or employee; not offered or enhanced because of the official position, candidacy or employment of the official or employee; national defense organization; restricted gift source; prohibited gift source mutual understanding
90018.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/Decision%20Chairs/NerFid/90018.Q.pdf	Outside Employment	A City employee who owned a health care consulting firm was advised that the Ordinance did not prohibit the firm from bidding on a contract with another, non-City government agency, given that the project would be unrelated to the employee's City job, and no City funding would be involved. The employee was advised of all restrictions relevant to outside business ownership, including improper influence, conflicts of interest, fiduciary duty, and representation, financial interest in City business, money for advice, confidential information, and use of City property.	Outside business ownership; outside employment; dual employment; health care consulting; solicit or receive money or anything of value in return for advice or assistance on matters concerning the operation or business of the City; hospital patients
90020.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_OutsideEmployment/90020.A.pdf	Outside Employment	This is a significant, precedential case. A City employee was asked to teach two courses at a public college system. The first was for managers and owners of business, and those seeking employment as inspectors, including for the City, and for current City employees who were seeking a promotion. The other was for professional certification, geared toward City employees.	Teaching; certification class; field supervisors; public colleges; inspectors; solicit or accept money or any other things of value in return for advice or assistance on matters concerning the operation or business of the City; promotion of former students

		<p>The Board determined that teaching these classes would be prohibited by the money for advice provision of the Ordinance, reasoning that the employee would have been paid to instruct students (and the school) on City Ordinances, certification, and City processes. Given the employee's City job description, the Board also found there to be a likelihood of creating an appearance of impropriety, both with regard to enforcement of inspection regulations, and in the potential hiring and promotions of inspectors in the employee's own department who had taken the employee's class. See <i>also</i> Case No. 91057.A.</p>	
<p>90021.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO_SF1/90021.A.pdf</p>	Statements of Financial Interests	<p>This is a significant, precedential case. The Board considered the case of a City employee who had failed to disclose a financial interest in real estate located in the City, but who had disclosed it in his personnel file, and who offered to amend the Statement, and who maintained that the omission was not based on intent to file a false or misleading Statement. The Board concluded that there was insufficient evidence from which to determine that the employee intended to mislead the Board and recommended no disciplinary action in the matter.</p>	Statement of Financial Interests; disclosure of a financial interest in real estate located in the City; failure to disclose; incomplete filing; intent to furnish false or misleading information to the Board of Ethics; evidence of intent; personnel file; erroneous Statement; offer to amend; insufficient evidence from which to infer intent
<p>90022.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO_GiftsTravel/90022.A.pdf</p>	Gifts	<p>This is a significant, precedential case. The Board determined that a City employee could accept and use a prize won in a random drawing for complementary registration fees for a professional conference worth \$800. The Board reasoned that it was a random</p>	Gifts; prize; professional conference; random drawing; economic interest in a specific City business transaction; worth more than \$50; worth more than \$500; mutual understanding; professional society; Continuing Professional Education; CPE; CLE; acceptance of a prize

		<p>drawing, and the donor of the prize had no business with the City, thus it was unlikely that the gift/prize would influence the City employee's decisions or action. The Board also advised that the employee report the gift/prize on the following year's Statement of Financial Interests, because it was worth more than \$500.</p>	
<p>90023.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO_ApptOfficials/90023.a.pdf</p>	Appointed Officials	<p>The Board discussed the structure of a newly formed Commission, its eight (8) advisory councils, and their staff. It determined that the political activity prohibitions applied (under the Ordinance then in effect) to all Commission members (appointed officials) and employees, and to the Chairs of the Advisory Councils by virtue of their <i>ex officio</i> membership on the Commission. The director and staff of the Councils likewise were subject to prohibited political activity because they were considered employees of the Commission. The Advisory Councils were determined to be 'solely advisory'.</p>	City Commission; Advisory Councils; City employees; appointed officials; political activity prohibition
<p>90024.A</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/Decision%20Chairs/LXIV/90024.A.pdf</p>	Post-employment	<p>This is a significant, precedential case. The Board determined that a former high-ranking employee had violated the Ordinance's one year subject matter prohibition by assisting a new client in the "planning and community process" for a real estate development project and by hiring a TIF (tax increment financing) consultant for a real estate development. The Board reasoned that the employee had been personally and substantially involved in seeking financing for this project while a City employee and had attended meetings about at which the</p>	Former high-ranking City employee; one year subject matter prohibition; TIF; tax increment financing; consultant; hiring TIF consultant; planning and community process; subject matter; participated personally and substantially in the subject matter; contact management authority; violation; revolving door; post-employment restrictions; file a lawsuit for an accounting; cancellation of contracts; sanctions; penalties; TIF subsidy; attend meetings discussing TIF financing; reconsideration; imposition of sanctions; action for accounting and damages

		<p>possibility of a TIF subsidy for the project was discussed. The Board recommended that the department impose appropriate sanctions, including considering filing suit for damages for pecuniary benefits received by the former employee.</p> <p>The same former high-ranking employee also was the subject of Case No. 90016.A and requested reconsideration of both cases. The Board denied the request and did not change its determinations in either case.</p>	
90025.A https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec%20Chairs/LXIV/90025.A.pdf	Statements of Financial Interests	The Board determined that an appointed official who had argued that the Electrical Commission, on which the official served, was solely advisory, was in fact solely advisory, and its members not required to file annual Statements of Financial Interests.	Electrical Commission; solely advisory in nature; appointed officials; no authority to make binding decisions; to enter into contracts, or to make expenditures
90026.I https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec%20Chairs/LXIV/90026.I.pdf	Post-employment	This is a significant, precedential case. After receiving a complaint from a department alleging that a former high-ranking departmental employee was in violation of the post-employment provisions of Ordinance, the Board conducted an investigation. It determined that the former City employee's consulting work for a real estate development firm, assisting the firm in restructuring a residential project, was performed in violation of the permanent post-employment prohibition. It based this determination on the following: (i) the former employee's involvement in the project while employed by the City	Former high-ranking City employee; one year subject matter prohibition; contract management authority; consultant; business transaction involving the City; CHA; Chicago Housing Authority; renegotiation of a City loan; negotiate a loan; execute a development agreement; subject matter; participated personally and substantially in the subject matter; violation; revolving door; post-employment restrictions; file a lawsuit for an accounting; cancellation of contracts; sanctions; penalties; attend meetings discussing financing; imposition of sanctions; action for accounting and damages; apartment building; affordable housing

		<p>constituted contract management authority, in that the employee negotiated a City loan for the property, executed it, and began supervising the redevelopment of the project soon thereafter; (ii) the assistance the former employee was providing to the new employer constituted a business transaction involving the City, because, in the time since the former employee had left City employment, the project had changed, and continued work would necessitate renegotiating the terms of this same loan, which the former employee had originally negotiated, and this attempt to convert the same project from a cooperative into a rental property constituted assisting the developer in a 'business transaction involving the City.</p> <p>Thus, the Board determined that the former employee had violated the Ordinance's permanent prohibition, and recommended that the former employee immediately cease all activity on this project, and if the employee failed to do so, that the Corporation Counsel pursue legal action against the former employee.</p>	
90027.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_Outside_Employment/90027.A.pdf	Non-profit Board Service; Outside Employment	The Board determined that an appointed official (who received a stipend) was not prohibited from serving concurrently as the president of a private foundation and as Chair of the City Board, as long as the private foundation position did not take up so much time as to prevent the official from performing duties as Chair. The Board noted that the Ordinance does not prohibit dual employment per se and	Non-profit board service not per se prohibited; foundation president; compensated appointed official; not for profit officer

		advised the official to contact the Board if questions arose.	
90028.A https://www.chicago.gov/dam/city/depts/ethics/general/AO Interest CityBusiness/90028.A.pdf	Financial Interest in City Business	<p>This is a significant, precedential case. This case (like the others cited below) raised two (2) central issues: (i) could City employees purchase or receive City-owned real estate or property the Urban Homestead Program; and (ii) could City employees receive loans in amounts greater than \$5,000 (the then-current threshold for a financial interest) from programs administered or funded by the City, such as the Section 312 Rehabilitation Loan Program?</p> <p>The Board determined that the Ordinance did prohibit City employees from receiving property through the Urban Homestead Program but that, because the employees who had applied to the program disclosed their City employment status, but were still approved, then were lucky and won a lottery, awarding them the property, and then had expended considerable sums of money in rehabilitating their properties, it would be contrary to the principles of equity, good conscience and justice to prohibit them from further participation at this late stage.</p> <p>The Board also determined that City employees are prohibited from receiving loans of \$5,000 or more from loan programs administered by City departments, such as the Section 312 program, as that would constitute a financial interest in City business.</p>	<p>Section 312 Rehabilitation loans; Urban Homestead loans; principles of equity and justice; financial interest in any City contract, work or business; expended considerable sums of money; principal residence; principles of equity, good conscience, justice and fairness; no attempt to conceal City employment; administered by the City; Department of Housing; HUD; federal funds; any interest with a cost or present value of \$5,000 or more</p>

		See <i>also</i> Cases 90029.A, 90033.A, and 90040.A, and 90062.A, and cf. Case No. 90057.A.	
90029.A https://www.chicago.gov/dam/city/depts/ethics/general/AO Interest CityBusiness/90029.A.pdf	Financial Interest in City Business	<p>This is a significant, precedential case. This case (like the others cited below) raised two (2) central issues: (i) could City employees purchase or receive City-owned real estate or property the Urban Homestead Program; and (ii) could City employees receive loans in amounts greater than \$5,000 (the then-current threshold for a financial interest) from programs administered or funded by the City, such as the Section 312 Rehabilitation Loan Program?</p> <p>The Board determined that the Ordinance did prohibit City employees from receiving property through the Urban Homestead Program but that, because the employees who had applied to the program disclosed their City employment status, but were still approved, then were lucky and won a lottery, awarding them the property, and then had expended considerable sums of money in rehabilitating their properties, it would be contrary to the principles of equity, good conscience and justice to prohibit them from further participation at this late stage.</p> <p>The Board also determined that City employees are prohibited from receiving loans of \$5,000 or more from loan programs administered by City departments, such as the Section 312 program, as that would constitute a financial interest in City business.</p>	<p>Section 312 Rehabilitation loans; Urban Homestead loans; principles of equity and justice; financial interest in any City contract, work or business; expended considerable sums of money; principal residence; principles of equity, good conscience, justice and fairness; no attempt to conceal City employment; administered by the City; Department of Housing; HUD; federal funds; any interest with a cost or present value of \$5,000 or more</p>

		See <i>also</i> Cases 90028.A, 90033.A, and 90040.A, and 90062.A, and <i>cf.</i> Case No. 90057.A.	
90030.I https://www.chicago.gov/dam/city/depts/ethics/general/AO_ConflictOfInterest/90030.I.pdf	Conflict of Interests; Fiduciary Duty	<p>This is a significant, precedential case. The Board received a written complaint from a City Department Head asking for assistance in determining whether a departmental employee had violated the Ordinance by contracting with a construction company to perform work on the employee's four (4) unit building. The employee regularly conducted City business with this contractor/construction company. The employee and a contractor then had a contractual dispute over this work, and the contractor complained to the Department that its matters and bids were being turned down due to this dispute.</p> <p>The Board referred the matter to the Inspector General for investigation. The Inspector General returned an investigative report in which it concluded that the allegations were not sustained. The question before the Board then was whether the employee had violated the Ordinance by privately contracting with a construction company over which the employee had some authority.</p> <p>The Board issued a final opinion in the matter discussing the conflict of interests, improper influence and fiduciary duty provisions, and determined that the conflict of interests and improper influence provisions did not apply,</p>	Complaint from a Department Head; conflict of interests; private contracts with person dealing with City department; construction contractor; conflict of interests; improper influence; fiduciary duty; put the City's best interest before personal gain; make objective decisions; disinterested; private dispute; economic interest in the matter; distinguishable from that of the general public; Inspector General; investigation; not sustained; substantiating the allegations; final opinion; departmental guidelines; contract bid; appearance of impropriety; enact departmental rules or policies stricter than those in the Governmental Ethics Ordinance;

		<p>because the private contract between the parties did not involve any governmental decisions, and that the investigation revealed no evidence that substantiated the allegation that the employee denied the construction firm a City contract in an effort to prevail over the contractor in their private dispute. In fact, the investigation revealed that the contractor's bids were rejected because they did not meet departmental guidelines. However, the Board recommended that the department institute a policy prohibiting its employees from entering into private contracts with any firms or persons that had dealings with the department, thereby preventing situations in which employees would be placed in the position of supervising work of City construction contractors with whom they have privately contracted. See <i>also</i> Case No. 94017.A. Cf. Personnel Rule XXIX, Section 2(b)(i).</p>	
<p>90031.I</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec%20Chairs/LXIV/90031.I.pdf</p>	<p>Post-employment; Lobbyist Registration and Disclosure</p>	<p>After investigating an anonymous complaint alleging violations of the Ordinance's post-employment restrictions by a former high-ranking City employee (the complaint attached a Chicago Tribune article about the former employee's post-City position), the Board concluded that there was no evidence that the former City assisted or represented the post-City employer in obtaining a City contract. In coming to its opinion, the Board reviewed City records and information supplied by a current high-ranking City employee in the same department. The Board also determined that the former employee engaged in no</p>	<p>Post-employment; contract management authority; anonymous complaint; investigation; reasonable cause; lobbying; lobbyist</p>

		activity indicating that the former City employee would need to register as a lobbyist, as the complainant also suggested.	
90033.A https://www.chicago.gov/dam/city/depts/ethics/general/AO Interest CityBusiness/90033.A.pdf	Financial Interest in City Business	<p>This is a significant, precedential case. This case (like the others cited below) raised two (2) central issues: (i) could City employees purchase or receive City-owned real estate or property the Urban Homestead Program; and (ii) could City employees receive loans in amounts greater than \$5,000 (the then-current threshold for a financial interest) from programs administered or funded by the City, such as the Section 312 Rehabilitation Loan Program?</p> <p>The Board determined that the Ordinance did prohibit City employees from receiving property through the Urban Homestead Program but that, because the employees who had applied to the program disclosed their City employment status, but were still approved, then were lucky and won a lottery, awarding them the property, and then had expended considerable sums of money in rehabilitating their properties, it would be contrary to the principles of equity, good conscience and justice to prohibit them from further participation at this late stage.</p> <p>The Board also determined that City employees are prohibited from receiving loans of \$5,000 or more from loan programs administered by City departments, such as the Section 312</p>	<p>Section 312 Rehabilitation loans; Urban Homestead loans; principles of equity and justice; financial interest in any City contract, work or business; expended considerable sums of money; principal residence; principles of equity, good conscience, justice and fairness; no attempt to conceal City employment; administered by the City; Department of Housing; HUD; federal funds; any interest with a cost or present value of \$5,000 or more</p>

		<p>program, as that would constitute a financial interest in City business.</p> <p>See <i>also</i> Cases 90028.A, 90029.A, and 90040.A, and 90062.A, and <i>cf.</i> Case No. 90057.A.</p>	
<p>90035.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO_RepresentingOthers/90035.A.pdf</p>	<p>Fiduciary Duty; Representation of Other Persons; Attorneys; Appointed Officials; Elected Officials; Relationship to Other Laws</p>	<p>This is a significant, precedential case. In light of the Illinois Supreme Court's then-recent decision in the case of <i>In re Vrdolyak</i>, an alderman requested that the Board clarify whether aldermen or appointed officials who are also attorneys may represent City employees with Workers' Compensation claims—which are judicial or quasi-judicial proceedings in which the City is a party and its interests are adverse to the City employees'/clients' interests.</p> <p>First, the Board stated it had may render advisory opinions only as to chapter 2-156 of the City's Municipal Code, that Governmental Ethics Ordinance, not to the rules of professional conduct for Illinois attorneys.</p> <p>Second, the Board stated it must follow the law as set forth by the Illinois Supreme</p>	<p>Elected officials; alderman; attorneys; lawyers; appointed officials; members of City boards and commissions; fiduciary duty; Worker's Compensation matters; quasi-judicial proceedings; in which the City is party and that person's interest is adverse to the City; Illinois Industrial Commission; actions; lawsuits; Finance Committee; public duties; <i>In re Vrdolyak</i>; Illinois Rules of Professional Conduct; <i>pro bono</i>; irresolvable conflict; competing fiduciary duties; <i>qua</i> attorney; public trust; represent; receive or derive compensation from the representation of; judicial proceedings; adverse party; where the City's interests are adverse; City treasury; voting; settlement</p>

Court and apply the Governmental Ethics Ordinance only to the extent that it does not conflict with that Court's decisions.

Third, the Board determined that aldermen who are lawyers are prohibited from representing clients in Worker's Compensation cases against the City, even if they receive no compensation.

Fourth, it determined that members of boards and commissions who are attorneys are not prohibited from taking on such representation, or deriving income or compensation from it, as long as the representation is wholly unrelated to their City duties and responsibilities.

The Board then engaged in a lengthy discussion of an alderman's and an appointed official's fiduciary duty to the City, stating that they must be able to exercise professional judgments free from outside influence or conflicting duties to another entity – this is distinct from their fiduciary duties owed to their law clients as attorneys. Aldermen owe a very broad fiduciary duty to the City, and are accountable to the public in a way that is much more expansive than are appointed officials – so, when an alderman, who is an attorney, represents a client in a Worker's Compensation case against the City, he or she faces an irresolvable conflict between competing fiduciary duties, and thus are prohibited by the Ordinance fiduciary duty section

		from representing City employees in such matters. See <i>also</i> Case No. 03027.A.	
90036.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_GiftsTravel/90036.A.pdf	Gifts	This is a significant, precedential case. The Board determined that a City employee could accept travel discounts on behalf of the City for business travel, but was prohibited from entering their name into drawings for tickets to the company's Wrigley Field Skybox or a trip to Tahiti, because the employee's eligibility for such drawings was contingent upon answering a survey regarding the City's travel plans, and these gifts were intrinsically personal, and not appropriate as gifts to the City. Note: the case is important in delineating what is an appropriate gift to the City: it must be usable for City business purposes.	Money for advice; sales promotion; solicit or accept any money or other thing of value in return for advice or assistance on matters concerning the operation or business of the City; prohibited gift; answering a survey; Wrigley Field Skybox; Tahiti trip; drawing; chance contest; appropriate gift to the City; intrinsically personal gifts; corporate travel; travel discounts for City business; gift acceptable as a gift to the City
90037.I https://www.chicago.gov/dam/city/depts/ethics/general/AO_Lobby/90037.I.pdf	Lobbyist Registration and Disclosure	A citizen filed a complaint alleging that a person had engaged in unregistered lobbying activity on behalf of a client. The Board spent considerable resources investigating the complaint, and then the citizen withdrew it. However, the citizen was advised that work on behalf of the client was confined to media relations – radio, television and newspapers – and there was no evidence that indicated the alleged lobbyist had had any contact on behalf of the client with any City employees or official in either the executive or legislative branches. The citizen was thanked for filing the complaint.	Citizen complaint; lobbyist; lobbying; media contacts; press relations; newspapers; radio; television; contact with City officials or employees is required; unregistered lobbying activity; definition of lobbyist
90040.A	Financial Interest in City Business	This is a significant, precedential case. This case (like the others cited below)	Section 312 Rehabilitation loans; Urban Homestead loans; principles of equity and

[https://www.chicago.gov/dam/city/depts/ethics/general/AO Interest CityBusiness/90040.pdf](https://www.chicago.gov/dam/city/depts/ethics/general/AO%20Interest%20CityBusiness/90040.pdf)

raised two (2) central issues: (i) could City employees purchase or receive City-owned real estate or property the Urban Homestead Program; and (ii) could City employees receive loans in amounts greater than \$5,000 (the then-current threshold for a financial interest) from programs administered or funded by the City, such as the Section 312 Rehabilitation Loan Program?

The Board determined that the Ordinance did prohibit City employees from receiving property through the Urban Homestead Program but that, because the employees who had applied to the program disclosed their City employment status, but were still approved, then were lucky and won a lottery, awarding them the property, and then had expended considerable sums of money in rehabilitating their properties, it would be contrary to the principles of equity, good conscience and justice to prohibit them from further participation at this late stage.

The Board also determined that City employees are prohibited from receiving loans of \$5,000 or more from loan programs administered by City departments, such as the Section 312 program, as that would constitute a financial interest in City business.

See also Cases 90028.A, 90029.A, 90033.A, and 90062.A, and *cf.* Case No. 90057.A.

justice; financial interest in any City contract, work or business; expended considerable sums of money; principal residence; principles of equity, good conscience, justice and fairness; no attempt to conceal City employment; administered by the City; Department of Housing; HUD; federal funds; any interest with a cost or present value of \$5,000 or more

<p>90041.Q</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/AO InterestCityBusiness/90041.Q.pdf</p>	<p>Financial Interest in City Business</p>	<p>A City employee was advised that participation in a City department's grant program was not prohibited, because the maximum grant possible under the program was \$3,000, which did not exceed the then-current \$5,000 threshold for a prohibited financial interest. The Board wrote the administering department that the employee's participation in the program did not need to be cancelled and recommended corrective action.</p>	<p>Financial interest in any City contract, work or business; City grant; City loan; \$3,000; \$5,000; financial interest; departmental approval</p>
<p>90042.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO Lobby/90042.A.pdf</p>	<p>Lobbyist Registration and Disclosure</p>	<p>The Board determined that an officer and employee of a private corporation was not required to register as a lobbyist, even though the officer had assisted the corporation in seeking passage of ordinance relating to the use of the public way on behalf of the company. The Board's reasoning was that, under the Governmental Ethics Ordinance in effect at the time, a person would be required to register as a lobbyist only if the person's expenditures or compensation for lobbying totaled \$5,000 in the preceding or current calendar year. The individual's good faith estimate of lobbying-related compensation came to \$4,800, and thus registration was not required, even though the activities would otherwise have constituted lobbying.</p> <p>Note: in 2000, the definition of lobbyist was significantly amended, and is no longer tied to the lobbying-related compensation or expenditures received or made by a possible lobbyist.</p>	<p>Lobbyist; lobbying; lobby; lobbying-related compensation; lobbying-related expenditures; total \$5,000 or more in a calendar year; good faith estimate; administrative action; legislative action; ordinance regarding use of the public way; advocacy; definition of lobbying; definition of lobbyist</p>

<p>90043.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO Interest CityBusiness/90043.A.pdf</p>	<p>Financial Interest in City Business</p>	<p>A City employee was advised that the Ordinance did not prohibit placing bids to purchase two parcels of City-owned property pursuant to a system of closed bidding, a closed bid process, whereby the sales were advertised in the newspaper for three (3) consecutive weeks, bids were received, and opened before a court reporter. The properties would then be sold to the highest bidder without consideration given to any other factor; the sales would then be approved by the City Council. This process qualified as a process of “competitive bidding following public notice,” and thus did not constitute a prohibited financial interest in the purchase of City-owned property, even if the purchase price would exceed \$5,000.</p>	<p>Financial interest in the purchase of City property; unless sold pursuant to a process of competitive bidding following public notice; closed bid process; real estate owned by the City; sale of real estate; exception to financial interest; advertised in the newspaper; sold to the highest bidder; bids opened before a court reporter; purchase price of \$5,000 or more; sold to the highest bidder</p>
<p>90045.Q</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec k%20Chairs/June/90045.Q.pdf</p>	<p>Gifts; Conflicts of Interest/Improper Influence</p>	<p>A department was advised regarding its proposed Conflict of Interests and Gifts policy. This is a good informational case, with explanation of important provisions.</p>	<p>Departmental policy; conflict of interests; gifts; honorarium; speaking engagements; hospitality; money for advice; solicit or accept anything of value in return for advice or assistance on matters concerning the operation or business of the City; grants; organizations seeking grants</p>
<p>90046.Q</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec k%20Chairs/4-15-12/90046.Q.pdf</p>	<p>Travel</p>	<p>A City employee was advised that the Ordinance did not prohibit acceptance of travel expenses paid by a potential City vendor to attend a presentation on new technology and then a 'focus group' meeting in Las Vegas. The whole trip would be one day—in and out. The basis for the opinion was that the travel offer did not come from an anonymous source, did not involve a mutual understanding that</p>	<p>Business travel; focus group; information presentation; educational travel; mutual understanding; Las Vegas; one-day in and out trip; four-hour focus group; educational travel; offered by the sponsor</p>

		the City employee's official decisions would be influenced by the travel, the expenses were reasonable, and related to the employee's official City responsibilities, and furnished by the sponsor of the event.	
90050.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_Lobby/90050.A.pdf	Lobbyist Registration and Disclosure	<p>The Board determined that the president of a local chamber of commerce who met with an alderman, along with others, to voice concerns about a potential City ordinance, in response to which the alderman established a task force, was required to register as a lobbyist. The Board reasoned that the act of going to the alderman to represent the chamber's members constituted lobbying. The Board did not address the work on the task force as lobbying. The president is also a member of an Advisory Commission, which serves as a support group for a facility in Chicago. Its work will not involve influencing City Council or administrative action and is therefore not lobbying.</p> <p>Note: pursuant to 2011 amendments to the Ordinance, persons who lobby on behalf of chambers of commerce must register but the Board may waive all registration fees.</p>	Advisory Commission; Task Force; meeting with an alderman; legislative action; definition of lobbying; establishing a task force; Chambers of Commerce; lobbyist; seeking to influence legislation on behalf of another; members of an association
90051.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec%20Chairs/NerFid/90051.Q.pdf	Financial Interest in City Business; Outside Employment	A City employee was offered a part-time position as a counselor at a City delegate agency, a shelter. The employee's City job was unrelated to the shelter's work; the delegate agency contract was with a separate City department. The employee was advised that, as long as the income or compensation from this part-time	Outside employment; outside employment; dual employment; part-time employment with a City contractor; part-time employment with a City delegate agency; financial interest in any City contract, work or business; \$2,500 per year; \$1,000 per year; no ownership interest; shelter

		<p>employment did not exceed the threshold of \$2,500 per year, it would not constitute a financial interest in City business.</p> <p>Note: this case was superseded by Case No. 91072.A, and is no longer good law. A City employee is not prohibited from earning any amount money from employment with or contracting with a City contractor or delegate agency but is subject to a host of other prohibitions and restrictions. See <i>also</i> Case nos. 90053.Q, 91072.A, 98009.Q.</p>	
<p>90052.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO_CampaignFinancing/90052.A.pdf</p>	Campaign Financing	<p>The Board determined that contributions made to a City elected official running for elected office of Cook County are subject to the limitations in the Campaign Financing Ordinance, that is, up to \$1,500 for each of the primary and general elections, for a total of up to \$3,000 in a reporting year. See <i>also</i> Case No. 09058.Q.</p>	<p>Any official or employee of the City who is seeking election to any other office; elected or appointed City officials and City employees seeking non-City public office; limit on contributions; candidate; candidacy in primary and general elections shall be considered separate and distinct candidacies</p>
<p>90053.Q</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec%20Chairs/NerFid/90053.Q.pdf</p>	Financial Interest in City Business; Outside Employment	<p>A company that proposed to hire five off-duty City employees to have them train other City employees in using new equipment the employees' City department had contracted to buy from the company was advised that this hiring was permissible provided the company agreed to limit the number of hours each trainer would be able to work so that income from this outside employment would be less than \$2,500 per year per trainer.</p> <p>Note: this case was superseded by Case No. 91072.A and is no longer good law. A City employee is not prohibited from</p>	<p>Outside employment; dual employment; part-time employment with a City contractor; training; part-time employment with a City delegate agency; financial interest in any City contract, work or business; \$2,500 per year; \$1,000 per year; no ownership interest</p>

		earning any amount money from employment with or contracting with a City contractor or delegate agency but is subject to a host of other prohibitions and restrictions. See <i>also</i> Case nos. 90051.Q, 91072.A, 98009.Q.	
90056.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_Outside_Employment/90056.A.pdf	Outside Employment	This is a significant, precedential case. The Board determined that persons paid by voucher – here a hearing officer – are not considered City employees for purposes of the Governmental Ethics Ordinance. Therefore, a person paid by voucher could serve as a hearing officer for two (2) different City departments. In making its determination, the Board sought advice from the Law Department as to who is a City employee; the Law Department advised that persons paid by voucher do not hold appointments or titles associates their City services and do not receive employee benefits – thus, their relationship to the City is contractual, and they are City contractors, not City employees. They are subject to the Governmental Ethics Ordinance as City contractors, not as City employees.	Persons paid by voucher; vouchered employees; City contractors; City employees; independent contractors; personal contract; opinion from the Law Department; hearing officer
90057.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_Interest_CityBusiness/90057.A.pdf	Financial Interest in City Business	The Board determined that a City employee who had applied for a MULTI loan from the City's Department of Housing was prohibited from receiving the loan, because it would be in excess of \$5,000. This was true even though the loan was funded by the federal government – however, the interest in City business provision applied because the program was administered by a City department. The Board did not apply the “equity” reasoning it had previously	Financial interest in any City contract, work or business; Department of Housing MULTI loan; in excess of \$5,000; principles of equity, good conscience, fairness and justice; loan from the City; financial aid from the City; investment property; not the principal residence

		employed in the “Homestead” cases (Case nos. 90028.A, 90029.A, 90033.A, 90040.A, and 90062.A), because those cases involved City employees;’ homes – here, by contrast, the property was investment property. See <i>also</i> Case No. 89121.A.	
90058.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_Lobby/90058.A.pdf	Lobbyist Registration and Disclosure	<p>The Board determined that a company’s employees, or consultants hired by the company, to the extent they were engaged in marketing and selling products or services to the City, were not acting as lobbyists, as defined under the Governmental Ethics Ordinance then in effect.</p> <p>The Board reasoned that persuasive efforts in connection with the award of government contracts have generally not been considering lobbying, whereas, in contrast, lobbying registration and reporting requirements have been directed toward efforts by individuals to influence government actions which have a broad impact, such as the formulation of laws, rules, regulations, and rate-making, not toward attempts to influence government actions whose application is limited to specific individuals, such as contract or administrative adjudications. These latter are regular not by public disclosure, but by specific rules of conduct. In the case of persuasive efforts in connection with the award of contracts, regulation is through laws that specifically address problem areas in procurement though restrictions on giving and acceptance of gifts, and prohibition on</p>	<p>Lobbyist; definition of lobbyist; sales person; sales consultant; marketing efforts; the solicitation, award or administration of a contract; the procurement of goods or services or construction; solely by submitting an application for a City permit or license or by responding to a City request for proposals or qualifications; RFP; RFQ; attempts to influence governmental actions that have a broad impact; ordinances; formulation of rules and regulations and rate-making; persuasive attempts or efforts to influence government contracts</p>

		<p>improper influence and bribery. Thus, the Board determined that sales and marketing efforts in connection with the award of a City contract do not in themselves constitute lobbying.</p> <p>Note: in 2000, this case was effectively superseded by amendments to the Ordinance, which define lobbyists as person trying to influence procurements matters, except those solely responding to an RFP (request for proposals) or an RFQ (request for qualifications). See <i>a/so</i> Case No. 01021.A.</p>	
<p>90059.Q</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/AOPolActivity/90059.Q.pdf</p>	Political Activity	<p>A City employee was advised of the relevant restrictions regarding volunteering for an alderman's reelection campaign. This is a helpful primer on political activity undertaken by City employees.</p>	<p>Aldermanic campaign; political work; City time; City property; campaign volunteer; political activity; solicitation of campaign contributions; political contributions</p>
<p>90060.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AOCampaignFinancing/90060.A.pdf</p>	Campaign Financing	<p>This is a significant, precedential case. The Board determined that:</p> <p>--a partnership that does business with the City (say, a law firm) is itself subject to the \$1,500 per year/per candidate contributions limitations on campaign contributions;</p> <p>--each partner of that partnership is not subject to this limitation as to contributions from personal funds, unless the partner is registered lobbyist or is individually doing or seeking to do business with the City or a named sister</p>	<p>Campaign contributions; campaign financing limitations; law firm; partnerships; doing or seeking to do business with the City or a named sister agency; registered lobbyist; spouse or domestic partner of a partner in a partnership doing or seeking to do business with the City or a named sister agency; reimbursement by the partnership; \$1,500 limitation; per candidate; per reporting year; made other than in the name of true donor; Illinois Uniform Partnership Act; not all activities of a partner bind or affect the partnership; Federal Election Commission; FEC; personal property assets; partnership</p>

		<p>agency, or is reimbursed for the contribution by the partnership;</p> <p>--a contribution by a partner of such a firm that is reimbursed by the partnership is aggregated with contributions from the partnership, and may not exceed the \$1,500 per year/per candidate limitation;</p> <p>--the spouse or domestic partner of a partner in such firm may not make a contribution for which the spouse or domestic partner is reimbursed by the partnership;</p> <p>--each spouse or domestic partner of a partner in such firm may make contributions in excess of the \$1,500 limit per year/per candidate provided there is not reimbursement from the partnership and the contribution is made from personal funds. See <i>also</i> Case No. 89063.A.</p>	<p>property and assets; contract in the name of the partnership;</p>
<p>90062.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO Interest CityBusiness/90062.A.pdf</p>	<p>Financial Interest in City Business</p>	<p>The Board determined that a City employee would be allowed to continue to participate in a Department of Housing rehabilitation loan program, even though the amount the employee stood to receive in loan funds would exceed \$5,000. This was a section 312 loan, funded by the federal government (HUD), but administered by the City. The loan was approved in 1988; the Department selected the contractor, but then terminated him because his work was unacceptable, then inspected the home and provided specification for completion of the job, including substantial repairs</p>	<p>Section 312 Rehabilitation loans; Urban Homestead loans; principles of equity and justice; financial interest in any City contract, work or business; expended considerable sums of money; principal residence; principles of equity, good conscience, justice and fairness; no attempt to conceal City employment; administered by the City; Department of Housing; HUD; federal funds; any interest with a cost or present value of \$5,000 or more</p>

		<p>needed to correct work of the terminated contractor. The Board, applying the rationale in prior cases, reasoned that the employee had not concealed City employment, and had expended considerable effort and expense to participate in the program, and thus principles of equity and justice necessitated the decision to allow the employees to continue to receive loans in excess of the threshold amount; the same was true here, where the employee expended considerable sums of money on rehabilitation work. See <i>also</i> Case nos. 90028.A, 90029.A, 90033.A, 90040.A, and <i>cf.</i> Case No. 90057.A.</p>	
<p>90063.A</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/Decision%20Chairs/LXIV/90063.A.pdf</p>	Post-employment	<p>The Board determined that a former small purchases administrator:</p> <p>(i) was not prohibited from assisting or representing a new employer in obtaining a contract with a City department, because, during City employment, the employee was involved solely with purchase order, under \$10,000, whereas this bid would be for a full contract, a different subject matter; and</p> <p>(ii) had participated personally and substantially in the awarding of purchase orders for this same type of product, and thus was subject to a one-year prohibition on assisting or representing the new employer (or any person) on them.</p>	<p>Post-employment; small purchases; purchase orders; contracts in amount in excess of \$10,000; subject matter; different subject matter; participated personally and substantially in the subject matter; same type of commodity, product or service</p>
90064.A	Gifts	<p>This is a significant, precedential case. The Board determined that gifts distributed at the annual golf outing organized by a City department violated</p>	<p>Golf outing; mutual understanding; \$45 tickets; contractors provide gifts; all employees receive gifts; totality of the circumstances presented compel the Board</p>

https://www.chicago.gov/dam/city/depts/ethics/general/AO_GiftsTravel/90064.A.pdf		<p>the Ordinance, because the event entailed the giving of gifts from City contractors to departmental employees, even though the employees did not necessarily know which contractors were providing the gifts they would receive, but knew the identity of all the corporate sponsors, and gifts ranged in value from \$3 to \$30; only 2 were worth more than \$50. The Board concluded that a reasonable inference existed that the gifts were given with the intention of influencing the governmental decisions of the City employees receiving them. See <i>also</i> Case No. 01054.Q.</p>	<p>to conclude that a reasonable inference exists that these gifts were given with the intention of influencing the governmental decision of the City employees and official who receive them; not an isolated event of gift-giving, but an annual event; corporate sponsors; violation; mutual understanding; prize</p>
<p>90065.A</p> https://www.chicago.gov/dam/city/depts/ethics/general/AO_InterestCityBusiness/90065.A.pdf	<p>Financial Interest in City Business</p>	<p>The Board determined that a matter involving a possible prohibited financial interest in City business by a City employee who was listed as an employee of the spouse's business was moot, as the employee had resigned from City employment. The Board dismissed the matter.</p>	<p>Prohibited financial interest in any City contract, work or business; independent occupation, business or profession of a spouse or domestic partner; employee listed as an officer of the spouse's company; not independent; employee resigned from City service; moot issue</p>
<p>90066.A</p> https://www.chicago.gov/dam/city/depts/ethics/general/AO_CampFinancing/90066.A.pdf	<p>Campaign Financing</p>	<p>This is a significant, precedential case. The Board determined that general (or Consolidated Municipal) elections and run-offs constitute the same candidacy. Therefore, a contributor subject to the \$1,500 limitation on contributions may not make up any additional contributions to the same candidate during the period of a run-off if the contributor has already contributed \$1,500 to that candidate during the general or Consolidated Municipal Election, because these are the same candidacy.</p>	<p>Run-off elections; single candidacy; Consolidated General Municipal Election; separate candidacies; primary and general elections; aldermanic or Mayoral run-off election</p>

<p>90067.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO_CampFinancing/90067.A.pdf</p>	<p>Campaign Financing</p>	<p>This is a significant, precedential case. The Board determined that the \$1,500 campaign or political contribution limits apply to a year for both incumbent and non-incumbent candidates. This avoids the unfairness of allowing incumbents to collect \$1,500 twice in the same year, first as an elected official, and second as a candidate, whereas non-incumbents would be able to collect only \$1,500 in that year, as a candidate.</p>	<p>Campaign or political contribution limitations; incumbent; non-incumbent; candidate; twice in the same year; unfair advantage; single candidacy</p>
<p>90068.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO_CampFinancing/90068.A.pdf</p>	<p>Campaign Financing</p>	<p>This is a significant, precedential case. The Board determined that:</p> <p>--the Ordinance does not specifically prohibit “bundling,” meaning that a corporation would collect individually-funded contributions from its employees, officer or directors and present them to a candidate together, as long as none of the employees, officer or directors is compelled or coerced to make the contribution;</p> <p>--even “mere” encouragement to make a contribution by one’s superior is viewed as coercion, unless evidence to the contrary is provided;</p> <p>--the bundling practice may not be used to persuade any City official, employee or candidate for elected City office to take a particular position or act in a particular manner. <i>See also</i> Case No. 89006.A.</p>	<p>Campaign contributions; coercion; compel; compulsion; coerce; directors, employees or officers; bundling; mere encouragement is coercive; mutual understanding; group contributions; personal contributions; corporate contributions</p>
<p>90069.A</p> <p>https://www.chicago.gov/content/</p>	<p>Post-employment</p>	<p>This is a significant, precedential case, perhaps the most important post-employment opinion that has been rendered by the Board of Ethics. The</p>	<p>Post-employment; revolving door; former Commissioner; former department head; accept a job or position with a City vendor is not prohibited; purposes of the post-</p>

Board determined that a former high-ranking employee (a department head), who planned to accept a position with a company that was regulated by the employee's former department, and which company, at the employee's department's urging, received a franchise transfer approved by the City Council, was:

(i) not prohibited from accepting the position – **the opinion makes clear that the Ordinance does not preclude an outgoing City executive from working for at least one year for a company that had been awarded a City contract while the employee was with the City, rather it restricts the matters on which a former employee may work for the new employer or client --** but was subject to the following:

(ii) for one year, the former employee could not assist or represent the company with respect to the particular area of regulated work as it related to the City;

(iii) assisting or representing the company with respect to its franchise agreement with the City for life or entire term of the agreement, because the employee exercised contract management authority over the franchise (and contract attached to it) transfer process), by directing that process – the Board was careful to state that not every administrator exercises contract management authority over every transaction or contract of their

employment restrictions; company regulated by the City; franchise agreement; outgoing City executive; high-ranking employee; one year subject matter prohibition; matters on which a former employee or official may work; regulated work area; subject matter; assisting; representing; assist; represent; entire life of a contract or agreement; contract management authority; approval process; managing City Council approval process; contract administrator; case-by-case basis; media relations; public relations; community relations; so interrelated to the company's City business; custodian; receptionist; solicit or accept anything of value in return for giving advice or assistance concerning the operation or business of the City; promise of future employment; no evidence; prohibited conduct; negotiate the possibility of future employment

department, but that these determinations must be made on a case-by-case basis; and

(iv) the former employee was not prohibited from engaging in public relations on behalf of the new employer. Under a broad reading of the terms “assist” or “represent,” the tasks of the new position could be construed as assisting or representing the new employer in fulfilling its agreement with the City, but this broad reading would also include the custodian and the receptionist who answer the telephone. If that were the case, then every former City employee would be precluded from working for a company that did business with the City. This is not what the Ordinance states, and the Board “does not believe such was intended.” The new position was not “so interrelated to the company’s business with the City” that it would fall under the Ordinance’s post-employment prohibitions.

Finally, the Board noted that, having interviewed many individuals in coming to its determination, there was no evidence that the former employee had violated the Ordinance by assisting or advising the company in exchange or in return for the possibility of future employment.

Note that, in 2013, amendments to the Ordinance were enacted that prohibit a City employee or official from negotiating the possibility of future employment with

		any person that has a matter pending before the employee or official.	
90070.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/AO-InterestCityBusiness/90070.Q.pdf	Financial Interest in City Business	During the Board's routine review of filed Statements of Financial Interests, a City employee was advised that payments the employee received from a third party organization in monthly retainers did not come from City funds, nor were administered by a City department, and thus did not constitute a prohibited financial interest in any City contract, work or business.	Entity, business, or firm owned by a City employee; monetary threshold for financial interests; \$2,500 per year; \$5,000 cost or present value; source of the funds; third-party administrator; City program; financial interest in any City contract, work or business; monthly retainer payments
90071.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/AO-SFI/90071.Q.pdf	Appointed Officials; Statements of Financial Interests	A City employee was that members of the City's Affirmative Action Advisory Board are required to file annual Statements of Financial Interest with the Board, because its duties include making binding decisions and making expenditures.	Members of a City board or commission that is solely advisory in nature and has no authority to make binding decisions, to enter into contracts or to make expenditures; Affirmative Action Advisory Board; not solely advisory; appointed officials; Statements of Financial Interests
90072.I https://www.chicago.gov/content/dam/city/depts/ethics/general/AO-Attorneys/90072.pdf	Attorneys; Board of Ethics members, staff	<p>The Board received a citizen complaint that one of its members was in violation the Ordinance by representing tort clients against the City while serving as a member of the Board. The Board voted to refer the complaint to an agency independent of the Board, here, the Office of Inspector General, for action it deemed appropriate, including investigation.</p> <p>After several years, the matter had not been resolved, and the Board recalled the matter from the Office of Inspector General, and then dismissed the matter, determining that:</p> <p>(i) members of the Board of Ethics perform a quasi-judicial function</p>	Attorneys; financial interest in any contract, work or business of the City; members of the Board of Ethics; representing clients in judicial cases against the City; wholly unrelated to the work of an appointed official's City work; wholly unrelated to the work of the Board of Ethics; lawyers; Office of the Inspector General; OIG; investigation of a complaint against a member of the Board of Ethics; referral to an independent investigative agency

		<p>(adjudicate ethics complaints) which is wholly unrelated to representing tort clients in court cases against the City;</p> <p>(ii) such representation would not in any way impair the Board member's fiduciary duty to the City or the Board member's judgments in ethics-related matters; and</p> <p>(iii) an attorney's interest in a client's potential recovery against the City in tort claims does not fall within the intended meaning of financial interest in City business, and thus would be in violation of the provision prohibiting Board members and staff from having a financial interest in any City or other governmental business within the City or County.</p>	
<p>90073.Q</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/AOInterestCityBusiness/90073.Q.pdf</p>	Financial Interest in City Business	The Department of Procurement Services was advised that an office supply company fully owned by a City employee could enter into one or more City contracts, provided the company did not earn more than \$2,500 per year or a lump sum of \$5,000. Note: the threshold for a financial interest in any City contract, work or business was lowered to \$1,000 in November 2012.	Contracting with the City; entity, business, or firm owned by a City employee; monetary threshold for financial interests; \$2,500 per year; \$5,000 cost or present value; office supplies company; Department of Procurement Services; financial interest in the name of another; financial interest in any City contract, work or business
<p>90074.Q</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/December%20Chairs/4-15-12/90074.Q.pdf</p>	Gifts	A City contractor was advised not to offer to several high-ranking City officials (and their spouses) an invitation to attend a Pro-Am golf tournament, worth \$2,000, even though it would be acceptable in this case as "reasonable hosting expenses, including travel and entertainment, furnished by the sponsor of the event." This advice was consistent with the Board's general advice that items or	Golf tournament; Pro-Am; gift to the City; reasonable hosting; entertainment; in connection with a public event; mutual understanding; gift package; appearance of impropriety; public event;

		services worth more than \$50 should simply not be offered to City employees or officials, and were always subject to review, or should be offered, where appropriate, as a gift to the City as and disclosed as such.	
90075.A https://www.chicago.gov/dam/city/depts/ethics/general/AO Interest CityBusiness/90075.A.pdf	Financial Interest in City Business	<p>This is a significant, precedential case. The Board determined that an employee of the City's Department of Housing was not prohibited from participating in a loan program operated by a third-party non-profit organization working with the City to provide affordable housing – the City assisted the organization in receiving a \$2.5 million grant from the federal government through a Department of Housing and Urban Development (HUD) program; the City provided no funding, but did sell 40 lots to the organization for \$1 each, and was waiving all City fees in connection with developing the lots, which comprised 40% of the total lots being developed. All decisions as to eligibility were to be made by the organization with no City involvement. On the facts, the Board reasoned that the City employee would have no contracts or direct involvement with the City, and thus the financial interest in City business provision did not attach, since this was not a contract, work, or business of the City.</p>	Any contract, work or business of the City; meaning of contract, work or business of the City; financial interest; Department of Housing; HUD; federal government; non-profit organization; affordable housing; waiver of City fees; value of housing; value of loans; City-owned lots; \$1; waiver of outstanding sewer liens; water bills; water tap fees; scavenger sales; Church-based organization
90076.A https://www.chicago.gov/dam/city/depts/ethics/general/AO Interest CityBusiness/90076.A.pdf	Financial Interest in City Business	<p>This is a significant, precedential case. The Board determined that City employees were not prohibited from participating in loan or grant programs funded by a City department or with City funds, but that if City monies provide all of the funding source, then 100% of the</p>	Loans, grants, or interest write-downs; non-profit program administrator; housing loans, grants, or interest write-downs; source of the money; funding source; percentage of a loan, grant or write-down coming from the City; administrator; loan committee; not-for-profit;

CityBusiness/90076.A.pdf		<p>loan, grant, or write-down is considered business of the City, even if the program is administered by a third-party non-profit; the Board also determined that, if the City is providing only partial funding, only that portion of the loan, grant, or interest write-down is considered City business. In either case, City employees and officials may not have a prohibited financial interest in City business.</p> <p>Upon reconsideration, the Board determined that City officials and employees may receive revolving loans of \$5,000 or more as long as: (i) less than \$5,000 in funds was provided by the City, (ii) the loan application is not reviewed by the committee on which a City employee sits; and (iii) the administering non-profit keeps documentation verifying that less than \$5,000 of the loan was provided by the City.</p>	<p>financial interest in any City contract or work or business of the City</p>
<p>90077.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO Interest CityBusiness/90077.A.pdf</p>	<p>Financial Interest in City Business</p>	<p>This is a significant, precedential case. The Board determined that a company 100% owned by a City employee could not bid on any City contract if the amount of the contract, when multiplied by the percentage of ownership the City employee has in it, would yield a figure that exceeds the threshold for a prohibited financial interest in City business. See also Case No. 93033.A.</p>	<p>Prohibited financial interest in any City contract, work or business; pro-rata amount of a City contract; formula for determining a City employee's ownership interest in any City contract, work or business; City contracts; gross amount of a City contract multiplied by the City employee's or official's ownership percentage in the person, entity, firm or company that would receive a City contract</p>
<p>90079.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO Interest CityBusiness/90079.A.pdf</p>	<p>Post-employment</p>	<p>The Board determined that a departing mid-level manager, who had been hired as a salesperson for a firm that had had contracts with the employee's department: (i) had not exercised contract management authority over any of these</p>	<p>Post-employment; revolving door; facilities manager; constructions; project management; new project; salesperson; contract management authority; accept a job or position with a City vendor is not prohibited; subject matter; one year subject</p>

eral/AO PostEmploy/90079.A.pdf		<p>contracts and was not subject to a permanent ban; and (ii) had supervised physical plant operations at a City facility, but the new position would involve new construction projects, and thus constituted a different subject matter, one in which the employee had not been personally and substantially involved. The Board advised the employee that, if future employment plans should change to seek specific advice from the Board, as this opinion was limited to the job described.</p>	<p>prohibition; new construction projects; different subject matter; explore new business relationships; day-to-day physical operations; utility systems</p>
<p>90083.Q</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/AOInterestCityBusiness/90083.Q.pdf</p>	<p>Financial Interest in City Business</p>	<p>The Board stated that it does not have the authority to determine whether the prohibition imposed on City employees and officials as to having a financial interest in any City contract, work or business – as applied to loans with federal funds, but administered by the City – is constitutional. It cited two (2) federal cases from Illinois and two (2) administrative law treatises and reiterated that the Ordinance’s prohibition on financial interest clearly applies to program administered by a City department, even if the source of funds is the federal government.</p>	<p>Prohibited financial interest in any City contract, work or business; United States Constitution; administrative law; constitutionality of the Governmental Ethics Ordinance; administrative agency; no jurisdiction to determine constitutional questions; federal courts; constitutionality of administrative or legislative action; jurisdiction of the Board of Ethics</p>
<p>90084.Q</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/AORepresentingOthers/90084Q.pdf</p>	<p>Representation of Other Persons; Non-profit Board Service; Outside Employment</p>	<p>This is a significant, precedential case. A City employee who was serving as an unpaid member of the Board of Directors for a not-for-profit organization that wished to apply to a City Department of Housing tax reactivation program to receive City financial aid to renovate a building was advised that the organization could apply and participate, and the employee could continue to serve on its</p>	<p>Service on a non-profit organization’s board; tax reactivation program; City financial assistance; Department of Housing; Department of Planning and Development; financial assistance; redevelop a residential building; restrictions are personal to the City employee; representation before a City department;</p>

		Board but the employee was prohibited from representing the organization in any aspect of the transaction with the Department of Housing, and the employee was advised regarding the fiduciary duty owed to the City, as well as confidential information and use of City property.	
90087.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec%20Chairs/4-14-12/90087.Q.pdf	Post-employment	A City department was advised that the Ordinance did not prohibit a former employee from being hired by the department as a computer expert, even though the employee had done the same work for the department while employed by it. Because the employee had left City employment 13 months before, there was no longer a relevant one-year subject matter prohibition. The employee did not deal with any City contracts during City employment and thus there was no relevant permanent prohibition.	Post-employment; expiration of the one-year subject matter prohibition; being hired by one's former City department; computer expert; independent contractor hired by the City
90088.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec%20Chairs/4-14-12/90088.Q.pdf	Post-employment	<p>A City department asked whether the Ordinance prohibited a former departmental employee, now employed by a non-profit organization with a City contract with the department, from being paid by the organization with funds derived from that City contract. The former employee had left City employment more than one year prior but had exercised contract management authority with respect the organization's prior contracts, which were annual and renegotiated each year.</p> <p>On these facts, the department was advised that this was not a violation of the Ordinance's post-employment provisions.</p>	Post-employment; contract management authority; employment with a former contractor of one's own department; being paid through an organization's City contract; non-profit organization; delegate agency; annually renegotiated contracts

		The department was advised that the Ordinance did not prohibit the former City employee from using prior knowledge of the department funding the organization to challenge the City on certain issues, provided the former City employee was not using confidential information.	
90089.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec%20Chairs/4-15-12/90089.Q.pdf	Gifts	A City employee was advised that the Ethics Ordinance did not prohibit the employee from participating in a visiting medical delegation to the Soviet Union, or from seeking grants from Chicago area organizations and corporations to fund the trip. The employee was advised of the relevant restrictions in the Ordinance and advised specifically to avoid soliciting funds from corporations or entities that did business with the City employee's department. Note: in 2013 the Ordinance was amended effectively to codify the advice given here.	Gifts; solicit; solicitation of travel grant; seeking funding; trip to Soviet Union; pre-hospital emergency care; 50 medical professionals from around the U.S.; financial sponsorship; anonymous donors; mutual understanding; appearance of impropriety; travel
91021.A https://www.chicago.gov/dam/city/depts/ethics/general/AO Interest CityBusiness/91021.A.pdf	Financial Interest in City Business; Appointed Officials	The Board determined that an appointed official who received a mortgage loan from the Department of Housing was not in violation of the Ordinance because the responsibilities of members of this commission were wholly unrelated to the subject matter of the departmental loans. The Board treated the case generically (because there were no facts that could show that the appointed official, in particular, had violated the Ordinance	Appointed official; prohibited financial interest in any City contract, work or business; loan from the Department of Housing; wholly unrelated; City board or commission
91022.A https://www.chicago.gov/dam/city/depts/ethics/gen	Campaign Financing	<p>This is a significant, precedential case. The Board determined:</p> <p>(i) that it did not have sufficient information to determine whether a person's obtaining contractor</p>	Campaign financing; campaign contributions; political contributions; \$1,500 per year limit; joint ventures; joint venturers; partnerships; single person; aggregation of political contributions; doing business with the City; seeking to do business with the City; partners

eral/AO_CampFin anacing/91022.A. pdf		<p>prequalification status with the City without taking any further action constitutes “seeking to do business; and</p> <p>(ii) joint ventures and joint venturers are “partners”; thus, partners of a joint venture that is doing business or seeking to do business with the City are not prohibited from making contributions in excess of \$1,500 per year to any single candidate or elected City official (or their committees) provided they are neither reimbursed by the joint venture nor individually doing or seeking to business with the City (or are registered lobbyists). Moreover, contributions by one partner do not affect contributions by another partner. <i>See also</i> Case No. 90060.A.</p>	
<p>91023.Q</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/Decision%20Chairs/4-15-12/91023.Q.pdf</p>	Travel	<p>A City employee was advised that the Ordinance did not prohibit three (3) employees (from two (2) departments) from accepting reasonable travel expenses to attend a conference in Phoenix. The company offering the invitation was not a direct City vendor but supplied parts in equipment purchased by these City departments.</p>	Reasonable travel expenses; business travel; conference; Phoenix; City contractor
<p>91025.Q</p>	Political Activity	<p>A City employee in the former Department of Revenue was advised that serving as a Deputy Registrar for the Chicago Board of</p>	<p>Political activity; serving as Deputy Registrar; Chicago Board of Election Commissioners; definition of political activity; Department of</p>

https://www.chicago.gov/content/dam/city/depts/ethics/general/AOPolActivity/91025.q.pdf		Election Commissioners was not “political activity” and thus not prohibited.	Procurement Services; non-political; Illinois Local Governmental Employees Political Rights Act; home rule pre-emption
91026.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_CampaignFinancing/91026.A.pdf	Campaign Financing	The Board determined that a firm that did <i>pro bono</i> , uncompensated construction work on City building, controlled by a City department, for the benefit of a non-profit foundation, was not thereby doing business or seeking to do business with the City for purposes of the campaign contribution limitations of \$1,500 per year to any candidate for elected City office or elected City official.	Campaign contribution limitations; political contribution limitations; doing business with the City; seeking to do business with the City; pro bono; gratis; volunteer work; construction work on a City building
91028.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/Deck%20Chairs/NerFid/91028.Q.pdf	Financial Interest in City Business; Outside Employment	This is a significant, precedential case. A high-ranking City employee was advised that: (i) the Ordinance did not prohibit an outside consulting position on a job with another government agency located in suburban Chicago, since neither the consulting firm nor government client had any business with the City; and (ii) that the Ordinance didn’t prohibit a person the employee knew and had known since college, and in whose firm the employee had no monetary interest, from bidding on a contract with the employee’s City department, not prohibit the employee from participating in the decision-making process, but that the employee owed a fiduciary duty to the City and must exercise decision-making authority in the City’s best interests.	Outside employment; another government entity or agency located in Cook County; consulting job; no economic interest in a City business; cronyism; personal friend; recuse’ conflict of interests; best interest of the City; recuse; recusal

<p>91029.Q</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec%20Chairs/NerFid/91028.Q.pdf</p>	<p>Outside Employment</p>	<p>The owner of a construction business that was a joint venturer on a project administered through a City program was advised that the Ordinance did not prohibit the owner from entering into a consultancy contract with the department to assist it in assessing loan or other applications with respect to the City program in which the contractor's firm was working. The opinion summarizes the various prohibitions applicable to City contractors.</p>	<p>Contractor; City contractor; construction business; entering into a consulting contract with the same department with which one already contracts; conflict of interests; gift to a higher-tier contractor</p>
<p>91030.Q</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec%20Chairs/NerFid/91030.Q.pdf</p>	<p>Outside Employment</p>	<p>A City employee was advised that the Ordinance did not prohibit outside employment with a private non-profit organization to assist it in writing a grant proposal to a separate non-profit organization, even though City employees served on the evaluation committee for the potential grantor non-profit, but was prohibited from advising the outside employer with respect to matters concerning the operation or business of the City.</p>	<p>Outside employment; second job; dual employment; grant-writing assistance; private foundation; representation of other persons; conflict of interests; money for advice or assistance concerning the operation or business of the City</p>
<p>91031.Q</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/AOCampFinancing/91031.q.pdf</p>	<p>Campaign Financing</p>	<p>This is a significant, precedential case. The officers of a PAC (political action committee) affiliated with an association that did business with the City was advised that the PAC was a separate person from the association, and was not subject to the \$1,500 annual limitations on contributions to candidates for elected City office or their political committees, and its contributions would not be aggregated with those of the association. The opinion relies on the fact that the PAC was funded not by the association, but individual members, voluntarily, and had</p>	<p>PAC; political action committee; association PAC; 50% rule; self-standing corporation; independent board of directors and bylaws; funded by individual members voluntarily; doing business with the City</p>

		a separate board of directors and separate bylaws. See <i>also</i> Case No. 95058.A.	
91033.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_Lobby/91033.A.pdf	Lobbyist Registration and Disclosure; Attorneys	The Board determined that an attorney representing clients before an administrative hearings officer (in a tax assessment case) is not lobbying, as defined in the Ordinance, and thus this activity does not require registration as a lobbyist. Attempts to influence governmental decisions in the context of established judicial or quasi-judicial proceedings do not constitute lobbying. Note: this exception was codified in amendments made to the Ordinance in 2000.	Lawyers; lobby; lobbyist; lobbying; representing clients in tax assessment hearings; Department of Administrative Hearings; attorneys; judicial or quasi-judicial proceedings; not lobbying
91035.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec%20Chairs/NerFid/91035.Q.pdf	Outside Employment	A City employee was advised that the Ordinance did not prohibit teaching an etiquette class for the member of a fellowship to which the employee belonged, in exchange for a \$200 payment; the teaching would be performed on no-compensated time and would not involve giving advice or assistance on matters concerning the operation or business of the City.	Outside employment; teaching; etiquette class; fellowship; \$200 payment; money for advice or assistance on matters concerning the operation or business of the City
91036.A https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec%20Chairs/LXIV/91036.A.pdf	Post-employment	The Board determined that a former City employee, who had formed a consulting firm, which a different City department wished to hire, was not subject to the Ordinance's post-employment restrictions as to this potential contract, because the former City employee did not participate personally and substantially in the subject matter of any of the tasks the consulting firm would be performing for the second City department	Post-employment; consulting firm; enter into City contracts; technical assistance; inspection; evaluation; obtaining grants or loans; reviewing funding applications; training staff; delegate agencies;

91037.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_CampFinancing/91037.q.pdf	Campaign Financing	The sale of television advertising time to a political committee or candidate for elected City office, for political advertising, pursuant to the rates authorized by the FCC (Federal Communications Commission) is not a campaign or political contribution and is not regulated or prohibited by the City's Governmental Ethics or Campaign Financing Ordinance.	Political contribution; campaign contribution; political advertising time; sale; TV; television advertising; fair market value; rates set by the FCC; Federal Communications Commission; campaign financing ordinance
91038.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_SFI/91038.A.pdf	Statements of Financial Interests	The Board determined that the Northwest Home Equity Assurance Commission was not a City agency. The main factors in the Board's determination were that the Commission was set up pursuant to state law, and received no City funds	What is a City agency?; State Urban Renewal Consolidation Act of 1961; blighted areas; Home Equity Assurance Act; not a City agency; solely advisory; Home Equity Assurance Commission; case by case basis
91039.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_SFI/91039.A.pdf	Statements of Financial Interests	The Board determined that the Conservation Community Council for Lincoln Park, and the other five (5) Conservation Community Councils, were not City agencies. The main factors in the Board's determination were that the Councils were set up pursuant to state law and received no City funds.	What is a City agency?; Conservation Community Council of Lincoln Park; Conservation Community Council of Englewood; Conservation Community Council of Hyde Park-Kenwood; Conservation Community Council of Lawndale; Conservation Community Council of the Near West Side; Conservation Community Council of North Kenwood-Oakland; State Urban Renewal Consolidation Act of 1961; blighted areas; Home Equity Assurance Act; not a City agency; solely advisory; Home Equity Assurance Commission; case by case basis
91040.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_SFI/91040.A.pdf	Post-employment	The Board determined that a City employee would not be prohibited from accepting a position with a company submitting a response to an RFQ (request for qualifications) to the Department of General Services for a contract to	Post-employment; representation; having one's name listed on RFQ documents; requests for proposals; participated personally and substantially in the subject matter; one-year subject matter prohibition

eral/AO PostEmploy/91040.A.pdf		<p>manage a large City facility. The Board reasoned that the employee would be prohibited from representing that company before the City as a current City employee but would not be prohibited by the post-employment provisions from accepting the position and being listed as part of the bid.</p>	
<p>91041.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO_RepresentingOthers/91041.A.pdf</p>	<p>Representation of Other Persons; Attorneys; Appointed Officials</p>	<p>This is a significant, precedential case. The Board determined that an appointed official, who was a partner in a law firm, would not be in violation of the Ordinance if the official's partners or associates were to represent clients before the City commission on which the official served, provided: the appointed official/attorney: (i) did not provide any assistance to the client or attorneys working on the case; and (ii) recused fully from the matter on the record of proceedings of the City commission. The appointed official was required to disclose the matter to the Board, given the official's financial interest in the matter. <i>See also</i> Case No. 89091.A.</p>	<p>Appointed officials; lawyer' attorney; partner in a law firm; law firm represents client before the City; law firm represents a client before the appointed official's/partner's own City commission; recusal; recuse at both ends; represent; have an economic interest in the representation of; derive or receive any compensation or income from the representation of a person in a formal transaction before a City agency; financial interest in a matter pending before one's own agency</p>
<p>91042.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO_PostEmploy/91042.A.pdf</p>	<p>Post-employment</p>	<p>The Board determined that a former City employee, who had worked in a clerical/administrative capacity for several City departments, including the Department of General Services, was not prohibited from accepting a position with a commercial real estate management company that was submitting a bid to the Department of General Services for a contract to manage the then-new Harold Washington Public Library. The Board concluded that the City employee had no contract management authority and had</p>	<p>administrative employee; leasing space; Department of General Services; Chicago Public Library; Harold Washington Public Library; commercial real estate management firm; inventory management; participated personally and substantially in the subject matter; asset manager; Bureau of Asset Management; clerical; setting up appointments; contact landlords; father documentation</p>

		not been personally or substantially involved in the subject matter of the work the City employee would be doing for the company. See <i>also</i> Case No. 91040.A.	
91043.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_PolActvty/91043.Q.pdf	Political Activity	<p>The City's Department of Procurement Services was advised that:</p> <p>(i) neither attendance at the inauguration of all 53 City elected officials, nor at victory parties for successful candidates, constitutes political activity, as long as no political contributions or entrance fees were required to attend, because such entry fees are political contributions, and making political contributions constitutes political activity (and thus departmental employees were not prohibited from attending); and</p> <p>(ii) serving as an election judge is considered political activity, as defined in the Ordinance, and thus departmental employees were prohibited from doing so. Note: see Case No. 99029.A, and the Illinois statute on which it is based, which effectively supersede this case. See <i>also</i> Case No. 12051.Q.</p>	Political activity; attendance at victory parties; make a political contribution; entry fee; poll-watcher; election judge; definition of political activity; Department of Procurement Services; non-political; Illinois Local Governmental Employees Political Rights Act; home rule pre-emption; Office of Inspector General; Commission on Human Relations; Board of Ethics; attendance at inauguration
91044.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_PolActvt/91044.A.pdf	Fiduciary Duty; Non-profit Board Service; Political Activity	<p>The Board determined that a City employee serving in the Department of Procurement Services was:</p> <p>(i) prohibited by the Municipal Code from serving on two (2) organizations, because such service would constitute political activity (which employees in the department were prohibited from engaging in) in that these organizations specifically supported candidates,</p>	Political activity; definition of political activity; soliciting political contributions; Department of Procurement Services; support political candidates; ask candidates to speak at meetings; political organizations; community organization; non-political; representation of other persons; fiduciary duty; in the City's best interests; Illinois Local Governmental Employees Political Rights Act; home rule pre-emption; Office of Inspector General;

		<p>collected and donate political contribution on behalf of members, and had elected officials and candidates speak at their meetings – all of which constituted political activity; but</p> <p>(ii) able to continue to serve as the Chair of a third organization, not political, but serving the needs of the employee's community, because the activities did not constitute representing the organization before the City, and these activities were also in the City's best interests. Note: this case is in part superseded by Case No. 99029.A, and by the Illinois statute on which it is based, the Illinois Local Governmental Employees Political Rights Act. <i>See also</i> Case No. 96032.A.</p>	Commission on Human Relations; Board of Ethics
91045.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec%20Chairs/4-15-12/91045.Q.pdf	Travel	A City employee was advised that the Ordinance did not prohibit acceptance of reasonable travel expenses as part of a delegation of other City officials, sponsored by a private foundation. The offer met the conditions of the Ordinance: it was not anonymous, not made to influence the official's City actions; reasonable, furnished by sponsor and in connection with public events, appearances or ceremonies related to official City business. <i>See also</i> Case No. 91051.Q.	Facilities siting; business travel; foreign travel; cultural exchange; delegation of government officials; intergovernmental jurisdiction; management techniques
91046.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_GiftsTravel/91046.A.pdf	Gifts; Elected Officials	The Board determined that an alderman who was a member of the City Council License Committee, that might be called upon to regulate movie theaters, would not violate the Ordinance by accepting and using a pass into the chain's theaters, good for one year, but that use of the pass	Gift; movie pass; movie theater chain; economic interest in a specific City business transaction; able to substantially affect that transaction; appearance of impropriety; gifts sent to officials and employees in other municipalities; City Council License Committee

		created a serious appearance of impropriety and was strongly discouraged. The chain routinely sent such passes to high-ranking government officials and employees in municipalities nationwide.	
91047.A https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec%20Chairs/4-15-12/91047.a.pdf	Representation of Other Persons	<p>This is a significant, precedential case. The Board determined that an aldermanic staff employee violated the Representation of other persons provision by appearing before a City commission in a public hearing, and meeting with several City employees, all on behalf of a non-profit neighborhood organization of the which the employee served as president. The Board noted that, although the employee was not prohibited from serving as the organization's president, the employee was subject to the representation provision, and violated it.</p> <p>The Board advised the employee (through the employee's attorney) to comply immediately with the Ordinance or be subject to sanctions, up to and including discharge, and subject any votes or decisions made by City officials or employees to cancellation. Note that the opinion was requested by the City department with whose employees this employee met, in violation of the Ordinance.</p>	Representation of other persons; representing constituents in the course of one's official duties; spokesperson; appearing at a public hearing; violation; employment sanctions; economic and community development; job training; redevelopment; cultural center; meeting minutes; president of a neighborhood association
91048.A https://www.chicago.gov/dam/city/depts/ethics/gen	Outside Employment	A City employee was advised that the Ordinance did not prohibit a City employee from selling tickets to fellow employees for a fundraiser for an organization for which the employee	Selling tickets to a charitable fundraiser; selling to co-workers; City property; Personnel Rules; departmental rules

eral/AO Outside Employment/91048.A.pdf		volunteered, provided it is approved by the employee's department and consistent with the City's Personnel Rules. Note: in 2013, the Ordinance was amended to prohibit this type of solicitation from any person or entity with City matters pending before the employee, which the employee could affect.	
91049.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec%20Chairs/4-14-12/91049.Q.pdf	Post-employment	A City employee had a business idea that would involve entering into a contract with the City. However, if the idea worked, it would have necessitated the employee resigning from City service and entering into a City contract with a City department. This is not per se prohibited. The employee was advised of the post-employment restrictions in general terms.	Post-employment; forming a business that contracts with the City; one-year subject matter prohibition; business idea; City contract
91050.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec%20Chairs/4-15-12/91045.Q.pdf	Travel	A City employee was advised that acceptance of reasonable travel expenses and an honorarium was not prohibited by the Ordinance, provided the expenses were reasonable and the honorarium was reported within five (5) business days, as required by the Ordinance then in effect.	Reasonable travel expenses; speaker; panel discussion; honorarium; honoraria
91051.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec%20Chairs/4-15-12/91051.Q.pdf	Travel	A City employee was advised that the Ordinance did not prohibit acceptance of reasonable travel expenses to Japan as part of a delegation of other City officials, sponsored by a private foundation. The offer met the conditions of the Ordinance: it was not anonymous, not made to influence the official's City actions; reasonable, furnished by sponsor and in connection with public events, appearances or ceremonies related to	Facilities siting; business travel; Japan; foreign travel; cultural exchange; delegation of government officials; intergovernmental jurisdiction; management techniques

		official City business. <i>See also</i> Case No. 91058.Q.	
91052.A https://www.chicago.gov/dam/city/depts/ethics/general/AO Interest CityBusiness91052.A.pdf	Financial Interest in City Business	<p>This is a significant, precedential case. The Board determined that a City employee who owned a building, which housed the employee's spouse's business as a tenant to run a day care center, would not be in violation of the Ordinance if the spouse's business applied to a City department for a business loan worth more than \$5,000 (the threshold then in effect for a financial interest).</p> <p>The Board reasoned that the definition of "financial interest" has an exception for an interest that represents a spouse's independent occupation, business profession; and second, that the employee's contract (the contract work on the building) is with the spouse's corporation and not with the City. Therefore, the City employee does not have a financial interest in City business on either account. The advised the employee not to participate in the management or operation of the spouse's day care center. In interpreting the definition of financial interest, the Board determined that, for this exception to apply, a City employee may not participate in the management or operation of the spouse's project, may not have an ownership interest in the spouse's or domestic partner's project, and may not exercise any legal or financial control over the project or related business.</p>	Financial interest in a City contract, work or business; independent occupation of a relative, spouse or domestic partner which interest is related to or derived from the relatives', spouse's or domestic partner's independent occupation, business or profession; day-care center; bank loan; loan from a City department; definition of financial interest; lease; rental payments; Department of Economic Development loan; may not participate in the operation or management of the spouse's or domestic partner's or relative's business;

91053.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec%20Chairs/NerFid/91053.Q.pdf	Fiduciary Duty; Outside Employment	A City employee was advised that the Ordinance prohibited charging a fee for notarizing personal documents of co-workers during the City employee's City work hours or compensated time, pursuant to the Ordinance's fiduciary duty provision, which prohibits using time designated for public service to obtain a personal or private advantage, even though it was not part of the employee's City duties to notarize documents.	Notary public; charging a fee for services; fee for notarizing personal documents; during City compensated time; dual employment
91054.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec%20Chairs/4-15-12/91054.Q.pdf	Travel; Elected Officials	A high-ranking City official was advised that the Ordinance did not prohibit acceptance of an invitation extended by a major airline to fly on its inaugural flight on a new route to a foreign City. The official was to attend numerous meetings with the Mayor of the foreign City as various other government and private industry officials there. Even though the official was in a position to substantially affect the airline's City business, the travel was not prohibited because they were not anonymous, not paid to influence the official's City actions or decision, reasonable, and furnished in connection with a public event, appearance or ceremony related to official City business, and furnished by the sponsor. The opinion states that "reasonable" means "that they do not exceed what is necessary to achieve the stated purpose of the trip, to promote economic and cultural relations between Chicago and the foreign City. See <i>a/s/o</i> Case No. 92017.Q.	Foreign travel; definition of "reasonable expenses"; not to exceed the business purpose of the trip; inaugural flight; airlines; elected official; in a position to substantially affect the offeror's City business; O'Hare International Airport
91055.Q	Travel	A high-ranking City employee was advised that the Ordinance did not	Business travel; speaker; presenter at a conference; Harvard University; reasonable

https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec%20Chairs/4-15-12/91055.Q.pdf		<p>prohibit acceptance of reasonable travel expenses offered by Harvard University, for the employee to speak at a workshop sponsored by the University. The offer met the conditions of the Ordinance: it was not anonymous, not made to influence the official's City actions; reasonable, furnished by sponsor and in connection with public events, appearances or ceremonies related to official City business.</p>	<p>hosting; related to official City business; furnished by the sponsor</p>
<p>91056.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO_PostEmploy/91056.A.pdf</p>	<p>Post-employment</p>	<p>The Board determined that a former City employee was not prohibited from assisting or representing a new employer on a project with the former City's employee's City department. The former employee had been involved in the planning stages of four (4) departmental programs pending in the former department, but had not worked on this particular project while with the City, and, further, the employee's City duties had involved only planning phases; the former employee's post-City position involved the construction phase. The Board determined that these phases were distinct enough to constitute separate subject matters.</p>	<p>Post-employment; one year subject matter prohibition; working for a departmental contractor; consulting firm; business transaction involving the City; contract management authority; participated personally and substantially in the subject matter of the transaction; planning phase; distinct from the construction phase; construction management; produce evaluation of the expected time schedule and cost of the project; project monitoring; definition of subject matters; phases</p>
<p>91057.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO_OutsideEmployment/91057.A.pdf</p>	<p>Outside Employment</p>	<p>This case concerns three classes that make up a certification program for current and prospective department employees. A City Colleges employee, who in the past had used retired City department employees to teach these classes, could not find any this year and asked a City employee at the department for suggestions. The City employee suggested several field supervisors in the</p>	<p>Department of Public Health; field supervisors; food sanitation program; City Colleges of Chicago; teaching; food sanitation certification; health inspectors; retired health inspectors; solicit or accept money or any other things of value in return for advice or assistance on matters concerning the operation or business of the City</p>

		City employee's department, but contacted the Board about their teaching, as the Board had previously determined that a current City employee was prohibited from teaching similar classes. In this case, the Board determined that this particular instance of teaching would not violate the prohibition on accepting anything of value in return for providing 'advice or assistance (partly because these courses were part of a City contract with City-Wide Colleges). <i>See also</i> Case No. 90020.A.	
91058.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec%20Chairs/4-15-12/91058.Q.pdf	Travel; Elected Officials	A City elected official was advised that the Ordinance did not prohibit acceptance of reasonable travel expenses to Japan as part of a delegation of other City officials, sponsored by a private foundation. The offer met the conditions of the Ordinance: it was not anonymous, not made to influence the official's City actions; reasonable, furnished by sponsor and in connection with public events, appearances or ceremonies related to official City business. <i>See also</i> Case No. 91051.Q.	Elected officials; business travel; Japan; foreign travel; cultural exchange; delegation of government officials
91059.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_Outside_Employment/91059.A.pdf	Conflicts of Interest/Improper Influence; Outside Employment	This is a significant, precedential case. A City employee originally requested this opinion concerning two issues: (1) could the City employee work in a non-City business ('company') that hires out guards to various venues, and (2) could employees in the City employee's department work as such guards? These guards are required by City ordinance for certain buildings that host public gatherings to ensure compliance with City safety codes. The City employee's	Inspectors; safety inspections; ability to recuse; mandatory inspections; buildings that host public gatherings; building engineers; noting violations; serving as guards for an outside company; obtaining a license; inspecting a building for which a City employee provides private services; inherent conflict of interests; recusal; may not turn down an assignment; no way to avoid a conflict of interests

		<p>department's inspectors inspect buildings within a given area for such code violations. These buildings are assigned to them and they cannot recuse themselves from inspection. The Board found a conflict with that department's inspectors working outside their City jobs for venues they may later be called on to investigate.</p> <p>Note: under the Conflict of interests and improper influence provisions, City employees and officials in a position of potential conflict must have the ability to recuse themselves from governmental actions in order to avoid violating the Ordinance.</p>	
91062.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec%20Chairs/4-15-12/91062.Q.pdf	Gifts	<p>A City employee was advised that, by winning a door prize worth more than \$50 (a radio) but then donating it to the City as a gift accepted on behalf of the City, and then reporting it promptly to the Board of Ethics and Comptroller, the employee had fully complied with the Ordinance. Note: this acceptance on behalf of the City option was codified in the amendments to the Ordinance that became effective in November 2012.</p>	<p>Gift to the City; door prize; disposal of improper gifts; acceptable gift on behalf of the City; report to the Board of Ethics and Comptroller</p>
91063.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_Lobby/91063.A.pdf	Lobbyist Registration and Disclosure	<p>A registered lobbyist who requested one thirty (30) day extension to file an activity report failed to file by the deadline, was fined the statutory rate of \$100, was advised that all lobbying cease and desist, and the matter was turned over to the Law Department for collection.</p>	<p>Registered lobbyist; failure to file activity report; fines; termination of lobbying activity; cease and desist; collection matter for the Law Department</p>
91064.Q	Travel	<p>A City department was advised that one of its employees could accept federal</p>	<p>Business travel; educational travel; conference; offered to the department, not a</p>

https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec%20Chairs/4-15-12/91064.Q.pdf		funds to cover travel to a conference, as a gift to the City, provided it was reported as required by the Ordinance.	specific employee; reasonable travel expenses; gift to the City; report
91069.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_GiftsTravel/91069.A.pdf	Gifts	The Board determined that a company that had contracts with the City and wished to offer all guests at gala gifts worth in excess of \$50 would comply with the Ordinance by sending the Board a list of all City employees and officials who attended, and notification as to whether any City official or employee attempted to use the gift. See also Case No. 91079.A.	Prohibited gift; City contractor; economic interest in a specific City business transaction; decline a gift; tickets; appearance of using a public office to obtain a private gain; avoidance of even the appearance of impropriety; cornerstone of the Ethics Ordinance; in a position to substantially affect the donor's City business
91072.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_OutsideEmployment/91072.A.pdf	Outside Employment; Financial Interest in City Business	<p>This is a significant, precedential case. A City employee took a one-year leave of absence from the City to accept a temporary full-time position as a technical analyst working on security with a local university, which was under a City contract; the employee was working on that contract for the university, for which the employee would be paid in excess of the threshold amount for a financial interest in City business.</p> <p>The Board determined that this outside employment would not give the City employee (on leave) a prohibited financial interest in a City contract, work, or business. The Board reasoned that an employee who has no ownership in, but is merely an employee or independent contractor of a City contractor, but who is paid by a City contractor for work performed on a City contract, directly out</p>	Definition of financial interest; paid out of a City contractor's general funds; working on a City contract as an employee or independent contractor of a City contractor; local university; prohibited financial interest in any City contractor, work or business; in the name of another; ownership interest; employment interest; contractual interest; status of employee on a leave of absence; solicit or accept money or anything of value in return for advice or assistance on matters concerning the operation or business of the City; wholly unrelated; salary; ownership interest

		<p>of the contractor's operating funds, does not thereby have a financial interest in City business.</p> <p>Note: the Board also determined that: (i) employees on leave a leave of absence from City employment are not exempt from the Ordinance, because they retain their status as City employees, as the City sets the terms of their leave. <i>See also</i> Case No. 88041.A; (ii): providing technical instruction and project updates to persons who will meet with City employees or officials did not constitute representation before a City agency or department; and (iii) the subject of the outside employment was wholly unrelated to the employee's City responsibilities.</p>	
<p>91075.Q</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec%20Chairs/4-15-12/91075.Q.pdf</p>	Travel	<p>A City department was advised that four (4) of its employee could attend a trade exposition and attend a seminar at a vendor's facility covering maintenance issues for City equipment purchased from the vendor.</p>	<p>Business travel; reasonable travel expenses; trade show; exposition; educational travel; equipment maintenance</p>
<p>91078.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO_Outside_Employment/91078.A.pdf</p>	Outside Employment	<p>The Board determined that a City employee was not prohibited from accepting a second job as a consultant for private companies, with some responsibilities similar to those the employee performed in the City job, but acquired as part of the employee's professional training and work in the private sector prior to City employment.</p>	<p>Outside employment; dual employment; outside jobs; consultant; pre-City professional experience; money for advice; fiduciary duty; second job</p>

		The Board advised the employee of the standard restrictions on outside employment, including fiduciary duty, representation; improper influence; conflicts of interest; City property and confidential information. In particular, the employee was advised to recuse from any projects involving the outside employer, and that if the employee's department would not permit recusal, the employee would be forced to resign from City employment.	
91079.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_GiftsTravel/91079.A.pdf	Gifts	The Board advised a high-ranking City official that using tickets given to all guests at a dinner by the airline would create the appearance of impropriety, and that the public office was being used for private gain, even though the official was not in a position to affect the donor's City business, and thus there was no legal prohibition on accepting and using them. See <i>also</i> Case Nos. 10021.A and 16032.A, dealing with the purchase of high-demand sports tickets at face value, and Case No. 91069.A.	Appearance of impropriety; decline a gift; tickets; appearance of using a public office to obtain a private gain; avoidance of even the appearance of impropriety; cornerstone of the Ethics Ordinance; in a position to substantially affect the donor's City business
91086.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/Decision%20Chairs/NerFid/91086.Q.pdf	Outside Employment	A City employee who was an inspector wished to take an outside job as a dietician, preparing menus and making nutritional assessments, but using professional and Master's degree skills. The outside employer has no City contracts or licenses and was not inspected by the City employee's department. The employee was advised that the Ordinance did not prohibit this dual employment, and of the standard restrictions: money for advice, conflict of	Outside employment; dual employment; outside employment; outside jobs; dietician; master's degree; money for advice; fiduciary duty; second job; nutrition assessment

		interests; fiduciary duty, City-owned property, and confidential information.	
91087.A https://www.chicago.gov/dam/city/depts/ethics/general/AO Interest CityBusiness/91087.A.pdf	Financial Interest in City Business	<p>This is a significant, precedential case. The Board determined that a City employee, who worked on a specific City low-income renters' assistance program, and who owned a rental building in the City, would not be in violation of the Ordinance's financial interest in City business provision if the tenants of the building applied for or received assistance under the program, given that:</p> <p>(i) the maximum assistance would be \$1,500 per unit, and the total value of the assistance, which would benefit the City employee as owner of the property, would be less than the \$5,000; (ii) the employee would not in any way affect the decision to award tenants the assistance.</p>	Financial interest in any City contract, work or business; rental property; rental assistance program; landlord; own a rental building; \$5,000; \$1,000; tenants' tenant applying for a City financial assistance program; City employee as landlord; recusal; recuse
91088.I https://www.chicago.gov/dam/city/depts/ethics/general/AO Employ Relatives/91088.I.pdf	Employment of Relatives or Domestic Partners	<p>This is a significant, precedential case. After investigating a complaint, the Board:</p> <p>(i) determined that the term "employ" in subsection (a) refers not only to the act of hiring but also to the ongoing supervision of an employee by a relative, because the purpose of this section is to prohibit favoritism of all kinds towards relatives, not only in hiring decisions, but in a broader range of employment issues, including employee evaluations, promotions, and salary increases. The Board considered the bureau chief's actions a violation of the Ordinance even though the chief's <u>supervision</u> over the brother was <u>indirect</u> (three supervisory levels removed). The Advisory Opinion states: "The fact that you both worked in</p>	<p>Nepotism; employment of relatives; domestic partner; ongoing supervision; hiring; employ" employees serving in the same bureau not a per se violation; ongoing employment; promotions; raises; performance reviews; daily work assignments; recuse; direct supervision; indirect supervision; totality of the circumstances; investigation; employee sanctions; penalties; attempt to comply with the Ordinance; recuse; recusal;</p>

the same bureau does not, in itself, constitute a violation of the Ethics Ordinance. As previously stated, the Ordinance prohibits situations in which one relative supervises another relative, including involvement in employee evaluations, promotions, and salary increases. Once you became head of the Bureau... you moved into a position that was ultimately supervisory over your brother. It is clear that your work relationship with [your brother] was not that of an immediate supervisor. Nevertheless, the facts show that you exercised supervisory responsibility when you signed the two documents pertaining to him." (I.e., if he had not signed the documents, there may not have been any violation)."

(ii) determined that a bureau chief's signing of the order that promoted the chief's brother within the bureau, as well as signing of the salary increase report for the brother, were violations of §2-156-130(a);

(iii) concluded that, based on the totality of circumstances in this particular case, it would recommend to department officials that no action be taken against the bureau chief because this chief did not attempt to influence any departmental decisions in favor of the brother and, in fact, attempted to comply with the Ordinance by recusing from the promotion process. *See also* Case Nos. 98045.A; 97054.A.

<p>91089.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO_GiftsTravel/91089.A.pdf</p>	<p>Gifts</p>	<p>The Board determined that, under the Ordinance in effect at the time, City employees and officials could accept honoraria for making speeches or presentations as gifts on behalf of the City, but they must be reported to the Board in writing. Note: Ordinance amendments effective in November 2012 supersede this case and prohibit City employees and official from accepting any honoraria related to their City duties, even as gifts on behalf of the City. Such honoraria must be declined.</p>	<p>Gifts; honoraria; honorarium; money for speaking or appearing; seminars; presentations; conferences; related to one's official City responsibilities</p>
<p>91090.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO_ConflictOfInterest/91090.A.pdf</p>	<p>Fiduciary Duty; Conflicts of Interest/Improper Influence</p>	<p>This is a significant, precedential case. The Board determined that the Ordinance does not limit the right of a City employee or appointed officials (here, a member of the City's Commission on Human Relations), to file a complaint with the same City department or board in which they serve or are employed, not does it prohibit fellow board members or employees from handling the case, even one involving their fellow commissioner's complaint. The Board determined that both are permissible as long as: (i) the commissioner or employee who files the complaint recuses from the matter, and does not try to influence any of the proceedings; and (ii) the other commissioners uphold their fiduciary duty to the City by recusing themselves if, in their own judgment, they cannot be unbiased in their decisions.</p>	<p>Bona fide complaint; filing a complaint with one's own agency or department; fiduciary duty; gain unfair advantage or benefits; CCHR; Commission on Human Relations; same rights as other citizens; participating in good faith; put the best interests of the City before any personal feelings they may have for the complainant; subjective test; appointed officials; adjudicative board or commission; adjudication; Fair Housing Ordinance; civil rights ordinances; hearing officer; objective test; recusal; recuse</p>
<p>91092.Q</p> <p>https://www.chicago.gov/content/</p>	<p>Gifts; Conflicts of Interest/Improper Influence;</p>	<p>A City employee was advised that proposed outside employment with a security company was not prohibited, with the standard restrictions (conflict of</p>	<p>Gifts to the City; gifts accepted on behalf of the City; outside employment; security systems; economic interest; conflict of</p>

dam/city/depts/ethics/general/Dec%20Chairs/June/91092.Q.pdf	Outside Employment	interests, improper influence, fiduciary duty; money for advice, City property, confidential information, representation), and that a proposed gift of security systems to three (3) City departments by the proposed outside employer was acceptable as a gift to the City, provided (i) the acceptance was reported to the Board and the Comptroller. The case is notable because the employee was advised that the Ordinance prohibited involvement in this gift offer, or any future gift offer from the outside employer.	interests; improper influence; making or participating in governmental decisions
91093.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_PostEmploy/91093.A.pdf	Post-employment	The Board determined that a former City employee, who had left City employment more than one year prior to requesting the opinion, would not be prohibited from working as a consultant/independent contractor to a company, which, in turn, had contracted with a second firm to review the success of the second firm assumption of managing a City program that had been “privatized.” Although the program was monitored by the former employee’s City department, the program was established after the former City employee had left City employment, and thus the former employee was not personally and substantially involved in the subject matter of reviewing that program’s new management. The Board also determined that the employee had not exercised contract management authority with respect to these contracts.	Post-employment; one-year subject matter prohibition; participated personally and substantially in the subject matter; privatize; privatization; not involved in the privatization process; not involved in the City contract; contract management authority
91096.Q https://www.chicago.gov/content/	Outside Employment	An employee of the Chicago Public Library was advised that the Ordinance did not prohibit writing a book, not on City compensated time, about a subject that	Writing a book; author; Chicago Public Library collection; copyright; work for hire; fiduciary duty; confidential information;

dam/city/depts/ethics/general/Decision%20Chairs/NerFid/91096.Q.pdf		<p>was also the subject of a collection (owned by the Library) the employee administered. The employee supervises those who make decisions regarding whether to add to the collection. The employee was advised of the relevant restrictions, including fiduciary duty, the use of City-owned property, confidential information, conflicts of interest, improper influence, and representation.</p>	<p>compensated time; publish; collection available to the public; write bibliographies</p>
<p>91097.Q</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_EmployRelatives/91097.Q.pdf</p>	<p>Employment of Relatives or Domestic Partners</p>	<p>A City department was advised that it did not need to withhold payment for design services rendered to the City by the spouse of a City employee, given that the employee had nothing to do with the project for which the design services were used, or with the spouse obtaining the contract.</p>	<p>Relative; contract management authority; relative's company contracting with the City; wife; spouse; domestic partner; nepotism</p>
<p>91098.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO_PostEmploy/91098.A.pdf</p>	<p>Post-employment</p>	<p>This is a significant, precedential case. The Board determined that a part-time employee, who performed medical examinations for one City department, could resign from City employment and then be retained to perform the same kind of examinations on City employees from a different department, as a consultant to that second department. The tasks performed in post-City employment would be based upon the "occupational skills of [the] profession, skills acquired through occupational education and training." The Board determined that this did not fall within the intended meaning of the post-employment prohibitions. Note: this is a key "trade skills" decision. See also Case No. 93018.A.</p>	<p>Post-employment; retained as a consultant to the City; medical examinations; trade skill; not prohibited; one year subject matter prohibition; revolving door; assist or represent any person in any business transaction involving the City; occupational skills on his profession; skills acquired through occupational education and training; intended meaning of the one-year subject matter prohibition</p>

<p>91099.Q</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/Deck%20Chairs/NerFid/91099.Q.pdf</p>	<p>Outside Employment</p>	<p>A City employee was advised that a fellow employee was not prohibited from accepting a paid position with a not-for-profit organization receiving funds from the City to act as a tutor to the organization's clients; the subject of the teaching was wholly unrelated to the employee's City duties, and the employee's City bureau had no decision-making authority over the funding of any of the department's delegate agencies. The employee was advised of the relevant restrictions, including fiduciary duty, use of City time, conflicts of interest, representation, and confidential information.</p>	<p>Outside employment with a delegate agency; outside employment; dual employment; second jobs; one's own department; relevant restrictions</p>
<p>91100.Q</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/AORepresentingOthers/91100Q.pdf</p>	<p>Representation of Other Persons; Non-profit Board Service; Outside Employment</p>	<p>A City employee was advised that the Ordinance did not prohibit uncompensated service on the board of directors of a not-for-profit neighborhood clinic. The employee's City job was unrelated to the board of directors or the work of the non-profit position. The employee was cautioned about the fiduciary duty, representation, City property, and disclosure of confidential information restrictions.</p>	<p>Non-profit board service; not-for-profit board service; delegate agency; fiduciary duty; representation; confidential information; City property; volunteer board of directors</p>
<p>91101.Q</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/AOOutsideEmployment/91101Q.pdf</p>	<p>Outside Employment</p>	<p>Consistent with the analysis of Case No. 91103.A, a City employee was advised that the employee was not prohibited from forming a business and through it teaching information the employee used in the regular course of City employment, as the "customers" or students would be business located outside of the City. The issue has nothing to do with the overlap of duties between his City job and his non-City employment. Rather, the issue is</p>	<p>Solicit or accept any money or any other thing of value in return for advice or assistance on matters concerning the operation or business of the City; teaching; university; college; City codes; money for advice; inside information; unfair advantage for students; outside employment; dual employment</p>

		what he will be teaching, or what kind of information he will be disseminating.	
91103.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_Outside_Employment/91103.a.pdf	Outside Employment	<p>This is a significant, precedential case. The Board determined that a City employee working in a City program would be prohibited from being paid for giving lectures at a local university regarding the same program only if the employee: (i) would have some decision-making authority over those who would be taking the class; or (ii) the employee was relating information in the course of the lectures that was not publicly available. Thus, if the employee were giving information about City codes, or City techniques, even if that information was learned in the course the employee's City position (not just as part of one's general professional skills), the teaching for pay would be still be acceptable as long as the information was publicly available and not insider information. See <i>also</i> Case nos. 91101.Q, 93021.A.</p>	Solicit or accept any money or any other thing of value in return for advice or assistance on matters concerning the operation or business of the City; teaching; university; college; City codes; money for advice; inside information; unfair advantage for students; outside employment; outside employment; dual employment
91104.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/December%20Chairs/4-15-12/91104.Q.pdf	Travel	An appointed official was advised that commission members were not prohibited by the Ordinance from accepting reasonable travel expenses from two competing teams of potential contractors, in order to aid in evaluating bids on an RFQ (request for proposals).	Business travel; reasonable travel expenses; RFQ; request for qualifications; facilities visit; educational travel; necessary
92001.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/December%20Chairs/4-15-12/92001.Q.pdf	Travel	A high-ranking City employee was advised that the Ordinance permitted acceptance of reasonable travel expenses for a seminar on the industry, because the sponsor of the seminar offered to pay the expenses, and the high-	Business travel; reasonable travel expenses; substantially affect the offeror's City business; educational seminar

k%20Chairs/4-15-12/92001.Q.pdf		ranking employee had no ability to affect any City business the offeror had.	
92002.A https://www.chicago.gov/dam/city/depts/ethics/general/AO Interest CityBusiness/92002.A.pdf	Financial Interest in City Business	The Board determined that principles of equity and justice compelled it to rule that a rank-and-file City employee who had been awarded a home six (6) years prior through a City lottery program (the home being worth less than the threshold for a financial interest, then \$5,000), and who had spent money on improving the property, which was now deemed structurally unsound, could receive a loan from the Department of Housing worth more than \$5,000 to improve the property, even though it would otherwise be considered a prohibited financial interest in a City contract, work or business. See also Case Nos. 90028.A, 90029.A, 90033.A, 90040.A, 90062.A, and 02022.A.	Principles of equity and justice; homestead; City loan greater than the threshold; financial interest in a City contract, work or business; fairness; structurally unsound; HUD; federal loan; housing loan; Department of Housing; equitable estoppel; detrimental reliance;
92003.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/AO InterestCityBusiness/92003.q.pdf	Sister Agencies; Financial Interest in City Business	A City department was advised that the Ordinance does not prohibit employees of the Chicago Public Schools from applying for or receiving real estate loans or grants from or administered by a City department. Teachers in the Chicago Public Schools are not City employees, for purposes of the Ordinance, and thus not subject to the prohibition on having a financial interest in any contract, work or business of the City.	Financial interest in any City contract, work or business; sister agencies; Chicago Public Schools; Board of Education; teachers; not City employees; loans or grants from or administered by a City department; not a City agency
92004.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec	Post-employment	A departing City employee and director of a non-profit organization that the employee wished to become by, and which was a contractor of the employee's department, were advised that the Ordinance's post-employment provisions	Post-employment; revolving door; one-year subject matter prohibition; participated personally and substantially in the subject matter; human resources training; contract management authority

k%20Chairs/4-14-12/92004.Q.pdf		did not restrict the employee from accepting the position and serving as a trainer for a City department. The employee had no involvement in the program on which the employee would be training, or with the non-profit organization's contract. <i>See also</i> Case No. 98043.A.	
92005.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_PolActivity/92005.A.pdf	Political Activity	This is a significant, precedential case. The Board determined that making contributions to candidates for judicial office – judge – whether for retention or first-time elections – is political activity, subject to the restrictions on political activity in the Ordinance. <i>See also</i> Case No. 99029.A.	Judicial elections; Cook County Circuit Court judges; Illinois Appellate judges; Illinois Supreme Court judges; political activity; making a political contribution; candidate for any elected office; prohibited political activity; nonpartisan candidacies; candidacy
92007.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/December%20Chairs/4-15-12/92007.Q.pdf	Travel	A City department was advised that the Ordinance prohibited a departmental employee from attending a week-long seminar, offered by a departmental vendor. The rationale was that the invited employee was in a position to substantially affect the vendor's/inviter's City business, and the vendor/inviter was not the seminar's sponsor.	Business travel; reasonable hosting; sponsor of the event; departmental vendor; contractor; educational seminar
92009.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_PolActivity/92009.Q.pdf	Political Activity	An employee of the Department of Revenue was advised that the Municipal Code prohibited the employee from running for election to the office of State Senator. Note: this case was effectively superseded by Case No. 99029.A, in which the Board held that a state of Illinois Statute, the Local Governmental Employees Political Rights Act, 50 ILCS 135/1, et seq., pre-empts a home rule unit of government, such as the City, from enforcing laws inconsistent with that statute.	Prohibited political activity; running for elected office; home rule pre-emption; the Illinois Local Governmental Employees Political Rights Act, 50 ILCS 135/1, et seq.; Department of Revenue; Office of Inspector General; Board of Ethics; Commission on Human Relations; Department of Procurement Services; State Senator; Illinois General Assembly

<p>92010.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO_PostEmployment/92010.A.pdf</p>	<p>Post-employment</p>	<p>This is a significant, precedential case. A former high-ranking employee opened a consulting firm, advising businesses on submitting documents to the employee's former bureau for examination and approval. As a consultant, the former employee would review the documents to ensure that they comply with applicable City codes. As a City employee, the former employee supervised the bureau that reviewed these documents and resolved issues with private businesses. The Board determined for the first time that the subject matter of the transaction was the specific project, and thus the former employee was prohibited, for one year, from consulting on any specific project on which the employee had worked during City service. However, the Board also determined that, during City employment, the former employee had had supervisory responsibility over all examiners and thus was permanently prohibited from consulting on any projects that went before the bureau during the employee's work there. Note: this case was modified by the Board in Case No. 94001.A.</p>	<p>Post-employment; one-year subject matter prohibition; consulting; consultant; documents; plans; examiners; permits; participated personally and substantially in the subject matter; contract management authority; final approval; definition of subject matter; particular project; particular site; particular development</p>
<p>92012.Q</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/Decision%20Chairs/4-14-12/92012.Q.pdf</p>	<p>Non-profit Board Service</p>	<p>A high-ranking City employee was advised that, although the Ordinance did not prohibit the employee's service as an unpaid director of a non-profit organization, it would severely restrict the employee's ability to perform required duties both as an outside board member and as a high-ranking City employee. Specifically, the representation provision would prohibit the employee from</p>	<p>Non-profit; Board of Directors; represent; representation of other persons; fiduciary duty; not for profit organization; non-profit board service; appearance of impropriety; appearance of favoritism; non-ministerial; non-compensated board service</p>

		representing the non-profit before the City, and, because the non-profit had business before the employee's City bureau and other City personnel supervised by the employee, the fiduciary duty provision would require recusal from a large number of matters. See <i>also</i> Case No. 06037.Q.	
92013.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/Decision%20Chairs/NerFid/92013.Q.pdf	Fiduciary Duty	A mid-managerial City employee was advised that the Ordinance did not prohibit service on the local alderman's local zoning review committee, but was also advised that the fiduciary duty provisions required the employee to exercise judgment in the best interests of the City, free from any loyalties owed to the alderman, and represent anyone before the committee.	Alderman; local zoning review committee; conflict of loyalty; fiduciary duty; best interests of the City; free from outside influences or loyalty
92014.A https://www.chicago.gov/content/dam/city/depts/ethics/general/AOOutsideEmployment/92014.a.pdf	Outside Employment; Fiduciary Duty; City Property	This is a significant, precedential case. The Board determined that a Chicago Police Officer who had an outside business as an insurance agent was prohibited from using Police Department records to gather information for marketing automobile insurance to uninsured motorists (during non-compensated time). Uninsured motorist violations are a matter of public record. The Board reasoned that the officer's fiduciary duty to the City prohibited the direct access to departmental records, bypassing the standard FOIA (freedom of information act) procedures as it would constitute obtaining a private benefit by virtue of one's City position. The officer requested that the Board reconsider its opinion, but the Board did not change its	Chicago Police Officer; Chicago Police Department; insurance agent; insurance agency; car insurance; auto insurance; automobile insurance; outside employment; outside employment; dual employment; selling insurance; uninsured drivers; uninsured motorists; fiduciary duty; City property; special access; private benefit; misuse of City position; FOIA; freedom of information act requests; public records; favoritism

		determination. See <i>also</i> Case No. 09034.A.	
92015.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_PolActivity/92015.Q.pdf	Political Activity	A clerical City employee was advised that the Ordinance did not prohibit attendance at a community ward meeting sponsored by the Mayor; the employee was also advised of the restrictions regarding political activity: (i) no employee may coerce or compel another to make or solicit a political contributions, or knowingly solicit or accept a political contributions from a person doing business with the City.	Making political contributions; campaign contributions; coerce or compel; solicit or accept a political contribution; knowingly
92016.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_PostEmploy/92016.A.pdf	Post-employment	This is a significant, precedential case. The Board determined that a former City employee who had been personally and substantially involved in formulating a City housing loan program was not prohibited by the Ordinance's post-employment provisions from applying for and receiving a loan through that very program, because: (i) this is not the kind of transaction intended to be prohibited by the Ordinance; (ii) it was a program available to all qualified City residents; and (ii) the former employee's loan application was submitted after the employee left City service. See <i>also</i> Case No. 98003.A.	Post-employment; loans or grants from the City; housing loans; assist or represent any person; participation in a loan program; use or disclosure of confidential information; purposes of the post-employment restrictions; insider information; goal of the post-employment provisions; rights available to all qualified applicants; any economic benefit provided equally to all residents of the City available to all property owners in the City; uniform procedure
92017.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec%20Chairs/4-15-12/92017.Q.pdf	Travel	A high-ranking City official was advised that the Ordinance did not prohibit acceptance of an invitation extended by a major airline to fly on its inaugural flight on a new route to a foreign City. The official was to attend numerous meetings with the Mayor of the foreign City as various other government and private industry officials there. Even though the official	Foreign travel; definition of "reasonable expenses"; not to exceed the business purpose of the trip; inaugural flight; airlines; elected official; in a position to substantially affect the offeror's City business; O'Hare International Airport

		<p>was in a position to substantially affect the airline's City business, the travel was not prohibited because they were not anonymous, not paid to influence the official's City actions or decision, reasonable, and furnished in connection with a public event, appearance or ceremony related to official City business, and furnished by the sponsor. The opinion states that reasonable means "that they do not exceed what is necessary to achieve the stated purpose of the trip, to promote economic and cultural relations between" Chicago and the foreign City. See <i>a/so</i> Case No. 91054.Q.</p>	
<p>92018.Q</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec%20Chairs/4-15-12/92018.Q.pdf</p>	Travel	<p>A high-ranking City employee was advised that the Ordinance did not prohibit acceptance of reasonable hosting and travel expenses to serve as leader of a delegation to a foreign country to exchange information regarding technical issues, infrastructure development, and solid waste disposal and recycling. The expenses were being offered by a non-profit organization that encouraged international communication. The paying organization had no business before the City. See <i>a/so</i> Case No. 91045.Q.</p>	<p>International travel; reasonable hosting expenses; foreign country; meetings regarding solid waste disposal; infrastructure; technical issues</p>
<p>92019.I</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO_GiftsTravel/92019.I.pdf</p>	Gifts; Minor Violations	<p>After conducting an investigation, based on a complaint it had received, the Board determined that City employee did violate the Ordinance by accepting a \$500 honorarium for participating on a panel discussion and failing to report it to the Board of Ethics, as required, but the Board also concluded that no sanctions were warranted because: (i) the</p>	<p>Honorarium; honoraria; payment for panel discussion; failure to report honorarium; minor violation; employment sanctions not warranted; complaint; investigation</p>

		employee stated that the employee was unaware of the reporting requirement; and (ii) immediately complied. Note: this is analogous to a minor violation, which was added to the Ordinance in 2013.	
92020.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_PostEmploy/92020.A.pdf	Post-employment	The Board determined that a former employee, who also served on a voluntary basis with a local industry council, was not prohibited from continuing to serve as a volunteer for this council, because this work would not involve the use of confidential information, and the employee's involvement with the council during City employment could not be considered "substantial," and thus the employee was not "personally and substantially involved" in the subject matter of the council's business transactions with the City.	Post-employment; one-year subject matter prohibition; participated personally and substantially in the subject matter; fundraising; what is substantial involvement; possible partnership plan; industry council; attending information meeting; writing two memos; not "substantial involvement"; definition of substantial involvement
92026.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_PolActivity/92026.A.pdf	Political Activity	This is a significant, precedential case. The Municipal Code then in effect prohibited employees and appointed officials of a particular City department from engaging in "political activity" as defined in the Governmental Ethics Ordinance. The Board determined that this provision did not prohibit an appointed official from becoming a candidate for elected office in a foreign country. The Board's reasoning is that the Ordinance's language refers to "national, state or local," and the word "national" must refer only to federal politics in the United States. The Board also discussed the legislative history behind the municipal code section at issue and the drafters' intent.	Political activity; elected office in foreign country; what is political activity; legislative history; drafters' intent; First Amendment; Commission on Human Relations; national, state or local political clubs or organizations;

<p>92028.I</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/AOFiduciaryDuty/92028.I.pdf</p>	<p>Fiduciary Duty; City Property</p>	<p>After conducting an investigation based on a complaint alleging that a City employee had used the employee's title improperly, by using the title "Inspector" on the telephone but for personal business, and thereby leading people to believe it was official business, the Board determined that complaint was not sustained, because there was insufficient evidence from which to conclude that the title had been used for private purposes. However, the Board advised the employee that this did in fact lead to a misunderstanding: at least person believed that the employee was engaged in an official investigation, in that the employee gave the City phone number as a contact, and did not indicate that the call was for business reasons.</p>	<p>Fiduciary duty; use of City title; Inspector; use of City title for personal, private purposes; complaint; investigation; not sustained</p>
<p>92030.A</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/Decision%20Chairs/LXIV/92030.A.pdf</p>	<p>Conflicts of Interest/Improper Influence; Elected Officials; Financial Interest in City Business</p>	<p>This is a significant, precedential case. An attorney requested an advisory opinion on behalf of a client regarding 10 hypothetical situations involving an alderman who was the primary owner of a real estate company. The Board's opinion states only the outcome of each question, owing to the hypothetical nature of the questions posed. The Board treated the real estate company's interests as the alderman's own. The questions related to whether the alderman could vote on City Council matters such as proposed sales of City property to clients, partners, or potential clients or partners of the company, or zoning matters. The Board also determined that, with respect to filing annual Statements of Financial Interests,</p>	<p>Alderman; financial interest in any City contract, work or business; real estate company; financial interest in the business; City Council matters; doing business with the City; architectural inspections; hypothetical; clients; partners; potential clients; sale of City property; zoning matters; zoning variance; zoning change; Statement of Financial Interests; advice or assistance concerning the operation or business of the City; attorney; confidential; anonymous alderman; duty inquire whether a person is doing business with the City</p>

		the alderman had no duty to inquire whether persons with whom the alderman's real estate company dealt do business with the City, but if there is a reason to believe that persons with whom the real estate company dealt had contracts in excess of the threshold amount (as of 2012, it is \$1,000) with the City, then duty inquire arises. <i>See also</i> Case No. 97063.A	
92032.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_PostEmployment/92032.A.pdf	Post-employment	The Board determined that a former high-ranking City employee was prohibited for one year from working for a new employer on a major City public way/traffic project – the Lake Shore Drive Relocation project. The basis for the determination was that the employee had significant, precedential planning design responsibilities for a project on the same roadway 9 years prior, and this constituted personal and substantial involvement in the subject matter, which the particular public way/traffic location itself. <i>Cf.</i> Case No. 94001.A. The opinion has an extensive discussion of “subject matter.”	Post-employment; one-year subject matter prohibition; participated personally and substantially in the subject matter; definition of subject matter; particular project; site; parcel; Lake Shore Drive Relocation; public way; traffic
92033.A https://www.chicago.gov/content/dam/city/depts/ethics/general/Decision%20Chairs/LXIV/92033.A.pdf	Post-employment	The Board determined that a former high-ranking City employee: (i) was subject to a one year subject matter prohibition regarding work for a new employer on a major City transportation project, because the employee had been involved in the planning stages and in the formation of the RFQ (request for qualifications) for the design and management teams and had reviewed responses to this RFQ – which did not contain any project specifications; and (ii) was not subject to any prohibition	Funding analysis; CATS; Chicago Area Transportation Study; MPO; Metropolitan Planning Organization; participated personally and substantially in the subject matter; business transaction involving the City; review RFQ responses; requests for qualifications; design phase; METRA; CTA; Chicago Transit Authority; involuntary termination; regional transportation plan

		<p>as to a second major project, even though the employee's former City staff had developed the idea for it, because it was accepted into a regional transportation plan, or CATS, which was supervised by the MPO, a committee of which the form employee had served on. The Board determined that this work did not constitute a business transaction involving the City.</p> <p>Note: the Board also determined that the former employee was not prohibited from working on plans that the former employee merely reviewed as a member of the MPO's Committee, and that a City employee is not exempt from the Ordinance's post-employment restrictions if the employee was involuntarily terminated.</p>	
<p>92034.A</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/Deck%20Chairs/LXIV/92034.A.pdf</p>	Post-employment	<p>The Board determined that a former high-ranking employee at O'Hare Airport was not subject to post-employment restrictions in the former employee's new job as Executive Director of a consortium of airlines responsible for purchasing equipment for airline operating systems in a specific terminal, such as baggage conveyors, display boards, passenger loading bridges, hydrant fueling systems, ground power systems, water systems, and docking equipment.. The employee had not exercised contract management authority with respect to the consortium's 1990 operating agreement with the City and had not participated personally and substantially in the management of airline operating systems in the specific terminal.</p>	<p>Post-employment; revolving door; aviation; O'Hare International Airport; terminal operation systems; participated personally and substantially in the subject matter; airlines consortium; purchasing equipment; baggage conveyors; display boards; fueling systems; water systems; landside operations; cargo operations; Terminal 4 operations; definition of subject matter</p>

<p>92035.A</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec%20Chairs/LXIV/92035.A.pdf</p>	<p>Post-employment</p>	<p>This is a significant, precedential case. The Board determined that a former high-ranking City employee violated the Ordinance by assisting a post-City client in preparing an RFP (Request for Proposals) for the historical restoration of a major City building within one year of leaving City employment. The employee had been responsible for seeking developers and funding sources to historically renovate and restore the same building.</p> <p>The Board recommended that the department issue a new RFP and impose appropriate sanctions pursuant to Article V of the Ordinance then in effect.</p> <p>Note: this case rests on the key determination that the former employee was assisting and representing post-City clients in seeking a contract with the City, which also constitutes a business transaction involving the City, even though the client did not make the final decision to submit a proposal to the City until the former employee's work for the client had largely ended – the record showed that the work was aimed at a making a request to the City, and that colored the entire transaction, and governed its timing. The former employee should reasonable have been that the likely outcome would be the submission of a proposal to the City.</p>	<p>Post-employment; penalties; sanctions; historical renovation; rehabilitation; violation of the on year ban; participated personally and substantially in the subject matter; business transaction involving the City; RFP; request for proposals; seeking a City contract; transaction need not be a direct one with the City; the City's involvement in the larger transaction is substantial; conduct that led to submission of a proposal; was aware of should reasonably have been aware that the likely outcome was the submission of a proposal to the City</p>
<p>92036.Q</p>	<p>Lobbyist Registration and Disclosure</p>	<p>A sales representative, who owned a sales firm that was seeking a City contract was advised that, based on the limited</p>	<p>Lobbyist; definition of lobbyist; contingent; sales; salesperson; sales representative; preparation of contract specifications; the</p>

https://www.chicago.gov/content/dam/city/depts/ethics/general/AOLobby/92036.q.pdf		<p>information the sales representative supplied, it was impossible to determine whether the person was required to register as a lobbyist. See Case No. 01021.A, which was rendered after changes to the Ordinance made in 2000, and which renders the analysis in this case obsolete.</p>	<p>solicitation, award or administration of a contract; award or administration of a grant, loan, or other agreement involving the disbursement of public monies; any other determination made by an elected or appointed City official or employee of the City with respect to the procurement of goods, services or construction; solely by submitting an application for a City permit or license or by responding to a City request for proposals or qualifications; RFP; RFQ</p>
<p>92038.A</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/Decision%20Chairs/LXIV/92038.A.pdf</p>	<p>Post-employment</p>	<p>This is a significant, precedential case. The Board determined that a departing City was not prohibited from accepting a post-City position as the executive director of a not-for-profit neighborhood development agency that had a contract with the employee's department, and that would continue to have extensive dealings with the City, given that the employee had not been personally and substantially involved in the subject matter(s) of any City transactions on which the employee would work as the organization's executive director. The employee was responsible for forms, records, and office operations such as housekeeping, vehicles, telephones and the department's budget process in the employee's City job</p>	<p>Post-employment; revolving door; one year subject matter prohibition; participated personally and substantially in the subject matter; definition of subject matter; delegate agency; non-profit; social service agency; neighborhood association; grantee; executive director; supervision of the budgeting process; office manager; no prohibition on working for delegate agency</p>
<p>92041.Q</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/Decision%20Chairs/LXIV/92041.Q.pdf</p>	<p>Special Services Areas (SSAs); Appointed Officials; Conflicts of Interest/Improper Influence; Fiduciary Duty</p>	<p>This is a significant, precedential case. A City department was advised that the Ordinance does not, of itself, prohibit City employees from serving as SSA (Special Services Area) Commissioners. However, the department was advised that the restrictions that would be placed</p>	<p>Appearance of impropriety; SSA; Special Service Areas; representation; appointed officials; own property in the SSA area;</p>

k%20Chairs/LXIV/92041.Q.pdf		on employees both as City employees and as SSA Commissioners would be severe: (i) if the employee owns property in the SSA area, there would be conflict of interests issues and the employee/SSA commissioner would need to recuse; (ii) fiduciary duty issues, if the employee/SSA commissioner has any monetary interests in the area; and (iii) representation issues.	
92044.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_Outside_Employment/92044.A.pdf	Outside Employment	The Board determined that a City was not prohibited from working part-time as an intake specialist for a not-for-profit organization that was a delegate agency of the employee's department. The Board relied on the fact that the City employee had no role in any decision-making about which delegate agencies received grants, but also advised the employee that the outside employer must be removed from the employee's referral list of outside agencies that could receive referrals of clients from the City department.	Outside employment; dual employment; employment with a contractor; employment with a delegate agency; conflict of interests; decision that could benefit the outside employer; non-profit organization; social service agency
93001.A https://www.chicago.gov/content/dam/city/depts/ethics/general/December%20Chairs/LXIV/93001.A.pdf	Post-employment	The Board determined that the Ordinance did not prohibit the new employer of a former City employee from bidding on and receiving contracts with the former employee's City department, though an impermeable ethical screen might be necessary.	Post-employment; participated personally in the subject matter; one-year subject matter prohibition; contract management authority; post-City employer is not prohibited from bidding on or contracting with the former employee's department
93003.A https://www.chicago.gov/dam/city/depts/ethics/gen	Post-employment	The Board determined that a former employee, whose City position was clerical, was not prohibited from taking a position with a consultant that was a vendor of the former employee's City department to work as an executive	Post-employment; one-year subject matter prohibition; trade skill; tradesman; executive secretary; position with a departmental vendor not per se prohibited

eral/AO PostEmploy/93003.A.pdf		secretary. The Board wrote specifically that the post-employment provisions do not prohibit former City employees from accepting positions with firms that deal with their former City agency, nor from dealing with their former City agency; rather, the prohibitions are matter-based.	
93004.Q	Gifts	A City employee was advised that the Ordinance did not prohibit the employee's acceptance of a one-day pass at a local entertainment facility, because the facility had no business with the City.	One-day pass; gift; acceptable gift; offeror had no economic interest in any City business transaction; local entertainment facility
93005.A https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec%20Chairs/LXIV/93005.A.pdf	Post-employment	The Board determined that a departing high-ranking City employee had not participated personally and substantially in the subject matter of the Central Area Circulator Project, which is what the post-City employer wished the employee to work on, and thus there was no prohibition. However, the Board also determined that the employee had exercised contract management over two major intergovernmental agreements involving the Metropolitan Pier and Exposition Authority, for Navy Pier and McCormick Place.	Post-employment; participated personally in the subject matter; one-year subject matter prohibition; contract management authority; Central Area Circulator; intergovernmental agreement with the MPEA; Metropolitan Pier and Exposition Authority; Navy Pier; McCormick Place
93006.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec%20Chairs/4-14-12/93006.Q.pdf	Post-employment	A City department was advised that a departing City employee was not prohibited by the Ordinance from contracting with the employee's own department to do Spanish translation work – the basis for the opinion is that this kind of work fell into the “trade skill” or “tradesman” exemption. Note: in light of 93018.A, the employee would have been permitted to contract with the City even there the trade skill exemption did not	Post-employment; contract management authority; contracting with the City by a former employee not per se prohibited; one-year subject matter prohibition; trade skill; tradesman

		apply, as long as the conditions set forth in Case No. 93018.A were met.	
93007.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_RepresentingOthers/93007.A.pdf	Representation of Other Persons; Attorneys; Pension Funds	This is a significant, precedential case. The Board determined that a City employee was not prohibited from representing a relative before the Fireman's Annuity and Pension Fund, because the fund is not a City agency. The opinion explains that the Pension Fund is established by state statute and analyzes the status of the other three (3) pension funds.	Not a City agency; pension funds; firefighters' pension fund; established by state law; Fireman's Annuity and Benefit Fund; a body political and corporate; not an arm of the City; Policeman's Annuity and Benefit Fund; ex officio; Illinois Pension Code; Municipal Employees', Officers' and Officials' Annuity and Benefit Fund; Laborers' and Retirement Board Employees' Annuity and Benefit Fund
93008.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/December%20Chairs/4-15-12/93008.Q.pdf	Gifts	A City employee was advised that the Ordinance in effect at the time did not prohibit the employee from accepting free satellite TV service in return for serving as the condominium representative for the satellite provided, on the basis that this was not a prohibited gift, because the employee did not participate in any City decisions regarding cable TV or other TV providers. Note: under Ordinance amendments in 2012, this would constitute a prohibited gift if worth more than \$50.	Prohibited gift; restricted gift source; accepting a gift or service from any person who has an economic interest in a specific City transaction if the employee or official is in a position to substantially affect that transaction; gift ban; gift restrictions; cable TV; satellite TV; condominium
93009.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_SFI/93009.A.pdf	Statements of Financial Interests	The Board determined that members of the Chicago Committee on Urban Opportunity – other than the Director -- were not required to file annual Statements of Financial Interests. While the board is a City agency, established by City ordinance, however the members merely advised the Director, but the Director had the authority to enter into contracts, and was intended to be a City employee, of the Department of Human Services, and the Municipal Code grants	Statements of Financial Interests; solely advisory; authority to enter into bidding decisions or to enter into contracts; Director only; Chicago Committee on Urban Opportunity; what is a City agency

		the power to enter into agreements and obligations solely to the Director.	
93010.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_PostEmployment/93010.A.pdf	Post-employment	The Board determined that a departing City employee was not prohibited by the Ordinance from contracting with the employee's own department to do consulting work – the basis for the opinion is that the employee had not been involved personally and substantially in the subject matter of the proposed consulting work. Note: in light of 93018.A, the employee would have been permitted to contract with the City even there had been personal and substantial involvement in the subject matter, as long as the conditions set forth in Case No. 93018.A were met.	Post-employment; contract management authority; contracting with the City; one-year subject matter prohibition; participated personally and substantially in the subject matter
93011.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec%20Chairs/4-14-12/93011.Q.pdf	Post-employment	A City department was advised of the post-employment generally that would apply to a former departmental employee who had formed a company and might be seeking contracts with the City. The Ordinance' post-employment provisions do not per se prohibit this; rather, the former employee would be subject to the one-year subject matter and permanent prohibitions.	Post-employment; contract management authority; contracting with the City by a former employee not per se prohibited; one-year subject matter prohibition
93012.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec%20Chairs/4-15-12/93012.Q.pdf	Travel	A City employee was advised that the Ordinance did not the employee's department from accepting an invitation for several departmental employees to attend a seminar at a vendor's headquarters in Indianapolis regarding a traffic control unit that the City purchased from the vendor.	Business; travel; reasonable travel expenses; educational seminar; vendor's headquarters; manufacturer's facility; company-sponsored seminar; Indianapolis
93013.Q	Sister Agencies; Outside	This is a good summary opinion: a City employee was advised that the	Outside business ownership; owning a company; contracting with the City; City

https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec%20Chairs/NerFid/93013.Q.pdf	Employment; Financial Interest in City Business	Ordinance did not prohibit ownership of a construction company, and was advised of all of the restrictions imposed on outside business ownership by the Ordinance, and that nothing prohibited the company from contracting with the City's sister agencies, as long as the funds for the contract were not administered by the City or authorized by City ordinance.	property; money for advice or assistance; financial interest in the name of another; sister agencies; CHA; CTA; ownership interest; \$1,000 threshold; obtaining business; conflict of interests; construction contractor
93014.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec%20Chairs/NerFid/93014.Q.pdf	Representation of Other Persons; Outside Employment	This is a significant, precedential case. A City employee working for the City's MBE/WEB (Minority Owned Business Enterprise/Woman Owned Business Enterprise) Certification Committee was advised that the Ordinance does not prohibit a City employee from applying for or obtaining MBE, WBE or DBE certification for a business the employee's owns in whole or in part. Sister agencies, like the Chicago Park District, Chicago Public Schools, Chicago City Colleges, and Metropolitan Pier and Exposition Authority have chosen to use the City's certification system and the Ordinance does not prohibit companies owned by City employees from contracting with these sister agencies. The employee was advised, however, that the Ordinance does prohibit the employee from having a financial interest in the name of the business in any City contract, work or business.	Representation of other persons in any formal or informal transactions; a financial interest in the name of another; sister agency; application for MBE/WBE/DBE status not prohibited; Minority, Disabled, Woman Owned Business Enterprise; contracting
93015.A https://www.chicago.gov/dam/city/depts/ethics/gen	Gifts	This is a significant, precedential case. The Board determined that City employees or officials may accept a permissible sales promotion, or discount, e.g., a parking discount, that is (i)	Sales promotion; not a gift; market of similarly situated persons; all employees of two (2) City departments; discounted checking accounts; bona fide sales promotion; any opportunity, benefit, loan, or service that is

eral/AO GiftsTravel/93015.A.pdf		<p>extended to “members of the public” or to a market of similarly-situated persons [this does <i>not</i> mean that offer must be extended to the entire world or the entire general public to constitute a <i>bona fide</i>, acceptable sales promotion]; and (ii) intended to create a sale and/or to expand business, so that acceptance of the offer constitutes an economic benefit to the offeror either in itself, as an exchange for a particular purchase, or as an incentive to future business. What does “members of the public” or “a market of similarly situated persons” mean? It means that the offer cannot be extended just to a targeted audience of City employees and/or officials who are in a position to affect the offeror’s business (and to a few others, just for show or camouflage). It does <i>not</i> mean that offer must be extended to everyone, everywhere (or to “all” members of the general public), but, rather, just to a “market of similarly situated persons” or some “members of the public” “on the same terms.” Thus, in this case, the offer of discounted checking accounts was made to all employees of two (2) large City departments, as well as to some other companies’ employees, and was permissible.</p>	<p>available to members of the public on the same terms; discount; general public; targeted audience of City employees or officials</p>
<p>93016.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO_SFI/93016.A.pdf</p>	<p>Statements of Financial Interests</p>	<p>This is a significant, precedential case. The Board determined that members of the Central Area Circulator Board (Special Service Area #12) were required to file annual Statements of Financial Interests, because the Board was not solely advisory, in that it had the power to: (i) negotiate contracts; and (ii) hire staff,</p>	<p>Statements of Financial Interests; appointed officials; SSA; Special Service Area; Circulator Board; not solely advisory; power to negotiate contracts; power to make binding decisions; power to hire staff; job duties; exercise of job duties; job description; what is authorized; what is exercise; employee’s job description; official duties</p>

		which entails making bidding decisions, even though the Board had never exercised this power. On this issue, see <i>also</i> Case No. 94011.A.	
93017.A https://www.chicago.gov/dam/city/depts/ethics/general/AO Interest CityBusiness/93017.A.pdf	Financial Interest in City Business	This is a significant, precedential case. The Board determined that, despite the hardship it may cause, a City employee was prohibited from receiving more than the threshold amount for a loan to rehabilitate multi-unit apartment buildings, purchased between 1982 and 1991. The Board recognized that, without \$1 million dollars in City loans, the employee would be unable to rehabilitate the units and correct building code violations and recognized that the employee presented a letter to the Board from the local alderman. The Board considered but rejected the argument that, on principles of equity, the employee should be granted the loan. Cf. Case nos. 90028.A, 90029.A, 90033.A, 90040.A, 90062.A, and 92002.A. The Board also noted that a colleague of the employee had received \$100,000 in loans administered by a City department in 1980, prior to the passage of the Ordinance.	Financial interest in any contract, work or business of the City; housing loan; rehabilitation loan; Department of Housing; building code violations; housing court; principles of fairness and equity; multi-unit loans; multi-unit residential buildings; reasonable expectation of receiving a loan; undue hardship; benefit to the community
93018.A https://www.chicago.gov/dam/city/depts/ethics/general/AO PostEmployment/93018.A.pdf	Post-employment	This is a significant, precedential case. Up until 1993, it was the Board's general policy that post-employment with the City is subject to the restrictions of § 2-156-100. (See Case No. 89021.A, which provided the six-point emergency exception. Also see Case nos. 87107.A, 91098.A, 93006.Q,, 91036.A., and 18027.Q)	Post-employment; consulting agreement between the City and a former employee; Executive branch; owe sole fiduciary duty to the City; written agreement; independent contractor; City seeks the service of the former employee; language obligating the former employee to act at all times in the City's best interests; subject matter; exemption or exception from the post-employment provisions; purpose of the post-

However, in this case, the Board determined that the post-employment provisions do not prohibit a former employee from contracting directly with the City and for its benefit, to perform tasks related to those the employee had performed during his or her City tenure, tasks for which the City seeks that person's knowledge and competence gained while with the City. The Board held that the "assist or represent any person" language of subsection (b) requires the presence of a third party in the transaction, which would entail dual loyalties on the part of the former employee. Thus, the Board stated that the post-employment provisions do not prohibit the City from retaining former employees under three conditions: 1) the *City seeks the assistance* of the former employee; 2) the agreement for services is made directly between the City and the former employee, and *no third party*—such as a corporate entity—is involved; and 3) the former employee's services would *benefit the City*.

The Board concurred with a Law Department opinion that “the purpose of post-employment provisions is to prevent former employees from using ‘inside knowledge’ to benefit third parties, thus impairing the integrity of government services and creating the appearance of impropriety.” See *also* Case No. 99010.A.

employment or revolving door restrictions; retiring City employees or officials; intended meaning of the post-employment provisions; purpose of the post-employment or revolving door provisions

<p>93020.Q</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec%20Chairs/4-14-12/93020.Q.pdf</p>	<p>Post-employment</p>	<p>A City employee was advised that several other departmental employees might be able to contract with the department as independent contractors if the conditions set forth in Case No. 93018.A are met.</p>	<p>Early retirement; retained by the former City department as a contractor; consultant</p>
<p>93021.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO_Outside_Employment/93021.A.pdf</p>	<p>Outside Employment</p>	<p>The Board determined that a City employee was not prohibited from accepting outside, paid employment, to make presentations on subject matters regulated by the employee's City department, provided it was publicly available information and would not give students an inside advantage in dealing with the department. The Board's opinion follows the decision rendered in Case No. 91103.A, but in this case, there was the additional circumstance that the City department itself currently offers seminars to private groups and businesses (seminars similar to those proposed by the employee in this case) and that the department was considering expanding its involvement in offering such seminars. Even in this case, the Board determined that the Ordinance does not prohibit the employee from undertaking this outside employment. See <i>also</i> Case No. 91103.A.</p>	<p>Outside employment; teaching; solicit or receive money in return for advice or assistance on matters concerning the operation or business of the City; purpose of the money for advice provision; would not give anyone an unfair advantage in seeking City business; not make decisions affecting persons or students taking the class; education</p>
<p>93032.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO_Employ</p>	<p>Employment of Relatives or Domestic Partners</p>	<p>This is a significant, precedential case. The Board determined that, because a high-ranking City employee exercised contract management authority over many City contracts, the employee's spouse could not go to work for a City</p>	<p>Employment of relatives or domestic partners; family members; employment by a subcontractor; contract management authority; presumption; evidence of a violation; employment of or contracting with a</p>

contractor. Such a situation would place the employee in a position of either: (i) having to exercise contract management authority over any modification to that contractor's City contract, or any new contract with that company, and thus violate the Ordinance's nepotism provisions; or (ii) not being able to fulfill the obligations under state law.

Note: The Board interpreted the phrase "shall be evidence of a violation" strictly. In this case, the employee's spouse was offered a job by a City contractor over whom, the Board determined, the employee exercised contract management authority. The Board interpreted the term "evidence" to mean presumption. It is presumed that if the relative or domestic partner is employed by (or contracts with) the contractor within six months prior to, during the term of, or subsequent to the period of the City contract, that employment or contracting was obtained in violation of the Ordinance. The Board held that this evidence is rebuttable, but such a presumption is hard to overcome. Even with facts to the contrary, the presumption might not be rebutted. This in fact was the Board's decision in Case No. 93032.A where statements contrary to the presumption made by the high-ranking City employee and others were deemed not to be sufficient evidence to rebut the presumption set up by the Ordinance.

relative or domestic partner or family member within six (6) months; presumed;

		<p>According to the Board, then, the Ordinance presumes that if the employee's relative or domestic partner takes a job with the contractor within six months of the employee signing the contract, the employee <u>has</u> used the City position to assist the relative/domestic partner in getting that employment. The presumption allows one to begin with the conclusion that the Ordinance has been violated, and mere statements to the contrary by the subject of the case are not sufficient to rebut that presumption.</p> <p>The opinion itself does not use the word "presumption" and does not go into this analysis. It reads: "Were your [relative] to accept the position, the Board would be compelled by the Ordinance to treat her employment as evidence of a violation of §2-156-130(c)" (p. 5). And in its conclusion: "The Board would be compelled by section 2-156-130(c) of the Ordinance to consider [your relative's] employment as evidence that a violation of the Ordinance has occurred. A full, fact-finding investigation by the Board would then be necessary to weigh all the evidence presented" (pp. 5-6). <i>Cf.</i> Case No. 05022.A</p>	
93033.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_Employ_Relatives/93032.A.pdf	Financial Interest in City Business	<p>This is a significant, precedential case. The Board determined that a company co-owned by a City employee that wished to enter into a subcontract with a City contractor, to work on that contractor's City contract, was not prohibited from doing so, provided: (i) the employee's company was paid out of the general</p>	<p>Financial interest in a City contract, work or business; subcontractor; security services; named subcontractor; disclosed subcontractor; City's authority to approve or disapprove subcontractor; prime contractor; general contractor; security subcontractor; property right</p>

		<p>funds of the City contractor, and not out of funds belonging to or administered by the City, or authorized by Ordinance; and (ii) the employee's company was not named on the primary contractor's bid for the City contract. In this case, the employee's company was not named on the primary contractor's bid for the City contract; rather bids for the subcontracting work were opened only after the primary contractor was awarded the City contract. Cf. Case No. 97019.A; 96038.Q.</p>	
<p>93034.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO Interest CityBusiness/93034.A.pdf</p>	Financial Interest in City Business	<p>This is a significant, precedential case. The Board determined that the process following by the Community Development (CDC) for selling City-owned real estate constitutes a process of competitive bidding following public notice. Thus, City employees could participate, submit bids, and purchase property for a price above the threshold for a financial interest in the purchase of any property that belongs to the City.</p>	<p>Financial interest in the purchase of City property; competitive bidding following public notice; a process in which all parties submitting bids are treated equally and bidding on the same conditions; CDC; Community Development Commission; Plan Commission; newspaper; Sun-Times; 30 days to submit a proposal; abandoned property; vacant property;</p>
<p>93035.Q</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/Deck%20Chairs/4-15-12/93035.Q.pdf</p>	Travel	<p>A City employee was advised that the Ordinance did not prohibit the acceptance of reasonable travel expenses to France for a seminar on the French High-Speed Rail System. The seminar was related to the employee's City responsibilities and the expenses were offered by a French trade association, and the French government, which were the seminar's sponsors.</p>	<p>Foreign travel; sponsor of the conference; France; high speed rail; seminar; French government; ACTIM; French trade association; reasonable expenses; provide valuable information</p>
<p>93037.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/gen</p>	Financial Interest in City Business; Elected Officials	<p>This is a significant, precedential case. The Board determined that, although a family member of an alderman was not prohibited from receiving a loan administered by a City department to</p>	<p>Alderman; alderman's family member; alderman's relative; apply for and receive a loan administered by the City; appearance of impropriety; financial interest in any contract, work or business of the City; external loan</p>

eral/AO Interest CityBusiness/93037.A.pdf		<p>renovate a building, and the alderman did not have an ownership interest in the property, but was a named beneficiary in the land trust that owned the property, and rented a unit in the building as the primary residence, the situation created an appearance of impropriety, and could not recommend that the loan be granted.</p>	<p>committee; Committee on Finance; Committee on Housing and Real Estate; Illinois state statute; untenable position; rehabilitation loan; rehab;</p>
<p>93038.A</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/AOPostEmploy/93038.A.pdf</p>	<p>Post-employment</p>	<p>This is a significant, precedential case. The Board determined that the departing Director of a City-wide program was: (i) personally and substantially involved in every phase of the program, from setting policy to coordinating program operations, and thus was prohibited for one year from assisting or presenting a new client or employer in any transactions or project involving that program; and (ii) prohibited permanently from involvement in any conveyance contracts in regard to properties that came under the program while the employee was its director. This permanent prohibition was based on the Board's conclusion that the term "administrative proceeding" "should apply to the process through which an applicant is selected to obtain a particular property and the property is conveyed to that applicant."</p> <p>However, the Board also determined that the employee, by sitting in on two meetings (outside of the program) but who had no voting authority, was not thereby personally and substantially involved in the proposals that were considered at these meetings. The case contains a discussion of the</p>	<p>Post-employment; revolving door; participated personally and substantially in the subject matter; subject matter as a City program; participated personally and substantially in a judicial or administrative proceeding involving the City; proceeding; subsequent real estate closing; definition of subject matter</p>

		term “subject matter.” <i>See also</i> Case No. 94011.A.	
93043.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec%20Chairs/NerFid/93043.Q.pdf	Outside Employment	<p>An architect serving on a City board was advised of the relevant restrictions imposed by the Ordinance given the architect’s employment with a local hospital.</p> <p>Note: in this case, the Board treated an appointed official who received a stipend of \$1,000 per Board meeting as an employee, not as an appointed official. This interpretation was in effect overruled by the Board in Case No. 02041.A.</p>	Outside employment; appointed official; employee; conflict of interests; recusal; abstain; economic interest; derive or receive any compensation from the matter
93045.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_RepresentingOthers/93045.A.pdf	Representation of Other Persons; Appointed Officials	The Board determined that an appointed official whose full-time work involved appearing at various City facilities and departments to accompany clients of the official’s full-time employer did not constitute “representation,” because the work involved preliminary fact-gathering and psychological support.	Representation of other persons; non-ministerial; spokesperson for; fact-gathering memoranda; no complaint has yet been made; formal or informal proceeding or transaction; Advisory Council; appointed official; wholly unrelated; psychological support; fact-finding process; hearing officers; case manager; judicial or quasi-judicial proceedings; advocate for another person; promote the interest of party to another
93046.A https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec%20Chairs/LXIV/93046.A.pdf	Statements of Financial Interests	This is a significant, precedential case. The Board determined that a City employee who loaned another City employee more than \$5,000 was required to disclose the loan on the annual Statement of Financial Interests, as the Ordinance requires filers to disclose all debts in excess of \$5,000 owed to or by the filer if the creditor or debtor (or guarantor) “has done work for or business with the City” in the preceding calendar year, and a City employee “has done work for the City.” In this case, the City	Statement of Financial Interests; FIS; SFI; debts; name and instrument of debt; a person who has done work for or business with the City in the preceding calendar year; debtor; creditor; guarantor; loans to City employees; loans to co-worker

		employee violated the Ordinance for failing to disclose such a loan.	
93047.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_RepresentingOthers/93047Q.pdf	Representation of Other Persons; Confidential Information	<p>This is a significant, precedential case. A City employee was advised that, if the employee wished to assist a co-worker in a reclassification-of-position hearing before the Human Resources Board: (i) this assistance would need to be unpaid; (ii) the employee could not “represent” the co-worker in this hearing, that is, act as a spokesperson before, or sign any documents to be submitted to, any City agency, including the Human Resources Board; and (iii) the employee could not use or divulge any confidential or non-public information to benefit the co-worker.</p>	<p>Assist a co-worker; colleague; co-employee; hearing before a City agency; Human Resources Board; unpaid; appearance of impropriety acts as a spokesperson for; sign any documents to be submitted; definition of representation; confidential information; solicit or receive anything of value in return for advice or assistance concerning the operation or business of the City</p>
93048.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_RepresentingOthers/93048.A.pdf	Representation of Other Persons; Elected Officials	<p>This is a significant, precedential case. The Board determined that an alderman-attorney who was affiliated with a law firm on an “of counsel” (or contractual) basis would not violate the Ordinance if the firm represented clients in matters before City agencies or the City Council, or in judicial proceedings in which the City was an adverse party, provided that: (i) the alderman-attorney did not participate in or receive any compensation from any of these matters; (ii) not vote on or attempt to influence the outcome of any such matters before any City agency; (ii) institute an impermeable ethical screen as to sharing of information; and (iii) not solicit any City business for the firm or solicit any clients seeking City business.</p> <p>Note: in 1997, the Ordinance was</p>	<p>Alderman; attorney; of counsel; practice of law; conflict of interests; improper influence; representation of clients or persons in formal or informal transactions before any City agency; any judicial or quasi-judicial proceeding in which the City is a party and the person’s interests are adverse to the City; appearance of impropriety; impermeable ethical screen</p>

		amended to add §2-156-080(b)(i) and (ii), which modify the holding in the case.	
94001.A https://www.chicago.gov/content/dam/city/depts/ethics/general/AOPostEmploy/94001.A.pdf	Appointed Officials; Post-employment	<p>This is a significant, precedential case. The Board determined that a former member (and Chair) of a City board was: (i) permanently prohibited from assisting or representing any person in any proceeding involving the City, including the member's own former board, if it involved any real estate development, proposal, project or application submitted to that board during the former member's service on it; (ii) prohibited, for one year after leaving the board, from assisting or representing any person in a transaction involving the City (including but not limited to the former member's board) if the transaction concerns a site or parcel of real estate or property that was the subject of any matter, proposal, project or application to the former member's board during the member's service on it.</p> <p>The case is significant, precedential for the way it construes "administrative proceeding" and for the distinction the Board drew in real estate cases between the "subject matter" (typically a parcel or site) and a "proceeding" or "contract," implicating the permanent prohibition (which is a particular proposal, development or project on that parcel or site).</p>	Post-employment; one year subject matter prohibition; permanent prohibition; appointed official; real estate; real estate development; redevelopment; planned development; participated personally and substantially in the subject matter; business transaction involving the City; Lakefront Ordinance; planning; urban planner; participated personally and substantially in the proceeding; judicial or administrative proceeding involving the City; definition of subject matter; Board Chair
94002.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/AOPostEmploy/94002.Q.pdf	Post-employment	A City department was advised that the Ordinance did not prohibit it from entering into a contract with a recently retired high ranking employee of the department to enable the City to use the former	Post-employment; consulting agreement between the City and a former employee; owe sole fiduciary duty to the City; written agreement; independent contractor; City seeks the service of the former employee;

hics/general/Dec k%20Chairs/4-14-12/94002.Q.pdf		<p>employee's services to assisting in labor contract negotiations – the recently retired employee had participated in such negotiations for 15 years. Under the contract, the former employee would be retained as an independent contractor to complete ongoing negotiations and the former employee would represent no other entity in this work and owe a fiduciary duty solely to the City. See <i>a/s/o</i> Cases 93018.A; 99010.A.</p>	<p>language obligating the former employee to act at all times in the City's best interests; cannot represent the interests of any other person or entity, even a corporation of which the former employee is the sole officer, employee, director, or shareholder; subject matter; exemption or exception from the post-employment provisions; purpose of the post-employment or revolving door restrictions; collective bargaining agreements; labor negotiations; union agreements</p>
<p>94003.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO Interest CityBusiness/94003.A.pdf</p>	<p>Financial Interest in City Business</p>	<p>This is a significant, precedential case. The Board determined that a rank and file City employee, who owned 100% of a business that was certified as a M/WBE, and wished to have the company listed as a M/WBE enterprise on another company's bid for a City contract, was prohibited from bidding on and receiving this contract unless the present value of the contract to the employee's company would be less than \$5,000 – any more would be the employee a prohibited financial interest in City business. Note: in 2012, the threshold was lowered to \$1,000. The Board reiterated that the formula for determining a City employee's or official interest in a City contract, "in the name of another," is to take the percentage of ownership that City person has in the business (here 100%) and multiply it by the gross amount of the City contract.</p>	<p>Financial interest; definition of financial interest; bid on a City contract; Minority Owned Business Enterprise; MBE; Woman Owned Business Enterprise; WBE; M/WBE; supplier of goods; be named on a bid; joint venture partner; ownership interest in a business; ownership interest in a City contract; monetary threshold; \$2,500; present value; \$5,000; financial interest in the name of another; financial interest in any contract, work or business of the City</p>
<p>94006.A</p> <p>https://www.chicago.gov/content/dam/city/depts/et</p>	<p>Post-employment</p>	<p>This is a significant, precedential case. The Board determined that a former mid-managerial City employee who had a position with a consulting firm that had subcontract on a City contract to update</p>	<p>Post-employment; one-year subject matter prohibition; participated personally and substantially in the subject matter; definition of subject matter; contract management authority; formulating a project versus being</p>

hics/general/AO PostEmploy/94006.A.pdf		<p>the City's central cost allocation plan. In the employee's City job, the employee had used data from the plan, but was not involved in negotiating any contracts regarding the formulation of, or in formulating, that plan. These represented different subject matters – formulating/updating the plan, in contrast to the end use of the plan (analysis of revenue and cost allocation). Thus, there was no one year or permanent prohibition.</p> <p>Note: this case is significant, precedential in that the Board drew the distinction between participation in the formulation of a project, versus using being a user of the data the project generates; they can be different subject matters.</p>	<p>a project user; revenue analysis; cost allocation plan</p>
<p>94009.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO_OutsideEmployment/94009.A.pdf</p>	<p>Outside Employment; Conflicts of Interest/Improper Influence</p>	<p>The Board determined that a clerical City employee whose job duties included making travel arrangements for departmental superiors, and who wished to serve as a part-time travel agent for one of the agencies that the employee used occasionally to make these arrangements, was prohibited from accepting this outside position while continuing to make City arrangements through this travel agency. The Board reasoned that the employee would have an economic interest in (receive or derive compensation from) the travel agency by accepting this part-time employment, thus it would be a conflict of interests to make City decisions to contract with the travel agency.</p>	<p>Outside employment; dual employment; second job; travel agency; travel agent; clerical employee; conflict of interests; economic interest; receive or derive income or compensation</p>

<p>94010.Q</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec%20Chairs/4-15-12/94010.Q.pdf</p>	<p>Travel</p>	<p>A department head was advised that the Ordinance did not prohibit several employees to attend a seminar at a vendor's headquarters regarding a type of unit that the City was purchasing from the vendor.</p>	<p>Business; travel; reasonable travel expenses; educational seminar; vendor's headquarters; manufacturer's facility; company-sponsored seminar</p>
<p>94011.A</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/AO PostEmploy/94011A.pdf</p>	<p>Post-employment</p>	<p>This is a significant, precedential case. The Board determined that former Director of Grants Administration who took a position with firm that contracted with the City and other governmental agencies to operate training programs was subject to: (i) a permanent prohibition as to the department's contracts with any delegate agencies (including the new employer) that resulted in the grant application evaluation process of the department during his employment; and (ii) for one year, from assisting or representing a new employer or client in managing a security guard training program, and in programs involving training dislocated workers, but not with respect to other matters.</p> <p>Note: the case is significant, precedential for several reasons. First, for its treatment of "subject matter" as a process (see Case No. 93038.A). Second, the Board explicitly determined that the one subject matter prohibition begins on the date that a City employee or official terminates City service, not on the date that he or she stops performing specific tasks. Third, the Board considered</p>	<p>Post-employment; one year subject matter prohibition; participated personally and substantially in the subject matter; job training; training program; vocational training; security guard training; departmental process; definition of subject matter; Director of Grants Administration; delegate agency; RFP; evaluative process; grant application process; subject matter as a process; date on which the one year prohibition begins; employee's job description; official duties</p>

		whether the post-employment provisions should be applied according to an official's or employee's "official duties" or job description, regardless of whether the employee or official actually performed them, or to actual duties performed. The Board determined that this should be judged on a case-by-case basis – in this case, the Board focused on the actual duties the employee had performed during City employment. On this issue, see Case No. 93016.A.	
94012.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec%20Chairs/4-15-12/94012.Q.pdf	Elected Officials; Travel	An alderman was advised that the Ordinance did not prohibit the alderman and several colleagues from accepting reasonable travel expenses from two (2) non-profits to travel overseas and to promote greater understanding between Chicago and the citizens of that country.	Alderman; official travel; overseas or foreign travel; paid for by two non-profit organizations; to promote greater cultural understanding; reasonable travel expenses
94013.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec%20Chairs/June/94013.Q.pdf	Fiduciary Duty; Conflicts of Interest/Improper Influence; Appointed Officials	An appointed official was advised that the Ordinance did not prohibit the official from continuing to serve on the City board while the official's full-time employer held a City contract to consult with delegate agencies of the department associated with the official's City board. The official was advised of the relevant restrictions, including using the official's City position or confidential information to assist the employer, and conflict of interests, fiduciary duty, and representation.	Appointed official; full-time job; employed by a City contractor; consultant to delegate agencies; representation of other persons; conflict of interests; not an owner; recuse
94014.A https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec%20Chairs/June/94014.A.pdf	Post-employment	This is a significant, precedential case. The Board determined that a former high ranking City employee who had been hired by a community organization to work on development a plan on which the	Real estate redevelopment; community redevelopment; area; region; definition of subject matter; vocational training; land use; organizational development; community meetings; empowerment zone; grant

hics/general/AO PostEmploy/94014.A.pdf		<p>former employee had worked on substantially was prohibited from assisting or representing the community organization in any transactions relating to development of the area/community as generally described in the plan. The case is notable for: (i) its construction of subject matter; (ii) its application of the term business transaction involving the City as “any matters that are related to the development of the region as generally described in the plan and are directed toward or are reasonably expected to lead up to City action, including action by any City agencies.” The Board also determined that “business transaction involving the City” does not include requests for City services from citizens expressed at meetings convened by the community organization.</p>	<p>programs; contract management authority; strategic development plan; enforcement of Board opinion; business transaction involving the City; directed toward or reasonably expected to lead up to City action; requests for City services at community organization meetings; one year subject matter prohibition; participated personally and substantially in the subject matter; development as described generally in a strategic redevelopment plan</p>
<p>94015.Q</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec%20Chairs/4-15-12/94015.Q.pdf</p>	<p>Gifts</p>	<p>A City employee was advised that the Ordinance did not prohibit acceptance of an offer from a local health club to for an 18-month membership for the price of 12 months, as the offer was made to about 1,000 people in office buildings near the club’s building. The offer was a sales promotion, not a gift. The opinion also advised the club not to make the offer to any City employees or officials in a position to influence any City business the club may have.</p>	<p>Sales promotion; health club; discounted membership; made to a market of similarly situated people; not a gift; employee not in a position to substantially affect the City business of the offeror</p>
<p>94016.Q</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec</p>	<p>Sister Agencies; Post-employment</p>	<p>A recently retired City employee was advised that the Ordinance did not prohibit the employee from bidding on and accepting a contract to provide security services to the Chicago Housing</p>	<p>Post-employment; business transaction involving the City; Chicago Housing Authority; CHA; not a City agency; contract to provide security services to the CHA; off-duty Chicago Police Officers</p>

k%20Chairs/4-14-12/94016.Q.pdf		Authority – this would not be a transaction involving the City.	
94017.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_ConflictOfInterest/94017.A.pdf	Conflicts of Interest/Improper Influence	This is a significant, precedential case. The Board determined that a high ranking City employee who wrote a memorandum (consistent with the employee's job duties) in support of awarding a City contract to the employee's residential tenant did not violate the Ordinance absent a showing that the employee had a specific monetary interest in the contract or the City's decisions to award it ("in the matter"), or that the recommendation would affect the terms of the residential lease.	Conflict of interests; improper influence; Sole Source Review Board; economic interest in or derive or compensation from the matter; residential tenant; memorandum in support of; representation; represent; residential lease; residential landlord-tenant relationship; economic interest that differs from that of the general public; definition of conflict of interest; definition of improper influence
94018.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/December%20Chairs/4-15-12/94018.Q.pdf	Gifts	An executive with a City contractor was advised that the Ordinance prohibited the executive's company from inviting selected City employees with whom the company dealt to play in invitational golf tournaments, worth about \$90 per recipient.	Gifts; gifts offered by a City vendor; City contractor; golf; greens fees; invitational tournaments; prohibited gifts; \$50 limit
94019.A https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_PostEmploy/94019.A.pdf	Post-employment	This is a significant, precedential case. The Board determined that a former department head, who had left City service several years before, was not prohibited from bidding on and acquiring City-owned real estate through some of the same programs administered by the employee's former department, in order to develop affordable housing, but was subject to two (2) permanent prohibitions: (i) first, as to any administrative proceeding in which the former department head had participated	Post-employment; contract management authority; affordable housing; City programs; New Homes for Chicago; Low-Income Housing Tax Credits; Urban Renewal; Tax Reactivation Program; Scavenger Sale; CAPP; Chicago Abandoned Property Program; former department head; participated personally and substantially in an administrative proceeding involving the City; personal involvement in or direct supervisory responsibility for the formulation of a City contract; evaluation of bids or

		personally and substantially; and (ii) with respect to any City contract over which the department head had exercised management authority, or with respect to any City contract that resulted from a proposal that the former department head had evaluated or exercised direct supervisory authority.	proposals; purchase of City-owned property; department head; former department head
94020.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec%20Chairs/NerFid/94020.Q.pdf	Fiduciary Duty; Outside Employment	A City employee, a Director of Human Resources inquiring on behalf of a fellow employee, was advised that, although the Ordinance did not prohibit the second employee from having outside employment with a private investigators' firm, it restricted this employment: (i) the employee should avoid investigations of, or on behalf of, any persons or business with whom or which the employee had dealings through the employee's City job, as well as the restrictions on use of City property or records, City title, or confidential information.	Outside employment; dual employment; outside job; private investigator; fiduciary duty; City records; City title; authorized use
94021.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/AOInterestCityBusiness/94021.Q.pdf	Financial Interest in City Business	A clerical City employee was advised that the Ordinance did not prohibit the receipt of \$4,950 in a City loan through the Department of Housing, as City employees could, under the Ordinance in effect then, receive up to \$5,000 in City loans or grants.	Financial interest in any contract, work or business of the City; \$5,000; City loan; City grant; housing assistance loan
94022.A https://www.chicago.gov/content/dam/city/depts/ethics/general/AO	Post-employment	The Board determined that a departing high-ranking City employee was not prohibited from assisting or representing a new employer in preparing a response to an RFP (request for proposals) for an affordable housing redevelopment in which the new employer would be a joint	Post-employment; one year subject matter prohibition; participated personally and substantially in the subject matter; business transaction involving the City; definition of subject matter; residential development; residential redevelopment; commercial development; commercial redevelopment;

PostEmploy/94022.A.pdf		<p>venture. The employee's City work involved commercial, not residential project and areas. The Board also determined that the employee had not been personally and substantially involved in creating the RFP, or in developing the plan to which the RFP referred. The case contains an extensive discussion of "subject matter."</p>	<p>affordable housing; RFP; request for proposals; planning area; redevelopment plan</p>
<p>94023.Q</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec%20Chairs/NerFid/94023.Q.pdf</p>	<p>Outside Employment</p>	<p>A City employee was advised that the Ordinance did not prohibit teaching part of a mandatory class offered to prospective taxi licensees by the City, as the employee's own City position did not involve interacting with or regulating the taxi industry, and the employee would have no authority over any students.</p>	<p>Outside employment; dual employment; outside job; teaching; mandatory licensure class; City Colleges; offered by the City;</p>
<p>94024.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO Interest CityBusiness/94024.A.pdf</p>	<p>Financial Interest in City Business</p>	<p>This is a significant, precedential case. The Board determined that persons paid by voucher are not City employees, but are City contractors, for purposes of the Ordinance, and therefore are not subject to the Ordinance as employees. Therefore, this person paid by voucher was not prohibited from applying for or receiving an \$80,000 loan from the City, as contractors are not subject to the prohibition against having a financial interest in any City contract, work or business.</p> <p>The case has a detailed discussion of the criteria that make a person a City employee versus a City contractor or independent contractor, based on advice the Board received from the Law</p>	<p>Financial interest in any City contract, work or business; City employee; definition of a City employee; City contractor; definition of a City contractor; \$80,000 loan; person paid by voucher; appointment or title; receive employee benefits; Law Department</p>

		Department. See also Case No. 90056.A.	
94025.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec%20Chairs/4-15-12/94025.Q.pdf	Non-profit Board Service; Fiduciary Duty; Representation of Other Persons	A high-ranking City employee was advised that, even though the Ordinance did not explicitly prohibit it, not to serve on the board of a non-profit organization that was interested in pursuing City funding for an area in which the employee had authority in the employee's City position. The employee was advised that there would be the perception of an inherent conflict of interests, and that the employee might be restricted in performing City responsibilities as well. See also Case No. 06037.Q.	Non-profit board service; representation; fiduciary duty; appearance of impropriety; appearance of favoritism; non-ministerial; non-compensated board service; inherent conflict
94026.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/AOCampFinancing/94026.q.pdf	Campaign Financing; Political Activity	An aldermanic Chief of Staff was advised that the alderman was not prohibited from inviting registered lobbyists to a neighborhood political fundraiser – the lobbyists would be among other invited guests and their cover donation would be \$100. However, the Chief of Staff was advised that selling tickets to this (or any) political fundraiser constitutes political activity and may not be done on or with City property, among other restrictions. Note: under current law, registered lobbyists are subject to a \$1,500 limitation on campaign or political contributions in a single calendar year to any single candidate for elected City office or incumbent elected official (or to their authorized political committee).	Campaign financing; political contributions; campaign contributions; registered lobbyists; inviting persons to political fundraising events; \$100 cover donation; political activity; City compensated time; City property
94027.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/AOCampFinancing/94027.q.pdf	Attorneys; Post-employment	This is a significant, precedential case. A former employee, formerly a litigator in the Corporation Counsel's office, was advised that the Ordinance did not prohibit the attorney, now in private	Attorneys; lawyer; private law practice; tax litigation; default judgment; lifting a default judgment; Corporation Counsel; Law Department; one year subject matter prohibition; participated personally and

hics/general/AO PostEmploy/94027.pdf		<p>practice, from representing a client in court to seek to lift a default judgment entered against the client for fines related to a tax matter. The attorney had not been involved in this matter, nor in tax matters, nor in entering default judgment for tax issues, nor with respect to the attorney's current client. Note: the case applies both the prohibitions in §2-156-100(a), covering judicial or administrative proceedings involving the City, and the business transaction involving the City provision in §2-156-100(b).</p>	<p>substantially in the subject matter; participated personally and substantially in any judicial or administrative proceeding involving the City; business transaction involving the City; post-employment; what applies to attorneys</p>
<p>94028.Q</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/AOInterestCityBusiness/94028.Q.pdf</p>	<p>Financial Interest in City Business; Outside Employment</p>	<p>A City employee who owned a 25% interest in company that cleaned vertical and horizontal blinds was advised that, although the Ordinance did not prohibit the company from bidding on and receiving a City contract, the monetary limit was low: it could be no more than \$20,000 (which would give the employee a \$5,000 interest in the contract, the maximum amount allowable); the formula for determining this is the gross amount of the contract multiplied by the City employee's ownership in the company. This is true even if the contract is unrelated to the employee's City job, as here – but it does not prohibit contracts between this company and the City's sister agencies, such as the Chicago Park District, Chicago Transit Authority, Chicago Public Schools Chicago Housing Authority, or City Colleges of Chicago. Note: in 2012, this limit was lowered to \$1,000.</p>	<p>Financial interest in any City contract, work or business; contracting with the City; prohibited contract; \$5,000; \$1,000; pro-rated amount; financial interest in the name of another; paid with funds belonging to or administered by the City; sister agencies; Chicago Park District; Chicago Transit Authority; Chicago Public Schools; Chicago Housing Authority; City Colleges of Chicago; business ownership</p>
<p>94030.Q</p>	<p>Gifts</p>	<p>A City employee was advised that the Ordinance did not prohibit City employees</p>	<p>Gift; sales promotion; not a gift; market of similarly situated persons; what is a market of</p>

https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec%20Chairs/4-15-12/94030.Q.pdf		from accepting an offer for a reduced-rate plan, the same plan offered to all State of Illinois employees, employees of other municipal governments, and numerous large corporations. The offer was a bona fide sales promotion, not a gift.	similarly situated persons; criteria for a <i>bona fide sales</i> promotion; cellular phone plan; discount; Ameritech; offered to all government employees; members of the general public; offer was not focused on City employees who could affect decisions relating to Ameritech or the offeror; intended to promote business, rather than affect City decisions
94031.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_RepresentingOthers/94031.A.pdf	Representation of Other Persons; Attorneys; Board of Election Commissioners	The Board determined that a former City employee, an attorney now employed full-time by the Chicago Board of Election Commissioners (CBEC), was not prohibited from representing as an attorney a client, a City employee (or from receiving compensation therefrom) in either cases pending before City agencies, or in cases pending in other tribunals or courts in which the City was an adverse party. The rationale is that the CBEC is not a City agency and its employees thus not subject to the Ordinance. Note: the opinion has a detailed analysis of State law establishing the CBEC.	What is a City agency; CBEC; Chicago Board of Election Commissioners; attorneys; lawyer; attorney; representation; formal or informal proceeding or transaction before a City agency; judicial or quasi-judicial proceeding in which the City is a party and the person's interests are adverse to the City; what is a City employee
94037.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec%20Chairs/NerFid/94037.Q.pdf	Outside Employment	A rank and file employee was advised that the Ordinance did not prohibit the employee from owning and operating a business that would exterminate insects and set traps for animals, for private residences and businesses. The employee was advised of the relevant restrictions, including money for advice or assistance, fiduciary duty, use of City title and property, and conflict of interests and improper influence.	Outside employment; dual employment; second job; business ownership; extermination business; motor truck driver; financial interest in a City contract work or business; animal trapping; solicit or receiving anything of value in return for advice or assistance concerning the operation or management of the City
94039.Q	Representation of Other Persons;	A City employee was advised that the Ordinance did not prohibit service on the	Volunteer board service; fiduciary duty; representation of other persons; recuse;

https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_RepresentingOthers/94039Q.pdf	Non-profit Board Service; Outside Employment	board of a non-profit organization that received funding from the City as a delegate agency, but from a separate City department, although it was possible that the employee's own City bureau may also apply for funding from other sources, like the federal government, for which the organization might also apply. The employee was advised of the relevant restrictions, including representation and fiduciary duty.	using City position to obtain a private benefit; delegate agency; competing with the City
94040.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/Decision%20Chairs/NerFid/94040.Q.pdf	Elected Officials; Outside Employment	An alderman was advised that the Ordinance did not prohibit outside employment as a paid consultant for a company (a bill collector) with no City contracts, and no intention to seek any. The alderman was advised of the relevant restrictions: (i) fiduciary duty; conflict of interests; improper influence (the alderman had an "economic interest" in the company that would employ the alderman) and would need to disclose and recuse from any matter coming before the City "particularly affecting" the outside employer; representation of other persons' and City property and confidential information.	Alderman; second jobs; dual employment; outside employment; consultant; economic interest in the outside employer; fiduciary duty; economic interest in the outside employer; recuse from matters particularly affect; solicit or receiving anything of value in return for advice or assistance concerning the operation or management of the City
94043.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/AO-Attorneys/94043.pdf	Attorneys; Outside Employment	A City employee who was an attorney was advised that the Ordinance did not prohibit the employee from maintaining a tax law practice while employed with the City, but that the Ordinance imposed restrictions, such as money for advice or assistance, conflict of interests; improper influence, representation of clients before the City or in any proceeding in which the City was an adverse party, and fiduciary duty.	Lawyers; attorneys; second jobs; dual employment; outside employment; practice of law; tax law; tax planning; preparing tax returns; Tax Court; Internal Revenue Service; Illinois Department of Revenue; any judicial or quasi-judicial proceeding in which the City is a party; representation; fiduciary duty; conflict of interests; improper influence; solicit or receiving anything of value in return for advice or assistance concerning the operation or management of the City

<p>94044.A</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/AOPostEmploy/94044.a.pdf</p>	<p>Post-employment</p>	<p>This is a significant, precedential case. A City engineer retired, and then for 18 months performed services for the employee's former department as an independent contractor/person paid by voucher. The question then, was when the Ordinance's post-employment provisions begin running. The Board determined that persons paid by vouchers/independent contractors are subject to these restrictions only from their work as City employees or officials.</p> <p>The Board also determined that a City employee or official may be held to have exercised contract management authority even on contracts that were not finalized or in effect at the time the City person terminates City service, if the employee's participation in the contracting process was significant, precedential enough, all with the aim of facilitating a City contract, it can constitute personal and substantial involvement in the formulation of the City contract that eventuates. See Case nos. 93018.A; 94011.A; 98052.A.</p>	<p>Post-employment; one year subject matter prohibition; contract management authority; right-of-way engineer; person paid by voucher; independent contractor; City employee; City contractor; Circulator; property acquisition; roadway and transit projects; preliminary engineering plans; alignment; conveyance contract; post-closing matters; ownership or boundary disputes; road-widening; early retirement; Letter of Understanding; no benefits; no tax deductions; consultant to the City; contract not yet awarded; personal involvement in the formulation of a City contract; preparation of specifications; dispositions of City property; viaduct dispositions; order title searches; site inspection; contact property owner regarding selling their property; prepare feasibility reports; road reconstruction; Stevenson Expressway; McCormick Place; MPEA; Metropolitan Pier and Exposition Authority; final right of way lines</p>
<p>94045.Q</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec%20Chairs/4-15-12/94045.Q.pdf</p>	<p>Travel</p>	<p>A high ranking City employee was advised that the Ordinance did not prohibit a Bureau of a large City department from accepting a departmental vendor's invitation to send several employees to its manufacturing facility to observe testing of equipment; they could accept only reasonable travel expenses related to the trip's business purpose.</p>	<p>Business travel; paid by vendor; manufacturer's facility; factory; observe product testing; reasonable travel expenses; meaning of the term gift</p>
<p>95001.E</p>	<p>Statements of Financial Interests</p>	<p>The Board determined that the Recycling Advisory Board was a City agency, but</p>	<p>Recycling Advisory Board; City board or commission; what is a City agency; solely</p>

https://www.chicago.gov/dam/city/depts/ethics/general/AO_SFI/95001.E.pdf		<p>was solely advisory, and thus its members were not required to file annual Statements of Financial Interests. It was created by City ordinance, but had no authority to make binding decisions, enter into contracts, or make expenditures.</p>	<p>advisory; authority to make binding decisions, enter into contracts, or make expenditures; established by City ordinance; any appointed, non-employee member of any City agency</p>
<p>95002.Q</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec%20Chairs/4-15-12/95002.Q.pdf</p>	<p>Travel</p>	<p>A department head was advised that the Ordinance did not prohibit three (3) departmental employees from accepting reasonable travel expenses to a two-day factory inspection of company from which the City had purchased equipment in the past, but had no contracts pending at the time. The opinion focuses on the fact that the department routinely researches new technologies and materials to make better purchasing decisions, and that the company had no matters pending before the City at the time.</p>	<p>Business travel; reasonable travel expenses; economic interest in a specific City business or transaction; no such economic interest</p>
<p>95004.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO_InterestCityBusiness/95004.A.pdf</p>	<p>Board of Ethics Members and Staff; Attorneys; Financial Interest in City Business</p>	<p>This is a significant, precedential, complex case. A member of the Board of Ethics requested an opinion addressing whether the member's law firm's (of which the member was a partner) work on a bond matter to be issued by an agency of County government (the Cook County Forest Preserve District) precluded the member from further service on the Board (members of the Board of Ethics are prohibited from having a financial interest in not only City work, contracts or business, but also that of other governmental agencies located within Cook County). The Board determined that: (i) the Board member did not have a financial interest in the law firm (because the member's partnership share was less than 10% of the firm); (ii) because the</p>	<p>Member of the Board of Ethics; board member; financial interest; any work or business or official action by the City or any other governmental agency within the jurisdiction of Cook County; Forest Preserve District; bond issuance; bond counsel; underwriter; underwriter's counsel; recuse; fee-screening arrangement; replacement payments; partner in a law firm; Corporation Counsel; Law Department</p>

		<p>member's law firm was counsel to the bond's underwriter, not to the issuing government agency, the law firm did not have a financial interest in the County bond work, although the its client, the underwriter did; (iii) even if the firm did, the Board member could forego all compensation from the law firm's business with these governmental entities and be in compliance with the Ordinance (that is, enter into a fee-screening arrangement); (iv) the language of the Ordinance does not preclude the member from actually working on the bond matter – rather, it is prohibition on having a financial interest in the matter only; and finally (v) the plain language of the Ordinance (“any governmental agency”) meant that the proper calculation is not made by adding all of the compensation the partner would receive from all transactions involving all governmental entities together, but by considering whether there was a financial interest in the work of any one of them – if all were under the threshold individually, there would be no prohibited financial interest.</p>	
<p>95006.A</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_PostEmploy/95006.A.pdf</p>	Post-employment	<p>This is a significant, precedential case. The Board determined that a departing high ranking City employee, who was taking a position with a British corporation that owned and operated airports: (i) exercised contract management authority with respect to a number of contracts at the City's airports, but that none were at issue given the employee's post-City job; and (ii) that, if were the employee's new company to seek City contracts, the</p>	<p>Post-employment; contract management authority; participated personally and substantially in the subject matter; retail consulting; landside operations; airside operations; Midway; O'Hare; operations management; definition of subject matter; day-to-day operations; runways; parking lots; long-range planning; assist or represent; receive informational reports;</p>

		employee would be subject to a one year prohibition with respect to airport operations management (including terminals, runways, parking lots, safety and security, and supervision of City employees),but not with respect to retail management and consulting or real estate consulting.	
95007.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/AO InterestCityBusiness/95007.Q.pdf	Financial Interest in City Business; Employment of Relatives or Domestic Partners	An employee was advised that the Ordinance did not restrict the business dealings of the employee's spouse's company as long as the employee holds no ownership interest in the company, and does not exercise contract management authority with respect to any City business or work it has.	Nepotism; business owned by spouse or domestic partner; financial interest in business not prohibited; spouse's independent occupation, business or profession; contract management authority
95008.E https://www.chicago.gov/dam/city/depts/ethics/general/AO_SFI/95008.E.pdf	Statements of Financial Interests	The Board determined that the Chicago Citizenship Assistance Council was a City agency, and its members were thus required to file annual Statements of Financial Interests. The board was created by Mayoral Executive Order, and was thereby a City agency; moreover, the Executive Order establishing it conferred the authority to "expend funds" and enter contracts, so it was not solely advisory.	Chicago Citizenship Assistance Council; City board or commission; created by Mayoral Executive Order; what is a City agency; solely advisory; authority to make binding decisions, enter into contracts, or make expenditures; established by City ordinance; any appointed, non-employee member of any City agency
95009.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/Deck%20Chairs/4-15-12/95009.Q.pdf	Gifts	This is a significant, precedential case. A company that offered reduced rates to City employees on a residential service was advised to withdraw the offer, because it would likely lead to violations of the Ordinance, create the appearance of a prohibited gift, and did not meet the Board's criteria for a <i>bona fide</i> sales promotion. The opinion was based on these factors: (i) the company was a City vendor; (ii) its letters went only to 30 City	Gift; sales promotion; not a gift; market of similarly situated persons; what is a market; criteria for a <i>bona fide sales</i> promotion; offer made only to individuals identified by the company's existing dealings is a gift, not a sales promotion; intent of the gifts provisions is that no offer for a personal benefit should be linked to City business; appearance of impropriety

		employees, individually, not to all City personnel; (iii) the discount was worth more than \$50; and (iv) the offer was not made to the public, but only to employees of organizations with which the company did business.	
95010.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec%20Chairs/NerFid/95010.Q.pdf	Outside Employment; Representation of Other Persons; Non-profit Board Service	A person paid by the City through a voucher – an independent contractor, in effect – who was in charge of the City’s public art program, was advised that the Ordinance did not restrict the person’s ability to serve in a volunteer capacity as a the president of a non-profit organization that might seek grants from a different division of the department with which the person contracted. The person was subject to the Ordinance as a contractor, and the representation prohibitions do not apply to contractors.	Person paid by voucher; not an employee; independent contractor; no benefits; vouchered personnel; not subject to the Ordinance as employees; public art; representation of a non-profit; not for profit; City grant; delegate agency; Vouchered Services Agreement
95011.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_RepresentingOthers/95011.A.pdf	Representation of Other Persons; Attorneys; Elected Officials	An alderman who was a partner in a law firm requested an opinion addressing whether the alderman, as attorney, could represent, on matters unrelated to the City, clients who did business with the City. The determined that the alderman could take on this representation, as long as the client matters were not before any City agency or involve the City as a party. The alderman was also advised that it was not clear whether the alderman would be required to disclose an interest in a matter before City Council and abstain from voting on it if the matter involved a client of the firm or of the alderman, but the alderman would certainly avoid any potential issues by doing so. Note: the Ordinance was amended in 1997, 1998, and again in	Alderman; attorney; recusal; financial interest; economic interest; client with a matter pending before the City Council; client who is doing business with the City; representation of other persons; receive or derive income or compensation from a person or matter; business relationship; any judicial or quasi-judicial proceeding before an administrative agency or court in which the City is a party and the person’s interests are adverse to the City; represent a client in any formal or informal proceeding or transaction before

		2012, so that the alderman would be required to abstain and recuse from such City Council matters, and more importantly, the client would be prohibited from doing business with the City.	
95012.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec%20Chairs/4-15-12/95012.Q.pdf	Gifts	A City employee was advised that an offer for City employees to become part of a V.I.P. program was a company sales promotion, not a gift, and therefore not prohibited by the Ordinance.	Sales promotion; not a gift; VIP program; V.I.P.; offered to a market of similarly situated persons
95013.E https://www.chicago.gov/dam/city/depts/ethics/general/AO_SFI/95013.E.pdf	Statements of Financial Interests	The Board determined that the Chicago-Gary Regional Airport Authority was not a City agency, and thus its members not required to file annual Statements of Financial Interests. It was created by City ordinance, but had no authority to make binding decisions, enter into contracts, or make expenditures. The Authority was created by a compact between the Chicago City Council and Gary Common Council, but as an interstate body politic and corporate, and not as an agent of any signatory, and that the Illinois Governmental Ethics Act applies to directors appointed by the Illinois Governor and Indiana law to those appointed by Indiana's Governor. It is not a City agency for these reasons, especially since the City Council had exempted it from City law.	Chicago-Gary Regional Airport Authority; City board or commission; created by intergovernmental agreement; what is a City agency; established by City ordinance; any appointed, non-employee member of any City agency; Compact; interstate body politic and corporate; creation of two cities; appointed by the Governor; Indiana law; rules, regulations and ordinance of any governmental entity shall not apply to the Authority or its operations or property
95014.Q https://www.chicago.gov/content/	Outside Employment	A City employee (an inspector who investigating complaints that businesses were operating without licenses) was advised that the Ordinance did not prohibit	Inspector; outside employment; outside employment; dual employment; teaching; local college; anatomy; potential hospital employees; solicit or receive anything of

dam/city/depts/ethics/general/Decision%20Chairs/NerFid/95014.Q.pdf		<p>co-teaching teaching a class in basic anatomy at a local college, to students who would be potential clerical employees at a local hospital, but the employee was subject to the following restrictions: (i) the employee could not solicit or accept anything of value in return for giving advice or assistance on matters concerning the operation or business of the City – here the class would not give students an unfair advantage in dealing with the City, and the employee would not have decision-making authority with respect to any students in City employment; (ii) conflict of interests; (iii) confidential information and City property.</p>	<p>value in return for advice or assistance on matters concerning the operation or business of the City; give students an unfair advantage; have decision-making authority over students</p>
<p>95015.Q</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/Decision%20Chairs/4-15-12/95015.Q.pdf</p>	<p>Gifts</p>	<p>A City employee was advised that the Ordinance did not prohibit acceptance of a bicycle the employee won in a raffle during Bike to Work Week. The opinion relies on the analysis of Case No. 90022.A: it was not anonymous, and the employee was chosen at random, and the giver had no business with the City. It was a prize, not a gift. See <i>also</i> Case No. 90022.A.</p>	<p>Gift; raffle; prize randomly chosen; bike; bicycle; Bike to Work Week; drawing; not anonymous; chosen at random; no economic interest in a specific City business transaction</p>
<p>95016.Q</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/AOInterestCityBusiness/95016.Q.pdf</p>	<p>Financial Interest in City Business</p>	<p>A City employee was advised that the Ordinance did not prohibit bidding on and the purchase of City-owned real estate through a Sealed or Closed Bid Process – the City places an ad in the Sun Times announcing that the property is for sale and asks for a minimum bid price, and then when the bidding is closed, bids are opened before a court reporter, and the highest bidder is submitted to City Council. This constituted a process of competitive bidding following public</p>	<p>Financial interest in the purchase of property belong to the City; real estate; Sealed Bid; Closed Bid; Sun Times; highest responsible bidder; competitive bidding following public notice</p>

		notice and fell into the exemption for a financial interest.	
95018.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec%20Chairs/4-15-12/95018.Q.pdf	Gifts	A City employee was advised that a gift of personalized stationery from a City contractor, but not a contractor of the employee's department, was not prohibited, as it was worth less than \$50, but that acceptance of the gift could create an appearance of impropriety, and thus was not recommended.	Gift; personalized stationery; \$50; no economic interest in a specific City business that the employee could substantially affect; appearance of impropriety
95020.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec%20Chairs/NerFid/95020.Q.pdf	Outside Employment	A City employee was advised that the Ordinance did not prohibit outside employment as a merchandising representative, building merchandise displays in stores and distributing samples. The outside employer would not involve any companies the employee monitored in the employee's City job. The opinion describes the standard prohibitions on outside employment, such as money for advice, representation, conflict of interests, fiduciary duty, and use of City property.	Outside employment; outside employment; merchandising representative; stores; distributing samples; salesperson; conflict of interests; money for advice or assistance
95021.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec%20Chairs/4-15-12/95021.Q.pdf	Gifts	A psychiatrist employed part-time was advised that the Ordinance did not prohibit acceptance of a scholarship funded by a pharmaceutical company to attend a professional conference. The doctor was not in a position to affect what drugs the City purchased for its formulary, although the doctor did prescribe drugs to patients; this company's drugs were not on the formulary. Because the company had no City business, and if it did, this doctor would not be in position to affect it, the Ordinance allowed acceptance of these expenses. Note: this is a classic	Gift; professional conference; scholarship; psychiatrist; pharmaceutical company; not in a position to substantially affect the donor's City business; drug formulary; prescribing drugs to patients; prohibited gift source analysis

		“prohibited gift source” case. The Ordinance was amended in 2012 and no longer employs the “prohibited gift source” concept.	
95022.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/AO InterestCityBusiness/95022.Q.pdf	Sister Agencies; Financial Interest in City Business	Two City employees were advised that the Ordinance did not prohibit the company they co-owned from entering into and being paid for contracts with the Chicago Public Schools, because the Chicago Public Schools, or the School Board, or the Chicago School Reform Board of Trustees, is not a City agency, thus its contracts are not contracts, work or business of the City, or paid with funds belonging to or administered by the City. The Ordinance prohibits employees and elected officials from having a financial interest in their own names or in the name of another only in City work, business or contracts.	Financial interest in City business; contracts, work or business of the City; not a City agency; business ownership; paid with funds belonging to or administered by the City; sister agency; Chicago Public Schools; School Board; Chicago School Reform Board of Trustees
95023.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/AO InterestCityBusiness/95023.Q.pdf	Financial Interest in City Business; Confidential Information; Conflicts of Interest/Improper Influence	A City employee was advised that the Ordinance did not prohibit the purchase of tax delinquent property from the Cook County Scavenger Sale, because the property was sold through a process of competitive bidding following public notice. The employee was advised that any City personnel who are privy to non-public information concerning Scavenger Sale property should abstain from bidding on such property	Financial interest in City business; scavenger sale; tax delinquent property; sold pursuant to a process of competitive bidding following public notice; State of Illinois Revenue Act; residential property; non-public information; confidential information
95027.A https://www.chicago.gov/dam/city/depts/ethics/general/AO Employ	Employment of Relatives or Domestic Partners	A City employee, an engineer, was working on a project at a specific site, and would soon be assigned to another site. In both assignments, he had contract management authority over contracts at those sites. The employee’s spouse was an architect who did work (both in the	Nepotism; employment of relatives or domestic partners; spouse; spouse’s employer; contract management authority; subcontractors; prime contractor; wife; persons who employ or contract with a relative; use or permit the use of one’s position to assist a relative or domestic

Relatives/95027.A.pdf		<p>spouse's own name and in the name of the spouse's employer for companies with contracts with the employee's department, but, none of the companies over whose work the employee exercised contract management authority employ or contract with the spouse at the first site, and the prime contractor at the second site did not either. The Board determined that the employee was not in violation of the Ordinance, but, because the employee he does not yet know all of the entities that will be doing work at the next location, the Board advised the employee of the restrictions imposed by the Ordinance, in particular, to be aware of companies there that may employ or contract with the spouse on other project. Note: in the opinion, the Board stated that "doing work" includes subcontracting by an employee's relative.</p>	<p>partner obtaining employment or contracts with a person over whom the City employee or official exercises contract management authority</p>
<p>95031.Q</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec%20Chairs/4-15-12/95031.Q.pdf</p>	<p>Gifts</p>	<p>A City employee was advised that the Ordinance did not prohibit the employee from accepting an offer to receive discounted services from a services supplier, as the offer was also being made to all City employees and employees of several large corporations located in the City. The opinion reiterates the conditions of an acceptable sales promotion: (i) the offer was made to public or to a market of similarly situated persons; (ii) acceptance of the offer will provide an economic benefit to the offeror, to create a sale or expand business, and is thus not a gift, even if worth more than \$50; and (iii) the offer is not made based on a mutual understanding the offeror's City</p>	<p>Gift; not a gift; sales promotion; discount; available on the same terms to members of the general public; available to other large organizations; acceptable sales promotion; provide an economic benefit to the offeror; available to a market of similarly situated persons; not made on a mutual understanding that the City recipient's judgments or decision would be affected</p>

<p>95033.Q</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_RepresentingOthers/95033Q.pdf</p>	<p>Representation of Other Persons; Non-profit Board Service; Outside Employment</p>	<p>A City employee who monitored the process by which local business sought M/WBE certification from the City was advised that the Ordinance did not prohibit volunteering in alumni network for a local college, or from making three consecutive presentations on M/WEBE certification at the college, but there were restrictions: because the class would be related to the employee's City job, the teaching would need to be done without compensation, and the employee was prohibited from discussing or becoming involved in any applications or matters involving network members (or those who attend these classes).</p>	<p>Volunteer board service; college alumni or alumnae group; teaching; classes; local college; Minority-owned or Women-owned business enterprise; MBE certification; WBE certification; money for advice; solicit or receive anything of value in return or exchange for advice or assistance on matters concerning the operation or business of the City; wholly unrelated; fiduciary duty; representation of other persons; recuse; impermeable ethical screen; applications or matters involving students; using City position to obtain a private benefit</p>
<p>95034.Q</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec%20Chairs/4-15-12/95034.Q.pdf</p>	<p>Travel</p>	<p>A City employee was advised that the Ordinance did not prohibit three (3) department employees from accepting reasonable travel expenses to attend the leading industry trade show in Louisville. The company that offered to pay was a conference sponsor, but not a direct City vendor, but the City purchased large vehicles, after putting out bids, and the company was a manufacturer of these vehicles, but the bids were always answered by dealers, who may or may not choose this company's vehicles. The department would choose the lowest responsible bid.</p>	<p>Business travel; industry trade show; Louisville; heavy equipment; reasonable travel expenses; paid by a manufacturer, not a vendor; contracts put out for competitive bidding; sponsor of the conference</p>
<p>95036.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO_Lobby/95036.A.pdf</p>	<p>Lobbyist Registration and Disclosure</p>	<p>This is a significant, precedential case, defining which actions constitute lobbying, requiring registration. The Board determined that a TIF (tax increment financing consultant) that prepared eligibility studies and <i>pro formas</i> for clients and met with City employees</p>	<p>What is a lobbyist; lobby; lobbying; administrative action; legislative action; undertake to influence; financial incentives; consultant; consulting; tax increment financing; TIF; industrial development bonds; bond ordinance passed by City Council; TIF area designation; TIF eligibility studies;</p>

		and officials, including the Mayor, to clarify and amplify on information which has been requested previously by the City, was, by these actions, undertaking to influence administrative or legislative actions and thus a lobbyist.	prepare <i>pro formas</i> ; intent to bring about City action favorable to the consulting firm's clients; meet with the Mayor himself; firm's persuasive efforts on behalf of clients are first director toward obtaining favorable administrative action; clarify and amplify on information previously provided to the City
95038.A https://www.chicago.gov/content/dam/city/depts/ethics/general/AOPostEmploy/95038.A.pdf	Post-employment	The Board determined that a departing City employee was subject to: (i) a one year subject matter prohibition as to setting up and implementing the employee's City's department's patient and billing operations and procedures; and (ii) that the employee had exercised contract management authority with respect to the post-City employer's successive one year contracts with the City – the question was really: when is a contract renewal or extension considered a different or separate contract for purposes of the Ordinance's "permanent" prohibition? The Board did not need to reach this issue, but the terms of any renewal or extension were not known	Post-employment; one year subject matter prohibition; participated personally and substantially in the subject matter; department's patient and billing operations and procedures; contract management authority; permanent as to that contract; when is a contract extension or renewal a different or separate contract?; same contract
95040.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec%20Chairs/4-15-12/95040.Q.pdf	Travel	A high ranking City employee was advised that the Ordinance did not prohibit the department from accepting an offer from a vendor to cover reasonable travel expenses for four (4) employees to observe and evaluate two of its most technologically advanced installations in Toronto and Raleigh, along with officials from other municipalities.	Business travel; view an installation; technologically advanced; paid by vendor; reasonable travel expenses; necessary to make a good business decision; Toronto; Raleigh
95046.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/AOPostEmploy/95046.Q.pdf	Conflicts of Interest/Improper Influence; City Property; Employment of	A City employee asked whether the Ordinance would prohibit the employee from securing an installation permit from the State to construct an underground storage facility, as only licensed installers	Apply for a State permit; license to install was acquired through the spouse's business; outside business; no additional compensation; seek advice from the Law Department

https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec%20Chairs/June%2095046.Q.pdf	Relatives or Domestic Partners	<p>could apply for such a permit, and the employee had the permit from and through work done for a company owned by the employee's spouse, not through the City, but that this work would be done for no additional compensation from the spouse's business or from the City. The employee was advised that, although the Ordinance did not prohibit this, other laws may apply, and the employee should seek counsel from the Law Department.</p>	
95050.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_RepresentingOthers/95050Q.pdf	Representation of Other Persons; Non-profit Board Service; Outside Employment	<p>A City employee was advised that the Ordinance did not prohibited from serving as an unpaid director of a non-profit organization that received a grant from the employee's department; the employee had no involvement in funding decisions. The employee was also advised of the relevant restrictions: representation of other persons; fiduciary duty; confidential information; and to avoid providing the organization with advice about the grant.</p>	Service on a non-profit board; delegate agency; serve on a delegate agency's board; unpaid; volunteer; director; professional services contract; representation; good faith judgment; fiduciary duty; undivided loyalty
95058.A https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_CampaignFinancing/95058.A.pdf	Campaign Financing	<p>This is a significant, precedential case. The Board considered when a political action committee (PAC) "of" a corporation can be considered the same "person" as the corporation for purposes of aggregating any contributions made by both. A PAC obviously does not do business with the City or a sister agency and is not a lobbyist. The Board determined that in that case, the two PACs at issue and the corporation were all a single person for purposes of the contribution limitations, because of the high degree of control exercised by the corporation over the PACs, which: (i) did</p>	Campaign financing; political contributions; campaign contributions; when are two or more entities the same "person"; aggregation of contributions; PAC; political action committee; high degree of control; corporate PAC; independent PAC; in concert with; federal election law; single person; affiliated persons; corporate control of the PAC; separate segregated funds; bank; national bank holding company; contributions to state and local candidates or offices

		not have their own bylaws; (ii) were established by corporate authority; (iii) the corporation could reorganize or dissolve at will; (iv) had governing boards comprised of high-level officers of the corporations; and (v) had decisions reflecting the will of the corporation. See <i>also</i> Case No. 91031.Q.	
96001.A https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_PostEmploy/96001.A.pdf	Post-employment	This is a significant, precedential case. A departing employee, an architect and Project Manager, was interested in taking a position with a real estate developer to work on five (5) residential redevelopment projects, four of which involved the New Homes for Chicago Program, and a fifth involving proposed redevelopment plans for a site with which the employee had been involved, on other plans. The Board, applying the rationale of Case No. 94001.A, determined that the employee was not subject to any prohibitions as to the first four (4) sites, because the New Homes For Chicago program was operated out of a different department, and the employee had not worked on it previously, nor on the proposed sites, but was subject to a one year subject matter prohibition as to the fifth site, because the employee had worked on previous plans involving this site. Note: the Board applied the term “subject matter” in this case to mean the constructions and sale of single family homes on specified sites, that is, as the particular redevelopment project on particular sites.	Post-employment; one year subject matter prohibition; participated personally and substantially in the subject matter; business transaction involving the City; contract management authority; definition of subject matter; real estate sites; parcels; New Homes for Chicago; redevelopment proposal; preliminary evaluation phase; RFP; request for proposals; definition of subject matter; assist or represent; subject matter of each project is the constructions and sale of particular single family homes on specified sites in accord with the requirements of the New Homes for Chicago Program; met with developers; communicate certain requirements the City has for redevelopment of the area; reviewed a proposal; have an understanding of the City’s position on various issues critical to whether a development goes forward
96002.Q	Outside Employment	A City employee was advised that the Ordinance did not prohibit the employee from teaching a class offered at the City	Second jobs; dual employment; teaching; City Colleges of Chicago; licensed social worker; unrelated to the operation or

https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec%20Chairs/NerFid/96002.pdf		<p>Colleges, because the class was unrelated to the operation or business of the City, and the employee had no authority to make or participate in decisions that could affect City Colleges, and because the students would not receive any advantages in dealing with the City. The employee was advised of the standard restrictions concerning second jobs.</p>	<p>business of the City; students receive inside information or advantages in dealing with the City; money for advice; accept anything of value in return for giving advice or assistance on matters concerning the operation or business of the City; give student an advantage with respect to programs or loans administered by the City</p>
<p>96005.Q</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec%20Chairs/4-15-12/96005.Q.pdf</p>	<p>Gifts</p>	<p>A high ranking City employee was advised that the Ordinance did not prohibit applying to a university for a corporate-sponsored fellowship for senior executive in state and local government, and accepting associated expenses, as the fellowship was related to the employee's official responsibilities and the expenses were furnished by the sponsor.</p>	<p>Scholarship; fellowship; university; Senior Executives in State and Local Government; acceptance of expenses; tuition</p>
<p>96006.Q</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec%20Chairs/NerFid/96006.Q.pdf</p>	<p>Outside Employment</p>	<p>A City employee was advised that the Ordinance did not prohibit teaching a class in a local institute's M.A. program on the nuts and bolts of the construction process, evaluating potential partners, and market the developments. The employee was advised that teaching on the generic elements of successful real estate development was not prohibited and would not provide students with an advantage with respect to City programs or loans. The employee was also advised of the standard restrictions concerning second jobs.</p>	<p>Second jobs; dual employment; teaching; money for advice; accept anything of value in return for giving advice or assistance on matters concerning the operation or business of the City; give student an advantage with respect to programs or loans administered by the City</p>
<p>96007.A</p> <p>https://www.chicago.gov/content/</p>	<p>Post-employment</p>	<p>The Board advised a departing City employee that, because the employee had not identified any specific transactions or matters on which the</p>	<p>Post-employment; one-year subject matter prohibition; participated personally and substantially in the subject matter; business transaction involving the City; contract</p>

dam/city/depts/ethics/general/AO PostEmploy/96007.A.pdf		<p>proposed post-City employer might ask the employee to work on, the Board could not make specific determinations, and used strong cautionary language to the employee that, even though the employee's work appeared to be clerical and administrative in nature, the employee had regularly attended senior management meetings affecting a wide range of departmental policies, and of the penalties and consequences to the employee and the new employer in the event of an Ordinance violation.</p>	<p>management authority; strong cautionary language; cancellation of contracts; affordable housing administrative and clerical</p>
<p>96009.Q</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/AO OutsideEmployment/96009Q.pdf</p>	<p>Representation of Other Persons; Non-profit Board Service; Outside Employment</p>	<p>A City employee was advised that the Ordinance did not prohibit the employee from serving as an unpaid director of a non-profit organization, but that there were several restrictions on the employee's conduct, both in City service and as an outside board member, including the prohibition on representing the organization in any transaction before a City agency, and fiduciary duty.</p>	<p>Non-profit board of directors; non-profit board service; not-for-profit; representation of other persons; making personal appearances or telephone calls to other City officials or employees on another's behalf; recuse; recuse at both ends</p>
<p>96010.E</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO SFI/96010.E.pdf</p>	<p>Statements of Financial Interests</p>	<p>A City employee was advised that appointees to the Lending Advisory Committee were not required to file Statements of Financial Interests, because the Committee had no power to make binding decisions; instead, it served the Department of Housing to advise on its lending policies and practices.</p>	<p>Statement of Financial Interests; solely advisory with no authority to enter into contracts or make expenditures; Lending Advisory Committee; Department of Housing</p>
<p>96013.Q</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/AO</p>	<p>Financial Interest in City Business</p>	<p>This is a significant, precedential case. A City employee was advised that, if a one-time non-competitive contract for \$8,600 was awarded to a company 100% owned by a City employee, for training services, the employee would be in violation of the Ordinance by having a prohibited</p>	<p>Prohibited financial interest in City business; training contract; financial interest in the name of another; business ownership; contract, work or business of the City; violation; entitled to receive money or compensation; City contract</p>

InterestCityBusiness/96013.Q.pdf		<p>financial interest in a City contract, subjecting the employee to sanction, including discharge; the opinion recommended that the contract not be awarded.</p>	
<p>96015.A</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/AOPostEmploy/96015.A.pdf</p>	<p>Post-employment</p>	<p>This is a significant, precedential case. The Board determined that a departing City employee was not prohibited from working for a developer under contract with the CHA and from assisting the developer in acquiring parcels and refining the overall design of the sites, even though these were business transactions involving the City, as the City would sell some of the parcels, and review design plans for some units and proposed modifications to infrastructure, like streets and curbs. But the Board based its determination on the conclusion that the subject matters of each transaction were different: the acquisition of parcels in each of these areas of the City and their development into housing units for the CHA – specific developments on specific sites. See <i>also</i> Case nos. 96001.A, 96024.A, and 96031.A.</p>	<p>Post-employment; one year subject matter prohibition; participated personally and substantially in the subject matter; business transaction involving the City; contract management authority; CHA; Chicago Housing Authority; specific geographic areas; narrow reading of subject matter; definition of subject matter; real estate; affordable housing; specific development; scattered sites; acquisition of parcels; City review of plans; modification to existing infrastructure such as streets and curbs</p>
<p>96016.Q</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/AOConflictOfInterest/96016.Q.pdf</p>	<p>Conflicts of Interest/Improper Influence; Financial Interest in City Business</p>	<p>This is a significant, precedential case. A City employee who owned 350 shares of Ameritech common stock (which was publicly traded), valued at about \$20,000, and represented less than 1% of the company's outstanding common stock, was advised that the Ordinance did not prohibit the employee from participating in a review of City licenses of an Ameritech subsidiary, because the shareholdings did not constitute an economic or financial interest in the company.</p>	<p>conflict of interests; ownership of common stock; publicly traded company; business relationship creating a financial interest; dividends; economic interest; National Securities Exchange; shareholder; 350 shares; financial interest</p>

<p>96017.Q</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_ConflictOfInterest/96017.Q.pdf</p>	<p>Representation of Other Persons; Elected Officials; City Property; Fiduciary Duty</p>	<p>This is a significant, precedential case. An alderman was advised that the Ordinance did not prohibit the alderman from writing a letter to the Department of Housing on behalf of a City employee, stating that the alderman supported the employee's application to the Department of Housing a City employee's participation in the City's Abandoned Property Program, as long as the alderman did not receive any compensation for this representation. The opinion notes that the alderman had a responsibility to act in the best interests of his or her constituents, and the alderman believes that the employee's development proposal would benefit the ward. The opinion does not specifically state whether the City employee was a constituent, but the proposed real estate development was located in the alderman's ward.</p>	<p>Alderman; aldermanic authority; fiduciary duty; letter of recommendation; good faith belief; act in the best interests of constituents; may not accept compensation; Department of Housing; letter of aldermanic support; any elected official from appearing without compensation on behalf of his constituents in the course of his duties as an elected official; constituent services; real estate proposal located in the ward; abuse of authority; Abandoned Property Program</p>
<p>96018.Q</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_InterestCityBusiness/96018.Q.pdf</p>	<p>Financial Interest in City Business</p>	<p>This is a significant, precedential case. A person serving part-time for the City asked whether the Ordinance would prohibit applying for a receiving more than \$5,000 from a City loan program. The individual signed a letter of understanding with the City, according to which the position came with no City benefits and was not appointed to a position in the City. The person was advised that this position was one of a City contractor, not a City employee, and, while various prohibitions in the Ordinance apply to City contractors, the financial interest in City business provision did not apply – it applies only to City employees – thus applying for or</p>	<p>Financial interest in any contract, work or business of the City; City loan; City grant; \$1,000 limit; \$5,000 limit; City contractor; prohibitions applicable to City contractor; City contractor not prohibited from having a financial interest in City business; entitled to City benefits; what is a City employee; criteria for distinguishing between City employees and City contractors; compensation and benefits; independent contractor</p>

		receiving a loan from a City department was not prohibited. The opinion contains a discussion of what makes a person a City employee versus a City contractor.	
96020.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec%20Chairs/4-15-12/96020.Q.pdf	Travel	A bureau chief was advised that the Ordinance did not prohibit four employees from accepting reasonable travel expenses to attend a working seminar at the company's manufacturing facility.	Business travel; reasonable travel expenses; facility or plant visit; expenses not paid to influence the employee's official City actions or decisions;
96022.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec%20Chairs/NerFid/96022.pdf	Sister Agencies; Financial Interest in City Business; Outside Employment	A City employee was advised that the Ordinance did not prohibit the employee from owning or operating a concession business, or from applying for and receiving and operating a concession at Navy Pier. Because Navy Pier is owned and operated by the Metropolitan Pier and Exposition Authority, which is not a City agency, this would not constitute a prohibited financial interest in City business.	Financial interest in City business; financial interest in sister agency contract; not a City agency; MPEA; Navy Pier; concession; concession contract; sister agency; CTA; Chicago Park District; Chicago Public Schools; outside business ownership; outside employment; Metropolitan Pier and Exposition Authority
96023.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec%20Chairs/4-15-12/96023.Q.pdf	Gifts	A City employee was advised that the Ordinance then in effect did not prohibit acceptance of an award, judged by a merit committee, and an obelisk, certificate and money that went with it. Note: pursuant to 2012 amendments to the Ordinance, the monetary award would be prohibited.	Award for public service; cash; cash equivalent; gift card; non-cash; monetary award; plaque; certificate; obelisk; acrylic paperweight; trophy
96024.A https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec%20Chairs/4-15-12/96024.A.pdf	Post-employment	A former City planner took a position with a real estate developer to work on three (3) projects, two (2) involving the CHA and the third involving a City affordable housing program. The Board determined	Post-employment; one year subject matter prohibition; participated personally and substantially in the subject matter; business transaction involving the City; contract management authority; CHA; Chicago

hics/general/AO PostEmploy/96024.A.pdf		<p>that, although the employee had not been involved in one (1) of the CHA projects or the City program, no prohibitions applied, but, as to the second CHA project, the employee had worked on the sale by the City of 87 parcels for it, and was subject to a one year subject matter prohibition as to this project, and finally, a permanent prohibition as to any proceedings concerning the sale of these 87 parcels from the City to the developer. <i>See also</i> Case Nos. 96001.A, 96015.A, and 96031.A.</p>	<p>Housing Authority; sale of parcels by the City; affordable housing; market-rate housing; RFP; request for proposals; redevelopment project; City Council's Housing and Real Estate Committee; participate in general policy decisions; assist in selling City-owned real estate; acquire land; compile a list of parcels; list all available parcels zoned for residential use; prepared an ordinance package for the Office of Intergovernmental Affairs; testify at Committee hearing</p>
<p>96025.Q</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/Deck%20Chairs/NerFid/96025.pdf</p>	<p>Outside Employment</p>	<p>This is a significant, precedential case. A City employee serving as a computer graphics technician was advised that the Ordinance did not prohibit outside employment as a concrete technician, performing material testing on concrete and asphalt intended for use in road construction. The outside employer would be a subcontractor on City and other governmental agencies' contracts, but the employee was not in a position in the employee's City job to make or influence decisions affecting the company or any City contracts on which it may subcontract. The employee was advised of all of the relevant prohibitions, including the prohibition on soliciting or receiving anything of value in return for giving advice or assistance on matters concerning the operation or business of the City.</p>	<p>Outside employment; dual employment; second job with a City contractor; representation of other persons; standard outside employment restrictions; money for advice; solicit or receive anything of value in return for advice or assistance concerning the operation or business of the City; outside employment with a City subcontractor</p>
<p>96026.Q</p> <p>https://www.chicago.gov/content/</p>	<p>Travel</p>	<p>A City employee, an urban planner, was advised that the Ordinance did not prohibit the acceptance of travel expenses to attend two professional</p>	<p>Business travel; reasonable travel expenses; sponsor of the event, appearance of ceremony; expenses not paid to influence the</p>

dam/city/depts/ethics/general/Dec%20Chairs/4-15-12/96026.Q.pdf		conferences, each related to official City business, because the expenses were reasonable, not paid to influence the employee's official City action, and furnished by the conference's sponsor.	employee's official City actions or decisions; professional conference
96027.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec%20Chairs/NerFid/96027.pdf	Outside Employment	A City employee was advised that the Ordinance did not prohibit outside employment as a sales consultant, selling artistic products and wares at shows and fairs, for a commission. The employee was advised of the standard restrictions on outside employment, including the prohibition on conducting an outside job while on City time or on City property, and on using the employee's City title for private purposes.	Outside employment; outside employment; dual employment; second job; salesperson; sales consultant; art fairs and shows; conflict of interests; representation of other persons; standard outside employment restrictions; City compensated time
96028.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec%20Chairs/NerFid/96028.pdf	Outside Employment	A City employee was advised that the Ordinance did not prohibit outside employment as a sales consultant, selling artistic products and wares at shows and fairs, for a commission. The employee was advised of the standard restrictions on outside employment, including the prohibition on conducting an outside job while on City time or on City property, and on using the employee's City title for private purposes.	Outside employment; dual employment; second job; salesperson; sales consultant; art fairs and shows; conflict of interests; representation of other persons; standard outside employment restrictions; City compensated time
96029.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/AOInterestCityBusiness/96029.Q.pdf	Financial Interest in City Business	This is a significant, precedential case. A City employee was advised that the City should not enter into a contract with a joint venture, the 50% partner in which was a security company that was 50% owned by a City employee. The proposed contract would be for more than year, and its value was approximately \$4,000,000. The opinion states that the employee's ownership interest in the contract would amount to a sum far greater than what is	Prohibited financial interest in City business; security contract; joint venture; partnership; financial interest in the name of another; business ownership; contract, work or business of the City; security services; violation; entitled to receive money or compensation; City contract

		allowable under the Ordinance and would amount to a prohibited financial interest in a City contract when the parties enter into the contract. <i>See also</i> Case No. 04049.A.	
96030.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec%20Chairs/4-14-12/96030.Q.pdf	Post-employment	<p>This is a significant, precedential case that follows the reasoning of Case No. 94001.A. A departing City employee was advised that: (i) because all Plan Commission proceedings constituted administrative proceedings involving the City, and the employee's work involved all project submitted to the Plan Commission, the employee participated personally and substantially in all proceedings submitted to or considered by the Plan Commission during City service, and was permanently prohibited from assisting or representing a new employer or client on any such proceeding or a particular development proposal or project that was the subject of the proceeding, even if the project would later involve the Zoning or Building Boards of Appeal; (ii) the employee had not participated personally and substantially in obtaining building permits for new projects that did not involve the Plan Commission, and no prohibition extended to this work; (iii) the employee was subject to a one year prohibition as to new planned and lakefront developments to the Plan Commission.</p>	<p>Post-employment; one year subject matter prohibition; participated personally and substantially in the subject matter; business transaction involving the City; contract management authority; definition of subject matter; obtaining building permit; planned developments; lakefront developments; Plan Commission; parcel or site; particular development; Zoning Board of Appeals; Building Board of Appeals; judicial or administrative proceeding involving the City; participated personally and substantially in an administrative proceeding involving the City</p>
96031.A https://www.chicago.gov/content/dam/city/depts/ethics/general/AO	Post-employment	<p>This is a significant, precedential case. The Board determined that: (i) a departing City employee was not exempt from the Ordinance's post-employment provisions, even though the new employer was a non-profit arm of the CHA, because the</p>	<p>Post-employment; one year subject matter prohibition; participated personally and substantially in the subject matter; business transaction involving the City; contract management authority; government to government exception; no waiver authority;</p>

PostEmploy/96031.A.pdf		<p>Board had no ability to issue waivers, and the Ordinance did not imposed a “government-government” exception; (ii) the CHA-related transactions constituted business transactions involving the City, because the City would convey land, and may negotiate or approve agreements, and its involvement in the larger transaction would be substantial, and directed toward City actions, or its parameters are set by the City’s role, though organizational responsibilities, like hiring staff, preparing budgets, and dealing with CHA residents, were not transactions involving the City; (iii) the subject matters or the transactions was the planning and constructions of replacement units that were part of specific redevelopment projects; (iv) the employee was prohibited for one year from assisting or representing a new employer or clients on redevelopment in a City Redevelopment Plan and Conservation Plan; (v) the exercised contract management authority over one specific redevelopment plan, but not over a separate understanding.</p> <p><i>See also</i> Case Nos. 96001.A, 96024.A, and 96024.A.</p>	<p>in the City’s best interests; CHA; Chicago Housing Authority; what is a business transaction involving the City; City involvement is substantial; directed toward City action; hiring staff; internal corporate matters not a business transaction involving the City; Redevelopment Plan; Conservation Plan; affordable housing; replacement units; CHA residents</p>
<p>96032.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO_FiduciaryDuty/96032.A.pdf</p>	<p>Fiduciary Duty; Representation of Other Persons; Non-profit Board Service; Outside Employment</p>	<p>This is a significant, precedential case. The Board determined that a high ranking City employee was not prohibited from serving, without pay, on the advisory board of a non-profit residence for women, or from using the employee’s City title and name on the organization’s letterhead stationery and other</p>	<p>Use of City title; benefit a third party; remuneration from board service; organizational letterhead; fundraising; women’s organization; fiduciary duty; use of name on outside letterhead or stationery; representation of other persons; policy issue; non-profit; not-for-profit; social service organization; City’s best interests; promoting</p>

		documents that list the board members, even if used for fundraising purposes, and even if the employee's City office created City policy and managed the legislative agenda in this area. However, the Board set out a test for whether employees' or officials' use of their City title in promoting an outside organization is allowable under the fiduciary duty provision: (i) will the employee or official receive any remuneration; (ii) would there be any use of City time or resources; (iii) would the use of the title be consistent with the employee's job responsibilities and complement and further City goals. The Board also reminded the employee of the prohibition on representing the organization in any non-ministerial transactions before a City agency	an outside organization; consistent with the mission of the City department; public hearings; private real estate development transactions
96036.A https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_PostEmploy/96036.A.pdf	Post-employment	This is a significant, precedential case. First, the Board issued an opinion to a current department head, who had requested the opinion regarding post-employment restrictions imposed on a recently departed high ranking employee in the department. The Board determined that a recently-departed high ranking City employee who had taken a position with a local cable TV producer as its Director of Human Resources/Governmental Compliance was subject to serious post-employment restrictions: (i) the former employee exercised contract management authority with respect to the new employer's cable franchise agreement, by drafting it, supervising cable system operators' performance under it, helping to coordinate the transfer	Post-employment; one year subject matter prohibition; participated personally and substantially in the subject matter; business transaction involving the City; contract management authority; drafting cable franchise agreement; internal company activities; human resources; cable franchisee; cable; Cable Ordinance; Cable Communications Ordinance; non-exclusive franchises; personnel administration; new business opportunities; federal Telecommunications Act of 1996; Illinois Cable Television Association; federal Cable Communications Act of 1984; workplace discrimination claims; monitoring compliance; leased access; municipal utilization; Government Compliance; Human Resources; assist or represent; behind the scenes; permitted internal corporate activity

		<p>of the license to another franchisee, and other activities, and was thus permanently prohibited from assisting or representing the new employer on it, including advising it “behind the scenes,” or helping to resolve disputes with the City arising from it; and (ii) because the former employee was personally and substantially involved in the subject matter of the City’s regulation of cable franchises, was prohibited for one year from assisting or representing the new employer with respect to renewing franchises, or advising it in connection with legal actions or claims involving the City’s Cable Ordinance.</p> <p>The opinion also addresses internal company activities that are not prohibited: these prohibitions did not extend to activities that are no so interrelated to the new employer’s City business, including personnel administration and responsibilities, relationships with outside attorney and insurers, complying with federal laws and regulations, serving as a liaison to the Illinois Cable Television Association, or matters involving leased access procedures and users, except as to the company’s City franchise agreement.</p>	
96037.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec	Post-employment	<p>A former City employee, now working as a bank Vice President, was advised that the post-employment prohibitions did not restrict this work. The employee’s post-City bank work involved financing real estate development in the Chicago region, which required no City action; the</p>	<p>Post-employment; one-year subject matter prohibition; Bank; affordable housing; new employer had transactions before the former employee’s City department; loan committee; development proposals reviewed by the City; multi-unit housing; residential development project; contract management authority;</p>

k%20Chairs/4-14-12/96037.Q.pdf		employee's City work had involved development of affordable housing. The bank had had two transactions pending in the employee's department at the time the employee left City service – the employee was advised that, as long as the former employee did not work on these matters, the employee would be in compliance with the Ordinance.	
96038.Q https://www.chicago.gov/dam/city/depts/ethics/general/AO Interest CityBusiness/96038.A.pdf	Financial Interest in City Business	A City employee was advised that, in certain situations, City employees may serve as subcontractors providing security services on a prime contractor's City contract. The opinion cites several older cases, and discusses factors such as the source by which the subcontractor's salary was paid, who hired the subcontractor and what kind of decision-making role, if any, the City had in the hiring process, specifically, Case No. 93033.A, stating that there the Board concluded that the City employee may have had a financial in the general contractor, but not in City business by virtue of this subcontract. In this case, the conclusion was based on the fact that the prime contractor chooses its own security subcontractor, as stated in its contract, and directly pays the subcontractor. The opinion states explicitly that it is not intended to apply to all subcontracting arrangements on City contracts, and not control those where general contractors identify subcontractors on bid documents to the City. See Case No. 93033.A.	Financial interest in a City contract, work or business; subcontractor; security services; named subcontractor; disclosed subcontractor; City's authority to approve or disapprove subcontractor; prime contractor; general contractor; security subcontractor; property right
96041.E	Statements of Financial Interests	The Board determined that the Chicago Workforce Board was not a City agency, and thus its members were not required	City agency; not a City agency; Workforce Board; Private Industry Council; created under the authority of state and federal law;

https://www.chicago.gov/dam/city/depts/ethics/general/AO_SFI/96041.E.pdf		<p>to file a Statement of Financial Interests. The opinion focused on the fact that the Board was created under the authority of the State of Illinois, in fulfillment of the federal Job Training Partnership Act, and that its members, while appointed by the Mayor, were not subject to City Council confirmation, and because the Board replaced the Private Industry Council, and was funded primarily through state and federal sources, and not created by City ordinance.</p>	<p>appointed by the Mayor; no City Council confirmation; funded primarily through state and federal sources</p>
<p>96042.A</p> https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_PostEmploy/96042.A.pdf	<p>Post-employment</p>	<p>The Board determined that a former high ranking City employee, who had taken a position with a computer consulting firm that had two City contracts, exercise contract management authority with respect to one of them, which was to manage work performed by skilled trades- and maintenance people, and manage inventory information, by preparing the RFP/RFQ, reviewing responses submitted, and negotiating the contract (even though it had not been finalized on the employee's last date of City service, but, in contrast, but, in contrast had not been personally and substantially involved in the other or in its subject matter, which was to manage the dispatch of emergency personnel, verify id-badging, and monitor access at several major City facilities. The case contains good descriptions of what it means to exercise contract management authority, and to be or not to be involved personally and substantially in the subject matter underlying a City contract.</p>	<p>Post-employment; one year subject matter prohibition; participated personally and substantially in the subject matter; contract management authority; computer programming; direct day-to-day computer operations; controlling emergency and security operations; administrative network; MIS; design a project; manage work performed by skilled trades- and maintenance people; manage inventory information; RFP; RFQ; reviewing responses; negotiating a City contract; contract not yet finalized on the last day of City employment; id-badging; computer-aided dispatch; request for proposals; request for qualifications</p>

<p>96043.Q</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec%20Chairs/NerFid/96043.pdf</p>	<p>Outside Employment</p>	<p>A City employee was advised that the Ordinance did not prohibit the employee from serving as a paid member of an ad hoc committee of another government agency in Cook County that was responsible for interviewing that agency's employees as part of the promotion process. The City employee worked in a bureau that informed the other government agency of repairs that might be necessary to that agency's infrastructure. The City employee was advised of the standard restrictions on outside employment, including if appropriate, the requirement to disclose this on the Statement of Financial Interests.</p>	<p>Outside employment; dual employment; Cook County governmental agency; Statement of Financial Interests</p>
<p>96046.Q</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec%20Chairs/NerFid/96046.pdf</p>	<p>Outside Employment</p>	<p>A City employee was advised that the Ordinance did not prohibit the employee from teaching a class on a certain kind of property inspection, even though the employee had previously worked in the department that performed these inspections. The employee was asked to teach training courses in this type of inspection, project management, and risk assessment, all courses required for those who apply to the State for a license, as well as by the Environmental Protection Agency and the Department of Housing and Urban Development. Students in these courses are typically enrolled by their employers, who pay their tuition. None of the employee's students would be City employees. The opinion is based on the fact that, in this teaching, the employee would not be giving students an unfair advantage in dealing with the City,</p>	<p>Outside employment; dual employment; teaching; inspections; EPA; HUD; property inspection; course required for State licensure; licensing; no City employees as students; course could not give students an unfair advantage in dealing with the City; the teacher would not be in a position to make decisions about current or former students in his or her City job; money for advice or assistance; intended meaning of the money for advice provision; solicit or accept anything of value in return for advice or assistance concerning the operation or business of the City</p>

		or where the teacher would be in a position to make decisions about students or former students in his or her City job. The employee was advised of the other relevant restrictions concerning outside employment.	
96047.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec%20Chairs/4-15-12/96047.Q.pdf	Travel	A City librarian was advised that nothing in the Ordinance prohibited the librarian from accepting a study of Northern Ireland's library collection, travel expenses to be paid by British Council, which had no business before the City.	Travel expenses; Northern Ireland; entertainment; meals; refreshment; British Council; librarian; tour of library facilities
96052.A https://www.chicago.gov/content/dam/city/depts/ethics/general/AOPostEmploy/96052.A.pdf	Post-employment	This is a significant, precedential case. The Board determined that a former employee, a Project Manager, who had taken a position with a real estate consulting firm that had one City contract to prepare redevelopment plans for potential TIF (tax increment financing) districts, and draft eligibility studies for potential TIF districts, and sought another such contract, had not exercised contract management authority with respect to either and thus was not subject to a permanent prohibition as to them (but had exercised contract management authority with respect to agreements not at issue in the opinion) but was subject to a one year subject matter prohibition as to assisting or representing the firm as to: TIF redevelopment contracts, but not as TIF planning and eligibility studies. The Board concluded that work associated with the TIF planning phase constituted a separate subject matter from the TIF	Post-employment; one year subject matter prohibition; participated personally and substantially in the subject matter; contract management authority; TIF; tax increment financing districts; planning phase; redevelopment phase; TIF eligibility studies; preparing potential TIF area redevelopment plans; Project Manager; community outreach activities; creation of TIF districts; TIF consultants; CDC; Community Development Commission; RFQ; request for qualifications; subject matter; negotiated redevelopment agreements; state guidelines;

		redevelopment phase (the latter of which this employee had participated personally and substantially in).	
96054.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/Board%20of%20Elections%20Commissioners/96054Q.pdf	Attorneys; Board of Election Commissioners	A hearing officer of the Chicago Board of Election Commissioners (CBEC), also an attorney, was advised that nothing in the Ordinance prohibited this person's representation of clients before the Illinois Industrial Commission, because the officer was not a City employee or a City contractor but, rather, a CBEC contractor), and thus not subject to the Ordinance, as the CBEC is not a City agency for purposes of the Ordinance.	Chicago Board of Election Commissioners; CBEC; not a City agency; represent; attorney; Illinois Industrial Commission; not a City contractor;
97001.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/Opinions%20involving%20%22Sister%20Agencies%22/97001.q.pdf	Sister Agencies; Outside Employment	Staff advised a City employee that the Ordinance did not prohibit the employee from contracting with the Chicago Public Schools/Board of Education (CPS/BOE), or the Cook County Forest Preserve District or Chicago Park District, sister agencies of the City, to create and produce a cable TV programs. These are not City agencies for purposes of the Ordinance and therefore, the Ordinance prohibition against City employees having a financial interest in the work of the City did not apply. The employee was also advised that the conflict of interests and improper influence provisions did not apply here either, as the employee was not in a position to influence the City in its dealings with the CPS/BOE. The employee was advised of all of the restrictions pertaining to outside employment.	Outside employment; second job; Chicago Public Schools; Board of Education; School Reform Board of Trustees; sister agency; financial interest in a contract, work or business of the City; Cook County Forest Preserve District; Chicago Park District; Personnel Rules; not a City agency
97004.Q	Financial Interest in City Business	A City employee was advised that the correct way to calculate the employee's interest in a \$225,000 second mortgage	Financial interest in City business; refinancing of a City loan; housing; real estate; redevelopment; co-owner; limited

https://www.chicago.gov/content/dam/city/depts/ethics/general/AOInterestCityBusiness/97004.Q.pdf		<p>loan from or administered by a City department is to calculate the percentage of the employee's ownership interest in the person or entity with the loan, multiplied by the total amount of the loan. In this case, a City employee owned 1.91% of a company. The company wanted to refinance the loan. Although the refinance would increase the City's risk, the City would not provide any new funding. The employee was advised that the Ordinance did not prohibit the refinancing because the employee's interest in the original City loan was less than \$5,000, and the refinancing would not increase the outstanding amount so the employee would not have a prohibited interest in City business.</p>	<p>partnership; Department of Housing; refinance; loan; refinancing</p>
<p>97005.E</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO_SFI/97005.E.pdf</p>	<p>Statements of Financial Interests</p>	<p>A City employee was advised that members of the Mayor's Domestic Violence Advocacy Coordinating Council were not required to file annual Statements of Financial Interests, because the Council did not have the authority to enter into contracts or make binding decisions, although it could make recommendations to the Mayor. Thus it was solely advisory in nature and its members not required to file.</p>	<p>Mayor's Domestic Violence Advocacy Coordinating Council; required to file a statement of financial interests; City agency; solely advisory; authority to make binding decisions, to enter into contracts, or make expenditures; make recommendations to the Mayor;</p>
<p>97008.Q</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_ConflictOfInterest/97008.Q.pdf</p>	<p>Conflicts of Interest/Improper Influence; Elected Officials</p>	<p>This is a significant, precedential case. The Board advised an alderman that applying for and receiving a tax credit from the Illinois Housing Development Authority for property the alderman owned, located in the City, would not violate the Ordinance. This is not business of the City, and would not need</p>	<p>Alderman; same rights as any private property owner; acting as a private citizen; use of City title or position to influence City decisions or other City officials or employee for private purposes prohibited; tax credit; application for tax credit; State of Illinois Housing Development Authority; property located in the City; owned by an alderman;</p>

		to come before the City Council, and thus would not constitute a prohibited financial interest in City business; it would also not violate the conflict of interests or improper influence, provided the alderman did not use or attempt to use the aldermanic position or title to influence other City personnel whose letters or certifications would accompany the application. The opinion states that “as you have described it, your involvement with application. It is staff’s opinion that as long as you do not use of attempt to use your City position to influence the actions or decisions of the City officials whose letters and certifications will accompany your application, these provisions do not prohibit you from seeking or obtaining those letters and certifications.”	not work, contract or business of the City; paid for with federal funds; administered by the Illinois Housing Development Authority; Department of Housing; Certification of Consistency; IHDA; IHDA-mandated plan;
97009.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_ElectOfficials/97009.Q.pdf	Campaign Financing; Elected Officials	An alderman was advised that the Ordinance did not prohibit the alderman’s authorized political committee from accepting two (2) checks from a married couple totaling more than \$1,500 in the same year (because neither spouse was doing nor seeking to do business with the City or its sister agencies), nor a third check, made out to the alderman’s congressional political committee, but that this third check was governed by relevant federal election law. The alderman was advised to contact the Federal Election Commission as to the third check’s acceptability.	Alderman; candidate for Congress; political contributions; campaign contributions; exceeding \$1,500; doing or seeking to do business with the City or its sister agencies; federal election law; Federal Election Commission
97010.A https://www.chicago.gov/dam/city	Financial Interest in City Business	This is a significant, precedential case, although the definition of financial interest was amended in 2012. A City employee owned 15% of a partnership that planned	Financial interest; contract, work or business of the City; multi-year contract; lease; lessor; lessee; property belonging to the City; \$1,000; financial interest in the person;

/depts/ethics/general/AO Interest CityBusiness/97010.A.pdf		<p>to lease a vacant lot owned by the City, and would pay the City over the four-year lease term. The City employee's share of the lease payments would be \$3,800 over the four-year term; the Board determined that this did not constitute a prohibited interest in City business, because the interest was worth less than \$5,000.</p> <p>The Board also determined that having an ownership worth more than 10% of a person (any business entity) gives the owner a financial interest in the business – which is important for disclosure purposes of the Statements of Financial Interests – but not necessarily in the company's/person's City business, as that can be determined only by doing the math. Note: in 2012, the definition of financial interest became simpler for ownership of entities other than through common stock of publicly traded corporations. It is now \$1,000 for determining whether one has a financial interest in the person or whether one has a financial interest in the person's City work, contracts or business – the formula is still that of multiplying ownership interest by gross amount of City contract, work or business.</p>	<p>financial interest in the name of another; financial interest in the person versus financial interest in the person's City work, contract or business; Statement of Financial Interests</p>
<p>97011.Q</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/AO InterestCityBusiness/97011.Q.pdf</p>	<p>Elected Officials; Employment of Relatives or Domestic Partners</p>	<p>This is a significant, precedential case. An alderman was advised that: (i) the Ordinance did not prohibit the alderman from leasing space for the aldermanic office from a relative of one of the alderman's staff members, as the staffer would not have any monetary interest in the lease or landlord, nor receive any</p>	<p>Alderman; property owner; lease of City office; relative of aldermanic staff; City Council staff; financial interest in a contract, work, or business of the City; no monetary interest in the transaction; fair market value transaction; federal program administered by the City; potential lease; City delegate agency; contingent</p>

		income from the lease, nor was the staffer involved in negotiating, signing or managing the agreement, and the lease would be at fair market value; and (ii) the Ordinance did not prohibit the alderman from selling a building the alderman owned to a persons who might lease it to a social service organization that would make all lease payments under a federal program administered by the City's Department of Human Services (now Department of Family & Support Services), because the alderman would not be party to the potential lease, nor did the alderman have any involvement in discussions about the potential lease, nor was the buyer's obligation to purchase the building contingent on the signing of the lease or the buyer's continued receipt of lease payments. The alderman was advised not to take any actions or make any communications to facilitate the potential lease.	
97013.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec%20Chairs/4-15-12/97013.Q.pdf	Gifts	Representatives of an association were advised that offering gifts, including cash, to City employees, is strictly prohibited, though non-cash of up to \$50 were technically allowable from a single source, and that violations of these restrictions could jeopardize the organization's position with the City.	Warning letter; offering gifts; cash gifts; non-cash gifts; penalties for violation
97014.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec	Travel	A high ranking City employee was advised that the Ordinance did not prohibit departmental employees from accepting reasonable travel expenses to attend a one-day technical conference to provide access to recent product	Business travel; paid by manufacturer; educational travel; purchasing decision; evaluation of products; recent development; laboratory demonstrations; reasonable travel expenses

k%20Chairs/4-15-12/97014.Q.pdf		developments and laboratory demonstrations to aid in purchasing decisions; the expenses were offered by the manufacturer of the products.	
97018.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec%20Chairs/4-15-12/97018.Q.pdf	Travel	A high ranking City employee (bureau chief) was advised that the Ordinance did not prohibit three (3) bureau employees from accepting reasonable travel expenses for travel to a vendor's manufacturing facility to witness on-site testing of equipment manufactured for the City; the City contract provided explicitly for this travel at the vendor's expense.	Travel as provided by City contract; on-site testing at manufacturer's facility; paid for by a vendor; per contract
97019.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_Outside_Employment/97019.A.pdf	Outside Employment; Financial Interest in City Business; Conflicts of Interest/Improper Influence	This is a significant, precedential case. The Board determined that a City employee who owned an M/WBE-certified company and desired for the company to be named as a subcontractor on a prime contractor's City contract would be subject to Ordinance's prohibition on having a financial interest in any City contract, work or business, because: (i) the company would be part of the City's consideration of the contract bid; and (2) the listing of the firm on the contract/subcontract bid would give the employee a "property interest" in the City contract.	Financial interest in any City contract, work or business; subcontractor; named in the bid; prime contract; MBE; WBE; property interest in the City contract; financial interest in the name of another
97020.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/AO-City%20Owned%20Property/97020.Q.pdf	City Property	A citizen who filed a complaint was advised that the complaint did not provide facts sufficient for the Board to investigate, but was also advised that the Ordinance prohibits City employees or official from using City equipment, personnel or supplies for an unauthorized purpose, for example, their own personal benefit or private gain. The citizen was also advised that the complaint could be	Citizen complaint; insufficient factual basis to commence and investigation; reasonable cause to commence an investigation; City owned property; personal gain; unauthorized purpose

		refiled and would be reconsidered if additional facts were provided.	
97021.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/AOElectOfficials/97021.Q.pdf	Fiduciary Duty; Representation of Other Persons; Non-profit Board Service; Elected Officials	This is a significant, precedential case. An alderman was advised that, while nothing in the Ordinance prohibited serving as an unpaid board members of various organizations in the ward, such as a Chamber of Commerce, to do so could give rise to apparent, if not actual, conflicts, and to a situation in which the alderman's ability to represent constituents and exercise judgment free from commitments and obligations to an outside could be called into question. A City official is bound in the discharge of public duties to act in the best interests of the City; a board member of a non-City organization owes a similar fiduciary duty to the organizations; the alderman could be in a situation involving a conflict of loyalties. The agency could not recommend that the aldermen accept these positions. The opinion discusses specifically the alderman's fiduciary duty to the City and the prohibition on representing any third party before the City.	Alderman; volunteer service on boards; organizations located in the ward; Chambers of Commerce; non-profit board member; appearance of impropriety; perception of preferential treatment; fiduciary duty; representation of other persons; use of City property; confidential information; conflict of loyalties; recommend that the position be declined
97023.A https://www.chicago.gov/content/dam/city/depts/ethics/general/AOPostEmploy/97023.A.pdf	Post-employment	The Board determined that a departing middle management employee, a contracts coordinator, did not prohibit the employee from taking a position with a vendor of the employee's department, but that the employee would be subject to a one year subject matter prohibition and did not exercise contract management with respect to this contract.	Post-employment; one year subject matter prohibition; participated personally and substantially in the subject matter; contract management authority; departmental vendor; computer systems for tracking geographic information; monitoring compliance; processing invoices already approved for payment; no decision-making authority; assisting or representing a person in a business transaction involving the City;

			helping a person to seek a contract as well as perform a contract
97025.A https://www.chicago.gov/content/dam/city/depts/ethics/general/AOPostEmploy/97025.A.pdf	Post-employment	The Board determined that a former high ranking City employee was prohibited for one year from representing a new employer or client in any business transaction involving the management of real estate at the City's airports, but not as to transactions involving the management or leasing of space at the airports for food, beverage or retail concessions. These are, the Board concluded, separate subject matters.	Post-employment; one-year subject matter prohibition; participated personally and substantially in the subject matter; food, beverage, and retail concessions; definition of subject matter; management of airport real estate; rental cars, ground transportation; skills and knowledge substantially different, different subject matter; separate subject matter
97026.A https://www.chicago.gov/content/dam/city/depts/ethics/general/AORepresentingOthers/97026.A.pdf	Representation of Other Persons; Attorneys	This is a significant, precedential case involving attorneys new to City service from the private practice of law. Before entering City service, a City employee represented a client before a City Commission. The attorney had entered into a <u>contingency fee</u> agreement with the client which provided that the attorney would be paid a percentage of any award resulting from the claim (which has not yet been settled). The attorney asked whether the Ordinance being paid either: (i) a percentage of the final award, or (ii) an estimated payment based on the hours she worked on the case. The question before the Board was whether either form of contingency payment violated the prohibition against an employee having an economic interest in the representation. The Board determined that it was not the intended meaning of the Ordinance to preclude an attorney in this situation from receiving payment for work completed "as long as the payment is based on the reasonable	Attorneys; representation of other person; formal or informal proceeding or transaction before a City agency; non-ministerial; economic interest in the representation; services performed prior to City employment; <i>quantum meruit</i> ; fair value of legal services; contingent fee; contingent fee prohibited; attorney's fees

		value of the attorney's completed services. . . . That the attorney might not receive payment, in the event the former client receives no award or amount in the settlement, does not change our conclusion." However, the Board also determined that the Ordinance does not allow all payment arrangements. The Ordinance does not prohibit the employee from receiving payment based on the hours worked (#2 above), but does prohibit the attorney from being paid purely a percentage of the final award (#1) because that payment might be much larger than the value of the attorney's work, depending on the representation by the attorney to whom the case was referred. This fee arrangement (#1) would be considered a prohibited economic interest in representation.	
97027.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec%20Chairs/4-15-12/97027.Q.pdf	Travel	A high ranking City employee was advised that the Ordinance did not prohibit an employee of the department from accepting reasonable travel expenses paid by a company that manufactures components of equipment the department uses to participate in a state-wide study of a prototype piece of equipment that company produced, at its headquarters. Representatives from other cities in Illinois and other states would attend as well.	Business travel; reasonable travel expenses; test a prototype; company headquarters; seminar
97028.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec%20Chairs/4-15-12/97028.Q.pdf	Gifts; Elected Officials	An alderman and a private business owner were advised that because the private business participated in a State program that required aldermanic approval for the business to receive	Alderman; installation of equipment; participating in a State program; reimbursement from the State; aldermanic approval; appearance of impropriety; expensive gift; approval of work orders

hics/general/AO GiftsTravel/97028.Q.pdf		reimbursement from the State, that, if the business were to install a product valued at \$2,000 in the alderman's ward office, it would create the appearance of impropriety, and could not be recommended.	
97030.CNS https://www.chicago.gov/dam/city/depts/ethics/general/AO_EmployRelatives/97030.CNS.pdf	Employment of Relatives or Domestic Partners	The Board advised a department head, who had forwarded an investigative report to the Board for a review and recommendation as to appropriate discipline, that, under the Ordinance then in effect, the Board could not recommend specific disciplinary sanctions, as that depended on the employee's record, and was the department head's decision. The Board agreed that a violation of the Ordinance occurred, specifically that an employee had exercised contract management authority over a contract with a firm that employed the employee's relative. The Board also stated that it has no jurisdiction to render decisions as to the City's Personnel Rules, and noted that the identity of all persons involved in the matter would be kept confidential by the Board, as required by law, though persons could waive their confidentiality.	Recommend appropriate sanctions; disciplinary sanctions; penalties; Board's jurisdiction; confidentiality; employment of relatives; nepotism; contract management authority; Board's review of another department's investigation; advisory opinion
97032.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_CampFinancing/97032.A.pdf	Campaign Financing	This is a significant, precedential case. The Board determined that, for purposes of \$250 limitation on "cash" political or campaign contributions in the Ordinance, "cash" means currency, cashier's check, or money orders. It does not mean or include personal checks.	Campaign Financing Ordinance; cash, political contributions; campaign contributions; donations; currency

<p>97034.Q</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO_CampFinancing/97032.A.pdf</p>	<p>Conflicts of Interest/Improper Influence; Elected Officials; Outside Employment</p>	<p>An alderman was advised that the Ordinance does not per se prohibit an alderman from having outside employment or business interests, but that there are numerous restrictions and obligations, most particular that a City Council member must disclose and abstain from voting on matters pending before the City Council if he or she has a business relationship with the person that has the matter pending.</p>	<p>Alderman; outside business ownership; outside employment; dual employment; outside employment; second job; business relationship; not per se prohibited; restrictions</p>
<p>97036.Q</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_ConflictOfInterest/97036.Q.pdf</p>	<p>Conflicts of Interest/Improper Influence; Employment of Relatives or Domestic Partners</p>	<p>This is a significant, precedential case. A high-ranking City employee was advised that the Ordinance did not prohibit an executive search firm from being retained by the employee's department to assist in the hiring of another high-ranking City employee. An employee of the executive search firm who would work on the matter was married to a City employee. The opinion is based on the facts that: (i) the City employee whose spouse worked for the search firm did not have or exercise contract management authority, or, indeed, any authority, with respect to the hiring or work of the search firm; and (ii) the City employee had no monetary or financial interest in the firm or in the search matter itself, because the matter was related to the employee's spouse's independent occupation.</p>	<p>Employment of relatives; contract management authority; executive search firm; spouse's or domestic partner's independent occupation, profession or employment; no monetary or financial interest; nepotism</p>
<p>97037.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO_Lobby/97037.A.pdf</p>	<p>Lobbyist Registration and Disclosure</p>	<p>The Board determined that the 1997 Ordinance amendments requiring lobbyists to disclose, on their activity reports, "an itemized list of every gift given to any official or employee of the City requires lobbyists to disclose, at a minimum: (i) the name of gift recipient; the</p>	<p>Lobbyist; lobbying; activity report; itemized list of every gift given to any official or employee; name of recipient; value of the gift; recipient's office or position</p>

		recipient's City office or position; (iii) a brief description of the gift; and (iv) the approximate market value of the gift.	
97053.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/AO-Attorneys/97053.pdf	Attorneys; Outside Employment	A City employee was advised that the Ordinance does not, per se, prohibit City employees who are also attorneys from representing persons in legal matters, or from receiving payment for this representation, but that the Ordinance does prohibit City employees who are attorneys from representing or deriving income or compensation from representing any person other than the City in a transaction before a City agency, or from deriving or receiving compensation from representing any person in a judicial or quasi-judicial proceeding where the City is a party and the person's interest is adverse to the City's. The opinion also advises the complainant that any City department may impose rules or policies that are stricter than those in the Ordinance.	Attorneys; outside practice of law; not per se prohibited; department rules or policies may be stricter; derive or receive compensation from the representation of persons in proceedings where the City is a party; interests adverse to the City; any informal or formal transaction before the City; non-ministerial
97054.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_Employ_Relatives/97054.A.pdf	Employment of Relatives or Domestic Partners; Relationship to Other Laws	This is a significant, precedential case. The Board agreed that a department's internal investigation showed that an employee had violated the Ordinance's employment of relatives provisions by signing missed punch report and vacation approval forms with respect to two of the employees' sons, and also agreed that the department's decision to bring the employee into compliance, such as a transfer, would be appropriate, and noted that a department could also impose rules or policies that are stricter than those in the Ordinance. The Board also determined that the Ordinance contains	Employment of relatives; nepotism; parent; son; signing missed punch report; approving vacation requests; employ; bring employees into compliance; discipline; department's authority to impose rules stricter than those in the Ordinance; no grandfather clause; longevity of a situation

		no “grandfather” clause, in other words, that situations in which there would have been a violation before the Ordinance’s effective date in 1987 were not exempt from needing to conform to the Ordinance’s requirement on the basis of their longevity. See <i>also</i> Case nos. 91088.I; 98045.A.	
97055.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_Lobby/97055.A.pdf	Lobbyist Registration and Disclosure	<p>This is the first of several significant, precedential opinions in which the Board considered when building or permit expeditors are required to register as lobbyists. The Board determined that: (i) an expeditor who represents a client before examiners from the Department of Buildings by preparing and submitting permit applications, monitoring their progress, determining and accomplishing necessary plan corrections, and serving as the contract person in case of emergency is not lobbying; (ii) an expeditor who makes an appeal to the Building Board of Appeals or an application to the Committee on Standards and Tests on behalf of a client, and who acts in the context established hearing procedures in order to obtain an exemption from the building code, or receive approval for a plan, is also not lobbying; (iii) an expeditor who acts outside of these established procedures and whose actions are aimed at persuading or influencing the actions or decisions of City employees or officials, is lobbying; and (iv) an expeditor who appeals to the Building Commissioner to render an interpretation or decision</p>	<p>Lobbyist; lobbying; building expeditors; permit expeditors; what is lobbying; what is not lobbying; Building Board of Appeals; Bureau of Standards and Tests; Department of Buildings; plan examiners; acting within established procedures; hearings; monitoring progress of applications; appeal to the Building Commissioner; what is lobbying</p>

		concerning the building code is lobbying. See <i>also</i> Case No. 02013.A.	
97056.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_PostEmployment/97056.A.pdf	Post-employment	A former City employee who previously received an advisory opinion (97025.A) asked the Board again for advice regarding matters not addressed in that opinion. The Board concluded that the employee did not exercise contract management authority over any of the City's airport use agreements, as the employee did not assist the City in negotiating or drafting them and had no formal authority over any of the agreements as a whole. However, because the employee did have considerable involvement in the agreements' interpretation, the one-year subject matter prohibition did apply to work for a new client or employer as to these agreements, and, although the employee had contract management authority over some contracts, the permanent prohibition would not extend to new contracts, while other matters were not business transactions involving the City.	Post-employment; one year subject matter prohibition; participated personally and substantially in the subject matter; interpretation of agreements; day-to-day involvement; judicial or administrative proceeding; rental cars, rental care use agreements; Gary airport; "good neighbor delegation"; consulting services; airlines; Chicago-O'Hare International Airport Use Agreement and Facilities Lease; Chicago Midway Airport Use Agreement and Facilities Lease
97057.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_OutsideEmployment/97057.Q.pdf	Attorneys; Outside Employment	An employee relations supervisor, who was also an attorney, was advised of the relevant prohibitions on the outside practice of law while continuing in City employment. The opinion goes through each of the restrictions and is instructive.	Attorneys; outside employment; outside practice of law; outside employment; lawyers; real estate closings; representation of other persons; solicitation or receipt of money for advice or assistance concerning the operation or business of the City; conflict of interests; improper influence; City owned property; confidential information; lawyers; Personnel Rules; Illinois Rules of Professional Conduct
97060.Q	Gifts	A City employee asked whether, in light of recent amendments to the Ordinance, the	Gifts; sales promotions; Walt Disney's Magic Kingdom Club; extended to a market of

https://www.chicago.gov/content/dam/city/depts/ethics/general/Decision%20Chairs/4-15-12/97060.Q.pdf		<p>employee's City department could continue its membership in the Walt Disney's Magic Kingdom Club. The offer was extended to all organizations with more than 500 employees or members and entitled holders to a discount at Disney facilities. Relying on earlier cases, the rationale is that a sales promotion is an exchange transaction, not a gift, and was offered to City employees on the same terms as it was offered to everyone else similarly situated, and not made to influence any City governmental decisions or actions. Note: this sales promotion exception to the gift laws was added to the Ordinance as part of amendments effective in November 2012. See <i>also</i> Case 98048.Q.</p>	<p>similarly situated people; all organizations with more than 500 members; exchange transaction; offeror had no business with the City department</p>
<p>97061.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO_FiduciaryDuty/97061A-redact.pdf</p>	<p>Fiduciary Duty; Representation of Other Persons; Attorneys; Outside Employment</p>	<p>This is a significant, precedential opinion, dealing with the restrictions imposed on the outside law practices of attorneys who are also City employees and officials.</p> <p>The Board determined that there is no flat-out prohibition on City employees and officials who from having outside law practices. But there are significant, precedential caveats. Here the Board considered the request of a high-ranking City employee to work in an "of counsel" capacity a private law firm. It advised that, given the employee's high-visibility position, the employee should consider the possible appearance of impropriety of such conduct, and, as an Executive Branch employee, inform the employee's department head of the employee's actions. The Board also advised that</p>	<p>Attorneys; outside employment; outside practice of law; of counsel; outside employment; lawyers; real estate closings; representation of other persons; solicitation or receipt of money for advice or assistance concerning the operation or business of the City; conflict of interests; improper influence; City owned property; confidential information; lawyers; Personnel Rules; Illinois Rules of Professional Conduct</p>

		there might be situations in which the City is not a party to a suit but has adverse interests to a client of the affiliated law firm; in such cases, the employee must enter into a fee-screening arrangement with the firm to ensure that no income or compensation is derived from such matters.	
97062.A https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_PostEmploy/97062.A.pdf	Post-employment	The Board determined that neither the permanent nor one-year prohibitions applied to a former City employee in the employee's new position, because the employee did not exercise management authority on any City contracts involving the new employer, and because the employee's post-City position involved a different subject matter than any in which the employee participated during City employment (namely, financing for social services agencies). The employee was involved in the development and financing of affordable housing.	Post-employment; one year subject matter prohibition; participated personally and substantially in the subject matter; housing tax credits; reviewing federal regulations; making recommendations regarding tax credit allocation; financial analyses of technical financing mechanisms; revenue bonds; Community Development Block Grants; seed money; non-profit developers; lending; non-profit social service agencies through Illinois; loans for development and construction of physical facilities; charter schools, childcare centers; community health care providers; residential special care facilities; evaluation of Facilities Rehabilitation Program; new loan resources; insurance companies; private foundations; put together and administer loans packages; contract management authority
97063.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_SFI/97063a.PDF	Statements of Financial Interests	This is a significant, precedential case. The Board determined that the duty of a City employee filing a Statement of Financial Interests to inquire about the spouse's or domestic partner's business interests, or the names of persons with whom the spouse's/domestic partner's employer does business (in order to answer specific questions on the form), depends on specific facts, and that the	Statements of Financial Interests; duty to inquire; actual knowledge; intent to mislead or file a false statement; false statements; knowingly furnished false or misleading information to the Board of Ethics; knowingly files a false or misleading Statement of Financial Interests; spouse; domestic partner; receive compensation in excess of \$5,000; a person or entity doing business with the City, the Chicago Transit Authority,

		<p>duty to inquire arises only if a reporting individual has some reason to know the information requested. Here, the filing employee's spouse was employed by an organization that received City funding, but the spouse had no involvement with funding for the organization. Knowing merely that one's spouse works for an organization that receives City funding (and thus does business with the City) does not, by itself, create a reason for the filer to know the names of persons for whom the organization performed services and received over \$5,000, and whether those persons did business with the City or any sister agencies.</p> <p>The Board stated that "if one lacks the information to respond to a question or part of a question on the Statement of Financial Interests, an intent to mislead could be inferred only if one knew or had reason to know the information one did not provide."</p>	<p>Chicago Public Schools; Chicago Park District; Chicago City Colleges; Metropolitan Pier and Exposition Authority; professional, business or other services rendered to any person or entity doing business with; incomplete statement</p>
<p>98001.Q</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_RepresentingOthers/98001Q.pdf</p>	<p>Representation of Other Persons; Elected Officials</p>	<p>This is a significant, precedential case. A City employee was advised that the Ordinance's representation of other persons provision clearly provides that elected officials, in the course of representing their constituents, and City employees, in the course of their duties, may represent other persons in proceedings before the requestor's City department, as long as such representation is not specifically compensated. The opinion advised the employee to develop procedures whereby elected officials or City</p>	<p>Representation of other persons; aldermen; aldermanic staff; represent, derive any income or compensation from the representation of; any formal or informal proceeding before a City agency; non-ministerial; performing the duties of employment; appearing without compensation before any City agency on behalf of constituents in the course of duties as an elected official</p>

		employees could identify themselves in the proceedings and explain the reason for their appearances.	
98003.A https://www.chicago.gov/dam/city/depts/ethics/general/AO Interest CityBusiness/98003.A.pdf	Financial Interest in City Business	<p>This is a significant, precedential case. The Board determined that a City employee did not have a prohibited financial interest in City business by petitioning the City to purchase (or “vacate”) an alley adjacent to the employee’s residence, even if the purchase price would be above the threshold for a financial interest in the purchase of property belonging to the City. The Board’s holding was based on the definition of “financial interest,” specifically that the vacation of alley, pursuant to the procedures described in the opinion, was available to all property owners in the City and thus constituted an “economic benefit provided equally to all residents of the City.” See <i>also</i> Case No. 92016.A</p>	<p>Financial interest; prohibited financial interest in the sale or purchase of any property belonging to the City; vacation of an alley; real estate; vacant property; abutting parcel; any economic benefit provided equally to all residents of the City; purchase part of the public way; available to all property owners in the City; portion of the public way that abuts one’s property; uniform procedure</p>
98007.A https://www.chicago.gov/dam/city/depts/ethics/general/AO Employ Relatives/98007.A.pdf	Employment of Relatives or Domestic Partners	<p>This is a significant, precedential case. The Board determined that a high ranking City employee, whose spouse was employed by a firm that prepared plans used by contractors that applied for permits issued by the employee’s bureau: (i) exercised contract management authority with respect to these permits, because of the employee’s direct supervisory responsibility over the bureau that issued such permits, and thus and was prohibited from performing any work with respect to any permit applications on which the spouse’s firm worked, or with whom or which the spouse’s firm was contracting; (ii) was not prohibited from</p>	<p>Nepotism; employment of relatives; contract management authority; permits; appearance of impropriety; past violations; where any relative or domestic partner is employed by or has contract with persons doing City work over which the employee or official has or exercises contract management authority; supervising the issuance of permits; bureau chief; recuse; abstain; delegation of work or authority; responding to inquiries; discretionary judgment; RFQ; request for qualifications; inherent conflict of interests; retainer contract</p>

working on or supervising the issuance of permits to sub/contractors that did not contract with the employee's spouse or firm; (iii) did not have contract management authority with respect to responding to inquiries in relation to preliminary reviews of proposed projects, which also involved review of design plans that might be prepared by the spouse's firm, because this review did not involve discretionary judgment, and could not reasonably be considered to be contract management authority; (iv) should recuse from *any* matters involving the spouse's firm while it employed the spouse in order to avoid even the appearance of impropriety; (v) would, if the employee accepted a promotion, then be in a position to have contract management authority with respect to the spouse's firm's contracts with the department, including the formulation of requests for qualifications (RFQs), and would be prohibited from exercising that authority if the spouse were employed by or had contracts with the firm. (vi) In this case, recusing would not avoid actual violations in every instance, and it would create a situation of inherent conflict, because the employee would have management authority over that business by virtue of the employee's position; and it would also create an appearance of impropriety; and (vii) the Board also determined that, in two previous City positions, the employee had exercised contract management authority over retainer contracts the spouse's firm had

		with the employee's department while the spouse was employed at the firm, and that these actions constituted Ordinance violations, but these violations were not ongoing and those contracts had expired, but the Board cautioned the employee as to the gravity of these violations.	
98009.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/Opinions%20involving%20%22Sister%20Agencies%22/98009.q.pdf	Conflicts of Interest/Improper Influence; Sister Agencies; Outside Employment	<p>This is a significant, precedential case. A rank and file employee was advised that the Ordinance did not prohibit the employee from accepting paid outside employment as a security guard with a firm that had a contract with a City vendor to provide security at various City and sister agency buildings, even to work at these particular buildings, as the employee's position was unrelated to providing security. The company might decide in the future to seek direct City contracts. However, the employee was advised of the strict prohibitions that applied: (i) the money for advice restriction, which prohibited the employee from accepting anything of value for giving advice or assistance on City business unless it was wholly unrelated to the employee's City job; (ii) the employee could not represent the outside employer in any formal or informal transaction before the City; (iii) the employee could participate in or try to influence any City decisions that might affect or benefit the outside employer; (iv) the employee could not use City time or property or confidential information for this outside job; and (v) at all times owed the City a fiduciary duty. The case stands for the proposition that the Ordinance does not</p>	<p>Outside employment; dual employment; second job; working for a City contractor; wholly unrelated; money for advice or assistance; conflict of interests; improper influence; security guard; City-owned buildings; sister agency buildings; work on a vendor's City contract; use of City property; confidential information; financial interest in any City contract, work or business</p>

		per se prohibit a City employee or official from having outside employment with City vendors or contractors.	
98016.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec%20Chairs/NerFid/98016.pdf	Outside Employment	<p>A rank and file City employee, a motor truck driver, was advised that the Ordinance did not prohibit the employee from having outside employment with a trucking firm that had City contracts with two departments other than the employee's, but that significant, precedential restrictions applied, including (i) the money for advice restriction, which prohibited the employee from accepting anything of value for giving advice or assistance on City business unless it was wholly unrelated to the employee's City job; (ii) the employee could not represent the outside employer in any formal or informal transaction before the City; (iii) the employee could participate in or try to influence any City decisions that might affect or benefit the outside employer; (iv) the employee could not use City time or property or confidential information for this outside job; and (v) at all times owed the City a fiduciary duty.</p>	<p>Outside employment; dual employment; second job; working for a City contractor; wholly unrelated; money for advice or assistance; conflict of interests; improper influence; motor truck driver; trucking firm; use of City property; confidential information</p>
98017.A https://www.chicago.gov/dam/city/depts/ethics/general/AO Interest CityBusiness/98017.A.pdf	Financial Interest in City Business	<p>This is a significant, precedential case. The Board determined that a City employee had a prohibited financial interest in City business in violation of the Ordinance. The issue was whether the business, which had City contracts, constituted the independent occupation, profession or employment of the employee's spouse. The facts presented to the Board showed that the employee had been identified on documents as the</p>	<p>Financial interest in his own name or in the name of another; any contract, work, or business of the City; any interest of the spouse or domestic of an official or employee which interest is related to the spouse's or domestic partner's independent occupation, profession or employment; continue to perform occasional, unpaid services for the company; transfer of ownership; hold oneself out as a corporate officer, shareholder, or employee; test to determine whether a</p>

		business's General Manager, and had responded to inquiries from a federal agency about the business in this capacity, had exercised legal and financial control of the business, had signed a contract on the business's behalf, and had powers to deposit or withdraw funds on the business's checking account, or sign other documents to pledge company assets as security.	business is the spouse's or domestic partner's independent occupation, profession or employment; transfer of ownership interest; regular negotiation of contract terms; participation in the operation or management of the spouse's or domestic partner's business; authorized to vote on corporate resolutions; exert legal or financial control over the company; sign checks; withdraw bank funds; pledge company assets as security
98018.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec%20Chairs/NerFid/98018.pdf	Outside Employment	A City employee was advised that the Ordinance did not prohibit the employee from participating in an inspection of a facility in a foreign City; the employee's expenses and a \$100 honorarium being paid by the federal government, and the employee would use vacation or other person time for the trip. The employee was advised that this is in the nature of outside employment, and that the standard restrictions applied: fiduciary duty, confidential information, and use of City property, and that the honorarium would need to be reported to the Board. The opinion also states that giving advice or assistance about the City's own system would not constitute a violation of the Ordinance's "money for advice" prohibition, since the information would not give the recipient any unfair advantage in dealing with the City.	Outside employment; foreign City; grant; federal government; honorarium; inspection of a facility in a foreign City; money for advice; soliciting or receiving anything of value in return or exchange for information about the operation or business of the City; wholly unrelated; purpose of the money for advice prohibition; give the recipient an unfair advantage in dealing with the City
98020.A https://www.chicago.gov/dam/city/depts/ethics/gen	Post-employment	This is a significant, precedential case. The Board determined that a departing middle-management City employee, an engineer, was prohibited for one year from assisting or representing a new client or employer with respect to	Field construction supervision; coordination of field construction supervision; on-site inspections; construction contractors; RFQ; request for qualifications; early retirement; one year subject matter prohibition; participated personally and substantially in

eral/AO PostEmploy/98020.A.pdf		<p>performing or coordinating field construction at particular City projects, because the employees work at these sites – coordinating field construction performed by other City employees and engineers from consulting firms hired by the City – constituted personal and substantial participation in the subject matter(s), which was these particular projects. The projects would be completed within one year, so the Board did not need to address the permanent prohibition. The one-year prohibition thus extended only to particular sites or City projects, consistent with prior cases where a former City's employee's work was limited to particular sites or projects.</p>	<p>the subject matter; subject matter; consulting retainer contracts; site specific; engineering cases; construction cases; substantial work at particular sites; definition of subject matter</p>
<p>98021.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO Interest CityBusiness/98021-A.pdf</p>	<p>Financial Interest in City Business</p>	<p>This is a significant, precedential case. The Board determined, based on the totality of the circumstances and facts presented to it, that a City employee did not have a prohibited financial interest in a City work, contract or business, but that the employee's negotiation of a contract on behalf of one division of a company owned by the employee's spouse created the appearance that the company was not the spouse's independent, occupation, profession or employment. The City contract was with another division of the company. The employee transferred the employee's 50% ownership in the business to spouse six (6) years before and was not an employee or owner of the company, which had a City contract. About 3-4 times per year, responded to customer complaints; the Board concluded that this was not regular</p>	<p>Financial interest in his own name or in the name of another; any contract, work, or business of the City; any interest of the spouse or domestic of an official or employee which interest is related to the spouse's or domestic partner's independent occupation, profession or employment; continue to perform occasional, unpaid services for the company; respond to a customer complaint; 3-4 times per year; transfer of ownership; hold oneself out as a corporate officer, shareholder, or employee; test to determine whether a business is the spouse's or domestic partner's independent occupation, profession or employment; transfer of ownership interest; totality of the circumstances; regular negotiation of contract terms; participation in the operation or management of the spouse's or domestic partner's business; authorized to vote on corporate resolutions; exert legal or financial</p>

		<p>enough to make the business not independent. The opinion contains a discussion of the factors that make a business “the independent occupation, profession or employment” of a spouse or domestic partner and discusses the four-pronged test.</p>	<p>control over the company; infrequent, irregular and uncompensated efforts</p>
<p>98023.Q</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/Deck%20Chairs/NerFid/98023.pdf</p>	<p>Outside Employment</p>	<p>A department head was advised that a Deputy Commissioner was not prohibited from continuing outside employment that had been approved by previous department heads. The outside position was unrelated to any business of the City and located outside of the City. Both were advised of the standard restrictions, including use of City property or time, confidential information, conflict of interests and improper influence, and fiduciary duty.</p>	<p>Outside employment; approval by department head; Deputy Commissioner; conflict of interests; standard restrictions; fiduciary duty; use of City property or City time; improper influence</p>
<p>98031.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO_RepresentingOthers/98031-A-redact.pdf</p>	<p>Representation of Other Persons; Appointed Officials</p>	<p>The Board determined that the Ordinance generally did not prohibit a person from being appointed to serve on two different City boards or commissions, nor prohibit an appointed City official from serving on other, non-City boards or commission. But it also determined that an appointed official was prohibited from representing a non-City agency before a City agency, because the subject of that representation was not wholly unrelated to the official’s duties for the City board on which the official served.</p>	<p>Representation of other persons; appointed official; City board or commission; contemporaneous service on another City or non-City board or commission; wholly unrelated; federal board or commission; state board of commission; Empowerment Zone Council; Enterprise Community Coordinating Council; urban renewal; conservation plans; Community Development Commission; CDC</p>
<p>98032.Q</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/AO</p>	<p>Travel</p>	<p>A City department was advised that two (2) of its employees could accept reasonable travel expenses to a vendor’s facility to inspect a prototype refuse truck to ensure it met City specifications before</p>	<p>Travel; business travel; inspect a prototype truck that the City has purchased; refuse trucks; standard practice in contracts of this type; meets specifications; necessary, not just a matter of convenience; before full-scale production begins; vendor’s headquarters</p>

GiftsTravel/98032.Q.pdf		<p>the truck was put into full-scale production.</p>	
<p>98033.Q</p>	<p>Outside Employment</p>	<p>A rank and file employee, a safety specialist, was advised that the Ordinance did not prohibit the employee from engaging in an outside job in which customers would be only private individuals whose property the employee would inspect for problems, and, if problems were uncovered, the customer would need to hire a qualified repairperson. The employee was advised of the standard restrictions on outside employment, including the prohibition on accepting any payment in return or exchange for giving advice about services that may be offered by the employee's department, as well a conflict of interests, improper influence, use of City property (the was advice that no City supplies or equipment could be used for the outside business), and confidential information.</p>	<p>Outside employment; dual employment; outside job; inspection; home inspection; hiring a qualified repairperson; money for advice; solicit or receive anything of value in exchange or return for advice or assistance concerning the operation or business of the City or services offered by the employee's department; City equipment; confidential information</p>
<p>98034.Q</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/AOGiftsTravel/98034.Q.pdf</p>	<p>Gifts; Fiduciary Duty; Travel</p>	<p>A department head was advised that the Ordinance did not prohibit an employee of the department from participating in a 3-5-month exchange program in a foreign City, during which time the employee would help the foreign City's facility (analogous to the City's) install a computer system. The City employee would receive no additional compensation, and this would be a "break-even deal," though the employee would have airfare, lodging and food expenses reimbursed. The department head stated that this exchange was in the City's best interests. The opinion advises</p>	<p>Gifts; travel; foreign exchange program; benefit to the City; install a computer system</p>

		that the employee is still a City employee during this period and owed a fiduciary duty to the City and may not use or divulge confidential information.	
98035.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_GiftsTravel/98035.Q.pdf	Travel	A City employee was advised that the Ordinance did not prohibit the employee from accepting reasonable travel expenses to attend an industry-wide marketing conference and serve as a panelist on a discussion panel, and that any honorarium received would need to be disclosed within five (5) days. Note: amendments to the Ordinance effective in November 2012 prohibit City employees or officials from accepting any honorarium offered in the course of their positions.	Travel; business travel; panelist; panel discussion; industry-wide marketing conference; administrators from other cities; reasonable travel expenses; offered by the conference's sponsor
98036.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_GiftsTravel/98036.Q.pdf	Gifts; Elected Officials	An alderman was advised that the Ordinance did not prohibit the airing of a public service announcement promoting a neighborhood event. The ad was to be aired free of charge. The announcement was designed to promote the event, not specifically the alderman, and named other sponsors of the event.	Gift; alderman; ward event; promotion; public service announcement; PSA; other sponsors; free of charge; media; advertising
98037.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_ConflictOfInterest/98037.Q.pdf	Conflicts of Interest/Improper Influence; Elected Officials; City Property	An alderman was advised that sponsorship of a home health program for the benefit of ward constituents, which would entail allowing the alderman's name and office to appear as a "sponsor" on promotional materials, would not violate the Ordinance, but that: (i) it could present liability issues for the alderman and the City, and the Law Department should be consulted; and (ii) it could create a perceived conflict of interest or the appearance of favoritism, in the event the company pursues a City contract, and	Alderman; sponsorship of a private company's program; benefit ward; benefit constituents; appearance of impropriety; possible liability issues; Law Department; use of name; use of office; unauthorized use of City owned property; perceived conflict of interest; appearance of favoritism; unfair advantage

		that the company has an unfair advantage over other health care providers.	
98038.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/AO-City%20Owned%20Property/98038Q.pdf	City Property	A department head and an appointed official were advised that the Ordinance did not prohibit them from appearing in a print advertisement for a company that had donated \$500,000 to a foundation affiliated with the City for materials and computer equipment that would benefit the department. They were unpaid for the appearance but were identified with their City titles; both the department and the private company received positive publicity. Note: the Board has advised that unpaid appearances by City employees or officials in advertisements for private companies – regardless whether the companies are vendors – is a policy question for the employees, department heads, and/ City Council or Mayor’s Office and Law Department. Cf. Case No. 10037.Q.	Appearance in an advertisement for a private company; policy decision; uncompensated; unpaid; positive publicity; use of name; use of City title; photograph; City imprimatur; not a vendor
98039.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/AO-GiftsTravel/98039.Q.pdf	Travel	A department was advised that two employees could accept reasonable travel expenses from a vendor to attend a training session on traffic systems at the vendor’s headquarters.	Travel; business travel; reasonable travel expenses; educational travel; training; paid by vendor; does not prohibit acceptance of travel expenses as long as the expenses are reasonably related to the business purpose of the travel and serve to benefit the City rather than the employee personally; traffic systems; signal lights; hands on demonstrations; Deputy Commissioner; meals; lodging; Transportation Safety Research Center
98039.Q. supp. https://www.chicago.gov/content/	Travel	A department was advised that four (4) additional employees, including two (2) Deputy Commissioners and two (2) bureau chiefs, could accept reasonable	Travel; business travel; reasonable travel expenses; educational travel; training; paid by vendor; does not prohibit acceptance of travel expenses as long as the expenses are

dam/city/depts/ethics/general/AO_GiftsTravel/98039sup.Q.pdf		<p>travel expenses from a vendor to attend a training session on traffic systems at the vendor's headquarters.</p>	<p>reasonably related to the business purpose of the travel and serve to benefit the City rather than the employee personally; traffic systems; signal lights; hands on demonstrations; Deputy Commissioner; meals; lodging</p>
<p>98040.Q</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_GiftsTravel/98040.Q.pdf</p>	<p>Travel</p>	<p>Two (2) City employees were advised that the Ordinance did not prohibit them from accepting an offer from a truck manufacturer to attend a factory training course on a fleet of trucks the City had contracted to purchase, as long as the expenses were reasonable and related to the business purpose of the trip. The opinion points that, as meals and entertainment were excluded from the offer, any meals or entertainment paid for by the vendor would be gifts to the employees and prohibited if worth more than \$50 in the calendar year.</p>	<p>Travel; business travel; reasonable travel expenses; truck manufacturer; educational travel; training; educational travel; paid by vendor; does not prohibit acceptance of travel expenses as long as the expenses are reasonably related to the business purpose of the travel and serve to benefit the City rather than the employee personally; traffic systems; signal lights; hands on demonstrations; meals excluded from the offer; prohibited gifts if worth in excess of \$50</p>
<p>98043.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO_PostEmploy/98043.A.pdf</p>	<p>Post-employment</p>	<p>A long-time middle manager accepted a position with a non-profit organization that had had a series of one year contract with the City to do management training. The Board determined that the employee had participated personally and substantially in the subject matter of the organization's ongoing work with the City, that is, a department's effort to improve organization effectiveness through strategic planning and implementation of plans, and was subject to a one year prohibition from assisting or representing the new employer with respect to this kind of training. The Board also determined that the employee had exercised contract management authority with respect to the organization's next one year contract, for</p>	<p>Post-employment; one year subject matter prohibition; management consulting; Program Director; organizational development; training; preliminary; preparatory; no formal written contract; no contract negotiation; permanent prohibition; consecutive contracts; one year contracts; draft scope of work recommendation; budget meeting; definition of subject matter; closely related; strategic plan</p>

		1999, even though no contract had been finalized when the employee left City service, because the employee met with the contractor's representatives and drafted a scope of work recommendation that described the tasks that the organization would be called on to perform in 1999, and presented this departmental staff in budget meetings. See <i>also</i> Case No. 92004.A.	
98044.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_GiftsTravel/98044.Q.pdf	Travel	A City employee and a City vendor requested a letter affirming that the employee could attend a meeting of an Advisory Council sponsored by the vendor at which the employee would gain knowledge of operating City systems more efficiently, and express the City's needs directly, with other customers of the vendor, and were advised that the Ordinance did not prohibit the travel	Travel; business travel; reasonable travel expenses; educational travel; conference; training; educational travel; paid by vendor; does not prohibit acceptance of travel expenses as long as the expenses are reasonably related to the business purpose of the travel and serve to benefit the City rather than the employee personally; advisory council
98045.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_EmployRelatives/98045A.pdf	Employment of Relatives or Domestic Partners	This is a significant, precedential case. The Board determined that a City employee who was a bureau chief would be in violation of the Ordinance's employment of relatives or domestic partners provision if the department hired a relative of the chief's. This was because the small size of the bureau made it impossible for the chief to not "employ" or exercise supervisory authority over the relative – recusal was impossible here. The opinions discusses prior case law holding that the term "employ" includes: (i) assigning, directing, inspecting and overseeing the work performance of an employee; (ii) signing City human resources or personnel documents relating to an employee; and (iii)	Nepotism; employ or advocate for employment; exercises authority, supervision or control; same bureau; direct supervision; indirect supervision; recuse; delegation of all employment supervision; relative; sign off on personnel or human resources actions or form; approve sick time; approve vacation time; performance reviews; daily work assignments; employ includes day to day supervision; bureau chief; domestic partner; relatives working the same department

		exercising the authority to make decisions or recommendations affecting an employee, such as approving sick time, vacation time, daily work assignments, performance reviews, etc. Even where there are levels of supervisory personnel between two relative employees, if one employee performs these activities in relation to a relative, the employee supervises or “employs” the relative under this provision of the Ordinance. See <i>also</i> Case Nos. 97054.A; 91088.I.	
98048.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_GiftsTravel/98048.Q.pdf	Gifts	A City employee, a Director of Personnel in a City department, was advised that the Ordinance did not prohibit employees of the department from accepting an offer for a free membership in the Walt Disney’s Magic Kingdom Club. The offer was extended to all organizations with more than 500 employees or members and entitled holders to a discount at Disney facilities. Relying on earlier cases, the rationale is that a sales promotion is an exchange transaction, not a gift, and was offered to City employees on the same terms as it was offered to everyone else similarly situated, and not made to influence any City governmental decisions or actions. Note: this sales promotion exception to the gift laws was added to the Ordinance as part of amendments effective in November 2012. See <i>also</i> Case No. 97060.Q.	Gifts; sales promotions; Walt Disney’s Magic Kingdom Club; extended to a market of similarly situated people; all organizations with more than 500 members; exchange transaction; offeror had no business with the City department
98049.A https://www.chicago.gov/dam/city/depts/ethics/gen	Post-employment	The Board determined that a former Special Projects Coordinator was prohibited for one year from assisting the employee’s post-City employer in drafting an RFP (request for proposals) to be	Post-employment; one year subject matter prohibition; work on an RFP; substantial work on an RFP; request for proposals; participated personally and substantially in the subject matter; definition of subject

eral/AO PostEmploy/98049.A.pdf		<p>submitted to the employee's former City department, because this work would necessarily involve the employee in a subject matter in which the employee had participated personally and substantially, namely the department's procedures and criteria for evaluating and selecting vendors. The employee had worked on two (2) previous departmental RFPs for similar services, and thus had special, personal knowledge of these procedures and criteria.</p>	<p>matter; the department's procedures and criteria for evaluating and selecting vendors; special, personal knowledge; Special Projects Coordinator</p>
<p>98050.Q</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/AOGiftsTravel/98050.Q.pdf</p>	<p>Travel</p>	<p>A high-ranking City employee was advised that the department could accept reasonable travel expenses, such as airfare, lodging, ground transportation and food offered to all participants for two (2) employees to attend a training seminar at the vendor's headquarters.</p>	<p>Travel; business travel; reasonable travel expenses; intelligent systems; educational travel; training; educational travel; paid by vendor; does not prohibit acceptance of travel expenses as long as the expenses are reasonably related to the business purpose of the travel and serve to benefit the City rather than the employee personally; traffic systems; signal lights; hands on demonstrations</p>
<p>98051.Q</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/AOOutsideEmployment/98051.q.pdf</p>	<p>Fiduciary Duty; Conflicts of Interest/Improper Influence; Outside Employment</p>	<p>A high-ranking City employee was advised not to take on clients located in the City for a business of which the employee owned a 50% interest. The business had two (2) potential clients (its first 2), and, although the employee's City duties did not include the subject matters in which the employee's business would be consulting (food safety), the employee's City position was such that employees in the same bureau would likely make inspections of facilities the business's customers used, and this would pose conflicts of interest for the employee, and create a strong</p>	<p>Outside employment; outside business ownership; cautionary language; food safety; consulting; consultant; economic interest; inspections; recuse; appearance of impropriety; appearance of preferential treatment; permits</p>

		appearance of impropriety given the employee's City position.	
98052.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_PostEmploy/98052.A.pdf	Post-employment	The Board determined that a former high-ranking City employee was prohibited by both the one-year subject matter and permanent contract management authority prohibitions from assisting or representing a new client employer on a contract the new employer had with the employee's former department. The employee served on the committee that reviewed and edited specifications for an RFP (request for proposals) and evaluated responses for the RFP for the project, which constituted both the exercise of contract management authority matter over the ensuing contract, and personal and substantial participation in the subject matter, which was to replace the department's billing and collection system.	Post-employment; one year subject matter prohibition; work on an RFP; substantial work on an RFP; request for proposals; participated personally and substantially in the subject matter; definition of subject matter; RFP review committee; contract management authority; conversion of billing and collection system; installation of a new billing and collection system; preparation of specifications; helped select a vendor; review RFP responses; voted on selection of a vendor; ensuing contract; contract not finalized at the employee's departure date
98053.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_PostEmploy/98053.A.pdf	Post-employment	This is a significant, precedential case. The Board determined that a former engineer, who had worked on eight (8) infrastructure projects in the last two (2) years of City employment under a specific Infrastructure Assistance Program involving commercial and retail buildings, was prohibited for one year from representing the new employer with respect to conducting field studies on several new commercial and retail sites involving the same Program. The Board determined that the subject matter of the business transactions involving the City on which the former employer had been asked to work, and in which the former employee had participated personally and	Post-employment; one year subject matter prohibition; work on a specific City program; application of a City program to specific sites; proposals; participated personally and substantially in the subject matter; engineer; infrastructure assistance program; commercial property; retail property; definition of subject matter; project sites

		substantially, was the application of this Program to specific project sites.	
98056.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_Lobby/98056-AO-redact.pdf	Lobbyist Registration and Disclosure	<p>Under the definition of “lobbyist” in effect in December 1998, the Board determined that the unpaid resident of a trade association who desired to make unsolicited public comments before the City Council’s Finance Committee would be required to register as a lobbyist if the president’s compensation or expenditures for this activity total \$1,000 or more in the preceding or current calendar year. Note: this opinion was based on the Ordinance in effect at the time. Under current law, this president would not be required to register as a lobbyist based on this activity, which would fall into the exemption for persons who testify publicly before the City Council or a committee thereof, regardless of whether the persons receives compensation or makes expenditures for such activity, and regardless of whether the trade association has for-profit members.</p>	Lobbying; lobbyist; person who testify publicly before the City Council, or a City Council Committee, or any City agency, department, board or commission; trade association; for profit; non-profit; not for profit; testimony; president
98060.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_PostEmploy/98060.A.pdf	Post-employment	<p>A former employee requested an opinion addressing whether the employee’s work for a new employer on two (2) projects constituted a violation of the Ordinance, and whether the Ordinance’s restrictions would apply to future projects for the department.</p> <p>As to the past work, the Board determined that: (i) the permanent prohibition regarding contract management authority did not apply and there was no violation of that provision, because the firm’s</p>	<p>Post-employment; one year subject matter prohibition; contract management authority; preliminary work on an RFQ; substantial work on an RFQ; request for qualifications; participated personally and substantially in the subject matter; business transaction with the City; design; design of different facilities; separate subject matters; future projects; consulting contract; reviewing plans; issuing permits for construction; design phase; retainer contracts; engineer; project manager; distinct sites; business transaction involving the City</p>

		<p>contract began after the employee left City employment, and the employee did not participate in that RFQ process and did not exercise contract management with respect to the contract; (ii) the one-year subject matter prohibition prohibited the employee from assisting or representing the firm in a business transaction involving the City that dealt with design in any project for which the employee supervised design while with the City. However, since the employee did not participate in design in either of the two specified projects, the Board determined that the Ordinance would not have prohibited the employee from working on them, as the employee had not been personally and substantially involved in the subject matter of the transactions; and (iii) the Ordinance's one-year subject matter prohibition did not prohibit the employee from working on the firm's future projects, provided the employee did not supervise those designs at the project sites.</p>	
<p>98062.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO_Outside_Employment/98062-AO-redact.pdf</p>	Outside Employment	<p>This is a significant, precedential case. A department head request an advisory opinion addressing whether an employee who had outside employment as a part-time radio announcer for a local station would be prohibited (or have a conflict of interests) by working for the station while also being responsible, in the employee's City responsibilities as a Program Coordinator, for producing one of the City's Summer music festivals, of which the radio station was applying to be an official sponsor. The Board determined</p>	<p>Outside employment; second job; dual employment; radio station; music festival; economic interest; any City decision or action that may enhance the employee's outside employment or that is related to the employee's outside employment; improper influence; conflict of interests; money for advice; solicit or accept anything of value in return or exchange for giving advice or assistance concerning the operation or business of the City; music festival; sponsorship; promotion; advertising; selection of a sponsor</p>

		that the employee had an “economic interest” in the outside employment, and determined that the employee was prohibited from making or attempting to influence any City decisions or actions that would be <i>related to or may enhance the employee’s outside job</i> , including the decision to award sponsorship of the festival to the radio station or its parent company, or to purchase advertising from the station or its parent company, or meeting with or communicating with the station or its parent company regarding possible donations of advertising promotions or equipment, or even doing interviews of herself to be broadcast on the station. The Board also determined that the Ordinance’s money for advice provisions prohibited the employee from advising or assisting the radio station in its application to sponsor the festival or other City matters.	
98068.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_GiftsTravel/98068.Q.pdf	Gifts	A department head was advised that the Ordinance did not prohibit the department from accepting and its employees from consuming two boxes of candy worth \$30 each (the second one was sent as a replacement for the first one, which was presumed lost, and paid for by the shipper, not the vendor, thereby costing the vendor a total of \$30). The gift in total was not worth more than \$50 to any single City employee or official who could affect the vendor’s City business.	Gift; holiday candy worth less than \$50 to a single recipient; nominal gifts; gifts from a vendor
99002.Q	Campaign Financing; Elected Officials	An elected official of the City was advised that a possible contributor in the amount of \$2,000 to the elected official’s authorized political committee was doing	Campaign contribution limitation; political contribution limitation; doing business with the City; \$1,500 per elected official,

https://www.chicago.gov/content/dam/city/depts/ethics/general/AOElectOfficials/99002.Q.pdf		<p>business with the City, and thus the contributor was limited to \$1,500 in contributions to this official or the official's authorized committee for that year. [Note: in November 2012 amendments to the Ordinance, the year period was changed to a calendar year from a July 1 – June year.]</p>	<p>candidate, or their authorized committee in a single year</p>
<p>99004.Q</p> https://www.chicago.gov/content/dam/city/depts/ethics/general/AOOutsideEmployment/99004.Q.pdf	<p>Outside Employment; Sister Agencies</p>	<p>A City employee was advised that the Ordinance did not prohibit the employee from accepting a second job with a for-profit art preservation company to assist in a project in the Chicago Public Schools, which was being funded by the Public Building Commission. The opinion recognized that both agencies are not City agencies, but are “sister agencies,” and reminded the City employee of the relevant restrictions, including conflict of interest, and improper influence, and that the employee could not make or participate in or try to influence any City governmental decisions that would enhance the outside employment.</p>	<p>Outside employment; dual employment; second job; art restoration; Chicago Public Schools; Public Building Commission; make, participate in or try to influence any City governmental decisions that would enhance the outside employment</p>
<p>99005.Q</p> https://www.chicago.gov/content/dam/city/depts/ethics/general/Decisions/Chairs/4-14-12/99005.Q.pdf	<p>Post-employment</p>	<p>A City department head was advised that the Ordinance did not prohibit a former departmental employee from working for a departmental contractor to assist the department with the “Y2k” compliance initiative, given that the employee had extensive knowledge of an obsolete code in which some City programs had been written. The opinion is based on the rationale that the former employee had not been involved in the subject matter – remediating City code for Y2k compliance, but rather had been involved in with specific computer code language.</p>	<p>Post-employment; one-year subject matter prohibition; former employee; work for a department vendor; Year 2000; Y2k; remediate code; obsolete computer language; subject matter</p>

<p>99009.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO_Outside_Employment/99009-AO-redact.pdf</p>	<p>Attorneys; Outside Employment</p>	<p>This is a significant, precedential case. The Board determined that, while a Chicago Police Department employee who was an attorney was not prohibited from accepting part-time paid employment as an attorney to do work with a private a law firm representing members of the Chicago Fraternal Order of Police before conduct non-City review boards and in criminal court (but was prohibited from doing this work personally or receiving compensation for others' doing this work before any City agency, whether for pay or <i>pro bono</i>), the Board cited potential conflicts between the employee's City job and the possibility that the firm might be retained to defend a subject of a City investigation, and this would create the appearance of bias that could be a serious detriment not only to the City work but also to the City's interests. The Board recommended that the employee not accept this outside employment.</p>	<p>Outside employment; law firm; representation of other persons; <i>pro bono</i> work; Chicago Police Department; Fraternal Order of Police; disciplinary hearings; judicial or quasi-judicial proceedings in which the City is a party and the person's interests are adverse; derive income or compensation from the representation of a person; appearance of impropriety; prohibited from using or attempting to use a City position to influence a City governmental decisions that would be related to or enhance one's outside employment; appearance of bias</p>
<p>99010.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO_PostEmploy/99010.A.pdf</p>	<p>Post-employment</p>	<p>This is a significant, precedential case. The Board determined that a former employee was not prohibited from entering into a short-term consulting contract with the former employee's department to work essentially on matters in which the former employee had been personally and substantially involved, and thus otherwise prohibited from working on for a private employer, provided the following conditions are met: (i) the City seeks the services of the former employee and stands to benefit substantially from hiring the former</p>	<p>Post-employment; consulting agreement between the City and a former employee; Executive branch; owe sole fiduciary duty to the City; written agreement; independent contractor; City seeks the service of the former employee; language obligating the former employee to act at all times in the City's best interests; cannot represent the interests of any other person or entity, even a corporation of which the former employee is the sole officer, employee, director, or shareholder; subject matter; exemption or exception from the post-employment</p>

		<p>employee as a consultant; (ii) the former employee does not represent the interests of any other persons or entity with respect to the consulting responsibilities – including not even a corporation of which the former employee is the sole officer, director or shareholder, so that the former employee will not owe any other person a fiduciary duty; (iii) the consulting agreement is in writing; and (iv) the consulting agreement contains language obligating the former employee to act in the City's best interests. As policy matter, such agreements must be approved by various City departments, if for a former Executive branch employee or official.</p>	<p>provisions; purpose of the post-employment or revolving door restrictions</p>
<p>99012.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO_PostEmploy/99012.A.pdf</p>	<p>Post-employment</p>	<p>The Board determined that a former City employee was not prohibited by the Ordinance's post-employment restrictions from assisting or representing a new employer in installing and maintaining computer servers, even though the employee had helped install and maintained older servers built by the same company (Sun Microsystems) in his City position. The Board reasoned that this work fell under the trade skills exception, and the former City employee would in this work be using trade skills acquired through education and training. However, the Board also determined that the post-employment restrictions prohibited the former employee for one year from assisting or representing a new client or employer in any business transaction involving the a specific IT compliance effort, because the employee</p>	<p>Post-employment; one-year subject matter prohibition; participated personally and substantially in the subject matter of the business transaction involving the City; tradesman exception; trade skill; exemption; installing and maintaining Sun Microsystems servers; serving on a City technology committee</p>

		had served on a City committee that addressed that very effort and thus was personally and substantially involved in that transaction's subject matter during City employment.	
99015.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec%20Chairs/4-14-12/99015.Q.pdf	Financial Interest in City Business	A high-ranking City employee, a Deputy Commissioner, was advised that the Ordinance would not prohibit an employee of the deputy's department from participating in a City permit fee waiver program, because the value of the waiver (approximately \$410) did not rise to the threshold relevant in the financial interest in City work or business provision (then \$2,500 per year). The opinion also noted that the employee did not make City decisions connected to these waivers. [Note: 2012 amendments to the Ordinance lowered the monetary threshold to \$1,000.]	Financial interest in any work, contract or business of the City; monetary threshold; \$1,000; City loan or grant program; City employee; paid with funds belonging to or administered by the City; City permit fee waiver program
99016.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/AOCampaignFinancing/99016.Q.pdf	Sister Agencies; Campaign Financing	This is a significant, precedential case. An alderman was advised of exactly who is subject to the Ordinance's limitation on political or campaign contributions per year to any single City elected official or candidate for elected City office (or to their authorized political committees). The opinion makes clear not every campaign or political contributor is subject to this limitation.	Campaign contributions; political contributions; limitation on campaign or political contributions; \$1,500; elected official; candidate; authorized political committee; authorized candidate committee; sister agency; doing business with; seeking to do business with; cashier's checks; money orders; cash; alderman; Mayor; City Clerk; City Treasurer; registered lobbyist; campaign financing ordinance; Chicago Transit Authority; CTA; Chicago Public Schools; CPS; Metropolitan Pier and Exposition Authority; McPier; Navy Pier; Chicago City Colleges; CCC

<p>99017.Q</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_OutsideEmployment/99017.Q.pdf</p>	<p>Representation of Other Persons; Attorneys; Outside Employment</p>	<p>A City employee who was an attorney was advised that the Ordinance did not prohibit the employee from doing <i>pro bono</i> legal work as a second job with an area legal assistance program. The employee was going to be responsible primarily for real estate conveyances and drafting wills and powers of attorney in the outside work. The employee was advised of the relevant restrictions, including representation of other persons before the City or in proceedings in which the City was a party and the person's interests were adverse.</p>	<p>Outside employment; outside job; volunteer; <i>pro bono</i> legal work; drafting wills; powers of attorney; real estate closings; real estate conveyancing; legal assistance foundation; representation of other persons; lawyer; attorney</p>
<p>99018.A</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_OutsideEmployment/99018-AO-redact.pdf</p>	<p>Outside Employment; Non-profit Board Service</p>	<p>The Board determined that a City employee, whose job duties included coordinating a City program with a sister agency, who was also the paid Executive Director of a non-profit organization, was not prohibited by the Ordinance from having this outside position, although restrictions concerning representation and conflicts of interest applied. The employee did not anticipate making any decisions about the organization or about City grants. The Board also determined that the Ordinance would not prohibit the organization from maintaining a City grant, or from accepting future grants, administered by the employee's City department, as long as the impermeable ethical was imposed and observed.</p>	<p>Outside board service; non-profit; conflict of interests; improper influence; paid Executive Director; delegate agency; representation of other persons; City grants; administered by the City; recuse at both ends; impermeable ethical screen</p>
<p>99019.Q</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_OutsideEmployment/99019.Q.pdf</p>	<p>Travel</p>	<p>A City employee of the Department of Public Health was advised that the Ordinance did not prohibit the employee from serving as a faculty member in an annual Clinical Update in HIV program in</p>	<p>Travel; reasonable travel expenses; business trip; speaker; faculty member; professional conference; HIV disease; Chicago Department of Public Health;</p>

hics/general/AO GiftsTravel/99019.Q.pdf		<p>Arizona, nor from accepting reasonable travel expenses from the conference's sponsor, or from accepting a \$1,500 honorarium, provided the honorarium was reported to the Board within five (5) days of its receipt by the employee. Note: 2012 amendments to the Ordinance prohibit City employees or officials from accepting honoraria offered in the course of their City employment and require that all travel expenses paid by third parties be reported to the Board.</p>	<p>honorarium; honoraria; reporting requirement; reasonable travel expenses</p>
<p>99022.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO_PostEmploy/99022.A.pdf</p>	<p>Post-employment</p>	<p>This is a significant, precedential case; one of the most important cases in which the Board construed and applied the term "contract management authority." The Board determined that a former employee, who would not begin work on a specific project until more than one year after leaving City service, did not exercise contract management authority by verifying that certain work had been done on a large infrastructure project, consistent with the employee's job responsibilities – the work constituting no more than 7% of the entire project – where the signature did not authorize City payment to a vendor. The case contains an extensive discussion of other cases involving "contract management authority," more specifically of the "supervision of performance."</p>	<p>Post-employment; permanent prohibition; large infrastructure project; contract management authority; signing documents verifying that certain work or services had been performed; not authorizing or having the authority to approve payment to a vendor; not contract management authority; totality of the circumstances; fulfilling a procedural requirement of one's City position or office; involvement in drafting or negotiating a City contract; exercised significant, precedential decision-making authority over the contract or transaction in question</p>
<p>99024.Q</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec</p>	<p>Outside Employment</p>	<p>A City employee was advised that the Ordinance did not <i>per se</i> prohibit the employee from starting a consulting engineering business as a second job, but that significant, precedential restrictions were imposed.</p>	<p>Outside employment; dual employment; outside job; ownership of a business entity; contracting with the City; no prohibition on outside employment</p>

k%20Chairs/NerFid/99024.pdf			
99026.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_GiftsTravel/99026.Q.pdf	Travel	A City employee was advised that the Ordinance did not prohibit acceptance of reasonable travel expenses to speak at and attend a professional conference sponsored by the Centers for Disease Control. The sponsor of the conference would pay the expenses City employee to attend a work-related conference on City time was not prohibited by the Ordinance.	Business travel; reasonable travel expenses; CDC; Center for Disease Control; sponsor of the conference
99028.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_PostEmploy/99028.A.pdf	Post-employment	The Board determined that a long time City employee who was departing from City employment had exercised contract management authority with respect to a City contract, and thus was prohibited from taking a position with a vendor that was now taking over the contract responsibilities to work on that contract, as the City had privatized this particular function. The Board also determined that, by serving on a committee that evaluated responses to an RFP or request for proposals, the employee had exercised contract management authority with respect to the resulting contract.	Post-employment; contract management authority; request for proposals; RFP; evaluation committee; review RFP responses; technology; data security; Y2k; evaluation of bids or responses; permanent prohibition as to that contract; not involved in negotiating a contract; privatization; privatize; opine on whether bidders could meet the terms of the RFP; interview bidders' references; review bidders' statements of work; study each bidders' response
99029.A https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_PolActvty/99029-AO-redact.pdf	Board of Ethics Members and Staff; Political Activity; Relationship to Other Laws	This is a significant, precedential case. The Board determined that a Board of Ethics employee was not prohibited from running for the elected office of Judge of Cook County Circuit Court, even though this was "political activity," and the Municipal Code prohibited employees of the Board (as well as employees of the Office of Inspector General Department of Procurement Services) from engaging in political activity. The Board, after	Political activity; Board of Ethics employees; employees of the Office of the Inspector General; employees of the Department of Procurement Services; prohibited political activity; home rule unit of government; home rule pre-emption; relationship to other laws; ordinances inconsistent with a State of Illinois statute or law; Judge of Cook County Circuit Court; Illinois statute; Local Governmental Employees Political Rights Act, 50 ILCS 135/1 et seq.; compel, coerce of intimidate

		consulting with the Department of Law, held that a state of Illinois Statute, the Local Governmental Employees Political Rights Act, 50 ILCS 135/1, et seq., in effect pre-empts a home rule unit of government, such as the City, from enforcing laws inconsistent with that statute. However, the employee was also advised of the relevant prohibitions in the Ordinance that still apply: the employee could not compel, coerce or intimidate any other City employee or official to solicit, make or not make a political contribution, and could not engage in political activities while at work or on duty.	any other City employee or official to solicit, make or not make a political contribution; engage in political activity while at work or on duty; Law Department; Corporation Counsel
99033.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/AOInterestCityBusiness/99033.Q.pdf	Financial Interest in City Business	A City employee was advised that the Ordinance did not prohibit the employee from entering into a contract to purchase and develop property belong to the City, even if the purchase price was more than \$5,000, under the negotiated sale procedures, because these procedures constituted a process of competitive bidding following public notice.	Financial interest in City business; purchase or sale of property belonging to the City; real estate; parcel; vacant lot; development; negotiated sale; application assessed according to criteria applied to RFPs' request for proposals; parcels in urban renewal areas; purchased and developed; through a process of competitive bidding following public notice; neighborhood Community Conservation Council; Community Development Commission; CDC; public meeting; vote; notice published in a major newspaper once a week for two consecutive weeks; invites others to submit proposals; final approval by City Council
99034.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec	Outside Employment	A City employee was advised that the Ordinance did not prohibit the employee from accepting reasonable travel expenses to conduct a training session for the State of Arizona's Department of Human Services on a governmental program the employee developed. The	Travel; outside employment; training; use of vacation time; conduct training sessions; Arizona Department of Human Resources; governmental program; reimbursement of airfare, hotel, and food expenses

k%20Chairs/NerFid/99034.pdf		<p>employee would not receive an honorarium, and the employee's City department and the Arizona department signed a contract. The employee was also advised that the Ordinance did not prohibit the employee from using personal vacation time for this purpose.</p>	
<p>99038.Q</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/AO OutsideEmployment/99038.q.pdf</p>	<p>Conflicts of Interest/Improper Influence; Elected Officials; Outside Employment</p>	<p>An alderman was advised that the Ordinance did not prohibit the alderman's acceptance of an offer to serve as a community liaison for a bank located within the ward, and was advised of the standard restrictions, including the need to recuse from all City Council matters involving the bank, and not being able to represent the bank as the alderman's constituent in any formal or informal transactions before any City agency. But the alderman was also advised to seriously consider whether accepting the position would create an appearance of impropriety and favoritism. The opinion contains a discussion of the concept of the appearance of impropriety and its relationship to the ethics law and ordinance.</p>	<p>Alderman; outside employment; community liaison; community bank appearance of impropriety; public perception; recuse; economic interest; business relationship; disclose; abstain; conflict of interests; appearance of impropriety; economic interest distinguishable from that of the general public or all other aldermen; purposes of the appearance of impropriety standard; bolster public confidence; fiduciary duty; good ethical judgment; your own further consideration</p>
<p>99039.Q</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/AO GiftsTravel/99039.Q.pdf</p>	<p>Travel</p>	<p>A City department head was advised that the Ordinance did not prohibit the department from sending seven (7) of its lower-ranking employees to a vendor's training facility to attend a three-day at the vendor's research center and laboratories, as long as all expenses were related to the business purpose of the trip.</p>	<p>Travel; business travel; training offered by a vendor; vendor's training facility; multiple employees; reasonable travel expenses; training; educational travel</p>

99044.A

https://www.chicago.gov/dam/city/depts/ethics/general/AO_PostEmploy/99044.A.pdf

Post-employment;
Attorneys

This is a significant, precedential case. The Board determined that a departing middle manager, and an attorney who was joining a local law firm, was subject to the following prohibitions: (i) a permanent prohibition on assisting or representing the firm or any client in any condemnation proceeding in which the employee had prepared reports or appeared in court, or in any follow up hearing or actions with respect to the same properties, as this work constituted personal and substantial participation in these proceedings, which involved the City; (ii) a one year prohibition with respect to assisting or representing the firm or any client with respect to real estate development or redevelopment transactions in a specific planning area of the City, for which the employee had supervisory authority, and for which the employee was required to monitor the progress of individual developments and improvements and coordinate acquisitions and demolitions called for by the City's development plan for the area; and (iii) a permanent prohibition with respect to redevelopment agreements in that area, though the employee stated that work for the new employer would not involve real estate work in this area of the City. The Board construed "subject matter" in this case as real estate development and redevelopment (not solely private real estate conveyances or work) in a particular planning area of the City.

Post-employment; one year subject matter prohibition; attorney; assist or represent any person in any judicial or administrative proceeding involving the City; counsel of record; participated personally and substantially; prepare reports; follow up proceedings; condemnation proceedings; same property; subject matter; City planning area; real estate development; parcel; plot; monitor progress of individual developments or redevelopments; coordinate acquisitions and demolitions; development plan; contract management authority; business transaction involving the City; purely private transactions or conveyances

99046.A, Parts 1 and 2

https://www.chicago.gov/dam/city/depts/ethics/general/AO_PostEmploy/99046.A.pdf

<https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec%20Chairs/LXIV/99046-A2.pdf>

Post-employment

This is a significant, precedential case.

In Part 1, the Board determined that a former high ranking City employee (who had been gone from City service for more than two (2) years did not exercise contract management authority and thus could assist or represent a developer or other client or employer with respect real estate development for which the City was to issue RFPs (requests for proposals). The Board's rationale was that, while employed by the City: (i) the employee negotiated the City's acquisition of land generally; 2) oversaw a planning study for the general area of land; 3) was the point person on the preliminary planning study; and, 4) negotiated and supervised the contract with the consulting firm that performed the preliminary study (now expired), but that the employee's involvement in the preliminary planning study for the land did not significantly shape the forthcoming RFPs, and thus did not constitute contract management authority with respect to contracts that would be let through the forthcoming RFPs.

In Part 2, the former employee disclosed that a firm of which the former employee was the sole owner had an ongoing contract with the employee's former City department to provide consulting services to the former department regarding contracts over which the former employee had previously exercised management authority, and in which the former

Post-employment; City real estate development; preliminary feasibility study; RFP; request for proposals; negotiation of a planning study contract; point person for preliminary planning study; consulting firm; significantly shape the RFPs or contracts that would emerge; contract management authority; totality of the circumstances; former employee as 100% owner of consulting firm; consulting contract with a former department; entered into by a former employee's firm; sought advice from the Law Department; acted in good faith reliance upon legal advice from the Law Department; corporation wholly-owned by former employee; third person; Case No. 99010.A; different result; violation of the Ordinance; would have violated the Ordinance

		<p>employee had been the lead negotiator. After the former employee left City service, the department asked the former employee to continue working on these same contracts as a consultant, which the employee did through the employee's own company. The City's Law Department had advised the department that the post-employment provisions did not intend to prohibit post-employment activities through a corporation wholly owned by this former employee. The Board determined that, given the totality of the circumstances, the former employee's post-employment activity with the City (the contract with the employee's own company on these matters) did not violate the Ordinance,, but that, if this contract had been entered into after the issuance of Board opinion No. 99010.A, the activity would have violated the post-employment provision, because the employee was advising a third party (own company), on contracts over which the employee exercised CMA while employed at the City. The Board stated that it was apparent from the facts presented that both the former employee and the department acted in good faith reliance on advice based on a reasonable interpretation of the case law at that time, but that under present law it would constitute a violation.</p>	
00002.A	Post-employment	<p>This is a significant, precedential case. The Board determined that a departing high-ranking City employee who formed a start-up company was not subject to a</p>	<p>Post-employment; one-year subject matter prohibition; start-up company; business transaction involving the City; Report submitted to the Mayor; participated</p>

https://www.chicago.gov/dam/city/depts/ethics/general/AO_PostEmploy/00002.A.pdf		<p>revolving door prohibition with respect to private transactions with the company's clients; however, it advised the former employer that the employee was subject to a wide-ranging one-year subject matter prohibition, including five (5) transactions that were named in a Report that the employee co-authored and submitted to the Mayor, and that the former employee was not prohibited from serving on a Mayoral Council of Advisors.</p>	<p>personally and substantially in the subject matter of the business transaction; co-authored; Mayoral Council of Advisors</p>
<p>00005.Q</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_GiftsTravel/00005.Q.pdf</p>	<p>Travel; Non-profit Board Service</p>	<p>A high-ranking City employee was advised that the Ordinance did not prohibit the acceptance of reasonable travel expenses for the employee to serve on a national advisory board that advised a federal agency and attend its meetings three (3) times per year in Washington, DC, but was also advised that, to avoid even the appearance of impropriety, to recuse from any decisions – on either the board or in the course of City employment – involving transactions or programs directly between the City and the federal agency.</p>	<p>Travel; service on a national advisory board; federal government; federal agency; recuse; meetings in Washington, DC; appearance of impropriety; related to official City business; business travel; reasonable travel expenses; recuse at both ends</p>
<p>00006.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO_EmployRelatives/00006-AO-redact.pdf</p>	<p>Employment of Relatives or Domestic Partners</p>	<p>A high-ranking City employee was advised that the Ordinance did not prohibit the employee from exercising contract management authority with respect to a joint venture/consortium that was bidding on a City contract, despite the fact that a joint venturer was owned by a person who was the employee's second cousin once removed (according to the table of consanguinity – the employee's great grandmother and the cousin's grandfather were brother and sister) This</p>	<p>Employment of relatives; second cousin once removed; table of consanguinity; joint venture; consortium; contract management authority; personal involvement in or direct supervisory responsibility for the formulation or execution of a City contract; evaluation of bids or proposals; remote cousin; distant relative; what is a relative; definition of relative; cousin; great-grandmother; grandfather</p>

		relationship does not fall under the definition of “relative.”	
00008.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_ConflictOfInterest/00008-AO-redact.pdf	Conflicts of Interest/Improper Influence; Appointed Officials	This is a significant, precedential case. The Board examined what it means to “participate in the making of a governmental decision” within the meaning of the Ordinance’s conflict of interests and improper influence provisions, and what constitutes a proper recusal. The Board determined: (i) that a City employee or official who sits as a member of a City agency, board or commission and examines a witness at a hearing before that body, then recuses from a vote , but the vote results in a decision or action, has participated in the decision or action, despite recusal; and (ii) a City official who chairs a City board or commission presides over a hearing before the body, but does not examine witness, and recuses from a vote has also participated in the decision or action.	Recuse; preside over a hearing; participate in the making of a City governmental decision or action; examine witnesses; recuse from the vote; proper recusal; conflict of interests; improper influence
00009.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_OutsideEmployment/00009-AO-redact.pdf	Outside Employment	The Board determined that a City employee, a training coordinator who was an expert in use of particular kind of medical equipment, was prohibited from accepting an outside job with the manufacturer of that equipment, as the outside paid employment would present an irresolvable conflict of interests for the employee, whose responsibilities included evaluating the equipment, and who was involved in the purchase of the equipment.	Training coordinator; outside employment; outside job; dual employment; medical equipment; training; education; conflict of interests; irresolvable conflict of interests; fiduciary duty; evaluation of equipment; utilizing equipment; manufacturer of equipment; teaching
00010.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_FinancialInterest/00010-AO-redact.pdf	Financial Interest in City Business	The Board determined that a City employee was not prohibited from purchasing a City-owned lot under the Adjacent Neighbors Land Acquisition	financial interest; purchase or sale of any property that belongs to the City; real estate; ANLAP; Adjacent Neighbors Land Acquisition Program; purchase at less than

/depts/ethics/general/AO Interest CityBusiness/00010.A.pdf		<p>Program, or ANLAP, a City program that permits lots to be purchased by the owner/occupier of the adjacent property. Because public notice had to be given to those owners/occupiers, it met the requirement under the Ordinance and did not constitute a prohibited interest in City business. The employee was advised that the employee could not make, participate in or use the employee's City position to influence any City decision related to the purchase of the lot.</p>	<p>market value; notice by regular and certified mail to other adjacent property owners; pursuant to a process of competitive bidding following public notice; City employee, parcel; owner/occupiers; vacant lots</p>
<p>00011.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO Outside Employment/00011-AO-redact.pdf</p>	<p>Outside Employment; Representation of Other Persons</p>	<p>This is a significant, precedential case. The Board determined that the Ordinance did not prohibit a middle management City employee of the Department of Public Health from attempting to speak to a City department regarding a software product the employee was trying to develop. The employee wished to offer the department free use of the finished product for five (5) years or more. The employee spoke on the employee's own behalf, and not on behalf of a third party. A key determination was that, as long as the employee acted merely in an individual capacity, and not as part of a larger business enterprise, the employee would not be representing a third party before the City. However, the Board also determined that: (i) because the employee had an economic interest in the software, the conflict of interest provisions would prevent the employee from making or participating in any City governmental decisions involving the product or its purchase; 2) to avoid the appearance of</p>	<p>Outside employment; sole proprietorship; software development; IT systems; patent; copyright; representing a person other than the City; economic interest; database platform developer; acting merely as an individual when approaching the department; conflict of interests; contracting with the City financial interest; resign from City employment; appearance of impropriety; representation</p>

		impropriety, the employee was advised to recuse from all decisions related to the City IT systems that could utilize the software; and 3) if the City were interested in the proposal, the employee could have a prohibited financial interest in City business, and might be required to resign from City employment.	
00012.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/Deck%20Chairs/NerFid/00012.pdf	Outside Employment	A City employee was advised that the Ordinance did not prohibit the employee's proposed outside employment in another county, assisting a consultant in a feasibility study regarding designing a fiber optic network; this work happened in the City in a different department and was wholly unrelated to the employee's City work. The firm for which the employee would work had never done business with the City department where the employee worked, although it had done business with other City departments.	Outside employment; nearby county; consulting; feasibility study; wholly unrelated; fiber optic network; outside job; dual employment; conflict of interests; City property; water and drainage engineering
00013.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/AO%20OutsideEmployment/00013.q.pdf	Outside Employment	A City employee was advised that the Ordinance did not prohibit the employee from owning and operating a home inspection business, but recommended that the employee not make or influence any City decisions regarding current or past clients of the business, even though that was unlikely, or to testify in any administrative hearing before a City agency or in a judicial proceeding involving the City. The opinion goes through the other restrictions, applicable.	outside employment; conflict of interests; improper influence; dual employment; home inspection business; representation of other persons; conflict of interests; use of City property; administrative proceeding before the City; Court or judicial proceeding involving the City
00018.A	Post-employment	The Board determined that a departing middle management employee was: (i) prohibited for one year from assisting or	Post-employment; purchase of equipment; managing inventory; contract; mechanical parts; contract management authority;

https://www.chicago.gov/dam/city/depts/ethics/general/AO_PostEmploy/00018.A.pdf		<p>representing a new employer or client in any transaction that involved equipment sold by the new employer to the City, given that the employee was responsible for evaluation, installation and maintenance of that particular type of equipment; and (ii) permanently prohibited from assisting or representing the new employer with respect to five (5) ongoing City contracts, because the employee supervised the execution and performance of these contracts or in determining the minimum specifications for City contracts in which equipment was purchased. The opinion contains a detailed description of activities constituting contract management authority.</p>	<p>subject matter; participated personally and substantially in the subject matter; impermeable ethical screen; Requests for Qualifications; RFQ; Requests for Proposals; RFP; contract management authority; reviewing contract specifications; determining minimum specifications; preparation of contract specifications; evaluation, installation and maintenance of equipment; supervision of performance; assist or represent person; single-space parking meters; electronic touchpad; Sole Source Review Board; coordinate daily supplies; coordinate reorders</p>
<p>00019.Q</p> https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_OutsideEmployment/00019.Q.pdf	<p>Outside Employment</p>	<p>A rank and file City employee, who worked for the City in one capacity but had other trade skills, was advised that the Ordinance did not prohibit the employee's proposed outside employment to work for a City subcontractor utilizing the other trade skill. The employee did not make any decisions that had any relation to the company. The employee was advised of all relevant provisions, especially the prohibition against soliciting or receiving money or anything of value in return for giving assistance or on matters concerning the operation or business of the City.</p>	<p>outside employment; conflict of interests; improper influence; dual employment; outside employment with a City contractor; City vendor; trade skill; soliciting or receiving money or anything of value in return for giving assistance or on matters concerning the operation or business of the City</p>

00021.A

https://www.chicago.gov/dam/city/depts/ethics/general/AO_Employ_Relatives/00021-AO-redact.pdf

Employment of
Relatives or
Domestic Partners

This is a significant, precedential case. The Board determined that: (i) the employment of relatives provision did prohibit a high-ranking City employee whose spouse had a 10% ownership in a firm that might be a subcontractor on various City contracts from having or exercising contract management authority over City work in which the spouse's business was not involved, but that involved persons or firms that contracted with the spouse's firm on unrelated, non-City business. The employee stated that the spouse's firm would not bid on or do work on any City contract with the employee's bureau. The rationale of the Board's determination was that a City contractor that had a non-City related contract with the company would not thereby be "employing" or "contracting with" the spouse, that is, the spouse cannot automatically be equated with the company merely by owning a non-controlling minority equity interest in the company, or merely by virtue of employment with it. The Board recognized the general principle of corporate law that a business corporation is a legal person distinct from its owners and employees. The Board did recognize that, in an appropriate case, it might have to disregard the corporate entity and look directly at the individuals involved facts indicated that the corporate ownership interest was attempt to circumvent the ordinance or another law, but, in this case, the Board saw no indications that

Nepotism; relative; spouse; domestic partner; husband, wife; engineer; subcontractor; contractor; exercise contract management authority; where any relative or spouse or domestic partner is employed by or has contracts with persons doing City work over which the employee has or exercises contract management authority; use or permit the use of a City position to assist any relative in securing employment or contracts with persons doing City work over which the employee exercises contract management authority; fundamental corporate law; minority ownership interest; any relative or domestic partner is employed by or has contracts with persons doing City work over which the official or employee has or exercises contract management authority; subcontractor; City bureau; different City bureau; 10% ownership interest

		such a device was being used. <i>See also</i> Case No. 01015.A.	
00022.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_GiftsTravel/00022.Q.pdf	Gifts	A City employee was advised that the Ordinance did not prohibit acceptance of a prize won in a raffle at an annual event, namely an \$800 gift certificate for travel booked through a specific travel agency. The opinion focused on: (i) the fact the prize was donated by the event's sponsors; (ii) the City employee was chosen at random from among dozens of persons in attendance; and (iii) neither sponsor had any business before the City. [Note: under 2012 amendments, the employee would be required to decline the prize, because it was a gift certificate awarded at an event that the employee was attending in her official City capacity.	Gift; raffle; prize; travel; award; sponsor; \$800 gift certificate; travel agency; chosen at random; bona fide chance contest; gift certificate
00024.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_PostEmploy/00024.A.pdf	Post-employment	This is a significant, precedential case involving the revolving door provisions as they relate to administrative proceedings before the City. The Board determined that a departing high-ranking City employee who was about to assume a position with a non-profit that had matters pending before the employee's bureau was: 1) prohibited for one year from assisting or representing a new client or employer in any business transaction involving the City that related to any property that came under consideration by the employee's former bureau during the employee's City service; and (2) permanently prohibited from assisting or representing any person, including the new employer, with respect to any administrative proceeding pending in the bureau or commenced during the	Post-employment; one year subject matter prohibition; subject matter as a departmental or bureau process; pending proceedings; any proceedings suggested or introduced during an employee's City service; proceeding involving the City; participated personally and substantially in the proceeding; judicial or administrative proceeding involving the City; property designation; subject matter; follow up proceedings; regular meetings of a City commission; providing staff or administrative support to a City board or commission; continued proceeding; business transaction involving the City

		employee's City service. The permanent prohibition included testifying or lobbying on behalf of the new employer or assisting or representing it in meetings or public hearings with respect to any properties considered during the employee's City service with the bureau. The Board also concluded that the term business transaction involving the City would include the process by which the City makes decisions through a board or commission; it is not only an administrative proceeding involving the City.	
00025.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_OutsideEmployment/00025.q.pdf	Outside Employment	A rank and file City employee was advised that the Ordinance did not prohibit the employee from starting a private business, because it was unrelated to the employee's City duties, but was subject to the standard restrictions, including soliciting or receiving money or any other thing of value in return for advice or assistance concerning the operation or business of the City; against the use of City property or time for the outside business; conflicts of interests; and to receive approval from the employee's department head.	Outside employment; outside job; department head's approval; Personnel Rules; use of City property; access to departmental or City records for a private purpose prohibited; City time; compensated time; financial interest in a contractor, work or business of the City
00026.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_OutsideEmployment/00026.q.pdf	Fiduciary Duty; Outside Employment	A City employee who had received approval from the employee's department head to work a second job was advised that the Ordinance did not prohibit the employee from mailing a job announcement to other City employees and officials, but that: 1) the Ordinance's fiduciary duty provision prohibited the employee from directly accessing confidential departmental records or	Outside employment; outside job; department head's approval; Personnel Rules; use of City property; fiduciary duty; access to departmental or City records for a private purpose prohibited; City personnel records; business cards; City time; compensated time; financial interest in a contractor, work or business of the City

		directories; 2) the employee could not use City-owned property for the outside business; 3) the employee could not distribute cards relating to the second job while on City time or property; and 4) that the employee remained subject to the prohibitions against having a financial interest in any City contract, work or business in the name of another.	
00027.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_Outside_Employment/00027-AO-redact.pdf	Outside Employment	<p>The Board determined that the Ordinance would not prohibit a City employee from establishing a privately held, non-profit firm that would assist other non-profit organizations in fund-raising activities and provide them with management consulting, provided that the consulting was wholly unrelated to the employee's City responsibilities. However, the employee was also advised that: 1) because of the employee's ownership interest and employment in the firm, the employee would have an economic interest distinguishable from the general public and was prohibited from participating in, making, or in any way attempting to use the employee's City position to influence, any City decision or action that would affect or relate to the firm; 2) there was a strong potential for and appearance of impropriety; 3) the employee's business could not enter into consulting agreements with any organization or person that had any business before the employee in the employee's City position.</p>	<p>outside employment; conflict of interests; business ownership; improper influence; wholly unrelated; interest in City business; financial interest in a contract, work or business of the City; fiduciary duty; not-for-profit; appearance of impropriety; outside employment; economic interest distinguishable from that of the general public; any City decision or action that would affect or benefit or relate to the outside business; separate interests; outside business ownership; money or advice for assistance on matters concerning the operation or business of the City; wholly unrelated</p>
00028.A	Financial Interest in City Business	<p>This is a significant, precedential case. The Board determined that the Ordinance did not prohibit non-City employee</p>	<p>Financial interest in a contract, work or business of the City; financial interest in City business; grants; grants administered by the</p>

https://www.chicago.gov/dam/city/depts/ethics/general/AO Interest CityBusiness/00028.A.pdf		<p>members of a department advisory group from seeking City contracts, as they members were not City employees or officials, but cautioned both the department and advisory group members about the appearance of impropriety that might arise from receiving departmental contracts. The Board's determination that the advisory council was not a City agency was based on the following factors: (1) it was not funded by the City budget; (2) it was not created by City ordinance; (3) its members were not subject to approval by City Council; and (4) it was not created by Mayoral Executive Order.</p>	<p>City; advisory group; appointed official; City agency; official; what is a City agency; who is an appointed official; appearance of impropriety; funded by the City budget; created by City ordinance; members are subject to approval by City Council; created by Mayoral Executive Order; wholly unrelated</p>
<p>01002.Q</p> https://www.chicago.gov/content/dam/city/depts/ethics/general/AO GiftsTravel/01002.Q.pdf	<p>Travel</p>	<p>A City department head was advised that the Ordinance did not prohibit two employees from accepting reasonable travel expenses offered by a vendor for the employees to attend a tour of a manufacturing facility, as long as the expenses were not offered or accepted based on a mutual understanding that the employee's decisions would be influenced, and the expenses were related to the business purpose of the trip. The tour was integrally related to the work of the employee's bureau.</p>	<p>Travel paid by a vendor; tour of manufacturing facility; not based on a mutual understanding that the recipient's judgments or decisions were based on the travel expenses; valuable to the City; travel integrally related to the employee's City responsibilities; limited to the business purpose; educational travel</p>
<p>01003.Q</p> https://www.chicago.gov/content/dam/city/depts/ethics/general/AO GiftsTravel/01003.Q.pdf	<p>Travel</p>	<p>A City department was advised that the Ordinance did not prohibit several employees from accepting reasonable travel expenses to attend the annual meetings of two organizations of which the City department was a dues-paying member.</p>	<p>Educational travel; dues paying member of an organization; reasonable travel expenses; expenses reasonably related to the purpose of the trip</p>

<p>01005.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO_RepresentingOthers/01005.AO-redact.pdf</p>	<p>Representation of Other Persons; Attorneys</p>	<p>The Board determined that two (2) employees were not prohibited from representing themselves and/or fellow employees in a lawsuit filed against the City but were prohibited from receiving or deriving any compensation or income from their representation. This is distinct from any recovery that they may receive as plaintiffs, which is not prohibited. Note that the standard is different for election officials, who are prohibited by the fiduciary section of the Ordinance from representing or deriving any compensation or income from representing plaintiffs in such actions, even <i>pro bono</i>.</p>	<p>Attorneys; representation of other persons before any administrative agency or court in any proceeding in which the City is party and that person's interest is adverse to the City's; economic interest in the representation; <i>pro bono</i>; derive any compensation or income from the representation</p>
<p>01007.Q</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_GiftsTravel/01007.Q.pdf</p>	<p>Travel</p>	<p>A City department was advised that the Ordinance did not prohibit an employee from accepting reasonable travel expenses to New York City to participate in focus group's regarding developing a product that the City department might purchase; the travel expenses were offered by a company not under City contract, but whose products the City purchases. The acceptance was conditioned on the expenses being reasonable and related to the trip's business purpose, and serve to benefit the City, not the employee personally, and not offered in exchange for influencing the employee's judgments or decisions.</p>	<p>Travel; related to official City business; focus group; web-based resource; development of a product the City might purchase; New York City; educational travel</p>
<p>01009.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/gen</p>	<p>Post-employment</p>	<p>The Board determined that a departing middle-management City employee was not prohibited from assisting or representing a new employer or client in the privatization of the management or</p>	<p>Post-employment; one year subject matter prohibition; participated personally and substantially in the subject matter of the business transaction involving the City; subject matter; different bureaus within a</p>

eral/AO PostEmploy/01009.A.pdf		<p>maintenance of terminals at a Chicago airport. The opinion focused on the fact that the departing employee had been involve only in one aspect of the operation of in “landside facilities” or operations (areas accessible to the general public), namely, supervising janitorial, custodial and trade staff, but not in “airside facilities” or operations (areas accessible only to those with security clearance). They were held to be different subject matters, supported by different bureaus and staff within the department.</p>	<p>department; landside facilities; landside operations; airside facilities; airside operations; aviation; airport terminals; janitorial staff; custodial staff, laborers; trade staff; privatization of airline terminals</p>
<p>01015.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO_EmployRelatives/01015-AO-redact.pdf</p>	<p>Employment of Relatives or Domestic Partners; Financial Interest in City Business; Fiduciary Duty</p>	<p>This is a significant, precedential case. A high-ranking City employee asked whether the Ordinance would restrict him in exercising his City responsibilities if the firm that employs the employee’s spouse, and of which the spouse is a 10 percent owner, bids on and receives City contracts or subcontracts. The Board advised the employee that: (i) if the spouse’s firm obtains a contract with the employee’s department the employee would be prohibited from exercising contract management authority over it, and of the restrictions that would apply; (ii) if the spouse’s firm contracted with another firm, the employee would be prohibited from exercising contract management authority over that firm; and (iii) the fiduciary duty provision prohibited the employee from aiding or assisting the spouse’s firm in any way, particularly with respect to potential business opportunities with firms or persons doing City work for the employee’s department. See <i>also</i> Case No. 00021.A</p>	<p>Nepotism; relative; spouse; domestic partner; husband, wife; engineer; subcontractor; contractor; exercise contract management authority; where any relative or spouse or domestic partner is employed by or has contracts with persons doing City work over which the employee has or exercises contract management authority; use or permit the use of a City position to assist any relative in securing employment or contracts with persons doing City work over which the employee exercises contract management authority; fiduciary duty</p>

<p>01018.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO_Lobby/01018-AO-redact.pdf</p>	<p>Lobbyist Registration and Disclosure</p>	<p>The Board determined that the term “substantial change or addition” to a lobbyist’s registration that would require amendment of the registration include: (i) a change in the name or address of the lobbyist; (ii) the addition of a client [Note: due to changes to the Ordinance in 2006, this entails payment of a \$75 fee per each additional client]; (iii) a change in the name of a client; or (iv) the supplanting of an oral retainer agreement by a written one.</p>	<p>Lobbyist registration; lobbyist; amendment to the registration; what actions require an amendment to the registration; substantial change or addition; change in client’s name; change in address; oral retainer or agreement to lobby; written retainer or agreement to lobby</p>
<p>01021.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO_Lobby/01021AO-redact.pdf</p>	<p>Lobbyist Registration and Disclosure</p>	<p>This is a significant, precedential case. The Board considered the 2000 amendments to the definition of “lobbyist,” specifically as it applies to salespersons typically paid on commission, and was compelled to determine that sales commissions, paid only upon a successful transaction, are prohibited lobbyist contingent fees. The Board strongly recommended that the City Council follow the lead of other jurisdictions and re-amend the Ordinance to provide either a bona fide salesperson’s exemption from the definition of lobbyist, or from the definition of “contingency fee,” so as not to discourage salespeople from approaching the City with innovative products or services. <i>Cf.</i> Case 90058.A.</p> <p>Note: changes to the Ordinance effective October 1, 2022 allow bona fide salespersons to be paid via sales commissions. See §2-156-010(p).</p>	<p>Lobbyist; definition of lobbyist; contingent; contingency fee; sales commission; success fee; the preparation of contract specifications; the solicitation, award or administration of a contract; award or administration of a grant, loan, or other agreement involving the disbursement of public monies; any other determination made by an elected or appointed City official or employee of the City with respect to the procurement of goods, services or construction; solely by submitting an application for a City permit or license or by responding to a City request for proposals or qualifications; RFP; RFQ</p>

<p>01022.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO_Employ_Relatives/01022-AO.redact.pdf</p>	<p>Employment of Relatives or Domestic Partners</p>	<p>This is a significant, precedential case. A department head was advised that, if a particular City employee was promoted to a very high position in the department (in which the employee would be responsible for all administrative functions of the department and its employees), and had three (3) relatives also working in the department, that newly promoted employee would need to recuse from all employment-related or ongoing supervisory decisions regarding the relatives, and delegate them fully to another employee, including all personnel or payroll actions, such as signing missed punch reports and vacation approval forms.</p>	<p>Nepotism; purposes of the employment of relatives or domestic partners provisions; relative; family member; hiring; ongoing supervision of a relative; employment of a relative; includes all personnel and payroll decisions; recuse; impermeable ethical screen; senior administrative position in a large department</p>
<p>01023.Q</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_GiftsTravel/01023.Q.pdf</p>	<p>Travel</p>	<p>A high-ranking City employee was advised that the Ordinance did not prohibit the employee and a delegation of aldermen and other employees, all of whom were attending a convention in Las Vegas paid for with City funds, from attending a cocktail reception sponsored by the convention's sponsor, nor from attending dinners or other receptions hosted by other attendees, at which real estate development business would be discussed. The events were all related to official City business, and to the business purpose of the trip, which was to promote the City as a site for shopping center and other retail development.</p>	<p>Travel; related to official City business; promote the City as a site for shopping center and other retail development; Las Vegas; cocktail reception; sponsor; other attendees; appearances related to official City business; delegation of City attendees; aldermen</p>
<p>01024.Q</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_GiftsTravel/01024.Q.pdf</p>	<p>Travel</p>	<p>A City employee was advised that the Ordinance did not prohibit the employee from accepting reasonable travel expenses offered by a vendor for the employee to attend a training seminar, as</p>	<p>Travel paid by a vendor; training seminar; not based on a mutual understanding that the recipient's judgments or decisions were based on the travel expenses; valuable to the City; travel integrally related to the</p>

https://www.chicago.gov/content/dam/city/depts/ethics/general/AOGiftsTravel/01024.Q.pdf		<p>long as the expenses were not offered or accepted based on a mutual understanding that the employee's decisions would be influenced, and the expenses were related to the business purpose of the trip. The seminar was integrally related to the work of the employee's bureau.</p>	<p>employee's City responsibilities; limited to the business purpose; educational travel</p>
<p>01025.Q</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/AOSFI/01025.Q.pdf</p>	<p>Attorneys; Statements of Financial Interests</p>	<p>An attorney in City service whose spouse (also an attorney) was an independent contractor to a different City department, was advised that the spouse's income from the City did not need to be disclosed, even if more than \$5,000, because there was entity in which the spouse had a financial interest that was doing business with the City; the spouse had the contract directly with the City.</p>	<p>Statement of Financial Interests; spouse receiving compensation or income in excess of \$5,000 from a person doing business with the City; independent contractor; solo practitioner; doing business with the City; City contractor</p>
<p>01026.Q</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/AOGiftsTravel/01026.Q.pdf</p>	<p>Travel</p>	<p>A City department was advised that the Ordinance did not prohibit one of its employees from accepting reasonable travel expenses offered by a vendor for the employee to attend a training seminar, as long as the expenses were not offered or accepted based on a mutual understanding that the employee's decisions would be influenced, and the expenses were related to the business purpose of the trip. The seminar was integrally related to the work of the employee's bureau.</p>	<p>Travel paid by a vendor; educational travel; training seminar; not based on a mutual understanding that the recipient's judgments or decisions were based on the travel expenses; valuable to the City; travel integrally related to the employee's City responsibilities; limited to the business purpose of the trip</p>
<p>01027.Q</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/AO</p>	<p>Representation of Other Persons; Financial Interest in City Business</p>	<p>Board staff advised a City employee who owned a condominium unit and 1/6 of the common area that the Ordinance did not prohibit the condominium association from submitting an offer to purchase City-owned property, or from responding to a City advertisement for the sale, to bid (this</p>	<p>Financial interest in the purchase of any property that belongs to the City; definition of financial interest; competitive bidding following public notice; condominium association; condo; condominium owner; representation; conflict of interests; economic interest in the matter; improper</p>

InterestCityBusiness/010027.Q.pdf		<p>was based on the appraised value of the property, which, when multiplied by the employee's ownership interest, would yield the employee a \$367 interest; and, if the property were sold through an auction, it would qualify as competitive bidding following public notice), but that the employee was prohibited from participating in any City actions or decisions with respect to the purchase, and from representing the association in any formal or informal transaction before the City.</p>	<p>influence; use of City title; use of City authority</p>
<p>01028.A</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/Opinions%20involving%20%22Sister%20Agencies%22/01028.A.pdf</p>	<p>Representation of Other Persons; Sister Agencies; Attorneys; Employment of Relatives or Domestic Partners; Outside Employment</p>	<p>The Board determined that the Ordinance did not prohibit an attorney employed by a City department from having outside employment as an attorney and partner in the employee's spouse's law firm, or having the employee's name listed in the firm name or letterhead, although it did impose certain restrictions, specifically, representing or deriving any compensation or income from the representation of any person other than the City in a proceeding or transaction before any City agency that is non-ministerial, or deriving any compensation or income from the representation of any person in a judicial or quasi-judicial proceeding in which the City is a party with adverse interests, as well as the prohibition against receiving compensation or anything of value in return for giving advice or assistance concerning the operation or business of the City, unless it was wholly unrelated to the employee's City responsibilities.</p>	<p>Attorneys; lawyers; outside employment; partner in a law firm; spouse's law firm; representation of other persons; judicial or quasi-judicial proceedings in which the City is a party' adverse interests; law firm letterhead; use of name; use of City title; Personnel Rules; wholly unrelated; receiving compensation or anything of value in return for giving advice or assistance concerning the operation or business of the City</p>

<p>01029.Q</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/AOInterestCityBusiness/01029.Q.pdf</p>	<p>Financial Interest in City Business; Sister Agencies</p>	<p>A City employee was advised that the Ordinance did not prohibit the employee from owning or operating a gumball concession business, or from applying for and receiving and operating a concession at Navy Pier. Because Navy Pier is owned and operated by the Metropolitan Pier and Exposition Authority, which is not a City agency, this would not constitute a prohibited financial interest in City business.</p>	<p>Financial interest in City business; financial interest in sister agency contract; not a City agency; MPEA; Navy Pier; gumball machine concession; concession contract; sister agency; CTA; Chicago Park District; Chicago Public Schools; outside business ownership; outside employment</p>
<p>01030.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AOPostEmployment/01030.A.pdf</p>	<p>Post-employment</p>	<p>The Board determined that a former City employee, an attorney, was not subject to the one-year subject matter prohibition in connection with increasing air and runway capacity at O'Hare International Airport. The employee's City employment was focused on non-aviation matters, and the employee was involved only "peripherally and minimally" in aviation matters, including inquiring of the Governor whether the Illinois Department of Transportation would require the City to seek certain certifications, and also sporadically attended meetings on other aviation-related matters, such as soundproofing, storm sewer systems, bathroom cleanliness, a report by the Mayor of Park Ridge, the "green airport" program, and the "World Gateway" program; but the employee was not part of the working group formed to address additional air traffic and runway capacity.</p>	<p>Post-employment; one year subject matter prohibition; subject matter; participated personally and substantially in the subject matter; aviation; increased runway capacity at O'Hare Airport; attending meetings on other topics; soundproofing; IDOT; Illinois Department of Transportation; World Gateway Program; storm sewer systems; bathroom cleanliness; Mayor of Park Ridge; did not draft or review memoranda; did not serve on a working group</p>
<p>01032.Q</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/AOGifts/01032.Q.pdf</p>	<p>Gifts</p>	<p>A City employee was advised that the Ordinance did not prohibit the acceptance of conference fees to attend a users' conference if the employee would speak on City experience at the conference.</p>	<p>Waiver of conference fee; presentation; annual users' conference</p>

hics/general/AO GiftsTravel/01032.Q.pdf			
01033.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_Lobby/01033.A.pdf	Lobbyist Registration and Disclosure; Attorneys	The Board addressed what information is required of registered lobbyists as to their written agreements to lobby, and determined that lobbyists with written agreements must furnish a copy of the agreement, but portions that do not relate to lobbying or that are protected by privilege (for example, attorney-client privilege) may be redacted; and (ii) lobbyists with oral agreements must provide a written statement containing at a minimum how compensation is determined, whether the lobbyist is authorized to incur expenditures, and whether these are reimbursed by the client.	Lobbyists; lobbyist; registration statement; oral retainer or agreement; written retainer or agreement; minimum disclosures; how compensation is determined; contingency fees; attorney-client privilege; redaction of privileged information
01037.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_PostEmployment/01037.A.pdf	Post-employment	The Board determined that a former City employee exercised contract management authority with respect to three City contracts and was permanently prohibited from assisting or representing any person on those contracts and was prohibited for one year from working on the development of affordable housing on several specific sites. The case has a good discussion of how to define subject matter in real estate development cases, and what constitutes personal and substantial participation, and why the prohibition in this case was not City-wide.	Post-employment; one-year subject matter prohibition; contract management authority; participated personally and substantially in the subject matter; affordable housing; City-wide prohibition; site specific; real estate development; tax credits; RFP; request for proposals; chaired loan committee; attended meetings
01042.A https://www.chicago.gov/dam/city	Outside Employment	The Board determined that a City employee was not prohibited from owning and operating a business that conducted inspections but recommended that the	Outside employment; outside inspection business; clients or customers located outside City limits; clients or customers located within City limits; money for advice or

/depts/ethics/general/AO Outside Employment/01028.A.redact.pdf		<p>business have only clients located outside of City limits. The Board also advised the employee that the Ordinance prohibits the use of the employee's City title or City resources to promote the business, for example, when conducting inspections in the course of the employee's City responsibilities.</p>	<p>assistance; soliciting or receiving anything of value in return for giving advice or assistance concerning the operation or business of the City; wholly unrelated; use of City resources; use of City title; access to potential customers; fiduciary duty</p>
<p>01046.A</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/AO InterestCityBusiness/01046.A.pdf</p>	<p>Financial Interest in City Business</p>	<p>This is a significant, precedential case. The Board determined that a City employee who owned a construction company was not prohibited from, in effect, becoming a City subcontractor with respect to a construction rehabilitation program in which qualified owners could receive up to \$5,000 to perform repairs per tenant space. The Board reasoned that the participants in the program hired their own construction contractors to do the work, without specific City approval of the contractor, although the participants had to submit to the City estimates from two contractors; here the contractor had no rights vis-à-vis the City, and the program participant had to pay the contractor before receiving any reimbursement from the City. The Board also determined that the Representation provision in the Ordinance did not prohibit a City employee who owned a construction firm from appearing at the meeting at which the participants presented estimates, because these were ministerial.</p>	<p>Financial interest in work, business or contracts of the City; program administered by two City departments; construction estimates; subcontractor; disclosed subcontractor; City's right to approve a subcontractor; subcontractor's contractual rights vis-à-vis the City; program participant pays subcontractor prior to receiving reimbursement from a City program; representation of other persons; ministerial transaction</p>
<p>01047.A</p> <p>https://www.chicago.gov/dam/city</p>	<p>Post-employment; Attorneys</p>	<p>The Board determined that a former City employee, an attorney, was permanently prohibited from representing a new employer or new client in any eminent</p>	<p>Post-employment; one year subject matter prohibition; participate personally and substantially in any judicial or administrative proceeding involving the City; counsel of</p>

/depts/ethics/general/AO PostEmploy/01047.A.pdf		<p>domain proceedings, including follow-up matters, in which the attorney made a personal appearance before a tribunal, or answered or signed interrogatories, or prepared reports, or otherwise in litigation, and prohibited for one year from assisting or representing any new employer or clients in real estate development transactions involving the City in specific planning areas of the City.</p>	<p>record in any judicial or administrative proceeding involving the City; eminent domain proceedings; seek to obtain acquisition authority; answering and signing interrogatories; highest ranking City employee concerned solely with development in specific areas of the City; other planning areas</p>
<p>01049.Q</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec%20Chairs/LXIV/01049.Q.docx</p>	<p>Travel</p>	<p>A City department head was advised that the Ordinance did not prohibit up to six (6) departmental employees from accepting reasonable travel expenses to attend demonstrations and receive a fact-finding tour of a vendor's facility, and to test products which the City was considering purchasing and entering into an agreement with the vendor to develop. The expenses must be reasonable and directly related to the business purpose of the trip, and the offer cannot be accepted if the expenses themselves would benefit the individuals more than the City.</p>	<p>Travel; reasonable travel expenses paid by a vendor; tour of a vendor's facility; testing equipment City is considering purchasing; product demonstrations; accept only those expenses related to the business purpose of the trip; department approval; bona fide business trip</p>
<p>01050.Q</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/AO GiftsTravel/01050.Q.pdf</p>	<p>Gifts</p>	<p>A City employee was advised that the Ordinance did not prohibit the acceptance of one of seven (7) round trip airline tickets won in a raffle or drawing at an event sponsored by a vendor, in that the employee had no dealings with the vendor, and the tickets were donated by companies other than the vendor, and the fact that the employee was selected randomly, thereby ruling out the possibility that the employee's judgments regarding the vendor would be affected.</p>	<p>Gifts; chance or random drawing; raffle; bona fide chance contest; round trip airline tickets; mutual understanding; gift certificate; chosen at random</p>

01051.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_OutsideEmployment/01051A-redact.pdf	Outside Employment; Sister Agencies	Two City employees were advised that the Ordinance did not prohibit them from having outside employment with a departmental vendor, but imposed strenuous restrictions, including a prohibition on soliciting or receiving anything of value in return for advising or assisting the company with respect to City business, or using their City positions or resources for the benefit of their outside employer, or using or divulging confidential information.	Outside employment; outside job; outside employment with a City vendor; outside employment with a vendor of one's own department; recusal; confidential information; soliciting or receiving anything of value in return for giving advice or assistance concerning the operation or business of the City; wholly unrelated; improper influence; conflict of interests; impermeable ethical screen; recuse
01051.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_OutsideEmployment/01051.Q.pdf	Outside Employment	Two City employees were advised that the Ordinance did not prohibit them from having outside employment with a departmental vendor, but imposed strenuous restrictions, including a prohibition on soliciting or receiving anything of value in return for advising or assisting the company with respect to City business, or using their City positions or resources for the benefit of their outside employer, or using or divulging confidential information.	Outside employment; outside job; outside employment with a City vendor; outside employment with a vendor of one's own department; recusal; confidential information; soliciting or receiving anything of value in return for giving advice or assistance concerning the operation or business of the City; wholly unrelated; improper influence; conflict of interests; impermeable ethical screen; recuse
01052.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_GiftsTravel/01052.Q.pdf	Gifts	A City department was advised that the Ordinance did not prohibit its acceptance of a luncheon for some of its employees, hosted during the day, by a non-profit organization that had no business with the department, and that the Ordinance did not prohibit an employee from receiving a \$500 award from that organization, chosen by the employee's peers. Note: 2012 amendments to the Ordinance would now prohibit this monetary award.	Employee appreciation luncheon; hosted by a non-profit with no business pending before the department; \$500 cash award; winner chosen by peers; award in recognition for public service
01053.A	Outside Employment;	The Board determined that a foreman of electrical mechanics was not prohibited	Outside employment; outside jobs; conflict of interests; improper influence; money for

https://www.chicago.gov/dam/city/depts/ethics/general/AO_Outside_Employment/01053.AO.redact.pdf	Conflicts of Interest/Improper Influence	from selling walkie-talkies or pagers to hospital, or from contracting to performance maintenance or consulting services as to the two-way radio system used by hospital to communicate, though the employee was prohibited from accepting anything of value in return for advice or assistance regarding the operation or maintenance of hospital communications console linked to any City governmental communications system.	advice or assistance regarding the operation or business of the City; 911 system; EMS; emergency medical services; trauma centers; Motorola; Trauma Care Network; wholly unrelated; personnel rules; distinguishable from the public generally; use City position or City title or City resources to obtain a personal benefit or promote a purely private interest; walkie-talkies
01054.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_GiftsTravel/01054.Q.pdf	Gifts	A City department was advised that, while the Ordinance did not explicitly prohibit a departmental vendor from hosting a holiday appreciation luncheon for all departmental employees, in that the cost per person was less than \$50, the luncheon would create the appearance of impropriety, and that the department should ascertain whether this luncheon would be prohibited as a matter of policy. See also Case No. 90064.A.	Gifts; holiday appreciation luncheon; all departmental employees; on City time; in lobby of City offices; City policy; departmental vendor; appearance of impropriety; hosted by a vendor; less than \$50 per recipient
02003.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_ElectOfficials/02003.Q.pdf	Representation of Other Persons; Elected Officials	An alderman was advised that the Ordinance did not prohibit the alderman from being a named representative in a class action lawsuit against the City arising out of the redistricting process ordinance. The alderman would receive no money or any other economic benefit from participating in the lawsuit or being a named representative of the class.	Alderman; representation of other persons in a judicial proceeding in which the City is a party and the person's interest is adverse to the City; not representation; named representative in a class action lawsuit against the City; derive no compensation or economic benefit or income; legislative redistricting process; ward remap
02006.A https://www.chicago.gov/dam/city/depts/ethics/gen	Post-employment	This is a significant, precedential case. The Board determined that a mid-level manager departing from a City department was subject to a one year subject matter prohibition with respect to assisting or representing a new client or	Post-employment; one year subject matter prohibition; participated personally and substantially in the subject matter; real estate; Planning Area; sub-districts; real estate development; redevelopment agreement; business transaction involving

eral/AO PostEmploy/02006.A.pdf		<p>employer on real estate transactions involving the City in particular areas of the City, but had not exercised contract management authority with respect to a particular redevelopment agreement because the work of the employee was too preliminary on a contract that would ensue after the employee left City employment.</p>	<p>the City; TIF; designation process; tax increment financing; assisting or representing clients with respect to land assembly and acquisition, presenting development plans or concepts to the City; participating in meeting with the City concerning real estate development; contract management authority; prior to the negotiation of a contract; employee's participation simply too preliminary; even though employee was aware that the City was selling property pursuant to some future contract;</p>
<p>02007.Q</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/AOInterestCityBusiness/02007.Q.pdf</p>	<p>Financial Interest in City Business; Employment of Relatives or Domestic Partners</p>	<p>A City employee was advised that the employee's spouse could apply for and receive a contract with the City, on the basis that the spouse's business was an independent occupation, profession or business, even though the employee had originally signed the spouse's business papers, upon the recommendation of the Immigration and Naturalization Service (INS), because the spouse was a resident alien at that time. The employee did not participate in the operation or management of the spouse's business, did not exercise any legal or financial control over it, had no ownership interest in it, and had no plans to become involved in it. The employee was advised that the Ordinance prohibited the exercise of contract management authority over the spouse's City contract.</p>	<p>Financial interest in City business; City contract; husband; wife; spouse; domestic partner; interest related to the spouse's or domestic partner's independent occupation, profession or employment; involvement in the spouse's business; signing incorporation documents; recommendation of the INS; Immigration and Naturalization Service; resident alien</p>
<p>02008.Q</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/AOInterestCityBusiness/02008.Q.pdf</p>	<p>Financial Interest in City Business</p>	<p>A City employee who was a member of an investment group that wished to purchase a parcel of City-owned real estate was advised that the sale would put the employee in violation of the Ordinance, as</p>	<p>Prohibited financial interest in City business; department of Planning & Development; competitive bidding following public notice; 25% interest; sale of City-owned real estate; purchase of property that belongs to the City;</p>

https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_ConflictOfInterest/02008.Q.pdf		<p>the employee's interest in would be worth less than \$5,000; moreover the property was being sold pursuant to a process of competitive bidding following public notice. Note: in 2012, the threshold ownership interest for having a prohibited financial interest in the purchase of property belonging to the City was lowered to \$1,000.</p>	<p>improper influence; conflicts of interest; representation of other persons; appearing before City boards or agencies; signing documents submitted to the City; the owner receives or entitled to receive; cost or present value of \$5,000 or more; competitive bidding following public notice</p>
<p>02009.Q</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_ConflictOfInterest/02009.Q.pdf</p>	<p>Travel</p>	<p>A City employee was advised that the Ordinance prohibited acceptance of travel expenses to attend a trade show in Amsterdam, because the offeror was engaged in ongoing negotiations with the employee's department and the employee was in a position to substantially affect the outcome of those negotiations.</p>	<p>Trade show; Amsterdam; reasonable travel expenses; sponsor of the trade show; sponsor; exhibitor; person who has an economic interest in a specific City business transaction; exhibition; vendor</p>
<p>02011.A</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_ConflictOfInterest/02011-AO.pdf</p>	<p>Conflicts of Interest/Improper Influence; Representation of Other Persons; Appointed Officials; Outside Employment</p>	<p>This is a significant, precedential case. The Board determined that an appointed official who also had a full-time position as the Executive Director of a non-profit that conducted its business in the same field, real estate development and redevelopment, as the City board on which the appointed official served, was subject to substantial restrictions as both a board or commission member, and as Executive Director of the non-profit. The opinion goes through each of the relevant restrictions in order.</p>	<p>Gap financing; appointed official; non-profit; Executive Director; wholly unrelated; redevelopment; use of City position to influence matters; abstain; recusal; recuse; impermeable ethical screen; fiduciary duty; confidential information; solicit or accept money or other thing of value; in return for advice or assistance on matter concerning the operation or business of the City; represent; economic interest in the representation of; derive or receive income or compensation from the representation of; economic interest in the matter; Section 8 housing; TIF; tax increment financing; developer's fee; review development proposals; private developer; direct services contract; instrumentality; redevelopment area designations; private, non-profit housing development corporation</p>

<p>02013.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO_Lobby/02013.A-redact.pdf</p>	<p>Lobbyist Registration and Disclosure</p>	<p>This is a significant, precedential case. The Board, in a follow up to Case No. 97055.A, determined that building expeditors are not lobbying (as defined) when they engage in certain activities, but are lobbying and required to register when they engage in other, specified activities. This is the definitive opinion discussing building expeditors.</p>	<p>Lobbying; not lobbying; lobbyist; building expeditors; building code; meeting with plan examiners; attempting to persuade; administrative action; legislative action; adopt a particular interpretation of the building code; attempting to persuade aldermen, employees of the Mayor's Office, or other City employees or officials to intercede in, promote or influence the permit application process; monitoring progress or status; clarifying what must be corrected</p>
<p>02021.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO_PostEmploy/02021.A.pdf</p>	<p>Sister Agencies; Post-employment</p>	<p>The Board determined that a former high ranking employee was not prohibited from assisting or representing a bond rating agency in evaluating bonds issued by the City's "sister agencies," such as the Chicago Transit, Chicago Public Schools, etc., unless these bonds were issued with involvement by the City, but that the employee was prohibited for one year from assisting or representing an new employer or client with respect to evaluating the structuring, issuance, and administration of the debt of the City through the issuance of bonds. See also Case No. 03047.A.</p>	<p>Municipal bonds; bonds; issuance of bonds; sister agencies; Chicago Transit Authority; Chicago Public Schools; Chicago Park District; CPS; CTA; public finance; debt obligations; bond indenture agreements; business transaction involving the City; rating service; participate personally and substantially in the subject matter of the business transaction; subject matter; bond brokers; bond buyers</p>
<p>02022.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO_InterestCityBusiness/02022.A.pdf</p>	<p>Financial Interest in City Business</p>	<p>The Board determined that a City employee who had entered into a \$40,535 forgivable loan agreement with the City prior to becoming a City employee could receive the remainder of the loan even after becoming a City employee, relying on principles of equity and justice. Note: in 2006, the Ordinance was amended so that the Commissioner of the Department of Planning & Development may designate certain programs as "eligible," thereby enabling</p>	<p>Financial interest in City business; forgivable loan; home repairs; loan agreement; loans administered by the City; loans funded by the City; principles of equity and justice; home rehabilitation loan; roof; qualified homeowners; business of the City; paid with funds belonging to or administered by the City</p>

		City employees and officials to participate to the same degree as other qualified members of the public.	
02023.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/AOInterestCityBusiness/02023.Q.pdf	Elected Officials; Financial Interest in City Business	An alderman was advised that the Ordinance did not prohibit the sale by the City of 9 parcels of City-owned property to a developer, to build homes, when the alderman had already expressed an interest in purchasing one of the homes. The alderman had already written a letter of recommendation on behalf of the developer to a City department. The alderman was advised to recuse from any discussions on the sale to the developer before City Council or any committee, and that the alderman did not have a prohibited financial interest in the purchase of City-owned property, because the alderman would be purchasing a home from the developer, not land from the City; state laws may apply, however.	Alderman; elected official; prohibited financial interest in the purchase or sale of City-owned property; developer; single-family homes; Sheriff's tax deed; nine parcels; recuse; letter of support from alderman; letter of support; Tax Increment Financing; TIF
02024.A https://www.chicago.gov/dam/city/depts/ethics/general/AOInterestCityBusiness/02024-A.pdf	Financial Interest in City Business	The Board determined that a City employee would violate the Ordinance by having a prohibited financial interest in a City business or City work by forming a non-profit (of which the employee would be the sole member, officer or staff) that would seek a grant contract with the City for more than \$10,000.	Financial interest in his own name or in the name of another; any contract, work or business of the City; cost or present value; non-profit entity; sole member, officer or staff of a non-profit
02025.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec	Lobbyist Registration and Disclosure	A representative of a trade organization, organized as a non-profit, but representing 18 research laboratories across the country, was in talks with City employees regarding the potential purchase of equipment, and was advised that registration as a lobbyist was not	Lobbying; lobbying; non-profit; sales; 3D imaging and laser equipment; laser scanning; employee, officer, or director of a non-profit entity

k%20Chairs/NerFid/02025.pdf		required because the employer was a non-profit. Note: the Ordinance was amended in 2011, and certain persons who engage in activity considered lobbying on behalf non-profits must now register.	
02026.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec%20Chairs/4-14-12/02026.Q.pdf	Post-employment	A former City clerical employee was advised that the Ordinance's one-year subject matter and permanent contract prohibitions did not restrict the former employee from performing clerical work for a post-City employer on its contract the employee's former department, citing the trade skill/tradesman exemption.	Post-employment; one-year subject matter prohibition; clerical work; stapling; faxing; filing; processing documents; skills common to all clerical work; acquired through education and job experience; processing and inputting purchase orders; verifying unit prices; preparing statistical reports; utilizing Bureau software
02027.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec%20Chairs/4-14-12/02027.Q.pdf	Post-employment	A long-time retired engineer was advised that the Ordinance did not impose a one-year or permanent restriction as to assisting a new employer with respect to certain projects. The trade skill/tradesman exemption applied here.	Post-employment; engineer; bridges; painting; bascule; structural engineers generally; personal and substantial participation in the subject matter; occupational and professional skills common to structural engineers; acquired through education and job experience, not through exposure to or unique knowledge of City specific standards or regulations
02029.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/AO%20GiftsTravel/02029.Q.pdf	Travel	A City employee was advised that the Ordinance did not prohibit the acceptance of reasonable travel expenses to attend an industry-wide program at which the employee would interact with other professionals and return with usable knowledge; the expenses were offered by the host of the conference.	Travel; reasonable travel expenses; furnished in connection with public events, appearances or ceremonies; related to official City business; furnished by the sponsor of the event; sponsor; industry-wide program
02030.A https://www.chicago.gov/dam/city/depts/ethics/gen	Post-employment; Attorneys	The Board determined that a former City employee who had left City employment more than one year prior to the opinion was permanently prohibited from assisting or representing any person in an	Attorneys; post-employment; counsel of record; participated personally and substantially in an administrative proceeding involving the City; witness; appearing as a witness in a proceeding; supervisory

eral/AO PostEmploy/02030.A.pdf		<p>administrative proceeding before a City department or commission in which the employee had been counsel of record or had participated as a witness, as well as in the sale of a particular type of license or permit if the application for that sale was made while the employee was the administrator of a section of a City department that handled such sales. The case contains an analysis of when contracts or sales that are rebid annually can be considered different contracts for purposes of the permanent prohibition.</p>	<p>authority over the staff responsible for reviewing and approving permit applications; Conducting background checks; representing buyers or seller of permits or licenses; rebidding of contracts; new or separate contracts</p>
<p>02031.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO PostEmploy/02031.A.pdf</p>	<p>Post-employment</p>	<p>The Board determined that the Ordinance's post-employment prohibitions applied to a former traffic engineer, even though that engineer had been laid off as part of a reduction in force. The engineer was subject to several permanent prohibitions, including for any contract that may ensue based on an engineering scope of services the engineer had drafted, and a one year subject matter prohibition s to any business transaction involving the City relating to the development of the City's intelligent transportation system, including specific projects named.</p>	<p>Post-employment; one year subject matter; laid off; reduction in force; contract management authority; authored scope of services; scope of engineering services; IDOT; Illinois Department of Transportation; RFP; request for proposals; Chicago safety information system; proposed maintenance and enhancement contract; contract not yet awarded at the date of termination of City employment; take any action toward the formulation of the execution of a City contract; author grant applications; RFQ; request for qualifications</p>
<p>02032.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO PostEmploy/02032.A.pdf</p>	<p>Post-employment</p>	<p>The Board determined that a former high ranking City employee, who had left City employment more than one year prior to the opinion, did not exercise contract management authority with respect to the employee's post-City employer's contract with the City, even though the employee had worked on drafting the RFP (request for proposals) the post-City employee answered. The RFP did not include</p>	<p>Post-employment; contract management authority; RFP; request for proposals; personal involvement in, or direct supervisory responsibility for, the formulation or execution of the a City contract; sufficiently detailed; narrowly focused scope of services; grant proposal; programs related to youth; public safety; non-profit; teaching an economic development entrepreneur class;</p>

		sufficiently detailed information, or specify a project, proposal or service. Thus, the Board concluded that the form employee did not have personal involvement in, or direct supervisory responsibility for, the formulation or execution of the post-City employer's contract with the City, awarded after the time the employee left City service.	
02034.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_PostEmploy/02034.A.pdf	Post-employment; Attorneys	<p>This is a significant, precedential case. The Board determined that a high ranking City employee did not exercise contract management authority with respect to a letter agreement-contract with a law firm to provide debt collection services, but was personally and substantially involved in the subject matter of the collection of certain debts owed to the City and thus subject to a one year prohibition as to that subject matter and letter agreement-contract, and that this one year prohibition applied even though the firm that signed the letter agreement-contract with the City was the City's client. The opinion extensively discusses what constitutes "contract management authority," and "personal involvement in" or "direct supervisory responsibility for" a contract. The opinion also holds that departing attorneys are subject to the one year and permanent prohibitions in §2-156-100(b) (the subject matter and contract management authority restrictions) not only to those in -100(a) (which covers personal and substantial participation in judicial or administrative proceedings involving the City).</p>	<p>Post-employment; one year subject matter prohibition; contract management authority; participated personally and substantially in the subject matter; law firm; letter agreement; personal involvement in or direct supervisory responsibility for' formulation of execution of a City contract; supervision of performance; debt collection; personal and substantial participation in a judicial or administrative proceeding involving the City; City appointed hearing officers; permanent prohibition; §2-156-100(b); §2-156-100(a); recommend; personally inspect; sign and approve; payment forms; authorize payment; drafting a request for proposals; RFP; verifying that work has been completed; participate in meetings at which a contractor is selected; judicial proceedings involve the City; administrative proceeding involving the City</p>

<p>02041.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO_ConflictOfInterest/02041-A_2.pdf</p>	<p>Fiduciary Duty; Conflicts of Interest; Representation of Other Persons; Appointed Officials; Financial Interest in City Business; Outside Employment; Attorneys</p>	<p>This is a significant, precedential case. The Board determined that an individual who served on a City commission for which the official received a stipend was an appointed official, not an employee, despite the stipend, and that thus the appointed official (who was also a partner in a law firm), was not prohibited from performing legal work for various other City departments and commissions, as that work was wholly unrelated to the work of the official's City commission. The Board also determined that the appointed official was not prohibited from serving on a state board, but continues to owe a fiduciary duty to the City, and thus was advised to recuse from any matters in which the official believed there was a conflict with the City interests.</p>	<p>Appointed official; "employee"; official; City board or commission; City agency; stipend; compensation; Corporation Counsel; common law; independent contract; public office; public employment; fact-intensive; case-by-case analysis; independent powers and duties of a commission; outside counsel; excessive force; Chicago police officers; financial interest; wholly unrelated; representation of other persons; not prohibited from having an economic interest in the representation; derive income or compensation from the representation of persons; judicial proceedings; quasi-judicial proceedings; adverse to the City; where the City is party; conflicts of interest; improper influence; economic interest in the matter; derive income or compensation from the matter; may not personally undertake the representation; advise or provide assistance; behind the scenes; money for advice or assistance; concerning the operation or business of the City; fiduciary duty; contract negotiations; contract, work or business of the City; avoid even the appearance of impropriety; recuse;</p>
<p>02042.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO_PostEmploy/02042.A.pdf</p>	<p>Post-employment</p>	<p>The Board determined that a departing employee, an Assistant Commissioner, was not prohibited from serving as an Executive Director of a delegate agency of the employee's department, or from performing certain duties with respect to the new employer's grant with the City because the employee had not been personally and substantially involved in the subject matter, which was performing the grant agreement, but was subject to a host of other one year prohibitions and</p>	<p>Neighborhood one-stop facility; post-employment; one-year subject matter prohibition; Director of Finance; Assistant Commissioner; participated personally and substantially in the subject matter; delegate agency; grant agreement; contract administration unit; Chicago Workforce Board; Workforce Investment Act; intergovernmental teams; Summer Youth Job Program</p>

		would need to implement an impermeable ethical screen.	
02044.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_PostEmploy/02044.A.pdf	Post-employment	<p>The Board determined that a departing City employee was not subject to either the one-year subject matter prohibition or the permanent prohibition with respect to the employee's post-City job with a non-profit entity that served as a fiscal administrator for the employee's City department's grant project. The opinion draws the distinction between programmatic monitoring and fiscal monitoring for one type of departmental service, versus another, and concludes that they were distinct subject matters within the employees' department, handled by different bureaus; the employee participated personally and substantially in programmatic and fiscal monitoring for one type of service, but was taking a position in another service in which the employee had not been involved..</p>	<p>Post-employment; one year subject matter prohibition; participated personally and substantially in the subject matter; business transaction involving the City; delegate agency; grant; programmatic assistance; programmatic monitoring; fiscal agent; fiscal monitoring; technical assistance; CDBG; Community Development Block Grant funds; monitoring of contracts; fiscal administrator; Federal program</p>
03002.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec%20Chairs/4-15-12/03002.Q.pdf	Travel	<p>A high level City employee was advised that reasonable travel expenses could be accepted from a departmental vendor in connection with attending a users' conference, and speaking on the City's installation of the vendor's product, but only reasonable expenses, on the basis that the employee and the department viewed this as educational travel that would benefit the City. The employee was advised of the \$50 gift limitation. Note: under 2012 amendments to the Ordinance, these expenses need to be reported to the Board and are made</p>	<p>Travel; educational travel; user's conference; paid for by a City vendor; opportunity to gain knowledge; honorarium; reasonable travel expenses; related solely to the business purpose</p>

		public, and any honorarium offered would need to be declined.	
03008.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/AOGiftsTravel/03008.Q.pdf	Travel	A City department was advised that it could accept travel expenses for five (5) employees to travel to an industry-wide trade show, from two departmental vendors, who were co-sponsors of the show, provided that the expenses were related solely to the business purpose of the trip. The employee was reminded of the \$50 gift limitation. Note: under 2012 amendments to the Ordinance, these expenses need to be reported to the Board and are made public.	Travel; educational travel; industry-wide trade show; conference; offered by City vendor; useful to the City; reasonable travel expenses
03009.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/AOGiftsTravel/03009.Q.pdf	Gifts	A City employee was advised that the Ordinance did not prohibit a departmental vendor from offering, to a two (2) project teams, seven (7) City employees in total, dinner at a local restaurant to celebrate the completion of a project, under a still-active contract, as long as the value of the dinner to each City employee was less than \$50, and there was no mutual understanding between the employees and vendor that the employees' decisions or judgments would be influenced by the dinner.	Gifts; celebratory dinner offered by a vendor; less than \$50; mutual understanding; team members
03010.55.CF https://www.chicago.gov/content/dam/city/depts/ethics/general/AOCampaignFinancing/03010.55.CF.pdf	Campaign Financing	This is a significant, precedential case. The Board determined that, for purposes of the Ordinance's campaign contribution limitations, an "otherwise affiliated company" means an entity that directly or indirectly, through one or more intermediaries, controls or is controlled by, or is under common control with, the entity specified. Indicia of common control include having officers or board members or sole or majority shareholders in	Campaign financing; single person; limitations on political or campaign contributions; otherwise affiliated entity; otherwise affiliated companies; affiliates; common control; common majority or sole shareholder; common head of accounting; political contributor; having a common address; Federal Election Commission

		common; having one address; having the same head of accounting. The factors are based on those established by the Federal Election Commission.	
03011.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_OutsideEmployment/03011.Q.pdf	Outside Employment	A City employee, a lead inspector, was advised that the Ordinance did not prohibit the employee from accepting an offer from a private company licensed by the State of Illinois for lead removal to teach safe lead removal practices in Spanish to its prospective lead workers. The focus of the class was industry-wide techniques for the safe removal of lead, and those taking it would not be given any unfair advantage in dealing with the City's lead inspectors.	Teaching; lead removal; money for advice or assistance concerning the work or business of the City; non-confidential information; inside or unfair advantage; lead inspectors; Spanish language class; lead abatement; work or business of the City; testify; witness; Department of Administrative Hearings
03020.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_OutsideEmployment/03011.Q.pdf	Travel	A high ranking employee was advised that the Ordinance did not prohibit the City department from accepting an offer from a vendor to cover expenses for another employee to attend an informational seminar on technical and operating information, innovations, safety features, and other features of equipment owned by the City, so long as the expenses were related solely to the business purpose of the trip; the employee was also reminded of the \$50 gift limitation. Note: under 2012 amendments to the Ordinance, these expenses need to be reported to the Board and are made public	Travel; educational travel; information seminar offered by City vendor; safety information; useful to the City; reasonable travel expenses
03022.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_PostEmploy/03022.A.pdf	Post-employment; Attorneys	The Board determined that a former City employee, an attorney, was subject to a one year subject matter prohibition against assisting or representing a new client or employer with respect to Phase 1 of the development of four (4) specific housing projects, including financing,	Post-employment; contract management authority; attorney; lawyer; participated personally and substantially in the subject matter; housing project; affordable housing; financing, building permits; zoning permits; condemnation or demolition proceedings; construction liens; scattered site; senior

		building or zoning permits, condemnation or demolition proceedings, or construction liens, but did not exercise contract management authority with respect to these projects, and was not subject to a permanent prohibition as to them. The case contains a discussion of “subject matter.”	buildings; Section 202 Family Properties; gap financing funds; fast track projects; Habitat Company; working group meetings; developer’s pro forma; technical expertise; set up meetings; oral reports; ensure that appropriate departments timely met with the developer; Metra; preparation of documents
03025.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_PostEmployment/03025.A.pdf	Post-employment	The Board determined that a former employee, a long time civil engineer, was subject to a one year subject matter prohibition and was prohibited from assisting or representing new client or employer with respect to any traffic engineering aspect of any project the employee had worked on, but not to such a prohibition as to one particular identified project, but was not subject to the permanent prohibition as to project identified.	Post-employment; one year subject matter prohibition; subject matter; participated personally and substantially; civil engineer; traffic feasibility study; Bureau of Bridges; rehabilitation; Phase 1; Phase 2; phased construction project; contract management authority; review responses to RFP; request for proposals; scope of services; traffic congestion; Ogilvie Transportation Center; Streeterville; RFP; request for proposals; Navy Pier; traffic flow; traffic consultant; Jackson Park; 57 th Street; IDOT; Illinois Department of Transportation; Phase; Contract Preparation Phase; Construction Phase; Bureau of Planning and Design; Request for qualifications; RFQ; McCormick Place South Expansion;
03027.A https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_ElectOfficials/03027AO-redact_1.pdf	Fiduciary Duty; Representation of Other Persons; Attorneys; Elected Officials	This is a significant, precedential case. The Board determined that an alderman/attorney’s fiduciary duty to the City prohibits the alderman/attorney from representing plaintiffs in legal actions brought against Chicago police officers in their official capacity, even though the City is not necessarily a party in the action – in part because the City is required by collective bargaining agreements to indemnify the police officers and offer them a legal defense. The case contains a lengthy discussion of an	Elected officials; alderman; attorney; fiduciary duty; partnership interest; business relationship; Chicago Police Department; Police officer; FOP; Fraternal Order of Police; union agreement; indemnification; legal defense; §1983 actions; lawsuits; lawyers; Law Department; Corporation Counsel; Finance Committee; \$100,000; public duties; <i>In re Vrdolyak</i> ; Illinois Rules of Professional Conduct; <i>pro bono</i> ; irresolvable conflict; competing fiduciary duties; Worker’s Compensation; <i>qua</i> attorney; public trust; represent; receive or derive compensation

		alderman/attorney's fiduciary duty, and of the relevant Illinois Supreme Court Rules of Professional Conduct. See <i>also</i> Case No. 90035.A.	from the representation of; judicial proceedings; quasi-judicial proceedings; adverse party; where the City's interests are adverse; City treasury; voting; settlement
03028.Q https://www.chicago.gov/dam/city/depts/ethics/general/AO_PostEmploy/03028.Q.pdf	Post-employment	A departing employee was advised that the one-year subject matter prohibition prohibited the employee from assisting or representing a new client or employer with respect to the installation of a kind of device City-wide, but was not subject to a permanent prohibition.	Post-employment; one-year subject matter prohibition; subject matter; participated personally and substantially; the installation of devices under a City program; City-wide; maintaining written and photographic records; reconciling invoices
03030.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_PostEmploy/03030.A.pdf	Post-employment	The Board determined that a former employee, a civil engineer; was not subject to the permanent prohibition with respect to 16 identified construction contracts, but was subject to the one year subject matter prohibition and was prohibited from assisting or representing a new client or employer with respect to the closeout of any construction contracts under the City's default resolution process. The case has a good discussion of subject matter.	Post-employment; one year subject matter prohibition; permanent prohibition; contract management authority; closeout process; default resolution process; audit quantity estimates; prepare change orders; payment vouchers; construction contracts; RFQ; requests for qualifications; developing construction plans; owner bureau; negotiating contract terms; RFP; request for proposals; subject matter; site specific; duty; responsibility; City-wide; head of sub-unit; engineer
03031.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec%20Chairs/4-14-12/03031.Q.pdf	Post-employment	A retired City employee was advised that the Ordinance did not prohibit the former employee from entering into a consulting contract directly with the City, even though the matters on which the former employee would work involve the same subject matters in which the former employee had been personally and substantially involved during City employment. The opinion restates the conditions under which such consulting contracts are permissible under the Ordinance.	Post-employment; retained by the City; consulting agreement with the City by a former employee; conditions under which consulting agreements conform to the post-employment restrictions; independent contractor; use of materials proprietary to the City; general subject matter;

<p>03036.Q</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_OutsideEmployment/03036.Q.pdf</p>	<p>Outside Employment</p>	<p>A City employee was advised that the Ordinance did not prohibit the employee from designing and teaching training sessions for employees of another government entity on a general subject matter about which the employee worked for the City. The key section was the money for advice restriction, which prohibits City employees or officials from soliciting or receiving anything of value in return for advice or assistance on matters concerning the operation or business of the City, unless wholly unrelated to their City job responsibilities. The teaching here was general and did not involve City-specific procedures or standards.</p>	<p>Training; solicit or accept anything of value in exchange for advice or assistance regarding the business of the City; wholly unrelated; teaching; outside employment; Personnel Rules; City-specific standards; teaching; City-specific standards; inside information; unfair advantage</p>
<p>03039.Q</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_GiftsTravel/03039.Q.pdf</p>	<p>Travel</p>	<p>City employees from the Chicago Public Library were advised that they could accept reasonable travel expenses paid by the Trade Commission of Spain to attend the annual Spanish book fair in Spain.</p>	<p>Travel; foreign country; reasonable travel expenses; furnished in connection with public events, ceremonies related to official City business; furnished by the sponsor of the event; not based on a mutual understanding that official decision or actions would be influenced; LIBER; Spain</p>
<p>03043.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO_PostEmploy/03043.A.pdf</p>	<p>Post-employment</p>	<p>The Board determined that a former employee, a long-time engineer, was prohibited from assisting or representing a new client or employer with respect to Phase 1 and Phase 2 of a particular project. The opinion addresses the specific job opportunity presented by the employee. The employee oversaw preparatory work for Phase 2, and reviewed responses to a request for proposals (RFP) for Phase 1. The opinion also discusses whether the employee exercised contract management authority</p>	<p>Post-employment; one-year subject matter prohibition; engineer; viaduct rehabilitation; Phase 1; Phase 2; phased construction project; contract management authority; review responses to RFP; request for proposals; scope of services</p>

		over Phase 2, but as no RFP had been issued, could not make a conclusive determination.	
03045.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_RepresentingOthers/03045Q.pdf	Representation of Other Persons; Non-profit Board Service; Outside Employment	A City employee was advised that the Ordinance did not prohibit the employee from establishing a non-profit organization or serving as a non-compensated board member and/or officer of it. The employee was advised of the standard restrictions: representation of others; conflicts of interest; improper influence; Fiduciary Duty; use of City property; confidential information.	Outside employment; volunteer service; forming a non-profit organization; representing a third party before the City; non-ministerial transaction; conflicts of interest; economic interest; improper influence; use of City title; use of City property; fiduciary duty
03047.A https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_PostEmploy/03047.A.pdf	Post-employment	The Board determined that a former employee was not prohibited by the one year subject matter or permanent restrictions from assisting or representing a new employer or client with rating bonds issued by the City where the employee's responsibilities had been limited to undertaking research and collecting information that would later be used to prepare bond indenture agreements. The opinion was limited in this fashion. See <i>also</i> Case 02021.A.	Municipal bonds; bonds; issuance of bonds; sister agencies; public finance; debt obligations; bond indenture agreements; business transaction involving the City; rating service; participate personally and substantially in the subject matter of the business transaction; subject matter; bond brokers; bond buyers
03049.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_PostEmploy/03049.A.pdf	Post-employment	The Board determined that a former City employee, a long-time civil engineer, was not subject to either the one year subject matter or permanent prohibitions with respect to a job with a firm to work on a street viaduct rehabilitation project. The case has a thorough discussion of how the Board has interpreted the term "subject matter" in real estate or engineering cases: depending on the facts of the case, either as the application	Post-employment; subject matter; what is subject matter; particular City program; real estate; engineer; rehabilitation; viaduct reconstruction; bascule; bridge; construction projects; one year subject matter prohibition; sidewalk replacement project; pedestrian bridge project; design questions; resident engineer; contract management authority; traffic planning study;

		of a City program to particular sites, or as to a City program, City-wide.	
03050.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec%20Chairs/NerFid/03050.pdf	Outside Employment	A City employee was advised that the Ordinance did not prohibit the employee from accepting a second job to investigate employment discrimination claims involving federal government employees but was subject to the standard restrictions.	Federal subcontractor; federal government; EEOC; investigator; internal complaints by federal employees; Illinois Department of Human Rights; IDHR; concurrent jurisdiction;
03051.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_EmployRelatives/03051AO-red.pdf	Employment of Relatives or Domestic Partners	This is a significant, precedential case. The Board determined that a high ranking City employee would not be in violation of the employment of relatives provision if a relative accepted employment with a company over which the employee exercised contract management authority; the Board focused on the facts that: (i) the relative's position would be with an entirely separate operating division of the company, which was a large public company with six operating divisions; and (ii) there was no evidence that the employee used any City resources or attempted to influence the company's hiring of the relative. The case's is not to be intended to cover all situations.	Nepotism; contract management authority; public company; relative; entry level position; large multinational company; City contractor; hiring or employment of a relative; automatic violation; hiring or contracting with a relative within six (6) months; separate and distinct operating divisions; synergies; employment of relatives; company doing work over which the City employee has or exercises contract management authority
03053.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_GiftsTravel/03053.Q.pdf	Travel	A high level City employee was advised that reasonable travel expenses could be accepted from a departmental vendor in connection with a users' conference regarding this vendor's product, but only reasonable expenses, on the basis that the employee and the department viewed this as educational travel that would benefit the City.	Travel; user's conference; vendor-sponsored travel; useful information for the City; educational travel

<p>04001.Q</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec%20Chairs/4-14-12/04001.Q.pdf</p>	<p>Post-employment</p>	<p>A former high-ranking employee was advised that the Ordinance did not prohibit the employee from entering into a consulting contract directly with the City to train staff in using particular software, or from having another unrelated position as Managing Director of a company. The opinion goes through the criteria for a former employee to be retained by the employee's own former City department or another department. The opinion also states that the Ordinance does not require that former employees devote 100% of their time to such contracts – if approved – they may have other post-City employment.</p>	<p>Post-employment; consulting agreement with the City; fiduciary duty; obligation at all times to act in the City's best interests; written consulting contract; exception to the post-employment restrictions; training in software usage; former employee retained by the City to do the same or similar work;</p>
<p>04003.1Q</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec%20Chairs/4-14-12/04003.1.Q.pdf</p>	<p>Travel</p>	<p>Two Department heads were advised that several employees in their departments could accept an offer from a potential City vendor for reasonable travel expenses to visit a City department in Philadelphia to examine an installation that the City was considering purchasing, but that all expenses must be related to the business purpose of the trip, and gifts worth more than \$50 were prohibited.</p>	<p>Travel; reimbursement from a prospective City vendor; reasonable travel expenses; airfare; lodging expenses; business trip; evaluation of equipment; informed business decision; gifts worth more than \$50 prohibited</p>
<p>04005.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO_PostEmployment/04005.A.pdf</p>	<p>Post-employment</p>	<p>The Board determined that a departing long time civil engineer was prohibited for one year from representing a potential new employer or client with respect to the management or supervision of the design or construction of City arterial, industrial and new street reconstruction, rehabilitation, resurfacing, streetscaping or lighting, and with respect to one particular named project, and was permanently prohibited from assisting or representing a new client or employer</p>	<p>Post-employment; one-year subject matter prohibition; participate personally and substantially in the subject matter; business transaction involving the City; documentation engineer; civil engineer; streetscaping; rehabilitation; reconstruction; street lighting; arterial street resurfacing; project manager; supervision of performance; contract management authority;</p>

		with respect to any project in which the employee had acted as project manager.	
04006.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_PostEmploy/04006.A.pdf	Post-employment	<p>This is a significant, precedential case. The Board determined that a departing high ranking City employee was prohibited for one year from assisting a new client or employer with respect to any ongoing or proposed real estate development or redevelopment projects involving the City in a planning area, and to a permanent prohibition as to four ongoing projects in that area, and a one-year prohibition with respect to economic development, marketing, and retail and corporate recruitment in the planning area, to the extent that this work entails interacting with personnel from the City, but did not prohibit the departing employee from performing certain services with respect to a contract with a Special Service Area (SSA). The case is notable because it discusses what constitutes contract management authority in real estate contexts, and which real estate transactions constitute “business transactions involving the City” – if they would reasonably be expected to lead to City action, such as financial assistance, contracts, permits or other approvals, or contacts made by a former City employee official about, or advising colleagues about, ongoing or intended City regulatory efforts, assistance, or programs.</p>	<p>Post-employment; real estate; planning area; redevelopment agreement; development agreement; marketing; corporate and retail recruitment; contract management authority; interacting with City governmental personnel; subject matter; business transaction involving the City; economic development; real estate transaction that would reasonably be expected to lead to City action; SSA; Special Service Area; participated personally and substantially in the subject matter of the transaction; subject matter as work under a specific real estate contract or real estate development; uniqueness of real estate transactions; commonness of real estate transactions; membership development of a neighborhood business association; SSA service provider; CDC; Community Development Commission; Executive Director; reasonably be expected to lead to City action; financial assistance; City contracts; City permits or other approvals; contacts made by a former City employee official about, or advising colleagues about, ongoing or intended City regulatory efforts, assistance, or programs; impermeable ethical screen</p>
04008.A https://www.chicago.gov/dam/city	Statements of Financial Interests	<p>The Board determined that filers of Statements of Financial Interests must provide information sufficient to identify assets from which capital gains of more</p>	<p>Capital gains; disclosure; identity of capital assets sold; capital gains realized in the previous year; identity; common stock; mutual fund</p>

/depts/ethics/general/AO_SFI/04008-AO-redact.pdf		than \$5,000 were realized in the previous year, including but not limited to the name of company or mutual fund whose shares were sold.	
04009.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_FiduciaryDuty/04009-AO-redact_2.pdf	Fiduciary Duty; Conflicts of Interest/Improper Influence	This is a significant, precedential case. The Board determined that a new high ranking employee did not violate the Ordinance by participating in a request for proposals (RFP) review where the new employee's immediate pre-City employer was a bidder, given that the new employee had severed all monetary ties with the pre-City employer, and believed that a fair, objective decision could be made. Note: this case would now be governed by the Ordinance's reverse revolving door provision, §2-156-111(c), but would lead to the same conclusion.	Reverse revolving door; conflict of interests; continuing monetary relationship; fiduciary duty; subjective test; appearance of impropriety; current economic interest; pre-City employer; RFP evaluation
04010.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_PostEmploy/04010.A.pdf	Post-employment	The Board determined that a recently retired Electrical foreman was prohibited from assisting or representing a new employer or clients with respect to illumination (including maintaining, repairing lights, signs and other equipment, and installing or repairing circuitry) at a particular site. The case is notable because the Board construed the subject matter not to this kind of work City-wide, but at this particular site.	Post-employment; one year subject matter prohibition; participate personally and substantially in the subject matter; business transaction involving the City; subject matter; inspection of diesel generators; illumination (including maintaining, repairing lights, signs and other equipment, and installing or repairing circuitry); illumination; subject matter as a particular project or site
04011.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_PostEmploy/04011.A.pdf	Post-employment	The Board determined that a departing civil engineer who had served as resident engineer on 17 consecutive street construction projects, and as a Project Manager of a City program, was prohibited for one year from assisting or representing a new client or employer regarding the design or construction of	Post-employment; one year subject matter prohibition; participate personally and substantially in the subject matter; business transaction involving the City; documentation engineer; civil engineer; resident engineer; residential, arterial or industrial streets; installation of landscaped medians; viaduct clearance improvements; rehabilitation of

		City arterial, residential and industrial streets, including new street construction, street rehabilitation and resurfacing, installation of landscaped medians and viaduct clearance improvements, and permanently prohibited from assisting or representing a new client or employer with respect to the project on which the employee served as project manager, including processing monthly estimates for or closing out design or construction contracts associated with these projects.	major arterial streets; supervision of contractors' construction activities to ensure compliance with contract specifications, plans and drawings; daily log book; project manager; close out of construction or design contracts; project manager
04012.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_PostEmploy/04012.A.pdf	Post-employment	The Board determined that a departing long-time civil engineer was prohibited for one year from assisting or representing a new employer or client with respect to the construction of City arterial, residential or industrial streets, including new street construction, street rehabilitation or resurfacing, or installation of landscaped medians, curbs or gutters, or installation of streets lamps and pedestrian lighting, and subject to the permanent prohibition with respect to any construction contracts associated with a particular street improvement project, because the employee had supervised the performance of three construction contractors with respect to that project.	Post-employment; one year subject matter prohibition; participate personally and substantially in the subject matter; business transaction involving the City; civil engineer; residential, arterial or industrial streets; installation of landscaped medians, curbs and gutters; street lamps; pedestrian lighting; construction of an overpass; resident engineer; contract management authority; supervision of performance; reviewed daily reports from field inspectors; regularly conducted field inspections; chronicled contractors' work in a daily log book
04014.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_PostEmploy/04014.A.pdf	Post-employment	The Board determined that a departing City employee, a long-time engineer, was prohibited for one year from assisting or representing a new client or employer on transactions involving providing electrical engineering services related to the City's street lighting and traffic signal systems, including preparing designs plans and cost estimates.	Post-employment; one-year subject matter prohibition; participate personally and substantially in the subject matter; business transaction involving the City; preparing engineering plans; electrical engineering services related to the City's street lighting and traffic signal systems; subject matter as a type of work; engineer

<p>04015.Q</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/AO InterestCityBusiness/04015.Q.pdf</p>	<p>Appointed Officials; Financial Interest in City Business</p>	<p>A City department was advised that, if two potential appointees to a City board continued to own companies that had contracts with the Mayor's Office for People with Disabilities (MOPD), they would be in violation of the Ordinance, because the contracts would not be wholly unrelated to the work of the City board on which their membership was being contemplated. Thus, to serve, they would need to terminate these contracts or dilute their ownership percentage in the companies they owned so that their shares in these contracts were under the threshold provided by Ordinance.</p>	<p>Financial interest in City business; appointed officials; wholly unrelated; Mayor's Office for People with Disabilities; MOPD; architect; accessibility design; recusal; dilution of ownership interest; financial interest in the name of another</p>
<p>04021.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO PostEmployment/04021.A.pdf</p>	<p>Post-employment</p>	<p>This is a significant, precedential case. The Board determined that a former City employee was not prohibited from working as a day laborer under contract with a private company to service the same equipment the employee serviced during City employment, on the basis that the tradesman exemption applied, and the post-employment provisions were not intended to prohibit such post-City work.</p>	<p>Post-employment; tradesman exemption; absence of any specialized knowledge of City-specific standards; relative lack of discretion or authority; day laborer; union hall; registry; participated personally and substantially in the subject matter of the transaction; 'house'; position; repairs; disassembly machinery; fabricate new parts on a lathe; DUR contract; depends on requirements</p>
<p>04022.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO PostEmployment/04022.A.pdf</p>	<p>Post-employment</p>	<p>The Board determined that a departing City employee was subject to a one year prohibition on assisting or representing a new client or employer with respect to a designation conferred by the City – in effect, a bureau's process – and was subject to permanent prohibitions with respect to three types of administrative proceedings, as to those that were pending during the City employee's tenure, and any follow up proceedings.</p>	<p>Post-employment; one year subject matter prohibition; participate personally and substantially in the subject matter; business transaction involving the City; historical preservation; research and write designation reports; public hearing transcripts; national database; business transaction involving the City; process by which the City designates and preserves certain property; acquire knowledge of the practical application; personally and substantially involved in the process by which the City makes designations and reviews and comments on</p>

			applications for inclusion in a national database; participated personally and substantially in administrative proceedings, public hearings, or public meetings of a certain City committee; permanent prohibition as to any judicial or administrative proceeding involving the City
04023.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/December%20Chairs/4-14-12/04023.Q.pdf	Post-employment	A departing City employee was advised that the Ordinance's post-employment restrictions still apply even though the employee took advantage of a City-sponsored early retirement incentive program, and that the one year subject matter prohibition restricted the employee from preparing and interpreting construction specifications for departmental programs and inspecting and reviewing completed projects for code compliance. These are the very same functions on which the departing employee had been asked to work by the post-City employer.	Post-employment; early retirement incentive program; preparing and interpreting construction specifications for departmental programs and inspect and reviewing completed project for code compliance; voidable as to the City; oversee quality control; one-year subject matter prohibition; participated personally and substantially
04028.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_PostEmployment/04028.A.pdf	Post-employment	The Board determined that a long-term engineer who was departing City employment was subject to a one year prohibition with respect to the engineering, design and construction of City arterial, residential and industrial streets, which included providing construction observation services on behalf of a prospective employer; the Board also determined that the departing employee had not exercised contract management authority with respect to the projects that the post-City employer had.	Post-employment; one year subject matter prohibition; participate personally and substantially in the subject matter; business transaction involving the City; streetscaping projects; excavation work; infrastructure improvements; curbs; gutters; resurfacing; cost estimation; line and grade; alignment and elevation of the roadway; topographical surveys; installation of stamped asphalt; DUR contract; Depends Upon Requirements; resident engineer; construction of new industrial and residential streets; resurfacing of arterial streets; viaduct reconstruction; installation of median planters; quantities log; preparing pay-estimates; the engineering, design and construction of City arterial,

			residential and industrial streets; construction observation services; engineer
04031.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_PostEmploy/04031.A.pdf	Post-employment	The Board determined that a former employee was prohibited for one year from assisting or representing a new employer or client on environmental regulatory matters or compliance work at the City's airports, including with respect to construction, demolition, restoration, maintenance, repair, replacement or capital improvement of airport facilities.	Post-employment; one-year subject matter prohibition; participate personally and substantially in the subject matter; business transaction involving the City; environment regulatory matters; Chicago airports; O'Hare; Midway
04032.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_PostEmploy/04032.A.pdf	Post-employment; Attorneys	The Board determined that the post-employment restrictions did not prohibit a former employee from processing real estate tax exemptions for private property acquired for a City department's public improvement projects. During City employment, the employee did not participate in real estate acquisitions, or perform tax services, but was involved in processing grants and drafting legislation for transportation matters.	Post-employment; one-year subject matter prohibition; participate personally and substantially in the subject matter; real estate tax matters; tax rolls; acquisition of property for transit projects; tax exemptions
04041.Q https://www.chicago.gov/dam/city/depts/ethics/general/AO_PostEmploy/04041.pdf	Post-employment; Attorneys	A departing City employee was advised that the Ordinance did not restrict the employee's proposed post-City employment, which was to work on real estate conveyancing, specifically, to acquire property; and the former employee could work for a company designated as a Special Assistant Corporation Counsel, under contract with the Law Department. The opinion was limited to this particular identified work. The attorney had not been personally and substantially involved in the subject matter during City service but had been involved in the disposition of City property, not its acquisition.	Attorney; post-employment; Illinois Department of Revenue; property management; tax-exempt status; tax rolls; conveyancing; Cook County Board of Review; Cook County Assessor's Office; subject matter; participated personally and substantially; Plats of Opening; Plats of Subdivision; tax deed acquisitions; Corporation Counsel; Law Department; Special Assistant Corporation Counsel

<p>04048.Q</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec%20Chairs/LXIV/04048.Q.pdf</p>	<p>Non-profit Board Service</p>	<p>A department head was advised that the Ordinance did not prohibit uncompensated service on the board of a major museum in the City. The department head would not be asked to engage in fundraising, and the museum did not receive funding from the department headed. The department head was advised of the relevant restrictions, including representation, fiduciary duty, City property, and confidential information, and that, as a policy matter, that the department head seek and receive approval from the Mayor's Office before accepting the appointment.</p>	<p>Department head; Commissioner; non-profit board of directors; board of trustees; museum; major cultural institution; fundraising; fiduciary duty; representation of other persons; receive grants from the City; policy matter; policy question; approval from the Mayor's Office; appearance of impropriety; recuse at both ends</p>
<p>04049.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO Interest CityBusiness/04049-A.pdf</p>	<p>Financial Interest in City Business</p>	<p>This is a significant, precedential case. The Board determined that a City employee violated the Ordinance by owning 100% of a firm that was a disclosed subcontractor on a City contract to provide towing services, and where the firm was entitled to payment of up to \$200,000 over a three year period; the firm had already been paid more than \$6,245 in a single year for such services. The Board recommended that: (i) the employee's department impose appropriate sanctions on the employee; (ii) the City terminate the subcontract immediately, or give the employee the choice of whether to continue to subcontract and resign immediately from City employment; and (iii) institute procedures so that applications for subcontracts are thoroughly reviewed to ensure that the firms awarded them are</p>	<p>Prohibited financial interest in City business; subcontract; financial interest in the name of another; business ownership; contract, work or business of the City; towing services; MBE; WBE; disclosed subcontractor; employment sanctions; violation; entitled to receive money or compensation; City contract</p>

		not owned in part or whole by City employees. See <i>also</i> Case No. 96029.Q.	
04052.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_PostEmploy/04052.A.pdf	Post-employment	<p>The Board determined that neither the Ordinance’s one-year subject matter nor permanent contract management authority prohibitions applied to the proposed post-City employment of a former high-ranking City employee. The employee was advised to contact the Board for further guidance if these post-City employment plans changed, as it was clear that the employee had exercised contract management authority with respect to many City contracts, and had been involved in capital improvements, but not in promoting high speed rail (which was the subject matter of the proposed employment. The opinion notes that: (i) the one year prohibition begins running on the date an employee or official leaves City service, not on the date he or she stopped performing certain tasks or responsibilities; and (ii) assisting or representing a person, such as a new client or employer, includes helping the person seek as well as perform a City contract.</p>	<p>Post-employment; one-year subject matter prohibition; contract management authority; participated personally and substantially in the subject matter; promoting high speed rail; capital improvements; being running; date on which one year prohibition begins running; assisting a person to seek as well as perform a City contract</p>
04055.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_PostEmploy/04055.A.pdf	Post-employment	<p>This is a significant, precedential case. The Board determined that a former high-ranking City employee who became Executive Director of a “501(c)(3)” organization affiliated with the employer’s former City department, and which served as a fiscal agent with respect various departmental grants, was subject to a one-year subject matter prohibition. The prohibition covered any and all work,</p>	<p>Post-employment; one year subject matter prohibition; contract management authority; participated personally and substantially in the subject matter; assisting a person to seek as well as perform a City contract; consulting on purely internal matters or non-City matters; organizational or managerial matters of a City contractor or grantee; delegate agency; identifying consultants; designing promotional materials; drafting a</p>

		including meeting with or contacting departmental personnel or potential outside funding sources, that involves or requires assessment of or coordination with departmental policies, grants, programs, public service initiatives or technologies, and would be reasonably expected to be directed toward City action, or in which the City's involvement would be substantial. The opinions contains an extended discussion of what constitutes a "business transaction involving the City," and is especially relevant for former City employees or officials who take management positions with organizations or firms that have City contracts or grants, but who plan to be involved in the general management of these persons, but not in performing the contracts or grants.	strategic plan to the extent it does not require contact with City employees or officials; managing non-City contracts; identifying grant announcements or opportunities; reporting on national, regional or local forces impacting a market; marketing to potential funding sources; fundraising for a delegate agency; serving as a fiscal agent; business transaction involving the City; if the City's involvement is substantial; project is directed toward some City action; City sets the parameters of the transaction; involves or requires assessment of or coordination of City policies, grants, programs, public service initiatives or technologies; would reasonably be expected to be directed toward City action; Executive Director; delegate agency; 501(c)(3) organization affiliated with the employer's former City department
04058.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_PostEmployment/04058.A.pdf	Post-employment	This is a significant, precedential case. The Board determined that a former high-ranking City employee, who had become President and Chief Operating Office of a construction firm that was a City subcontractor, was subject to various permanent prohibitions, including with respect to judicial or administrative proceedings, and with respect to two (2) contracts on which the post-City employer was a subcontractor, and to a one year subject matter prohibition that included any business transaction involve the operation, maintenance or development of a major City service/infrastructure system. The Board also advised the former employee of the importance of establishing an impermeable ethical	Post-employment; marketing; subject matter; departmental processes; pending contracts; contract management authority; interacting with City governmental personnel; business transaction involving the City; impermeable ethical screen; construction; subcontractor; operation, development, or maintenance of a major City service/infrastructure system; President; Chief Operating Officer; voidable as to the City; cancellation of contract or subcontract; monetary penalties

		screen, as these prohibitions were personal as to former employee, but that violations could lead to cancellation of the contract and monetary penalties.	
04060.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_PostEmploy/04060.A.pdf	Post-employment	The Board determined that a departing City employee was subject to a one year subject matter prohibition with respecting to assisting or representing the post-City employer, a private foundation that had bid on and received City grants, on any matters involving City workforce development initiatives, but not to a permanent prohibition as to any of the six (6) grants that the new employer had from the City.	Post-employment; participated personally and substantially in the subject matter; contract management authority; interacting with City governmental personnel; subject matter; business transaction involving the City; delegate agency; private foundation; City grants; workforce development initiatives
05002.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/Opinions%20involving%20%22Sister%20Agencies%22/05002.q.pdf	Sister Agencies; Financial Interest in City Business; Outside Employment	This is a significant, precedential case. A City employee was advised that the Ordinance did not prohibit the employee from owning or operating a candy and toy vending machine concession business, or from applying for and receiving and operating a concession at Navy Pier. Because Navy Pier is owned and operated by the Metropolitan Pier and Exposition Authority, which is not a City agency, this would not constitute a prohibited financial interest in City business.	Financial interest in City business; financial interest in sister agency contract; not a City agency; MPEA; Navy Pier; candy and toy vending machine concession; concession contract; sister agency; CTA; Chicago Park District; Chicago Public Schools; outside business ownership; outside employment
05010.A https://www.chicago.gov/dam/city/depts/ethics/general/AO Interest CityBusiness/05010.A.pdf	Financial Interest in City Business	The Board determined that City employees would have a financial interest in and thus are prohibited from purchasing any unit of affordable housing though the City's Affordable Housing Commitment Ordinance (AHCO) if the difference between the unit's market price and affordable price (the City Subsidy Recapture Amount) is \$5,000 or more, but are not prohibited from renting units	Financial interest; affordable housing; participation by City employees in City housing assistance programs; purchase of City-owned property; City's Affordable Housing Commitment Ordinance; AHCO; Department of Housing; Department of Planning & Development; sign mortgages, pledges; mortgage agreement; affordable market price; artificial market; City Subsidy Recapture Amount

		offered through the program. Note: in 2012, the threshold amount was lowered to \$1,000.	
05011.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/AO InterestCityBusiness/05011.Q.pdf	Financial Interest in City Business; Outside Employment	A motor truck driver was advised that the Board does not have authority to approve or disapprove a change to the employee's work shift so the employee could work on any outside business the employee owned with a spouse – that is up to the department head under the City's Personnel Rules. The employee was advised that neither the employee's ownership of nor employment with the company violated the Ordinance.	Outside employment; outside jobs; motor truck driver; schedule change; approval of outside employment; Personnel Rules; business ownership; financial interest; appearance of impropriety; private business interests; work shift; day shift; night shift; either approve or disapprove; discretion of department head; authority of department head
05022.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_Employ_Relatives/05022.A.pdf	Employment of Relatives or Domestic Partners	This is a significant, precedential case. The Board determined that a high ranking City employee violated the Ordinance where the employee exercised contract management authority over a City contract with a person who contracted (in unrelated matters) with a business fully owned by the employee's relative for the relative to act as a lobbyist on the company's behalf. But the Board also determined that the employee did not violate another provision of the Ordinance, because the evidence showed that the employee was not using his position to assist the relative's business. The opinion is significant, precedential for its interpretation of §2-1456-130(c), which creates a presumption that an employee violates the Ordinance by exercising contract management authority over a person who contracts with a relative, but the presumption is rebuttable. The Board also recommended that the City department	Contract management authority; relative; employment of relatives; where any relative is employed by or has contracts with persons doing City work over which the employee has or exercises contract management authority; use or permit the use of one's City position to assist any relative in securing employment or contracts with persons over whom the employee or official exercises contract management authority; brother; lobbyist; presumption of a violation; rebuttable presumption; violation of the Ordinance; appropriate employment sanctions

		institute righter safeguards to prevent potential violations. <i>Cf.</i> Case 93032.A.	
05025.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/AOElectOfficials/05025.Q.pdf	Conflicts of Interest/Improper Influence; Elected Officials; Financial Interest in City Business	An alderman was advised that, by virtue of owning less than 1% of the outstanding common stock of a publicly-traded and publicly-owned company, the alderman had neither a financial nor economic interest in the company or its matters pending before City Council and the Ordinance did not prohibit the alderman from participating in or voting on the matter involving the company. Note: the threshold was changed to .5% in 2014. See <i>also</i> Case Nos. 96016.Q; 87053.D.	Alderman; elected official; conflict of interests; ownership of common stock; publicly traded company; business relationship creating a financial interest; dividends; economic interest; National Securities Exchange; shareholder; recuse; recusal; financial interest
05031.CNS https://www.chicago.gov/content/dam/city/depts/ethics/general/Deck%20Chairs/LXIV/05031.CNS.docx	Conflict of Interests; Appointed Officials; Special Service Areas (SSAs)	An executive of a business was advised that the Ordinance did not prohibit appointment to an SSA that encompassed the executive's employer's location, but that, as a City appointed official, the executive would need to recuse from SSA decisions that would affect the employer in a manner separately and distinctly from other SSA Commissioners or their businesses, or between the City and the employer directly. There was no need to recuse from SSA decisions that affected local businesses <i>in toto</i> , such as street cleaning, police protection, parades, or tax levies, even if the employer was the largest consumer of these services in the SSA's area. The executive was advised that, while there is no way to protect completely against the perception or appearance of impropriety, declining to serve was not necessary or required. <i>Cf.</i> Case Nos. 87079.A; 87067.A.	SSA's; Special Service Areas; SSA Commissioner; appointed official; recusal; employer of Commissioner; recuse from matters separately and distinctly affecting the employer; no need to recuse from decisions affecting the SSA and its member business <i>in toto</i> , or that would affect the employer indirectly; stress cleaning; resource allocations; police protection

05032.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_ElectOfficials/05032.Q.pdf	Representation of Other Persons; Attorneys; Elected Officials; Fiduciary Duty	An alderman/attorney was advised that the Ordinance did not prohibit the alderman's representation, as attorney, of a client in a personal injury lawsuit filed against the Chicago Transit Authority (CTA). It was highly unlikely that the City would become a party to the lawsuit. The alderman was advised of appropriate recusal requirements.	Fiduciary duty of an alderman; CTA; attorney/alderman; representation of party in an action where the City is a party and its interests adverse to the client's; personal injury lawsuit; Chicago Transit Authority; lawyer; Illinois Rules of Professional Conduct
05036.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_PostEmploy/05036.A.pdf	Post-employment	The Board determined that a departing City employee was prohibited from assisting a new employer in conducting training for the new employer's clients, because the employee had used a software tool and drafted various plans on which he might be asked to train, and this constituted personal and substantial participation in the subject matter.	Crisis management; software tool; post-employment one-year subject matter prohibition; OEMC; Department of Public Health; contract management authority; permanent prohibition; disaster preparedness; epidemiological outbreak; nuclear emergency; biological warfare; radiological emergency; chemical emergency; Department of Homeland Security; DHS; emergency response synchronization matrix;
05040.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_Lobby/05040.A.pdf	Pension Funds; Lobbyist Registration and Disclosure	This is a significant, precedential case. The Board determined that persons who lobby any of the four pension funds are not required to register as lobbyists with the Board of Ethics, under the Ordinance, because the pension funds are not City agencies, and thus these lobbyists are not attempting to influence City "administrative action" or "legislative action." This conclusion holds even when these persons are lobbying the City Treasurer or City Comptroller, who are ex officio members of some of these pension funds. The pension funds are created by and subject to Illinois statute. <i>See also</i> Cases 141280.A; 10047.CNS.	Pension funds; what is a City agency; Four Pension Plans; lobbyist; administrative action; legislative action; City Treasurer; City Comptroller; ex officio; Laborers & Retirement Board Employees Annuity & Benefit Fund of Chicago; Municipal Employees Annuity & Benefit Fund of Chicago; Firemen's Annuity & Benefit Fund of Chicago; Policemen's Annuity & Benefit Fund of Chicago; investment adviser; jurisdiction; not a City agency; Illinois Pension Code;
05047.Q	Conflicts of Interest/Improper	An alderman who leases business real estate from a private business, which in	Alderman; lease business property sites; Chicago Transit Authority; CTA; conflict of

https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_ElectOfficials/05047.Q.pdf	Influence; Elected Officials	turn leases it from the Chicago Transit Authority, was advised that the Ordinance does not prohibit the lease, but that it does place restrictions on the official if a matter involving the property or the company from which the official leases it is before the official.	interests; recuse; improper influence; business relationship; abstain; disclosure
05050.A https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_Lobby/05050.A.docx	Lobbyist Registration and Disclosure	This is a significant, precedential case. At Board staff's request, the Board determined that lobbyists must register and disclose individually, and that entity or "umbrella" registrations listing individual lobbyists are not permitted under the Ordinance.	Lobbyist registration; umbrella registrations; entity registration; individual lobbyist registration; law firm lobbyist registration; individual lobbyists
05051.Q https://www.chicago.gov/dam/city/depts/ethics/general/AO_PostEmploy/05051.Q.pdf	Post-employment	A former City employee, a District Foreman, who had left City employment more than one year prior was advised that the Ordinance did not prohibit employment with a subcontractor on a City contract, because the employee had not exercised contract management over that contract while a City employee.	Post-employment; permanent prohibition; contract management authority; work on a task order; no involvement in negotiation or supervision of performance of a City contract; District Foreman
05055.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_PostEmploy/05055.A.pdf	Post-employment	The Board determined that a former employee was prohibited for one year from assisting or representing any person or client on any City matters involving building permit applications, and thus could not effectively work as a Chicago permit expediter for one year. The Board also advised the former employee that, after the one-year period expired, the Ordinance's lobbyist registration requirements apply to certain activities that expediters may undertake.	Building expediter; lobbyist; Department of Zoning; Department of Construction and Permits; Department of Buildings; permits; zoning code; post-employment; one year subject matter prohibition; penalties for violation; personal and substantial participation in the subject matter

05067.Q https://www.chicago.gov/dam/city/depts/ethics/general/AO_RepresentingOthers/05067-Q_1.pdf	Fiduciary Duty; Representation of Other Persons; Non-profit Board Service; Outside Employment	A high-ranking City employee was advised that another employee, a direct report, did not violate the Ordinance by serving as a board member of one non-profit and assisting it with a grant application to a private foundation where the City was applying for a similar grant. Both employees were advised of the appropriate restrictions.	Grants specialist; non-profit; 501(c)(3); self-evaluation protocol; fiduciary duty; conflict of interests; non-profits in competition with each other for funds; representation; limited funds
05071.Q https://www.chicago.gov/dam/city/depts/ethics/general/AO_PostEmploy/05071.Q.pdf	Post-employment	A departing high-ranking City employee was advised that the Ordinance's post-employment provisions did not restrict post-City employment with a family foundation.	Post-employment; family foundation; one-year subject matter prohibition; Assistant Commissioner; contract management authority
05073.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_GiftsTravel/05073.Q.pdf	Gifts	A City department was advised that it could accept as a gift to the City a database platform for use for official City business, provided the gift was disclosed to the Board of Ethics and Comptroller.	Gift to the City; gift accepted on behalf of the City; software licensing; copyright
06001.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_PostEmploy/06001.a-postEmp.pdf	Post-employment; Confidential Information	The Board determined that a former City employee, a licensed electrician, was not prohibited from accepting a position to install new fiber optic cable and or surveillance cameras, even though a significant, precedential part of the employee's City career was doing the same work. The opinion focused on the fact that standard for laying fiber optic cable are industry-wide, and the City has no proprietary method for laying cable or connecting it to its surveillance network,	Post-employment; tradesman/trade skill exemption; electrician; fiber optic cable; industry-wide standards; personal and substantial involvement in the subject matter; confidential information; surveillance cameras; occupation skills of a profession; intended meaning of the one-year prohibition; upgrading existing infrastructure; new construction

		and the Board applied the tradesman/trade skill exemption, although it cautioned the former employee about using and divulging confidential information.	
06002.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_PostEmploy/06002.a.pdf	Post-employment	The Board determined that a former high-ranking City employee and appointed official was prohibited for one year from assisting or representing a new client or employer with respect to the process by which the City considers and decides building permit applications. This prohibition applied to transactions in which the City was a party, but also private transactions involving interpretations of that code, but did not apply to building permit or zoning applications on the former employee's own personal behalf, as an individual, and did not apply to contacts with City departments other than the ones names. The Board also determined that the former employee did not exercise contract management authority with respect to the project discussed.	One-year subject matter prohibition; subject matter as a departmental process; process by which the City considers and decides building and zoning permit applications; same rights as any individual homeowner or resident; contract management authority; personal and substantial participation; judicial or administrative proceeding
06012.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_InterestCityBusiness/06012.Q.pdf	Elected Officials; Financial Interest in City Business; Conflicts of Interest/Improper Influence	An alderman was advised that the Ordinance did not prohibit the purchase of a home in the ward at fair market value (any discount of more than \$50 would be considered a prohibited gift) from a developer that may have had or in the future have zoning matters pending before the alderman, or pursuing building or zoning permits for the home should an existing property be purchased and rehabilitated. However, not City financial assistance could be involved, and property could not be purchased from the	Alderman; elected official; purchase of home from a developer; economic interest in the matter; City financial assistance prohibited; recusal; recuse; same rights as any homeowner; private party transaction; conflict of interests;

		<p>City. Finally, if the alderman were to buy a home as part of the development, then the alderman would have an economic interest in the matter of the home purchase, and could submit applications to the City for any required permits in the same way that any private citizen may, but could not use the official aldermanic position to influence those judgments or decisions, and would need to abstain from and disclose any votes or discussions on the matter before City Council.</p>	
<p>06015.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO_Lobby/06015.lob.pdf</p>	Lobbyist Registration and Disclosure	<p>A Deputy Commissioner informed the Board that he had met with several businesspeople and advised them at the conclusion of the meeting to register as lobbyists. Board staff then ascertained that the Deputy knew of no further contact between the City department and the two businesspeople, and that no further contact was envisioned. Board staff wrote the two businesspeople, advising them of the lobbyist registration provisions and penalties for violating them.</p>	Unregistered lobbying; Board follow up with potential lobbyists
<p>06027.Q</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO_PostEmploy/06027.Q.pdf</p>	Post-employment	<p>A former City employee was advised that the Ordinance did not prohibit the employee from working on or responding to a Request for Proposals (RFP) to be issued by the Chicago Park District to redevelop Northerly Island. While this was a project of the Park District, it would involve the City, in that several aspects of the project would require City Council approval; however, the employee had not been personally and substantially</p>	<p>Northerly Island; RFP; Chicago Park District; one-year subject matter prohibition; business transaction involving the City; personal and substantial participation in the subject matter; landscaping; City Council approval;</p>

		involved in the subject matter of the transaction.	
06033.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_PostEmployment/06033A.pdf	Post-employment	<p>This is a significant, precedential case. A former high-ranking employee asked the Board to address whether the employee and another former high ranking City employee were restricted from assisting a new client in entering into an agreement with the City to develop property. The Board determined that the two former employees' conduct on the project did not violate the Ordinance's one-year and permanent post-employment prohibitions. Notably, the Board determined that one of the employees made several calls to City personnel about the project during the employee's first year of post-City employment, but these were in the nature of status inquiries: the former employee was gathering information about the progress made by the City on the environmental cleanup of a City-owned parcel, and informing the City of a damaged fence and fallen sign and asking about the status of repairs. These activities did not constitute assistance or representation within the meaning of the Ordinance.</p>	<p>Post-employment; assist or represent; status inquiries; phone calls; gathering information; one year subject matter prohibition; environmental cleanup of a parcel; redevelopment agreement; industrial redevelopment project; RFP; request for proposals; real estate; environmental remediation; contract management authority; planning area; Illinois EPA; NFR; no further remediation required; soil remediation work; tax increment financing; TIF</p>
06034.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_RepresentingOthers/06034.Q.pdf	Representation of Other Persons; Attorneys	<p>A City employee, an attorney, was advised that the Ordinance did not prohibit representing clients in two legal proceedings in which the City was a named defendant but does prohibit the employee from deriving any compensation or income from such representation. None of the employee's City duties involved representing the City or any of its departments in legal</p>	<p>Attorney; representation of clients in legal proceedings in which the City is an adverse party; fiduciary duty; administrative proceedings; Illinois Department of Human Rights; Equal Employment Opportunity Commission; Circuit Court of Cook County; <i>pro bono</i>; direct or indirect compensation or income; economic interest; fee screening arrangement; judicial or quasi-judicial proceeding</p>

		proceedings. Note: this case is distinguishable from cases involving aldermen/attorneys, who are subject to a more stringent fiduciary duty, and cannot undertake representation in such cases, even for no compensation or income.	
06037.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_FiduciaryDuty/06037q.docx	Fiduciary Duty; Representation of Other Persons; Non-profit Board Service; Outside Employment	This is a significant, precedential case. A City employee was advised that, by serving on the board of a non-profit, even if for no compensation, would tie the employee's hand because the employee would be prohibited from representing the organization's interests before any City department (including, most particularly, the employee's own department), unless the employee was merely performing the duties of City employment. However, the employee was advised to be aware that the perception would be that such representation was undertaken not as part of City responsibilities, but in a private capacity, and thus staff strongly recommended that the employee decline this Board service. See <i>also</i> Case No. 92012.Q	Non-profit board service; representation; fiduciary duty; appearance of impropriety; appearance of favoritism; non-ministerial; non-compensated board service; representation of other persons
06038.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_PostEmploy/06038.A.pdf	Post-employment; Attorneys	The Board determined that a departing City employee, an attorney, was not prohibited from assisting a post-City employer in acquiring properties for the expansion of O'Hare Airport through the O'Hare Modernization Program. The employee had been involved in real estate acquisition for the City through eminent domain, but this position involved acquisition through federal law and regulations, and the employee was not involved in acquisition of land for O'Hare.	O'Hare airport; OMP; O'Hare Modernization Project; O'Hare Land Acquisition Program; OLAP; FAA; Federal Aviation Administration; O'Hare Modernization Act; eminent domain; aviation; Federal Uniform Relocation Assistance and Real Property Acquisition Act; 433 acres of land; usage rights; easements;

<p>06040.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO_PostEmploy/06040A.pdf</p>	<p>Sister Agencies; Post-employment; Attorneys</p>	<p>The Board determined that a former high ranking City employee, an attorney, who had left City employment more than one year prior to the opinion's issue date, was not prohibited by the Ordinance from: i) taking a position with a law firm; or ii) from assisting or representing its clients in negotiating future union or collective bargaining agreements, because these agreements expire fully and are negotiated <i>de novo</i>; or iii) lobbying the City's sister agencies; or iv) analyzing or providing recommendations as to legislation introduced at the City, state or federal levels.</p>	<p>Attorney; post-employment; union agreement; collective bargaining agreement; negotiate; labor negotiations; contract management authority; <i>de novo</i>; expiration of agreements; lobbying; sister agencies; counsel of record</p>
<p>06050.Q</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO_PostEmploy/06050.Q.pdf</p>	<p>Post-employment</p>	<p>A departing high ranking City employee, who was an attorney, was advised that the Ordinance's one-year subject matter prohibition restricted the employee from assisting or representing a new employer or client with respect to the management, operation, maintenance, design or construction of City facilities, or acquiring or maintaining MBE or WBE status, or with respect to leasing or licensing agreements at two City facilities, but was not prohibited from taking a position with a vendor of the department, provided an impermeable ethical screen was established. Note: in May 2011, Shakman-exempt employees became prohibited from lobbying their former City department for a period of two years after leaving City service.</p>	<p>Post-employment; impermeable ethical screen; one-year subject matter prohibition; Minority- or Women-Owned business enterprises; M/WBE; construction management; capital planning; engineer; personal and substantial participation in the subject matter; negotiate leases; negotiate licenses;</p>
<p>06051.A</p> <p>https://www.chicago.gov/dam/city</p>	<p>Financial Interest in City Business</p>	<p>Without performing an independent investigation of its own but based on the fact provided by the investigating department, the Board determined that a</p>	<p>Financial interest in City business; trucking contract; Hired Truck Program; independent occupation, business or profession of a spouse or domestic partner; participation in</p>

/depts/ethics/general/AO Interest CityBusiness/06051.A.pdf		<p>City employee violated the Ordinance's Interest in City Business provision. The employee's spouse owned 100% of a company that had had City contracts under the Hired Truck Program, and the employee gave the appearance of being an agent for the spouse's company, and would receive calls from the City if trucks were needed pursuant to a contract, and used his walkie-talkies to communicate with the spouse, and actually drove trucks under contract. Thus, the employee participated in the business's operation and management, and the spousal exception to financial interest did not apply. The Board recommended that the department consider terminating the employee from City employment.</p>	<p>the operation or management of a spouse's or domestic partner's business; termination of employment; independent investigation; motor truck driver; advisor and consultant; appearance of being an agent for a company</p>
<p>06054.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO PostEmploy/06054.A.pdf</p>	<p>Post-employment</p>	<p>The Board determined that a former City employee was prohibited for one year from assisting or representing a new employer or client with respect to the construction, design, operation or maintenance of a City system, as the employee had been the Project manager over that program. This was a City-wide prohibition.</p>	<p>Post-employment; resident engineer; facilities improvement program; construction management responsibility; green roof project; City-wide subject matter; construction, design, operation, maintenance of a single City system</p>
<p>06060.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO PostEmploy/06060.A.pdf</p>	<p>Post-employment</p>	<p>The Board determined that a departing City employee was not subject to a one year or permanent prohibition with respect to supervising a major public facility day-to-day, but was subject to a one year prohibition with respect to assisting or representing a new client or employer on any work involving energy efficiency on any City-owned or City-leased properties. The opinion addressed only the job possibility presented.</p>	<p>Post-employment; one-year subject matter prohibition; day-to-day management; major public facility; one year City-wide prohibition; energy efficient for any City-owned or City-leased property; providing property management services; purpose of goal of a transaction as the subject matter; oversight of contractors</p>

06066.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_PostEmploy/06066.A.pdf	Lobbyist Registration and Disclosure; Post-employment	The Board determined that a former employee was not prohibited by the Ordinance from assisting a new client, a registered lobbyist, as an architect with respect to four real estate transactions involving the City, and was not involved in the subject matter of the business transaction involving the City.	Lobbying; architect; post-employment; HUD; one-year subject matter prohibition; personal and substantial participation; Lakefront Ordinance; Planned Developments; Zoning Ordinance; redevelopment agreement; green gut rehab; sister agencies
06073.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_PostEmploy/06073.A.pdf	Post-employment	The Board determined that a departing City engineer was prohibited for one year from assisting or representing a new client or employer with respect to providing design and construction of City roadways (City-wide), and permanently prohibited with respect to seven (7) specifically named projects, in which the employee had acted as project manager, including roadway design, formulating roadway specifications; redlining drawings; and performing final inspections	Post-employment; engineer; roadway construction; redlining blueprints and specifications; one year subject matter prohibition; project manager; City-wide prohibition; design; formulating roadway specifications; final inspections; construction phases; curbs and gutters; excavation; drainage structures; horizontal/vertical road location; personal and substantial involvement in the subject matter; contract management authority
06076.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_PostEmploy/06076.A.pdf	Post-employment	The Board determined that a former high ranking City employee was permanently prohibited from assisting or representing a new client or employer on several City contracts resulting from specific affordable housing development projects, and for one year from assisting or representing a new client or employer in any real estate project involving rehabilitation of buildings funded through several City programs, City-wide.	Post-employment; contract management authority; permanent prohibition; affordable housing; City funding programs; program-wide prohibition; loans to a troubled developer; monitoring Comptroller reports; flagging problems; separate divisions within a department; supervision of performance; HUD Good Neighbor Initiative; Chicago Rehab Initiative; Initiative 311 Campaign; keep City loans current
06079.A https://www.chicago.gov/dam/city/depts/ethics/general/AO Interest	Financial Interest in City Business	The Board determined that it is not a prohibited financial interest in City business if a City employee purchases a taxicab medallion, because the typical procedures by which medallions are sold constitutes public notice followed by	Financial interest; financial interest in the purchase of property that belongs to the City; competitive bidding following public notice; taxis; taxicab medallion; taxicab medallion license holders; lease of medallion

CityBusiness/06079.A.pdf		competitive bidding, and falls within the exception to a prohibited financial interest in City business. Thus, the Ordinance also does not prohibit a City employee from leaving the medallion to another, or from renewing it.	
07015.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_OutsideEmployment/07015.Q.pdf	Outside Employment	A City employee on a 3-month leave of absence was advised that, during this leave, they remained subject to the Ordinance, and were not prohibited from working for a City vendor during that time, but were subject to the standard restrictions, and could not make, participate in or attempt to influence any City decision affecting or benefitting the outside employer or any contracts it may have or be seeking. The employee was advised of several other restrictions that applied as well.	Outside employment; outside employment; leave of absence; Conflicts of Interest/Improper Influence; fiduciary duty; representation; recusal
07019.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_PostEmploy/07019-a.pdf	Post-employment	This is a significant, precedential case. The Board determined that a former high ranking City employee who asked whether the employee may assist a post-City employer on a City contract was not subject to a one year prohibition, since a year had already passed since the employee's resignation, but that the employee was permanently prohibited from assisting or representing the employee's new employer, or any other person other than the City, on any work arising under a Depends on Requirements (DUR) task order, as that task order was "part and parcel" of the original contract.	One-year subject matter prohibition; permanent prohibition; post-employment; contract management authority; task-order; architectural and engineering services; Depends on Requirements; DUR; contract; agreement to agree; consideration; scope of services; contract modification as a different contract; part and parcel of the original contract
07020.Q	Statements of Financial Interests; Travel;	An alderman was advised that the Ordinance does not require the official to disclose as gifts, on the official's	Not a gift; business travel; disclosure of travel expenses; reimbursement of travel expenses; aldermen; official responsibilities;

https://www.chicago.gov/content/dam/city/depts/ethics/general/AOSFI/07020.Q.pdf	Elected Officials	Statement of Financial Interests, travel expenses the official received from non-profit organizations for two trips taken, provided the trips were related to official City business. Note: this case is modified by 2012 amendments to the Ordinance, which require disclosure of business-related travel paid by a third party within 10 days of the travel.	Statements of Financial Interests; travel; paid a third party
07027.A https://www.chicago.gov/dam/city/depts/ethics/general/AOPostEmploy/07027-A.pdf	Post-employment	The Board determined that a high level departing City employee was prohibited for one year from assisting or representing a post-City employer with respect to projects involving razing, relocating, improving or repairing City-controlled infrastructure, but that the permanent prohibition did not apply with respect to any City contracts the new employer had.	Post-employment; subject matter; City-wide prohibition; real estate; infrastructure; contract management authority; personal and substantial participation; project manager; TIF assistance; Mayor's Office; Chief of Staff; departmental signoffs; business transaction involving the City;
07030.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/AOElectedOfficials/07030.Q.pdf	Elected Officials; Employment of Relatives or Domestic Partners	An alderman official was advised that the Ordinance did not prohibit the hiring of a relative as part of the alderman's personal staff pursuant to the exception set forth in §2-156-130(a) of the Ordinance.	Alderman; hiring; relative; family member; member of personal staff of alderman; nepotism; employment of relatives or domestic partner
07037.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/AOGiftsTravel/07037.Q.pdf	Gifts	A City department was advised that the Ordinance does not prohibit it from re-giving donated materials that it does not need to companies or persons who may be City vendors (<i>i.e.</i> , acting, in essence, as an exchange agent of these materials). The department was also advised to consult with the Law Department and the Mayor's Chief of Staff as policy matters.	Materials exchange; gifts to vendors; re-gifting donated materials; exchange agent; policy matters; gifts to the City; City-owned property

07043.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_PostEmploy/07043.A.pdf	Post-employment	The Board determined that a departing City employee was not prohibited from assisting a post-City employer on a new (prospective) contract with the employee's former City department.	Subject matter; one-year prohibition; contract management authority; employment with a vendor of one's City department
07044.Q https://www.chicago.gov/dam/city/depts/ethics/general/AO_OutsideEmployment/07044Q.pdf	Non-profit Board Service; Outside Employment	A City employee was advised of the relevant prohibitions that would apply with respect to working on a fundraising project for one non-profit while at the same time serving as a Board member for a second non-profit, especially with respect to soliciting donations.	Non-profit Board membership; volunteer service; non-profit; soliciting donations
07048.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_EmployRelatives/07048.A-ald-empofrel.pdf	Employment of Relatives or Domestic Partners	<p>The Board determined that an alderman was not prohibited by the Ordinance from hiring a relative as part of the alderman's personal staff, as either a City employee or a contractor, provided that neither the alderman nor any other member of City Council had a business relationship with the relative.</p> <p>Note: this case was superseded by changes made to the Ordinance in February 2010.</p>	Alderman; hiring; relative; family member; member of personal staff of alderman; City Council contractor; nepotism; employment of relatives or domestic partner; City Council committee staff; 1012 employee
07053.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_GiftsTravel/07053.Q.pdf	Elected Officials; Travel	An alderman was advised that the Ordinance did not prohibit acceptance of expenses for overseas travel for educational and cultural purposes, and that, as this was official travel, the trip did not need to be reported on the official's Statement of Financial Interests.	Elected official; alderman; travel; Statements of Financial Interests; overseas; foreign; educational or cultural purposes

<p>08004.Q</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO_PostEmploy/08004.Q.pdf</p>	<p>Post-employment</p>	<p>A departing high-ranking City employee was advised that the Ordinance's one-year subject matter prohibition applied to: (i) design and management of staff training and development for two City departments; (ii) performance management for two departments; (iii) the procurement and contracting process for a City department; (iv) management of a department's information technology process; and in effect, a one year prohibition as to a consulting contract. The opinion states the employee did exercise contract management authority with respect to any number of City contracts, but these were not at issue given the job opportunities the employee was pursuing.</p>	<p>Post-employment; one-year subject matter prohibition; performance management; staff training and development; procurement and contracting process; consulting contract</p>
<p>08008.Q</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_Lobby/08008.Q.pdf</p>	<p>Lobbyist Registration and Disclosure</p>	<p>The Vice President of a museum, a non-profit organization, was advised that registration as a lobbyist was not required, given that, under the Ordinance in effect at the time, an employee, officer or director of a non-profit entity who seeks to influence administrative or legislative action shall not be considered a lobbyist. Note: the case was superseded by Ordinance amendments made in July 2011 and July 2019.</p>	<p>Lobbyist; lobbying; seeking to influence legislative or administrative action; museum; non-profit; not-for-profit; exemption from lobbying</p>
<p>08010.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO_PostEmploy/08010.A.PDF</p>	<p>Post-employment</p>	<p>This is a significant, precedential case. The Board determined that a City employee who worked at Midway Airport would, if the proposed "privatization" of the airport proceeded, be allowed to assume a position with the consortium that would own and operate the airport, even if that position would otherwise be prohibited by the Ordinance. This is due</p>	<p>Privatization; Midway airport; pre-emption by state law; Illinois Public Act 094-0750; Local Government Facility Lease Act; Chicago Midway International Airport; legislative history; home rule unit of government; pre-emption; Representative Barbara Flynn Currie; relationship to other laws; post-employment; offer of employment on substantially similar terms; Public Law; Board</p>

		to a state law that pre-empted the City's Governmental Ethics Ordinance, and would require the successful bidder who would operate the airport to offer the employee and others similarly situated employment, with compensation and other terms similar to those of the employee's current City employment. The opinion discusses the legislative history of the act on the floor of the Illinois General Assembly.	required to follow Public Law; legislative history; Illinois General Assembly
08015.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec%20Chairs/4-14-12/08015.Q.pdf	Non-Profit board Service; Fiduciary Duty	This is a significant, precedential case. A high-ranking employee was advised to consider resigning from the board of a non-profit organization, one of whose partner organizations had a large, multi-year contract with the employee's department, in order to avoid even the appearance of impropriety or favoritism and best comply with the Ordinance's fiduciary duty provision. <i>See also</i> Case No. 06037.Q.	Non-profit board service; departmental vendor; appearance of impropriety; multi-year contract; not-for-profit; volunteer board service; departmental contractor; conflict of loyalties; social service organizations; airport; travelers; aid
08026.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_PostEmployment/08026.A.pdf	Post-employment	The Board determined that a high-ranking departing City employee was subject to the one-year subject matter prohibition regarding assisting or representing anyone with respect to designing and maintaining certain City security systems.	One-year subject matter prohibition; security systems; LAN; WAN; networks; Network Architect; hydraulic hammer; business transaction involving the City; FBI; 911 network; camera; Local Area Networks; Wide Area Networks
08029.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_ConflictOfInterest/08029.A.pdf	Conflicts of Interest; Representation of Other Persons; Non-profit Board Service; Financial Interest in City Business; Outside Employment	This is a significant, precedential case. The Board determined that a City employee who served, unpaid, on the board of a non-profit organization (of which the employee's domestic partner was the founder and director) that was interested in purchasing a building and receiving Tax Increment Financing (TIF)	Service on a board of directors; non-profit organization; tax increment financing assistance; Department of Planning & Development; redevelopment agreement; independent occupation, business or profession of a spouse, domestic partner, or relative; conflicts of interests; representation; recuse; recusal; recuse at both ends;

		assistance from the City for that purchase, would not violate the Ordinance if the transaction proceeded, but was required to recuse completely “at both ends,” and could not “represent” the entity in any City transaction. The opinion also discusses the financial interest in City business provision, and the exception for a relative independent occupation, profession or business, and the provision’s application to non-profit organizations.	financial interest in City business; alter ego; 501(c)(3) organization; artistic director; arts organization;
08030.A https://www.chicago.gov/dam/city/depts/ethics/general/AO Interest CityBusiness/08030.A.pdf	Appointed Officials; Financial Interest in City Business; Post-employment	This is a significant, precedential case. The Board determined that: (i) an appointed official, who had an ownership interest in two affiliated companies, would be in violation of the Ordinance if either company were to receive a subcontract on a construction project, because that project would need approval from the official’s City board, and thus was not wholly unrelated to the official’s City work, and was work authorized by City ordinance; and (ii) if the official were to resign from the City board, the official would personally be prohibited from assisting or representing either company in such a transaction, but that this prohibition is personal, and that either firm or its employees or owners may bid on such contracts or subcontracts.	Appointed official; City contract; subcontract; general contractor; construction contract; redevelopment plan; redevelopment areas; financial interest in City business; ownership interest; in the name of another; financial interest; work or business of the City; paid with funds administered by the City or authorized by ordinance; wholly unrelated; statutory mandate; post-employment; impermeable ethical screen; assist or represent; permanent prohibition; administrative proceeding involving the City; real estate development; one-year subject matter prohibition; personal and substantial participation; business transaction involving the City; contracts that can be performed only because of City action; City-sponsored financing; subject matter as each site or parcel of real estate to be developed
08033.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/AO	Conflicts of Interest/Improper Influence; Outside Employment	A high-ranking City official was advised that the Ordinance did not prohibit proposed employment as an adjunct professor at a local college, given that the class to be taught does not convey information that would give students an advantage with respect to programs or	Teaching; inside information; unfair advantage; hiring practices; labor relations; money for advice or assistance

ConflictOfInterests/08033-Q.pdf		loans administered through the official's City department.	
08037.A https://www.chicago.gov/dam/city/depts/ethics/general/AO_PostEmploy/08037.A.pdf	Post-employment	The Board determined that a departing City employee was subject to a one year subject matter prohibition on assisting or representing any person in any real estate transaction in a particular planning area of the City, including seeking or coordinating City financial assistance with respect to retrofitting industrial properties for energy efficiency, and to various permanent prohibitions with respect to certain real estate transactions.	Post-employment; one-year subject matter prohibition; retrofitting industrial properties; planning area; personal and substantial participation; redevelopment agreement; Sustainable Growth Initiative; green retrofitting; business transaction involving the City; City financial assistance; personal and substantial participation; geographical subject matter; Project Manager
08038.A https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_InterestCityBusiness/08038-FICB.pdf	Financial Interest in City Business	The Board determined that a City employee would not have a prohibited financial interest in the purchase of City property by paying \$5,000 for a home under the City's Preserving Communities Together (PCT) Program, because the property would be sold pursuant to a process of competitive bidding following public notice, which constitutes an exception to the definition of (prohibited) financial interest. The property was posted on the Department of Housing's website for a minimum of 30 days, and then in the newspaper for several weeks.	Financial interest in the purchase of City-owned property; sold pursuant to a process of competitive bidding following public notice; sale advertised on the internet; City website; eligible program; submit a proposal; Department of Housing; Preserving Communities Together Program; PCT; negotiated sale; real estate sales; Community Development Commission; CDC
08039.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_GiftsTravel/08039-Q.pdf	Travel	City employees from the Chicago Public Library were advised that they could accept reasonable travel expenses paid by the Trade Commission of Spain to attend the annual Spanish book fair in Spain.	Travel; foreign country; reasonable travel expenses; furnished in connection with public events, ceremonies related to official City business; furnished by the sponsor of the event; not based on a mutual understanding that official decision or actions would be influenced; LIBER; Spain

<p>08051.A</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_PostEmploy/08051-A.pdf</p>	<p>Post-employment</p>	<p>The Board determined that a former City employee was prohibited, for one year, from assisting or representing any person, including the post-City employer, with respect to securing vacant or unimproved parcels of real estate owned by the City, some of which would be slated for demolition. The Board also determined that the employee did not exercise contract management authority with respect to the post-City employer's City contract.</p>	<p>Post-employment; one-year subject matter prohibition; contract management authority; type of transaction City-wide; vacant properties; board-up; demolition; fence installation; security</p>
<p>08059.A</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_PostEmploy/08059-A.pdf</p>	<p>Post-employment</p>	<p>The Board determined that a former employee, a Mechanical Engineer, was prohibited for one year from assisting or representing a new employer or client with respect to projects involving water or sewer mains, and other infrastructure projects in the former employee's department. The Board also determined that the employee was permanently prohibited from working on a specific contract, even though that contract had not been finalized at the time the employee left City employment.</p>	<p>Engineer; air compressors; water mains; sewer mains; mechanical ducts; HVAC; pump houses; engineering contracts; bid materials; contract specifications; designs; drawings; Remaining Core Area; contract management authority; Update of Design and Construction Standards; Core Area; impermeable ethical screen; assist or represent;</p>
<p>09005.A</p> <p>https://www.chicago.gov/dam/city/depts/ethics/general/AO_PostEmploy/09005.A.PDF</p>	<p>Post-employment</p>	<p>The Board advised a departing high-ranking City employee that the employee was subject to a:</p> <ol style="list-style-type: none"> 1. one-year prohibition with respect to City grant-related processes, and 2. "permanent" ban with respect to several Task Order contracts, a master agreement, and contracts involving various technologies. 	<p>Post-employment; task order; PO; master agreement; client services; business development; structural operations; software; depends upon requirements contract; DUR; CIO; Chief Information Officer; customer service; performance management; statistics; capital improvements; TIF; tax increment financing; aldermanic menu; ADA; Americans with Disabilities Act; grants; FMPS; HUD; draft action plan; after-school activities; quality control; contract management authority; monitoring; tax credits; YMCA; GPS installation; facilitator;</p>

			grant money; subject matter; participated personally and substantially; ultimate responsibility; financial operations; business transaction involving the City; child care; obtaining and managing grants for City departments; lobbyist; definition of lobbying
09007.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/AOFiduciaryDuty/09007.q.docx	Fiduciary Duty; Representation of Other Persons; Non-profit Board Service; Elected Officials; Outside Employment	An alderman was advised that there was no prohibition on serving as a part-time Executive Director of a non-profit museum in the alderman's ward, but there were restrictions: using the alderman's City title and authority; representing the museum in City transactions; delegation of aldermanic approvals; accepting anything of value in return for providing advice or assistance on City business; use of City property or confidential information to benefit the museum.	Alderman; executive director; museum; unpaid; volunteer; fundraising; private donors; Joyce Foundation; MacArthur Foundation; fiduciary duty; City's best interests; conflicts of interest; best judgment; private purpose; City title or authority; confidential information; recusal; money for advice or assistance on matter concerning the business of the City
09011.A https://www.chicago.gov/content/dam/city/depts/ethics/general/AOGiftsTravel/09011.A.pdf	Gifts	This is a significant, precedential case. The Board determined that, to be a sponsor of an event, a person or entity must be either the event's beneficiary (if a fundraising event) or play a substantial role in organizing the event. Merely donating money to underwrite the event, even if recognized as a "gold" or "platinum" "sponsor," does not itself make one a sponsor.	What is the sponsor of a public event; charity event; reasonable hosting; furnished by the sponsor of such public event; platinum sponsor; buying tables; substantial role in organizing the event; invitations to events; galas; awards banquets; fundraising gala; event's sponsor; event's contributor
09012.A https://www.chicago.gov/content/dam/city/depts/ethics/general/AOFiduciaryDuty/09012-a.pdf	Fiduciary Duty; Outside Employment; City Property; Gifts	This is a significant, precedential case. The Board determined that a City employee violated the Ordinance's fiduciary duty, City property, and money for advice (now gifts) provisions by receiving compensation for testifying as an expert witness in court cases, regarding the employee's expertise on City codes and laws, and by accessing	City records; City property; expert witness; money for advice; solicit or accept any money or other thing of value in return for advice or assistance on matters concerning the operation or business of the City; City-issued computer; wholly unrelated; access to documents outside Freedom of Information process; FOIA; take advantage of his City position; private business transactions;

		departmental records and using a City computer to prepare expert testimony. The Board recommended termination.	deposition testimony; outside employment; Personnel Rules
09014.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/AOFiduciaryDuty/09014q.pdf	Fiduciary Duty	<p>A City employee received a letter from a citizen claiming that the employee could not be objective in a City hearing over which the employee was presiding, involving a facility serving LGBTQ youth, because the employee's domestic partner contributed to a different group that assisted these youth, and the employee was a member of the LGBTQ community.</p> <p>The employee was advised that nothing in the Ordinance prohibited the employee from making this decision, and that the employee's fiduciary duty to the City required that if, in the employee's judgment, it was not possible to make a professional, impartial judgment, the employee should recuse. The opinion discusses relevant standard of judicial canons of ethics with respect to judge's who make charitable contributions or whose spouses do, or because of the judge's sexual orientation.</p>	Judicial ethics; ABA Canons; sexual preference; LGBTQ; fiduciary duty; unbiased; impartial; subjective test; bias; sexual orientation; charitable contribution; recuse; no monetary interest in the outcome of the matter
09015.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/AOFiduciaryDuty/09015-Q.pdf	Fiduciary Duty; Representation of Other Persons; Non-profit Board Service	A City employee was advised that there was no prohibition on serving as a volunteer member of a non-profit organization's board, but there were restrictions. The opinion goes through each of these restrictions.	Unpaid junior board member; non-profit organization; fundraising; fiduciary duty
09033.A	Appointed Officials; Financial Interest in City Business;	The Board determined that a City appointed official who was a partner in a family partnership would not violate the	Appointed official; 20% ownership interest; wholly unrelated; prohibited financial interest in City business; partnership; City monetary

https://www.chicago.gov/content/dam/city/depts/ethics/general/AO%20OutsideEmployment/09033A.pdf	Outside Employment	Ordinance if the partnership applied for and received City financial assistance, as the program applied for was wholly unrelated to the work of the official's City board.	assistance; appointed by the Mayor; technical review; confirmed by City Council; not-for-profit; rollout; community meeting; application process; lottery; family partnership; commercial property; influence decisions; ex officio; City-owned land; evaluate applicants; SBIF; TIF-funded projects;
09034.A https://www.chicago.gov/content/dam/city/depts/ethics/general/AO%20FiduciaryDuty/09034A.pdf	Fiduciary Duty; Outside Employment; City Property	<p>This is a significant, precedential case. The Board, reviewing an investigation conducted by another City department of an employee who had used a City-issued laptop computer to record political contributions, and contributions to a union ad book, all of which the employee had solicited from vendors, determined that the employee violated the Ordinance's fiduciary duty and City property provisions. The Board recommended termination, and that the Law Department review whether the employee intentionally violated the Ordinance in a way that would also constitute a violation of state law, subjecting the employee to criminal penalties.</p> <p>The case establishes a test to determine whether an employee or official violates the fiduciary duty to the City by soliciting vendors: (i) was the activity in furtherance of or part of an approved City initiative; (ii) did the employee personally and directly solicit the vendor; (iii) did the employee have direct authority over the vendor or its contract; and (iv) would a reasonable person infer that the vendor's relationship would be affected by agreeing to or refusing the solicitation?</p>	Internal investigation; laptop computer; political donations; use of City property; intentionally misuse; solicit; solicitation of vendors or contractors; direct authority; union ad book; contributions; City-approved initiative; fiduciary duty; reasonable person; four pronged test; private benefit; consequences of agreeing to contribute; not contribute; Illinois Officials and Employees Ethics Act; state law; Class A misdemeanor; enhanced access; February 2003 election; voters' names; political affiliations; golf outing; sponsor a hole; charity benefit; fundraising; handheld computer; personal business; supervising contractors or vendors; making recommendations; union fundraising ad book

		See <i>also</i> Case Nos. 92014.A; 87052.A.	
09035.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_GiftsTravel/09035-Q.pdf	Travel	City employees from the Chicago Public Library were advised that they could accept reasonable travel expenses paid by the Trade Commission of Spain to attend the annual Spanish book fair in Spain.	Travel; foreign country; reasonable travel expenses; furnished in connection with public events, ceremonies related to official City business; furnished by the sponsor of the event; not based on a mutual understanding that official decision or actions would be influenced; LIBER; Spain
09057.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_ConflictOfInterest/09057Q.pdf	Conflicts of Interest/Improper Influence	A City employee who served as an unpaid board member of a City delegate agency was advised to recuse “at both ends,” from any negotiations between the City and the organization on whose board the employee sat and was strongly encouraged to resign from the outside board.	Non-profit service; delegate agency board; recuse at both ends; recusal; fiduciary duty; representation of other persons; non-compensated; volunteer; outside board; not-for-profit organization
09058.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_CampFinancing/09058Q.pdf	Campaign Financing	This is a significant, precedential case. A City elected official was also a candidate for a non-City elected office. As required by state law, the official established two separate political committees, one per office. Each committee had already received \$1,500 in contributions from a person doing business with the City; the person wished to donate more. The Board determined that each committee could keep its \$1,500 contribution, but the business could not contribute any more to the non-City elected office committee unless the official reached the general election, which is a separate candidacy. The case is important in that Board construed the language limited contributions by certain persons to “any	Campaign contributions; contributions to a City official or employee seeking election to any other office; \$1,500 per year limitation; state elected office; County elected office; equity; fairness; incumbent elected official running for non-City office; candidacy; primary election; general election; separate candidacies; candidate committee; Illinois Election Code

		<p>official or employee of the City who is seeking election to any other office.” This case would apply to, among others, sitting aldermen running for Ward Committeeman, or judge, or state office. See <i>also</i> Case No. 90052.A.</p>	
<p>10004.A</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_GiftsTravel/10004.pdf</p>	Gifts	<p>This is a significant, precedential case. The Board determined that a high-ranking City employee had violated the Ordinance’s gift provisions by soliciting and receiving a gift of personal services from a vendor of the department, the services being provided during regular City business working hours, and in City offices, and not being part of the vendor’s contract or paid for by the employee. The Board admonished the employee that the conduct created the impression that the employee’s judgment as a City employee could be compromised. The Board recommended that the employee immediately reimburse the vendor for the value of the services, immediately cease accepting the services, discuss the Board’s determination with the Mayor’s Office and Law Department, and report back to the Board on what action was taken. The Board stressed that it had the authority to initiate an investigation into the matter, but that, in its judgment and discretion, an investigation was unnecessary, as the employee had approached the Board voluntarily and in good faith, and in confidence, and the facts were not in dispute and were known. See <i>also</i> Case No. 11004.A, which dealt with the vendor.</p>	<p>Personal services; provided in City offices during regular City working hours; economic interest in a specific City business, service or regulatory transaction; substantially affect such transaction; gift; anything capable of valuation in monetary terms; anything given without consideration or expectation of return; \$50 limit; substantially affect; vendor; confidentiality of advisory opinions; admonition; letter of admonishment; investigation;</p>

<p>10005.A</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/AO%20OutsideEmployment/10005.pdf</p>	<p>Financial Interest in City Business; Statements of Financial Interests; Outside Employment</p>	<p>The Board advised a City department that, whether one of its employees violated the Ordinance by working part-time for (and possibly being an owner of) a business owned by a relative, which business had a contract with the department, was unclear. The employee's Statements of Financial Interests were inconclusive on this point, or whether he had an ownership interest in the business. The Board recommended that the department consult with the Law Department and the Inspector General's Office to obtain the relevant facts. The provisions at issue were the "Money for Advice" prohibition, which prohibits City employees from receiving anything of value in return for giving advice or assistance concerning City business.</p>	<p>Outside employment; financial interest; any interest of a relative which interest is related to or derived from the relative's independent occupation, business or profession; Statement of financial interests; City contractor; vendor; wholly unrelated</p>
<p>10008.A</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/AO%20SFI/10008.A%20redacted-1-.pdf</p>	<p>Statements of Financial Interests</p>	<p>The Board determined that the board of directors of a newly formed commission were not appointed officials (thus not required to file annual Statements of Financial Interests) because the commission itself is not a City agency. The opinion goes through the analysis of what is and is not a City agency.</p>	<p>Not a City agency; City agency; appointed official; criteria for determining a City agency; appointed by the Mayor; confirmed by City Council; funded primarily through the City budget; established by ordinance</p>
<p>10009.A</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/AO%20PostEmploy/10009.A-redacted.pdf</p>	<p>Sister Agencies; Post-employment</p>	<p>The Board determined that a departing City employee was not subject to a prohibition on installing equipment within the City through a contract that the employee's prospective employer had with a City sister agency. The case is notable because the Board concluded that the contract did constitute a business transaction involving the City, because the sister agency was provided with</p>	<p>Sister agencies; business transaction involving the City; participated personally and substantially in the subject matter; one-year prohibition; subject matter; installation of equipment; project manager; City network; tradesman exception; trade skill exception</p>

		specifications regarding compatibility with the City's equipment, and the equipment would eventually be linked to the City networks.	
10021.A https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_GiftsTravel/10021A.pdf	Gifts; Elected Officials	This is a significant, precedential case. The Board issued a comprehensive opinion addressing whether City officials may purchase sports or entertainment tickets to high-demand events at face value. The Board determined that this practice would not violate the Ordinance, but recommended against it, as it gives the impression that government officials or employees have special access to be able to buy such tickets. Note: this opinion addresses situations in which the official or employee would appear in a private capacity, not in an event in which he or she is announced or makes a public appearance. See also Case Nos. 91079.A.; 16032.A.	Baseball tickets; sports tickets; concert tickets'; high-demand tickets; market value; face value; special access; appearance of impropriety; proper use of government authority or position; public event or appearance or ceremony related to official responsibilities; fair market value; spirit of the law; letter of the law; foster public confidence in government; elected officials; public officials
10025.A https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_PostEmploy/10025.a.pdf	Post-employment	The Board determined that a City employee would not be prohibited, after retiring from City service, from being nominated to and serving as an SSA (Special service area) board member, an appointed official position, even though the employee would be working on matters from which the employee would otherwise be prohibited from working on by the Ordinance's post-employment provisions.	Post-employment; SSA; Special Service Area; Commissioner; appointed officials; continuity of City service; inside knowledge; impairing integrity of City government services; separate terms of City employment or service; trigger of post-employment provisions; termination of her employment or term of office; former employee; former official; contractor; transfer; a change in positions within City service
10033.A https://www.chicago.gov/content/dam/city/depts/ethics/general/AO	Post-employment	The Board determined that a departing City employee would not be subject to one year or permanent prohibitions if the employee were to become a member of an advisory board of a non-profit agency. The opinion explains that the functions	Managerial employee; Advisory Board; City-owned land; non-profit agency; New Market Tax Credits; NMTC; federal income tax credits; private sector investment; LIC; Low-income communities; purely consultative body; one year prohibition; subject matter;

PostEmploy/10033.A redacted-1-.pdf		the employee performed while a City employee were qualitatively different from and thus a separate subject matter from the work of the advisory board.	participated personally and substantially in the subject matter; business transaction involving the City; day-to-day operations managed by City employees; maintain accountability to low-income communities; provide funding; make funding decisions; contract management authority
10037.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/Deck%20Chairs/6/10037.Q.docx	City Property	A high-ranking City employee was advised that, while the Ordinance did not prohibit the employee from appearing without compensation in a filmed advertisement for a City vendor's product – the ad to be used in client and potential client webinars – Board staff strongly discouraged the appearance because there appeared to be no advantage to the City in terms of increased knowledge or technical expertise; the question was ultimately a policy question, for the Law Department and Mayor's Office, as to whether to lend the City's imprimatur to the vendor. Cf. Case No. 98038.Q.	City property; product endorsement; policy question; use of City title; City's imprimatur; print advertisement; webinar; commercial endorsement; Law Department; Mayor's Office; uncompensated
10038.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/AOGiftsTravel/10038.Q redacted-1-.pdf	Travel	A City employee was advised that acceptance of an offer of reasonable travel expenses to a professional conference, and a merit award of \$2,500 if selected were not prohibited. Note: under changes to the Ordinance effective November 1, 2012, the Ordinance would prohibit acceptance of this monetary award.	Travel; award for public service; reasonable expenses
10041.36.LOB https://www.chicago.gov/content/dam/city/depts/ethics/general/AO		This is a significant case. The Board considered a case involving a registered lobbyist who had failed to file a semi-annual lobbying activity report, and whom the Board had fined \$1,000 per day, and terminated his registration, as provided in	Lobbyist; lobbying activity report; late filing; accrued fines of \$1,000 per day; death of a relative; equity; fairness; Homestead cases; court of equity; waiver of fines; reinstatement of lobbyist registration

Lobby/10041.36.L OB.pdf		<p>the Ordinance (after providing him with his due process rights). However, the now-terminated lobbyist wished to re-register, filed the semi-annual report, but asked the accrued fines to be waived due to hardship (the Ordinance provides that a re-registration not be accepted until all outstanding fines are satisfied). The Board determined to waive the outstanding fines, because the lobbyist presented extenuating circumstances, namely: a death in the family, religious observance connected therewith, and a loss of computer service.</p> <p>The case illustrates the Board's "equity jurisdiction." See <i>also</i> Cases 90040.A; 90058.A; 17004.A.</p>	
<p>10042.CNS</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_GiftsTravel/10042.CNS.pdf</p>	<p>Gifts</p>	<p>This is a significant, precedential case. The Board clarified the conditions under which City employees can participate in City-approved charitable drives, and under what conditions City letterhead could be used.</p>	<p>Fundraising; City fundraising efforts; City-approved effort; City-approved fundraising campaign; solicitation of charitable contributions; departments competing with each other; voluntary contributions; use of City letterhead or stationery; Department Head's authority; City property;</p>
<p>10046.CNS</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_GiftsTravel/10046.CNS.pdf</p>	<p>Gifts</p>	<p>The Board outlined the factors in considering when the Ordinance's gift restrictions should apply to acceptance by City employees or officials of benefits (like travel, or equipment) that are part of negotiated contract provisions. The test is whether the offered item or service meets a business purpose test; acceptance is not automatic. See <i>also</i> Case 10062.CNS.</p>	<p>Negotiated contracts; travel provided for in a contract; equipment provided for in a contract; business purpose; contract provisions; valid business purpose; not a gift; gift accepted on behalf of the City; Department of Defense; reasonable</p>

<p>10047.CNS</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/AOPostEmploy/10047.CNS.pdf</p>	<p>Post-employment; Pension Funds; Lobbyist Registration and Disclosure</p>	<p>A departing City employee went to work for a financial firm and asked whether the Ordinance prohibited solicitation of the City's four pension funds. The Board determined that such transactions with the pension funds are not "business transactions involving the City" and thus there were no relevant post-employment prohibitions, and no requirement that the individual engaged in such activity register as a lobbyist. <i>See also</i> Cases 141280.A; 10047.CNS</p>	<p>Pension funds; not a City agency; business transaction involving the City; money management instruments; Laborers' & Retirement Board Employees' Annuity & Benefit Fund of Chicago; Municipal Employees' Annuity & Benefit Fund of Chicago; Firemen's Annuity & Benefit Fund of Chicago; Policemen's Annuity & Benefit Fund of Chicago</p>
<p>10052.Q</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec20Chairs/6/10052.q.docx</p>	<p>Board of Ethics Members and Staff; Financial Interest in City Business; Attorneys; Conflict of Interests</p>	<p>A prospective member of the Board of Ethics, an attorney and associate in a law firm that did business with the City, was advised that the Ordinance did not prohibit appointment to the Board, because, as an associate attorney in the firm, the prospective Board member had ownership in it or in its revenues, and "financial interest" depends on having an ownership interest in the legal person with the City contract(s).</p> <p>The prospective Board member was advised of the Board's own rule on conflicts of interest and recusal (Rule 2-5), and to avoid performing any legal work for the firm in which the City is its client, in order to avoid even the appearance of impropriety. <i>See also</i> Case No. 95004.A.</p>	<p>Board of Ethics member; financial interest; ownership interest in the legal person or entity with a City contract; attorney; associate in a law firm; not a partner; Board Rules and Regulations; recusal; recuse;</p>
<p>10054.CNS</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec</p>	<p>Conflict of Interests</p>	<p>The Department of Buildings was advised on strengthening its internal conflicts of interest disclosure form for its building inspectors.</p>	<p>Department of Buildings; inspectors; conflicts of interest; disclosure forms; property in the City; inspections; recusal; notification; departmental internal policies</p>

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10058.A https://www.chicago.gov/content/dam/city/depts/ethics/general/AOLobby/10058.A_redacted.pdf	Lobbyist Registration and Disclosure; Attorneys	This is a significant, precedential case. The Board determined that attorneys need not register as lobbyists when they represent clients in contractually required, formal mediations with the American Arbitration Association (AAA), in which the City is a party; or in a formal, binding arbitration in accordance with the AAA's commercial arbitration rules.	Lobbyist; attorneys; lawyers; representing clients in a formal adversarial hearing; lobbying; not lobbying; arbitration; mediation; American Arbitration Association; AAA; lawyers as lobbyists
10060.CNS https://www.chicago.gov/content/dam/city/depts/ethics/general/Deck%20Chairs/6/10060.CNS.pdf	Outside Employment; Conflicts of Interest; Gifts	A City department was advised that its employees were not prohibited from being compensated as instructors as a State-sponsored institute on subject that appeared to be related to their professional skills, provided: (i) no department employee serving as an instructor could be involved in any decisions affecting contracts between the City department and the state-sponsored institute; and (ii) no City employee serving as an instructor could affect any City decisions (such as hiring or promotion) with respect to any student of the employee's at the institute; and (iii) no departmental employee could teach any standards or techniques that are unique and apply solely to the City of Chicago, but must keep to teaching techniques utilized generally as industry standard. See <i>also</i> Case 10024.CNS.	Teaching; institute; grants; Public Safety Academy; Department of Homeland Security; instructors; money for advice or assistance; receipt or solicitation; wholly unrelated; give students an inside advantage; instructor has supervisory authority over students; City standards; industry-wide standards; wholly unrelated
10062.CNS https://www.chicago.gov/content/dam/city/depts/ethics/general/Deck%20Chairs/6/10062.CNS.pdf	Gifts; City Property	A department head was advised that City departmental employees who were provided with cell phone or vehicles by a vendor, pursuant to the terms of City contracts did not thereby violate the	City contract; Law Department; Illinois Procurement laws; vehicles; cell phones; provided to City employees pursuant to contract; not prohibited; review by Law Department; prohibited gift; property owned

hics/general/Dec k%20Chairs/6/10 062.CNS.pdf		<p>Ordinance, but that the Board agreed that the practice should be suspended, pending review by the Law Department. The review should focus on amending contracts to prohibit the practice or at least clarify which practices would be then reimbursed by the City to the vendor. See <i>also</i> Case No. 10046.CNS.</p>	<p>by the City; property paid for the City per contract</p>
<p>10063.CNS</p> <p>https://www.chic ago.gov/content/ dam/city/depts/et hics/general/Dec k%20Chairs/6/10 063.cns.pdf</p>	<p>City Property; Elected Officials; Gifts; Political Activity</p>	<p>An alderman was advised that the Ordinance does not prohibit him from holding “satellite office” hours on weekends, at retail stores located in the ward, provided: (i) the alderman discloses the use of the space as a gift to the City from the retailers (thus it is not a campaign contribution); (ii) no political activity or speech by the alderman or other City council employees may occur during these hours; (iii) the alderman or one of his designees keeps careful time records of staff’s attendance at these locations, as they would be performing City work; and (iv) the Board cannot opine on whether and how provisions in the Municipal Code covering aldermanic expense allowances may apply, or, whether under other provisions of the Municipal Code, or state or federal laws, this would be prohibited – the alderman was advised to consult with the Law Department or private counsel regarding that.</p>	<p>Alderman; elected official; ward office; big-box retailers; off-site ward office; satellite ward office; City services; City council employees; political activity; City-owned property; gift to the City; speechifying; campaign literature; political literature; time records for aldermanic staff; weekend hours; campaign contribution; state law; aldermanic expense allowance</p>
<p>10066.Q</p> <p>https://www.chic ago.gov/content/ dam/city/depts/et hics/general/Dec</p>	<p>Post-employment</p>	<p>A departing City employee was advised of the relevant one-year subject matter prohibition with respect to projects involving the employee’s soon-to-be former City department, and that the Ordinance does not prohibit taking a</p>	<p>One-year prohibition; participated personally and substantially in the subject matter; ethical screen</p>

k%20Chairs/6/10066.Q.docx		position with a vendor of one's City department – rather, the prohibitions are matter-based.	
11004.A https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_GiftsTravel/11004A.pdf	Gifts	<p>This is a significant, precedential case. After reviewing facts presented in a report from the Inspector General's Office, and making no independent investigation or fact-finding of its own, the Board determined that a City vendor had violated the Ordinance's gift provisions by providing a gift of personal services to a City employee, during regular City business working hours, and in City offices, these services not being part of the vendor's contract or paid for by the employee. The employee was a high-ranking official with the department with which the vendor contracted. The Board had to piece together the value of the services offered, as that was not delineated in the Inspector General's report. The Board had no authority to address the Inspector General's recommendation that the vendor be debarred, as the Board has no authority to address City debarment rules. See <i>also</i> Case No. 10004.A, which dealt with the employee himself.</p>	<p>Personal services; provided in City offices during regular City working hours; economic interest in a specific City business, service or regulatory transaction; substantially affect such transaction; gift; anything capable of valuation in monetary terms; anything given without consideration or expectation of return; \$50 limit; substantially affect; vendor; Inspector General; investigation; debarment rules; debarring; valuation</p>
11007.CF https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_CampFinancing/11007.CF.pdf	Campaign Financing	<p>The Board determined that a business had violated the campaign financing ordinance by contributing in excess of \$1,500 to a City elected official in a single year. The issue was whether the business was seeking to do business with the City, and whether it had been doing so within 6 months prior to the contribution. Applying §2-156-010(x), which defines seeking to do business, the Board</p>	<p>Campaign financing ordinance; Board's powers and duties; discretion to investigate; reasonable basis to believe that a contributor violated the campaign financing limitations; campaign contributions; political contributions; reasonable basis; doing business with the City; seeking to do business with the City; taking any action within the past six month to obtain a contract or business from the City; take any action;</p>

		concluded that the business was seeking to do business with the City by sending emails to City officials pushing for a matter to be presented to City Council – a necessary step in enabling the business to negotiate and execute a contract with the City. The Board directed staff to handle the matter as it would any apparent violation of the campaign financing ordinance due to excess contributions.	past six months; email to Managing Deputy Commissioner; cc to Law Department; matter pending; six months prior to the contribution; passage of an ordinance by City Council; communication to employees shepherding the matter through City Council; totality of the circumstances; substantive and forward-looking nature of the communication or action; desire of person making communication to press forward through the legislative or contracting process; explicit or implicit understanding; definition of seeking to do business; §2-156-010(x)
11037.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/AOPostEmploy/11037Q.docx	Post-employment	A departing City employee was advised that the employee did not participate personally and substantially in various engineering projects merely by receiving lists of tentative locations from another department and taking that list to other divisions within his own department, The Board also restated that the one year prohibition begins on the employee's last effective of City employment, not on the date he or she stops performing certain tasks.	Engineer; City infrastructure projects; participated personally and substantially in the subject matter; evaluating permit requests; issuing or approving permits; installation and maintenance; permitting process; contract management authority
11044.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/AOElectedOfficials/11044Q.docx	Conflicts of Interest/Improper Influence; Representation of Other Persons; Elected Officials; Outside Employment	An alderman-attorney was advised of the relevant restrictions and prohibitions if the alderman to join a law firm as an associate, as a second job. The opinion goes through each of the restrictions that would apply, particularly with respect to the Conflicts of Interest provision, and the disclosures and recusals required by that provision.	Alderman; attorney; lawyer; private practice; outside employment; business relationship; conflict of interest; improper influence; recuse; abstain; abstention; associate; partner; of counsel; Rule 14; matter pending before the City Council or any Council committee; economic interest distinguishable from that of the general public or all aldermen in any matter; business relationship with a person or entity with a matter pending before the City Council or any Council committee; EDS; Economic Disclosure Statements; owner or partner of the firm; law firm; City

			contractor; money for advice; giving advice or assistance on matters relating to the business of the City; prior or subsequent payment or compensation; appearance of favoritism; appearance of impropriety; representation of other persons; pro bono representation; in rem; in personam
11045.A https://www.chicago.gov/content/dam/city/depts/ethics/general/AO OutsideEmployment/11045A- red.pdf	Conflicts of Interest/Improper Influence; Representation of Other Persons; Attorneys; Elected Officials; Outside Employment	The Board advised an alderman-attorney of the relevant restrictions and prohibitions were the alderman to join a law firm on a contractual basis, in an of counsel relationship, as a second job. The opinion goes through each of the restrictions that would apply, particularly with respect to the Conflicts of Interest provision, and the disclosures and recusals required by that provision.	Alderman; attorney; lawyer; fiduciary duty of an alderman; <i>in rem</i> ; <i>in personam</i> ; private practice; outside employment; business relationship; conflict of interest; improper influence; recuse; abstain; abstention; associate; partner; of counsel; Rule 14; matter pending before the City Council or any Council committee; economic interest distinguishable from that of the general public or all aldermen in any matter; business relationship with a person or entity with a matter pending before the City Council or any Council committee; EDS; Economic Disclosure Statements; pro bono representation; owner or partner of the firm; law firm; City contractor; money for advice; giving advice or assistance on matters relating to the business of the City; prior or subsequent payment or compensation; appearance of favoritism; appearance of impropriety; representation of other persons; economic interest; where the City is an adverse party; fiduciary duty of an alderman;
12001.CNS https://www.chicago.gov/content/dam/city/depts/ethics/general/AO ElectOfficials/12001CNS.doc	Gifts; Conflicts of Interest/Improper Influence; Elected Officials; Financial Interest in City Business	The Board determined that a landlord who rented space to an alderman for the alderman's City ward office could apply for and receive financial assistance through the City's SBIF Fund (Small Business Improvement Fund), even though this would benefit the alderman, but recommended that the alderman/City	Financial interest in City business; gift accepted on behalf of the City; alderman; City Ward office; Small Business Improvement Fund; SBIF; gift; prohibited gift; landlord; rental; appearance of impropriety; side agreement; indirect benefit; leasehold; rent payments; good faith estimate;

		consider reimbursing the landlord for improvements to the alderman's leasehold, perhaps through raised rent, or declare the value as a gift to the City, and that the alderman not participate in or have any input into the decision whether to grant the landlord this assistance.	
12005.A https://www.chicago.gov/content/dam/city/depts/ethics/general/AOPostEmploy/12005-Apostemploy.pdf	Post-employment	The Board determined that a departing City employee was not prohibited from accepting job opportunities with either of two companies, but that the employee was subject to a one-year subject matter prohibition with respect to one of these positions.	Contract management authority; award or negotiation; authorizing payment to vendor; participated personally and substantially in the subject matter; Shakman-exempt; lobbying; ethical screen
12007.A-1 https://www.chicago.gov/content/dam/city/depts/ethics/general/AOInterestCityBusiness/12007.A-1.pdf	Financial Interest in City Business	This is a significant, precedential case. The Board determined that a City employee who owned a business that entered into a contract with a Chamber of Commerce, acting as a Service Provider to an SSA (Special Service Area), which is a City agency, violated the Ordinance by having a prohibited financial interest in City business. The contract was, in effect, a City subcontract, as it was authorized by Ordinance enacted by the City Council. The Board recommended that the contract be terminated, and that the City implement procedures so that SSAs and their service provider firms owned by City employees and not enter into such contracts.	Financial interest in City business; SSA; Special Service Area; authorized by Ordinance; contract, business or work of the City; City-administered funds; subcontract; Chamber of Commerce; financial interest; business ownership
12007.A-2 https://www.chicago.gov/content/	Financial Interest in City Business	This is a significant, precedential case. The Board determined that a City employee who owned a business that entered into a contract with a Chamber of	Financial interest in City business; SSA; Special Service Area; authorized by Ordinance; contract, business or work of the City; City-administered funds; subcontract;

dam/city/depts/ethics/general/AOInterestCityBusiness/12007.A-2.pdf		<p>Commerce, acting as a Service Provider to an SSA (Special Service Area), which is a City agency, violated the Ordinance by having a prohibited financial interest in City business. The contract was, in effect, a City subcontract, as it was authorized by Ordinance enacted by the City Council. The Board recommended that the contract be terminated, and that the City implement procedures so that SSAs and their service provider firms owned by City employees and not enter into such contracts.</p>	<p>Chamber of Commerce; financial interest; business ownership</p>
<p>12017.CNS</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/AOFiduciaryDuty/12017.Cns.docx</p>	<p>Fiduciary Duty; Conflicts of Interest/Improper Influence</p>	<p>An incoming City employee did not violate the Ordinance by delegating responsibility for decision-making authority to a colleague with respect to a company for which the incoming City employee had worked as an independent consultant for 6 weeks prior to commencing City employment, and which had paid the employee all monies due and owing, and for which company the employee had provided assistance in completing a response to an RFP for a similar project in a different City.</p>	<p>Reverse revolving door; economic interest; pre-City employer; New York City; recusal; delegation; no continuing monetary interests; fiduciary duty; good faith; City's best interests; consultation on technical aspects of the vendors' financial models</p>
<p>12018.A</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/AOLobby/12018A.pdf</p>	<p>Lobbyist Registration and Disclosure</p>	<p>This is a significant, precedential case. The Board determined that a spokesperson from a non-profit would be a lobbyist because the non-profit had for-profit members. This is an important case for understanding how the exception for certain persons who engage in activities that would be considered lobbying on behalf of certain non-profits need not register, in contrast with others who must register.</p>	<p>Definition of lobbying or lobbyist; non-profit; not for profit; for profit; one tier non-profit; two tier non-profits; lobbying exception; plain language of the statute; volunteer; staff person; no-for-profit; lobby</p>

12027.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/AO%20OutsideEmployment/12027.Q.pdf	Outside Employment	A City department was advised that food sanitarians were prohibited from receiving compensation for teaching a class to certify summer food festival operators.	Teaching; food inspectors; food sanitarians; City Colleges; Harold Washington college; wholly unrelated; money for advice; summer festivals; certification class; appearance of impropriety; advice or assistance on matters concerning the operation or business of the City
12040.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/AO%20GiftsTravel/12040.Q.doc	Travel	Employees from the Chicago Public Library were advised that they could accept reasonable travel expenses paid by the Trade Commission of Spain to attend the annual Spanish book fair in Barcelona.	Travel; foreign country; reasonable travel expenses; furnished in connection with public events, ceremonies related to official City business; furnished by the sponsor of the event; not based on a mutual understanding that official decision or actions would be influenced; LIBER; Spain; Chicago Public Library
12042.A https://www.chicago.gov/content/dam/city/depts/ethics/general/AO%20InterestCityBusiness/12042A.pdf	Financial Interest in City Business	This is a significant, precedential case. A City employee's spouse owned a business that contracted with a Chamber of Commerce, which served as a service provider to a Special Service Area (SSA) of the City. The employee served as President of the business, founded it, and was a paid employee of it. The Board determined that the employee violated the financial interest in City business provision of the Ordinance and recommended that the City consider terminating the contract, imposing employment sanctions on the employee, and filing suit for an accounting and recovery of pecuniary benefits received by the business.	Financial interest in the name of another; prohibited financial interest in City business; City contract, work or business; business ownership; SSA; Special Service Area; independent occupation, business or profession of a spouse; spouse; participation in the operation or management of a spouse's business; relative; family member's business
12043.A	Post-employment	The Board determined that a departing City employee was subject to the two-year lobbying restriction as to the	Post-employment; lobbying; contract management authority; subject matter; tradesman exception; trade skill; RFP;

https://www.chicago.gov/content/dam/city/depts/ethics/general/AOPostEmploy/12043.A.pdf		<p>employee's former department, including seeking to influence it with respect to new or existing contracts on behalf of the new employer, and that the exercised had contract management authority with respect to the new employer's City contract by evaluating bids submitted for one contract, but was not personally and substantially involved in the subject matter of the request for proposals the new employer was bidding on in a different contract.</p>	<p>request for proposals; installation of systems; participated personally and substantially in the subject matter</p>
<p>12048.CNS</p> https://www.chicago.gov/content/dam/city/depts/ethics/general/AOPtOfficials/12048.CNS.pdf	<p>Infrastructure Trust; Appointed Officials; Statements of Financial Interests</p>	<p>The Board determined that the Infrastructure Trust was a City agency for purposes of the Ordinance, and that its members must file Statements of Financial Interests</p>	<p>City agency; Infrastructure trust; not solely advisory</p>
<p>12049.Q</p> https://www.chicago.gov/content/dam/city/depts/ethics/general/AOOutsideEmployment/12049.Q.pdf	<p>Fiduciary Duty; Representation of Other Persons; Attorneys; Elected Officials; Outside Employment</p>	<p>An alderman-attorney was advised of applicable restrictions and prohibitions were the alderman to become "of counsel" to a law firm, or as an employee of the firm. The opinion goes into depth in explaining the prohibitions under representation, conflicts of interest, Prohibited Conduct, and fiduciary duty.</p>	<p>Alderman; elected official; attorney; of counsel; law firm; practice of law; retainer agreement; economic interest in the matter; economic interest in the person with a pending matter; matter pending; clients; compensation; abstain; recuse; Rule 14; business relationship; City contractor; conflicts of interest; improper influence; salary; compensation; income</p>
<p>12051.Q</p> https://www.chicago.gov/content/dam/city/depts/ethics/general/AO	<p>Political Activity</p>	<p>This is a significant, precedential case. An alderman was advised that the Ordinance permits the distribution of applications for election judge at aldermanic offices or other City property, but recommended that City employees or</p>	<p>Election judge; Judge of Elections; City property; Chicago Board of Election Commissioners; prohibited political activity; political activity; City property; aldermanic offices; ward offices; City employees or officials serving as election judges;</p>

PolActvty/12051 Q.pdf		<p>officials not pick these up at such offices during their compensated time, and that City employees or officials who are party chairmen or Ward Committeemen not sign or approved these applications at aldermanic offices or on City property, and that City employees and officials may apply to and serve as election judges, but it is “prohibited political activity” and thus they must do so on their own non-compensated time, as with outside employment.</p>	<p>compensated time; Ward Committeeman; Party Chair; outside employment; facially neutral; obtain signature; appearance of impropriety; appearance of political purpose or use</p>
<p>12060.I</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/AOFiduciaryDuty/12060.I.doc</p>	<p>Fiduciary Duty; City Property</p>	<p>This is a significant, precedential case. After receiving a complaint, the Board conducted an investigation into a veteran City employee’s alleged use of departmental lists and photocopying equipment without authorization; a blog with which the employee was affiliated then printed a story about someone whose name was on that list. The Board determined that the employee violated the Ordinance’s fiduciary duty and use of City property provisions by printing a list of licensed plumbers and using it for private purposes, and recommended termination. The Board also determined that the employee gave evasive, dishonest, or incomplete answers to Board investigators. The City’s Human Resources Board upheld the Board’s findings and recommendation of termination.</p>	<p>City property; list of licensed plumbers; misuse of City property; photocopying machines; missing pages; Human Resources Board; discharge; confidential information; business purpose for accessing information</p>
<p>12064.Q</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/AOFiduciaryDuty/12064.Q.doc</p>	<p>Elected Officials; Travel</p>	<p>An alderman was advised that travel expenses to Israel were acceptable, as reasonable travel and education expenses.</p>	<p>Alderman; business travel; reasonable expenses; travel; Israel</p>

hics/general/AO ElectOfficials/12064QL.pdf			
12065.A https://www.chicago.gov/content/dam/city/depts/ethics/general/AOInterestCityBusiness/12065.A.pdf	Appointed Officials; Financial Interest in City Business	<p>This is a significant, precedential case. The Board determined that an appointed official violated the Ordinance by having a prohibited financial interest in City business. The official owned a company that provided construction management services to a sister agency, as a subcontractor, but the construction contract was approved by her City board and was paid with funds authorized by City ordinance. Thus, the subcontract was not wholly unrelated to the work of the official's City commission. The Board recommended that the official be removed from the commission, and that the Law Department and Mayor's office together consider filing suit for pecuniary benefits received through the subcontract.</p>	<p>Financial interest; wholly unrelated; construction management services; subcontract; appointed official; paid with funds belonging to or administered by the City, or is authorized by Ordinance; ownership percentage of person or entity; appointed official's official City duties and responsibilities; subcontractor; intergovernmental agreement; prime contract; property interest; ownership interest; contractual rights and obligations; third party beneficiary; agent; City's agent; using City money pursuant to ordinance</p>
12067.1.A, 2.A, and 3.A https://www.chicago.gov/content/dam/city/depts/ethics/general/AOGiftsTravel/12067.a.doc	Gifts	<p>This is a significant, precedential case. The Board issued a three-part opinion to a legislative caucus, which is not itself a City agency, though its members are City elected officials. It advised the Caucus that its members could not solicit donations on behalf of the caucus or its charitable arm from persons with matters pending before them. The opinion also discusses when these members may accept travel expenses in the course of their City responsibilities.</p>	<p>Legislative caucus; 501(c)(3); 501(c)(4); charitable contributions; charitable foundation; gifts accepted on behalf of the City; aldermen; City Council; City purpose; private capacity; solicitation from third parties; directly affect the outcome; matters pending before the City; matters pending before a City official or employee; covered relative; travel; reasonable hosting; social welfare groups; pet charities; Super PAC; DISCLOSE Act; pay-to-play; disclose donors; tax deductible; IRS Publication 557; fundraising</p>

<p>12072.A</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_RepresentingOthers/12072A.pdf</p>	<p>Fiduciary Duty; Representation of Other Persons</p>	<p>The Board, reviewing an investigation conducted by another department, determined that a City employee violated the representation of other persons and fiduciary duty provisions of the Ordinance by advocating for a relative within the employee's own department; the relative applied for City financial assistance. The facts adduced showed that the application contained inaccurate information. The Board also noted that the fiduciary duty provision prohibits City employees and officials from receiving private benefits or obtaining advantages over the public generally by virtue of their City positions, and that there may have been violations of the Personnel Rules as well. The Board recommended termination of employee, and that the department consult with the Law Department regarding filing suit for pecuniary damages and work the Board to develop protocols to prevent similar future abuses.</p>	<p>Fiduciary duty; inside information; improper access; misuse of City authority; misuse of City property; submitting misleading application; representing a relative before a City department; suit for pecuniary damages; Law Department; internal investigation; potential criminal fraud; Personnel Rules; termination; caregiver; live-in aide; Code of Federal Regulations; CFR; develop protocols for handling relatives who are program applicants; relatives; grant applications</p>
<p>13008.Q</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_PostEmploy/13008.Q.doc</p>	<p>Post-employment; Attorneys</p>	<p>A departing employee was advised that the one year prohibition restricted the employee from on assisting or representing the post-City employer with respect to providing land acquisition services and assistance for several City departments, and that, as the employee had served as counsel of record in various proceedings involving the City, the employee thus was permanently prohibited from assisting or representing the new employer with respect to these proceedings.</p>	<p>Post-employment; land acquisition; sale of real estate; one-year prohibition; participate personally and substantially in the subject matter; counsel of record; permanent prohibition; administrative or judicial proceedings</p>

13018.A https://www.chicago.gov/content/dam/city/depts/ethics/general/AOSFI/FIS-13018A.pdf	Statements of Financial Interests	This is a significant, precedential case. That Board determined that Mayoral appointees to two newly constituted boards were not City officials because these boards were not City agencies. The opinion goes through the criteria for what is or is not a City agency.	Appointed official; City agency; agency; created by ordinance or intergovernmental agreement; primarily funded by the City; primarily advisory; designed to support City programs; financed primarily through the City budget; created by City ordinance or Executive Order; Board membership confirmed by City Council; created by State statute; working Board;
13021.A https://www.chicago.gov/content/dam/city/depts/ethics/general/AOFiduciaryDuty/13021.A.doc	Fiduciary Duty; City Property	The Board reviewed an investigation conducted by a department of one of its employees, who had without authorization printed confidential time reports of co-workers, for the purpose of requesting bereavement leave; access to these reports was beyond the employee's job responsibilities. The Board determined that the employee violated the fiduciary duty to the City recommended termination.	Internal investigation; fiduciary duty; bereavement leave; misuse of City property; photocopy machines; time records; personnel records; termination; City property; without authorization; Personnel Rules
13022.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/AOPostEmploy/13022.Q.doc	Post-employment	A departing employee was advised that employment with a company with contracts with the employee's City department was not prohibited, but that the employee was prohibited for one year from assisting it in several of these contracts, and that the was a tradesman and would in part be doing trade work for the new employer and for that work could rely on the trade skill exception.	Locate; repair; install; oversee day-to-day operations; forwarding approval forms; project manager; bidding process; pre-bid conferences; contract extensions; contract specifications; purchase orders; trade skill exception; tradesman exception; personally, and substantially involved in the subject matter; one year prohibition; post-employment
13025.A; 13025.A (Reconsidered) https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec	Appointed Officials; Financial Interest in City Business	An appointed City official owned a building leased to a local Chamber of Commerce that received funds administered by the City; the appointed official's City commission contracted with the Chamber to provide the commission with administrative services. The Board determined that the appointed official had	Appointed official; financial interest in City business; SSA; Special Service area; rent; lease; wholly unrelated; Chamber of Commerce; Service Provider; ownership interest

<p>k%20Chairs/LXIV/13025.A.doc</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec%20Chairs/LXIV/13025.A-recon.doc</p>		<p>a prohibited financial interest in City business because the rental payments from City-administered funds were not wholly unrelated to the official's City commission's work. On reconsideration, however, the Board vacated its determination, because the amount of City-administered funds used to pay rent to the official's building was shown to be less than the threshold amount.</p> <p>Note: the Board granted reconsideration of its original opinion and reversed its determination after receiving additional facts from the appointed official.</p>	
<p>13041.A</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/AOInterestCityBusiness/13041.A.pdf</p>	<p>Financial Interest in City Business</p>	<p>This is a significant, precedential case. The 100% owner of a subcontractor on a City contract was a City employee; the payments to this subcontractor totaled more than \$2,500 in a year (Note: the limit was lowered to \$1,000 per year on November 1, 2012). The Board determined that this employee violated the Ordinance by having a prohibited financial interest in City business. This subcontractor was an indirect subcontractor, meaning that its products and services were not directly related to the contract. The Board assessed a fine of \$1,500.</p>	<p>Financial interest in City business; City contract; City subcontract; indirect contractor; direct subcontractor; M/WBE status; work, contractor or business of the City; business ownership; prime contract; definition of financial interest</p>
<p>13043.Q</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/AOPostEmploy/13043.Q.pdf</p>	<p>Post-employment</p>	<p>A departing City employee was advised that employment with a company bidding on City contracts was not prohibited even though the employee was personally and substantially involved in the subject matter of its potential contract with the City, but the employee was subject to a one year prohibition as to the subject</p>	<p>Post-employment; one-year prohibition; personally and substantially involved in the subject matter; City contract; RFP; request for proposals; permanent prohibition; solely respond to an RFP; lobbying; subject matter; ethical screen</p>

		<p>matter of that contract, and thus must ensure that an impermeable ethical screen is created as to its bid on this City contract. The employee was advised of the two-year lobbying prohibition as to the former City department, and that the employee had not exercised contract management authority with respect to any relevant contracts.</p>	
<p>13044.A</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/AOCampaignFinancing/13044.A.pdf</p>	Campaign Financing; Elected Officials	<p>This is a significant, precedential case. This case explains the campaign financing enforcement structure and procedure, while concluding that three companies were “affiliated” and two of them were doing business with the City and/or a sister agency, thus had violated the Ordinance by contributing a total of \$4,000 in aggregate contributions to the same elected official’s authorized political committee in a single calendar year. The companies brought themselves into compliance with the Ordinance. The case also explains the 10 day “safe harbor” provision in the Ordinance, and the differences between the old Campaign Financing Ordinance and revised Article VI of the Ordinance.</p>	<p>Campaign financing ordinance; changes to the campaign financing law; affiliated companies; excess political or campaign contributions; 10 day safe harbor provision; Inspector General; Legislative Inspector General; differences between old Campaign Financing Ordinance and new Article VI; partners; owners; employees; officers; contribution limitations; knowing violation; reimbursement; pseudonymous contributions; penalties; with knowledge; pay-to-play; reporting year; Article VI</p>
<p>13048.Q</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/AOGiftsTravel/13048.Q.doc</p>	Gifts	<p>The Board determined that the Ordinance’s exception allowing City employees and officials to accept unlimited gifts (including cash and gifts cards) from personal friends applies to gifts given to an employee’s children by friends of the employee who may not know the children, or who are friends of the children, but not necessarily of the employee.</p>	<p>Gifts; personal friends; personal friend exemption; children; family members; gifts to relatives</p>

13053.A https://www.chicago.gov/content/dam/city/depts/ethics/general/AO%20OutsideEmployment/13053.A.doc	Outside Employment; Sister Agencies	The Board determined that a sworn law enforcement officer employed by the City could own a security firm and that this firm could enter into a contract with a sister agency to provide security services, as the services were wholly unrelated to the employee's City responsibilities.	Wholly unrelated; money for advice; security guards; Chicago Public Schools; security; sworn law enforcement officer; sister agency; security services; Board of Education
13054.CNS https://www.chicago.gov/content/dam/city/depts/ethics/general/AO%20ElectOfficials/13054.CNS.doc	Conflicts of Interest/Improper Influence; Minor Violations; Elected Officials	An alderman was advised that, by failing to recuse from City Council matters involving a business the alderman owned in matters going back more than 10 years, the alderman had violated the Ordinance's conflicts of interest provisions, and was advised by the Board to regarding self-reporting to the Legislative Inspector General.	Alderman; recusal; failure to recuse; signage; business ownership; non-minor violation; self-report; conflicts of interests; Rule 14; vote; City Council; abstention from voting; prima facie violations; self-report to Legislative Inspector General;
13056.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/AO%20ConflictOfInterest/13056.Q.doc	Conflicts of Interest/Improper Influence; Elected Officials; Outside Employment	An alderman was advised that the Ordinance did not prohibit either the alderman or the alderman's spouse from becoming independent insurance agents, but imposed significant, precedential restrictions on the alderman's activity as an elected official: the alderman could not submit documents or informally communicate with other City officials or employee as a representative of the insurance agent, company or broker, and was also advised not to sell insurance to constituents, because the ability to act as their alderman would be compromised.	Alderman; outside employment; conflicts of interest; clients; customers; constituents; insurance agency; insurance broker; representation; improper influence; recuse
13058.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/AO%20PostEmployment/13058.Q.doc	Post-employment	A departing high ranking employee was advised that the employee had exercised contract management authority over a City contract and thus was permanently prohibited from assisting any new employer or client on that contract, and	Post-employment; employment with a City vendor or contractor; subject matter; total ban on contract; behind the scenes; consultant to City contractor; contract management authority; ethical screen; lobbying ban; two year; Shakman-exempt

PostEmploy/13058.Q.doc		that this prohibition applied even if the employee would not be an employee of the company but would be just a consultant or independent contractor to it.	
14005.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/AOPostEmploy/14005.Q.doc	Post-employment	A former high-ranking City employee was advised that he was subject to several restrictions: (i) a permanent restriction as to one City contract, in that he supervised the vendor's performance of that contract; (ii) a two-year City wide lobbying ban; and (iii) a one-year ban on transactions with his former City department.	Post-employment; program-wide prohibition; subject matter; department-wide prohibition; participated personally and substantially in the subject matter; lobbying ban; contract management authority; permanent ban; supervision of performance; evaluation of bids; RFP; request for proposals
14006.A https://www.chicago.gov/content/dam/city/depts/ethics/general/AOMinorViolations/14006.A.doc	Prohibited Conduct; Minor Violations	The Board admonished a recently hired City employee and determined that the employee had committed a minor violation of the Ordinance by discussing RFP responses with City colleagues, regarding a response submitted by a non-profit organization that was part of an umbrella non-profit organization affiliated with the employee's immediate pre-City employer.	Immediate pre-City employer; reverse revolving door; minor violation; request for proposals; RFP; decision-making authority; review RFP responses; umbrella organization; reasonable person; without intent; not a substantive violation; recuse; upholding the spirit of the Ordinance; Board Rule 3-11; letter of admonition
14011.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/AOPolActvty/14011.Q.pdf	Political Activity	A City employee responsible for delivering mail to other City employees and officials at their official City addresses in City-owned property was advised that this activity would not constitute prohibited political activity even if that mail was obviously political in nature, because the employee was performing the duties of City employment.	Delivery of mail; delivery of political mail; incidental; compensated time; City property; activity performed as part of City job responsibilities; doing one's job
14012.CNS https://www.chicago.gov/content/dam/city/depts/ethics/general/AO	Conflicts of Interest/Improper Influence; Minor Violations; Elected Officials	An alderman was admonished by the Board for committing a minor violation by failing to recuse from and voting yes on an omnibus viva voce vote in which a business that the alderman owned was approved for an awning permit.	Alderman; failure to recuse; ownership of business; awning permits; omnibus vote; viva voce vote; Committee on Zoning, Landmarks and Building Standard; Rule 14; conflicts of interest disclosure; yes vote; financial interest; abstention

ElectOfficials/14012.CNS.doc			
14017.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/AOPostEmploy/14017.Q.doc	Post-employment; Sister Agencies	A departing City employee who owned a company was advised that the post-employment restrictions did not prohibit the employee or company from entering into a City contract after City employment, because the employee was not personally and substantially involved in the contract's subject matter during City employment. Also, the employee did not hold a Shakman-exempt position and thus was not subject to the two-year lobbying ban with respect to the former department. Last, the Ordinance does not prohibit businesses owned by former employees from entering into contracts with sister agencies, such as the Chicago Park District.	Post-employment; snow plowing; personally, and substantially involved in the subject matter; contract management authority; Shakman-exempt position; lobbying ban; subject matter; business transaction involving the City; sister agencies; Chicago Park District
14021.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/AOPostEmploy/14021.Q.doc	Post-employment	A departing City employee was advised that the Ordinance did not employment by a company that had currently did not have but might bid on City contracts, but that the employee was prohibited from assisting it for one year in a contract it was considering bidding on, and that the employee and company must implement an impermeable ethical screen. The employee was also subject to the two-year lobbying prohibition with respect to the former City department.	Post-employment; employment with a City vendor or contractor; subject matter; departmental operations and management; lobbying; two-year lobbying ban; one year subject matter ban; personally and substantially involved
14023.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/AOPostEmploy/14023.Q.doc	Post-employment	A departing City employee was advised that the Ordinance did not prohibit employment by a company with a City contract, but the employee could not assist or represent the company on this contract for its entire remaining term, and	Post-employment; framing market opportunities; developing and recruiting professionals; employment with a City vendor or contractor; subject matter of the business transaction; one-year prohibition; contract management authority; large City

PostEmploy/14023.Q.doc		the employee and company must implement an impermeable ethical screen. The employee was also subject to the two-year lobbying prohibition with respect to the former City department.	facilities; behind the scenes work; administrative work; impermeable ethical screen; two-year lobbying ban
14025.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/AOPostEmploy/14025.Q.doc	Post-employment	A departing City employee was advised that the Ordinance did not prohibit employment by a company that a City contract over which the employee had exercised contract management authority, but the employee could not assist or represent in on this contract for its entire remaining term, and the employee and the company must implement an impermeable ethical screen.	Post-employment; projects administrator; subcontractor; Project Management Organization; PMO; impermeable ethical screen; contract management authority; behind the scenes work; administrative work;
14032.A https://www.chicago.gov/content/dam/city/depts/ethics/general/AOPConflictOfInterest/14032A.pdf	Conflicts of Interest/Improper Influence; Attorneys	The Board determined that a law firm and its legal staff, retained by the City pursuant to a contingency fee arrangement, was a City contractor, not a City employee or official, and not subject to the provisions in the conflicts or interests or improper influence sections.	Law firm; outside counsel; Corporation Counsel; improper influence; City employee; City official; City contractor
14034.A https://www.chicago.gov/content/dam/city/depts/ethics/general/AOPProhibitedConduct/14034.A.doc	Prohibited Conduct	The Board determined that an incoming employee was subject to the two year prohibition on acting in a decision-making capacity with respect to an immediate pre-City employer, and that, if the pre-City employer were to merge with another company into a newly formed company, the incoming employee would not be prohibited from acting with respect to matters involving the newly formed company unless the pre-City employer, which was to be a subsidiary of the newly	Reverse revolving door; corporate merger; subsidiary; acting in a decision-making capacity; merged entities; parent corporation; corporate affiliates

		formed company, participated in the matter.	
141264.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/AOPostEmploy/141264.Q.doc	Post-employment	A departing employee was advised of the relevant one year, permanent, and two-year City-wide lobbying prohibitions; and that the employee had exercised contract management authority with respect to a client of the employee's new firm, and thus that an impermeable ethical screen is necessary, which would cover all communications, document management, discussions, decision-making and/or input concerning the contract. The opinion explains that registering as a lobbyist in other jurisdictions is not prohibited.	Post-employment; lobbying; lobbyist; contract management authority; impermeable ethical screen; communication regarding City matters; review of documents; informal discussions with City employees or officials; registering as lobbyist in other jurisdictions; Chicago Transit Authority; Chicago Public Schools; Chicago Housing Authority; Public Building Commission; assisting or representing; behind-the-scenes; Ethics Pledge
141268.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/AOConflictOfInterest/141268.Q.doc	Conflicts of Interest/Improper Influence; Elected Officials	An alderman was advised regarding a potential business opportunity for a spouse who was a real estate agent. The spouse was not prohibited from taking advantage of this opportunity, but the alderman was advised that, to avoid even an appearance of impropriety, the spouse should forego the opportunity.	Alderman; spouse; real estate agent; conflict of interests; improper influence; business relationship that creates a financial interest; real estate developer; appearance of impropriety
141269.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/AOEmployRelatives/141269Memo.doc	Employment of Relatives or Domestic Partners	The Board advised a department that intended to hire a senior managerial employee what steps to take given that the prospective employee had two relatives already employed by the department in lower-ranking positions.	Relatives; supervision of relatives; recusal; advocate for hiring; exercise contract management authority; indirect supervision; father; brother; favoritism; employ; ongoing supervision; ethical screen; employment of relatives; same department; chain of command; different bureaus
141271.Q https://www.chicago.gov/content/	Gifts; Elected Officials	This is a significant, precedential case. The Board determined that bonuses given by an alderman to the alderman's City staff in excess of \$50 from non-City	Bonus; aldermanic staff; gratuity; tip; official superior; subordinate; alderman; employer/employee; money for advice or assistance; supplemental compensation;

dam/city/depts/ethics/general/AO GiftsTravel/141271.Q.doc		funds for City-related services were not prohibited gifts and did not violate the Ordinance's gift provisions.	wages; gifts; political funds; Illinois Election Code; D-2; employee-related services
141277.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/AOProhibitedConduct/141277.Q.doc	Prohibited Conduct; Financial Interest in City Business; Sister Agencies	A prospective City employee who owned a real company with City contract, and who also served as Executive Director for a non-profit that received City funding, was advised of the relevant restrictions imposed by the Ordinance were the City to hire the individual, including the two-year reverse revolving door prohibition, and to cancel the City contract or dilute the ownership interest in the company so that the individual would no longer own an interest in the contract worth more than \$1,000.	Reverse revolving door; recuse; non-profit organization; financial interest; ownership interest in any City contract, work or business; real estate company; reasonable payment; <i>quantum meruit</i> ; work performed prior to City employment; CHA; prohibited conduct; ethical screen; delegate responsibilities
141280.A https://www.chicago.gov/content/dam/city/depts/ethics/general/AOCampaignFinancing/141280.A.pdf	Fiduciary Duty; Campaign Financing; Pension Funds	This is a significant, precedential case. Several aldermen publicly and in writing requested that the Board investigate possible violations of the Ordinance based on political contributions to the Mayor's political committee by officers and employee of firms doing or seeking do business with the City's four pension funds. The Board, following prior case law, determined that the four pension funds are not City agencies, thus officers of firms seeking or doing business with these funds did not (by doing or seeking to do business with these funds) violate the Ordinance by contributing in excess of \$1,500 per year. The Board recognized the perception problem and made legislative recommendations that could remove the problem. <i>See also</i> Case No. 89010.A.	Pay-to-play; Confidentiality of complaints, advisory opinions; Securities and Exchange Commission Rules; SEC; pension advisors; pension funds; MEABF; not a City agency; Illinois Pension Code; not part of the government of the City; state law; Policemen's Pension Fund; Firemen's Pension Fund; Laborers' Pension Fund; ex officio; offer of pension fund; political action committees; PAC; 50% rule; political committees of an elected official; substantial control over expenditures

141285.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/AOLobby/141285Q-lobbying.doc	Lobbyist Registration and Disclosure	The Board determined that the Ordinance does not provide or require that lobbyists maintain lobbying records for any specific period of time but recommended that lobbyists and clients retain lobbying records for four (4) years.	Retention of records; lobbyists; lobbyists' clients; period of time to retain records; substantial compliance; suggested guideline; four-year statute of limitations
15008.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/AOProhibitedConduct/15008.Q.doc	Prohibited Conduct	An incoming City employee was advised of the two-year reverse revolving door prohibition as to a City project involving a company that had purchased the employee's immediate pre-City employer.	Reverse revolving door; immediate pre-City employer; assist; coordination with consultants; utility companies; monitoring construction; design plans; contract specifications; project schedules; discretionary judgments;
15013.CNS https://www.chicago.gov/content/dam/city/depts/ethics/general/AOMinorViolations/15013.CNS.doc	Political Activity; Minor Violations	This is a significant, precedential case. A City Council employee was advised that the employee had committed a non-minor violation of the Ordinance, and regarding self-reporting to the Legislative Inspector General, after the employee set out political material at a City meeting that the employee was attending in an official City capacity; the meeting was held on non-City property. The Board determined that violations such as these are not minor.	Political activity; compensated time; minor violation; non-minor violation; City meeting; attending in official City capacity; off-hours; City property; evening; photographer; Ward Office; Legislative Inspector General; wearing one's City hat; prohibited political activity; intentionally misappropriate City property for political purposes; political materials; political brochures; campaign materials; self-report to Legislative Inspector General
15014.C https://www.chicago.gov/content/dam/city/depts/ethics/general/AOMinorViolations/15014.mem.doc	Political Activity; Minor Violations; Elected Officials	This is a significant, precedential case. The Board determined that an alderman had committed a minor violation of the Ordinance by maintaining a website, paid for with political committee funds (the use of which is governed by state statute) with the City seal on it, and inviting users to request City services, attend ward nights, and the like, but also had a donate button,	Political website; City website; City seal; constituent services; minor violation; City property; campaign funds; Illinois Election Code; Donate button; alderman; elected official; prohibited political activity; give the impression that City officially supports a political campaign; Ward night; Paid for by political committee; admonishment

		whereby users could donate to the official's political committee. The alderman was admonished, and immediately corrected the violative conduct. A website that includes the City seal and other indicia of an official City or Ward website site, including links to information about constituent services, must remain "non-political," and have no links on it to or mention of an official political committee, and no links whereby users could make political donations.	
15015.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/AOElectedOfficials/15015.Q.docx	Elected Officials; Travel	An alderman was advised that travel expenses for an education conference in Washington were acceptable if reasonable but must be reported to the Board.	Aldermanic travel; Washington, DC; policy conference; honorarium ban; honoraria; reasonable travel expenses; business travel expenses are not a gift; Statement of Financial Interests
15020.CNS https://www.chicago.gov/content/dam/city/depts/ethics/general/AOMinorViolations/15020cns.doc	Minor Violations; Employment of Relatives or Domestic Partners	This is a significant, precedential case. A high-ranking City employee was admonished that, by signing two documents necessary for the employee's spouse's employer to complete a real estate conveyance from the City, the employee had committed a minor violation of the Ordinance. The Board took into account that the employee had not participated in the conveyance in any way, and the documents had been pre-approved by the employee's staff.	Signing documents; contract management authority; husband; wife; spouse; employment of relatives; alley vacation; spouse's employer; recusal; teacher; redevelopment agreement; campus; signature of documents as a matter of course; negotiations; not participating in negotiations; minor violation; nepotism
15027.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/AOProhibitedConduct/15027.Q.docx	Prohibited Conduct; Financial Interest in City Business; Outside Employment;	An incoming City employee was advised that a position held on a compensated Board did not make the board a pre-City employer, and that the reverse revolving door provision did not apply to that	Recusal; pre-City employer; Rule XXIX, Personnel Rules; outside employment relationship; waiver; infrastructure projects in a foreign country; outside Board member; reverse revolving door; Statement of

https://www.chicago.gov/content/dam/city/depts/ethics/general/AOInterestCityBusiness/15027Q.docx	Conflicts of Interest/Improper Influence	position, but that the employee would have a financial interest in a privately-held pre-City employer by virtue of stock ownership in it and would need to recuse from City transactions involving it, and, under the Board's reading of the Personnel Rules, to divest ownership of that stock.	Financial Interests; any employment relationship with any other entity; stock; retirement plan; financial interest in City business; privately-held corporation
15032.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/AOProhibitedConduct/15032.Q.docx	Fiduciary Duty; Conflicts of Interest/Improper Influence; Representation of Other Persons; Prohibited Conduct; Elected Officials; Attorneys	This is a significant, precedential case. An incoming alderman-attorney was advised of the restrictions and obligations imposed by the Ordinance with respect to liquidating a law partnership interest and becoming either an associate of or of counsel to the firm, and on recusal from City matters involving the firm or its clients.	Alderman; attorney; of counsel relationship; reverse revolving door; prohibited conduct; matter that benefits his immediate former employer or immediate former client or employer; City Council or committee discussions or votes; appearance of impropriety; prior lobbying clients; representation of other persons; deriving compensation; judicial or quasi-judicial proceeding; fiduciary duty; <i>In re Vrdolyak</i> ; pro bono; representing clients; named party; money for advice; behind the scenes; conflicts of interest; recusal; in rem restrictions; Rule 14; financial interest in law firm; associate; partnership interest; ethical screen
15033.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/AOInterestCityBusiness/15033.Q.docx	Prohibited Conduct; Financial Interest in City Business; Outside Employment	An incoming City employee was advised that service on a non-profit board would need to be disclosed on the Statement of Financial Interests, and of the appropriate restrictions regarding recusal from City matters involving a firm which previously employed the new employee; but that the employee could make decisions affecting the pre-City employer as a member of a class generally.	Reverse revolving door; prohibited conduct; pre-City employer; Personnel Rule XXIX; personally participating in a decision-making capacity; matter that benefits a pre-City employer; recusal procedure; deferred compensation plan; common stock; public company; business relationship with any person doing business with the City; dilution of ownership of common stock; financial interest; definition of financial interest; decision affecting pre-City employer as a member of a class generally
15038.Q	Post-employment; Attorneys	A departing City Council employee who was also an attorney was advised of the	Post-employment; administrative proceedings involving the City; attorney;

https://www.chicago.gov/content/dam/city/depts/ethics/general/AOPostEmploy/15038Q.docx		<p>relevant one-year restriction, and that the employee may not assist or represent a new employer or client in matter that would appear before the specific committee on which the employee served as staff. The case recognizes that the post-City lobbying ban does not apply to departing City Council employees.</p>	<p>community meetings; review development proposals; real estate transactions; property tax relief; zoning applications; two-year lobbying restriction not applicable to City Council employees; infrastructure; independent consultant with the City; Rules of Professional Conduct; ARDC;</p>
<p>15039.Q</p> https://www.chicago.gov/content/dam/city/depts/ethics/general/AOPostEmploy/15039Q.doc	<p>Post-employment</p>	<p>A departing employee was advised that he was subject to a one-year prohibition with respect to a program he managed.</p>	<p>Post-employment; performance management team; performance analytics; data analysis; lobbying restriction; small business, education, youth violence social service programs</p>
<p>15041.A</p> https://www.chicago.gov/content/dam/city/depts/ethics/general/AOCampaignFinancing/15041A.pdf	<p>Labor Unions; Campaign Financing</p>	<p>This is a significant, precedential case. The Board determined that labor unions are not doing business with the City by virtue of their collective bargaining agreements, thus not subject to the Ordinance's campaign contribution limitations on that basis. The opinion discusses the history of campaign finance regulation in the City and concludes that the purpose of the contribution limitations is to prohibit undue influence in the contracting or procurement process. See also Case 18022.Q</p>	<p>Collective bargaining agreements; labor unions; doing business with the City; campaign contributions; purpose of campaign contribution limitations; political contributions; Campaign Financing Ordinance; pay-to-play; intent of the statute; procurement contracts; procurement process</p>
<p>15042.Q</p> https://www.chicago.gov/content/dam/city/depts/ethics/general/AOInterestCityBusiness/15042Q.pdf	<p>Prohibited Conduct; Financial Interest in City Business; Conflicts of Interest/Improper Influence</p>	<p>An incoming City employee was advised that, to avoid even an appearance of impropriety, for as long as the employee owns common stock of an immediate pre-City employer, the employee should recuse from City or sister agency matters involving the pre-City employer, but that the employee does not have a financial</p>	<p>Common stock; compensation; bonus; reverse revolving door; recusal; pre-City employer; financial interest; authorized compensation paid to her for any office or employment; Personnel Rule XXIX; prior written recusal policy and protocol; financial interest and ownership interest; appearance of impropriety</p>

		interest in the pre-City employer or any City contracts or business it may have, because the stock was part of the authorized compensation paid to the employee for “any” office or employment.	
15043.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_ApptOfficials/15043.Q.docx	Appointed Officials; Financial Interest in City Business	A potential appointee to a City Council committee was advised that the committee is a City agency, and that he would be an appointed official under the Ordinance, and that the company he owned could have City contracts as contemplated because these contracts would be wholly unrelated to the work of his City committee.	City agency; wholly unrelated; financial interest in City business; CEO; private business ownership; funded by the City; established by Municipal Ordinance; definition of financial interest; oversight by City Council
15047.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_OutsideEmployment/15047Q.docx	Fiduciary Duty; Representation of Other Persons; Non-profit Board Service; Outside Employment	A City employee was advised that the Ordinance did not prohibit service on the Board of a charitable organization, and of the standard restrictions imposed on City personnel who so serve.	Volunteer board service; non-profit organization; representation; sister agencies; dual employment form; Personnel Rules; fundraising; charitable contributions
151688.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec%20Chairs/NerFid/151688Q.docx	Elected Officials; Outside Employment; Conflicts of Interest/Improper Influence; Gifts; Fiduciary Duty	This is a significant, precedential case. An alderman was advised that the Ordinance does not prohibit volunteer service to or paid employment with a non-profit entity in the ward that has and may continue to receive City funding; but, it imposes severe restrictions on the alderman as both an employee of the organization and as alderman. The alderman would effectively be prohibited from acting as the organization’s alderman and would need to recuse from any City Council or other City matters involving the organization. The alderman was also advised to seek counsel	Alderman; fiduciary duty; outside employment; City grantee; delegate agency; recusal; conflicts of interest; representation; direct other City employees or official to act; Community Development Block Grant; CDBG; Rule 14; reasonable expect to derive any compensation in the following twelve months; represent; solicitation; fundraising; charitable; money for advice or assistance; behind the scenes advice; paid consultant; seeking administrative or legislative action from the City; <i>In re Vrdolyak</i> ; zoning reclassification

		regarding applicable federal rules, statutes, or regulations.	
151690.A https://www.chicago.gov/content/dam/city/depts/ethics/general/AOPostEmploy/151690A.doc	Prohibited Conduct; Post-employment; Confidential Information	This is a significant, precedential case. The Board determined that a departing high-ranking City employee was not prohibited from accepting employment with a non-profit organization with contracts with the employee's City department, but that the employee is subject to a one year prohibition with respect to the delivery of services by the former department, and to permanent prohibitions with respect to all contracts it had with the department, and to the two year lobbying ban. The employee was also advised that there was a violation of §2-156-111(c) when the employee signed and approved contract extensions with respect to the new employer during and after the period of negotiation of post-City employment, and was advised regarding self-reporting to the Inspector General.	Ethical screen; Post-employment; one-year prohibition; subject matter; grants; contract management authority; non-profit; prohibited conduct; past violation; self-report to Inspector General; knowingly negotiate possibility of future employment; permanent prohibition; personal and substantial involvement; past violation
151692.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/AOPolActivity/151692Q.pdf	Political Activity	A City employee was advised that the Ordinance did not prohibit the employee from hosting of a political fundraising event for a City supervisor, a City elected official, but the employee was subject to several restrictions.	Political activity; political fundraising committee; contract management authority; prohibited political activity; compensated time; fundraising event; intentionally misappropriate services of another City employee or official; knowingly solicit or accept political contribution; person seeking or doing business with the City; additional compensation; meet and greet; off of City governmental premises
151696.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/AOPostEmploy/151696Q.doc	Elected Officials; Non-profit Board Service	An elected official was advised of the restrictions that applied to service as a member of an auxiliary fundraising committee for a non-profit religious organization.	Elected official; non-profit; volunteer service; fundraising on behalf of third party; City title; City property; religious organization

FiduciaryDuty/151696Q.docx			
151698.A https://www.chicago.gov/content/dam/city/depts/ethics/general/AOPostEmploy/151698A.doc	Post-employment; Attorneys	This is a significant, precedential case. The Board determined that an attorney leaving City employment was subject to a one-year prohibition on the operation and administration of justice by the employee's City department, and to relevant permanent and two-year lobbying prohibitions, and that Rule 5.6 of the Illinois Rules of Professional Conduct (RPC) did not apply.	Subject matter of the transaction; personal and substantial involvement; administration of justice; department policies; department operations; department management; Rules of Professional Conduct (Illinois); Rule 5.6; ARDC; Attorney Registration and Disciplinary Commission; attorney
151698.A reconsideration https://www.chicago.gov/content/dam/city/depts/ethics/general/AOPostEmploy/151698A-Recons.docx	Post-employment; Attorneys	The Board denied the request to reconsider its opinion in Case No. 151698.A, and affirmed its determination that an attorney leaving City employment was subject to a one-year prohibition with respect to the operation and administration of justice by the employee's City department, and to relevant permanent and two-year lobbying prohibitions, and that Rule 5.6 of the Illinois RPC did not apply. The employee's request for reconsideration of the Board's opinion was denied on the basis that there were no new facts presented that had been unavailable to the Board when it first considered the matter.	Subject matter of the transaction; personal and substantial involvement; administration of justice; department policies; department operations; department management; Rules of Professional Conduct (Illinois); Rule 5.6; ARDC; Attorney Registration and Disciplinary Commission; attorney; reconsideration
151700.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/AOPostEmploy/151700.Q.pdf	Outside Employment	A City employee was advised that the Ordinance did not prohibit outside employment with a company that had contracts with a different City department, but that the employee was subject to several prohibitions, including representing the outside employer in matters before the City and providing	Money for advice; wholly unrelated; representation; advice or assistance; employment with a City contractor;

		advice or assistance on matters concerning City business.	
151701.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/AOPostEmploy/151701Q.docx	Post-employment; Attorneys	A departing City employee, an attorney, was advised that the employee was prohibited for one year from assisting or representing any person on matters involving the employee's former department, and on any proceeding that was pending in the former department at the time of the employee's departure.	Attorneys; subject matter; matters falling under the purview of a City department; ethical screen; behind the scenes involvement or assistance; pending proceedings; administrative hearings
16004.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/AOPostEmploy/16004.Q.docx	Post-employment	A departing City employee took a position with a departmental vendor; and was advised of the one-year prohibition on assisting or representing the new employer with respect to getting its invoices processed or paid by the employee's former department.	Post-employment; subject matter; financial comptroller; accounts payable and maintenance; City invoice process; invoice routing slip; process of approving vendor invoices; vendor payments; invoice processing; ethical screen; transaction involving the City; assisting or representing
16005.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/AORepresentingOthers/16005.q.docx	Representation of Other Persons; Attorneys; Elected Officials	This is a significant, precedential case. An alderman-attorney who had performed legal work for plaintiff in a <i>qui tam</i> suit prior to becoming an alderman was advised that Ordinance allows the alderman to receive the full portion of any recovery from claims involving laws of other government entities, provided such recoveries are segregable from claims involving City law. But as to claims involving City law, the alderman-attorney could recover only the reasonable value of legal services provided prior to becoming a City elected official.	Alderman; attorney; <i>qui tam</i> ; fees; fee-splitting; contingent fees; representation; interests adverse to the City; party to lawsuit; <i>quantum meruit</i> ; reasonable value of legal services
16006.A https://www.chicago.gov/content/	Campaign Financing	This is a significant, precedential case. The Board determined that an entertainment management company was not doing business with the City by	Contract law; entertainment law; entertainment management company; artists' agent; warrant check; producer; political contribution; direct payment voucher;

dam/city/depts/ethics/general/AOCampFinancing/16006A.docx		representing artists for performances at City festivals, because the company was not a party to the City contracts for these performances; rather it was acting solely as the artists' talent agent. Thus, the company was not subject to the Ordinance's \$1,500 per year/per candidate/elected official limit in campaign contribution as a person doing business with the City.	doing business with the City; music festivals; performers; campaign contribution; artist rider; to, from or with any City agency; involving the City; purchase; agency law; principal; parties to contracts; privity of contract; talent agent; California Labor Code; client trust account; furnish the services of; f/s/o
16009.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/Deck%20Chairs/NerFid/16009.Q.docx	Post-employment	A departing high-ranking employee was advised of the relevant one-year subject matter and permanent prohibitions, and the two-year lobbying prohibition.	Post-employment; one-year prohibition; subject matter; contract management authority; two-year lobbying prohibition
16011.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/AOPostEmploy/16011Q.doc	Post-employment	A departing high-ranking employee taking a position with a City vendor was advised of the relevant one-year prohibitions (effectively covering all transactions with the employee's former City department), permanent prohibitions (effectively covering all contracts in effect during the entire term of employment in the department), and the two-year lobbying prohibition.	Post-employment; one-year prohibition; subject matter; contract management authority; two-year lobbying prohibition; ultimate responsibility; deployment of crews; routine and emergency projects; lobbyist; management and operation
16013.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/Deck%20Chairs/NerFid/16013Q.pdf	Aspirational Code; Attorneys; Elected Officials; Lobbyist Registration and Disclosure	A legislative caucus was advised that the Ordinance does not prohibit an attorney and registered lobbyist from advising it, but that the situation creates an appearance of impropriety that would be removed by retaining a different attorney who does not lobby before them.	Appearance of impropriety; lobbyist; legislative caucus; attorney; pro bono; elected officials; aspirational code of conduct; preferential treatment

<p>16015.Q</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec%20Chairs/NerFid/16015Q.docx</p>	<p>Fiduciary Duty; City Property; Confidential Information; Representation of Other Persons; Aspirational Code; Whistleblower Protection</p>	<p>A City employee reported facts indicating that another employee (a person supervised by the reporting employee) asked another departmental colleague to handle an application submitted by an immediate family member for City assistance from their City department, and that this colleague had determined that the immediate family member did not meet the program's criteria and denied the application. The employee-relative then appealed to department's senior management, which reversed the denial, and directed the employee reporting to the Board to act on the reversal, which the reporting employee refused to do. The Board advised the reporting employee to report the matter to the Inspector General, and discussed several possible violations of the Ordinance, which, the Board stated, require a full factual investigation.</p>	<p>Disciplinary action; relative; immediate family member; application for City services; advocate for relative; fiduciary duty; conflicts of interest; favoritism; improper use of City property; improper use of City authority; representation; Personnel Rules; aspirational code of conduct; Office of Inspector General; referral; investigation; Whistleblower protection</p>
<p>16019.Q</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec%20Chairs/LXIV/16019.Q.docx</p>	<p>Non-profit Board Service; Prohibited Conduct; Fiduciary Duty</p>	<p>A City department was advised that one of its employee's service on a non-profit organization's board prior to becoming a City employee did not preclude the department from entering into a partnership with this organization; however, to avoid even the appearance of impropriety, the department was advised that the employee should recuse from any such City discussions or decisions or from managing the partnership</p>	<p>Reverse revolving door; participated personally and substantially in that matter; pre-City employer; non-profit Board service; fiduciary duty; prohibited conduct; appearance of impropriety; pre-City employer; pre-City client; appearance of favoritism</p>
<p>16020.Q</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec%20Chairs/LXIV/16020.Q.docx</p>	<p>Elected Officials; Outside Employment; Conflicts of</p>	<p>An alderman became an employee (not an owner) of a business founded by the alderman's relative; the business has clients located both within and outside of the alderman's ward. The alderman was</p>	<p>Alderman; outside employment; relative's business; family business; financial interest; conflicts of interest; improper influence; representation; constituents; aldermanic services; zoning applications; providing</p>

https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec%20Chairs/LXIV/16020Q.docx	Interest/Improper Influence	advised of the relevant restrictions and prohibitions, most importantly that the alderman may not, in effect, act as the alderman for any of the business's clients, and if necessary, should ensure that a neighboring alderman evaluate and submit any recommendations requested by such clients, and of the relevant disclosure and recusal requirements.	aldermanic services; improper influence; business relationship that creates a financial interest
16021.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec%20Chairs/LXIV/16021.Q.docx	Post-employment	A departing City engineer who was planning post-City employment with a vendor of the engineer's City department was advised of the relevant prohibitions: (i) the employee was subject to a one year ban on all heating and refrigeration related projects at a City facility; and (ii) because the employee had exercised contract management authority with respect to nine (9) projects at the facility, is subject to a permanent prohibition with respect to assisting a new employer or client on these nine (9) projects.	One-year prohibition; subject matter; permanent prohibition; contract management authority; impermeable ethical screen; Requests for Qualifications; RFQ; Requests for Proposals; RFP; contract management authority; construction project; reviewing contract specifications
16032.A https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec%20Chairs/LXIV/16032.A.pdf	Gifts	This is a significant, precedential case. The Board determined that the Ordinance prohibit City officials or employees from purchasing face-value tickets from an entertainment or sporting event's host, for high-demand events where a reasonable persons would expect to have to pay in excess of \$50 over face value, unless the official or employee is performing an appropriate ceremonial function at the event – there must be a clear and direct connection between the person's performance of the ceremonial duty or action and the nature and location of the event itself.	Gift; prohibited gift; worth more than \$50; baseball tickets; Chicago Cubs; Chicago White Sox; Chicago Blackhawks; Chicago Bears; Chicago Bulls; sports events; concerts; public appearance; face value tickets; special access; fair market value; secondary market; StubHub; Vivid; high-demand entertainment events; post-season baseball; theater tickets; personal friend; personal friend exception; gift restrictions; gifts from family members; Jumbotron; ceremony related to official City business; aldermen; greater than \$50 differential; season tickets; same rights as other season ticket holders; Illinois State Officials and Employees Act; Illinois Ticket Sale and

		<p>The Board also discussed situations that may come up, such as accepting offers from a personal friend or family member, or buying last-minute tickets on the secondary market, and accepting tickets through one's outside employment or community activities.</p> <p>Note: in its January 2017 meeting, the Board determined that a City official or employee who accepts an offer from a host for face or reduced-value tickets to an event, then performs that event and wishes to leave the event early, may not give his or her ticket away to others – the ticket and offer are personal and non-transferable. This is Appendix I to the opinion.</p>	<p>Resale Act; Hamilton tickets; luck; official appearance; offers customarily made to others in the same situation; outside community activities; outside employment or position; non-City position; discounted or free tickets</p>
<p>16034.Q</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/AOCampFinancing/16034.Q.docx</p>	Campaign Financing	<p>This is a significant, precedential case. A City employee was advised that:</p> <p>(i) The manager of an LLC seeking to do business with the City, thus subject to the \$1500 per year/per candidate contribution limit, does not violate the Ordinance by making a contribution greater than \$1,500 in a single year, unless the manager was reimbursed by the LLC for the contribution. Should investigation show that, then the manager and LLC are treated as a “single person” and their contributions aggregated; both would then violate the Ordinance. Moreover, were there such reimbursement, there might be an additional violation by both: this could be a pseudonymous contribution, made other than in the name of the true donor.</p>	<p>Campaign contributions; reimbursement of an employee, officer, or director; LLC; limited liability company; \$1,500 per calendar year; aggregation of contributions; single person; covert reimbursement; pseudonymous contributions; contributions made other than in the name of true donor; 10-day notice; safe harbor rule; registered lobbyist; restricted campaign source; seeking to do business; campaign financing</p>

(ii) If a person makes a \$1,000 campaign contribution to a City elected official, in January, then, later in the same calendar year becomes a registered lobbyist, then, as the a registered lobbyist, makes another contribution to the same official's committee in the same calendar year, causing total contributions to exceed \$1,500 for the calendar year, then the person has violated the Ordinance. The \$1,500 contribution limitation applies per restricted source/per reporting/calendar year/per elected official or committee. When the person becomes a registered lobbyist, the person assumes the status of a restricted/limited contribution source for that reporting/calendar and may not make an excessive contribution during the same year.

(iii) Finally, to avoid a determination of a violation, there would need to be a refund so that total contributions from this lobbyist to this official/committee do not exceed \$1500 for the year. However, the Ordinance does not require the lobbyist to request it until both parties receive the 10-day notice provided, unless an investigation shows that the violation was "knowing" on both the part of the contributor/lobbyist and recipient elected official/committee at the time the contribution that put the total amount for the year at more than \$1500.

16035.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec%20Chairs/6/16035Q.pdf	Post-employment	<p>A departing high-level employee who oversaw various projects and supervised preparation of a grant application submitted by the employee's department to the proposed post-City employer was advised that:</p> <p>(i) the permanent prohibition restricts the employee from assisting or representing anyone other than the City, including the post-City employer, as to those projects and as to the grant, for their full term;</p>	<p>Post-employment; grants; private foundation; contract management authority; participated personally and substantially in the subject matter; business transaction involving the City; preparation of a grant application submitted by a City; bureau; two-year lobbying prohibition; Shakman-exempt</p>

		<p>(ii) the one-year restriction prohibits the employee from assisting or representing any person, including the new employer, even behind the scenes, not only on the grant, but also on other funding requests sent to or through the City bureau the former employee headed; and</p> <p>(iii) the employee is prohibited from lobbying the City department for two years.</p>	
16036.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec%20Chairs/6/16036Q.doc	Employment of Relatives of Domestic Partners; Attorneys	A City employee, an attorney, was advised that the work she performed in a legal proceeding did not constitute contract management authority over a consulting firm hired to assist her department in the proceeding; the attorney's fiancé works for the firm on non-City matters. Thus, the employee would not be required to recuse from further work on the matter.	Nepotism; fiancé; fiancée; attorney; consulting firm; consultant; contract management authority; retention agreement; working with a vendor; personal involvement in the or direct supervisory responsibility for the formulation or execution of a City contract; negotiation of contract terms or supervision of performance; relative; formulating the scope of services
16040.C https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec%20Chairs/6/16040C.docx	Political Activity; Minor violations	A City Council employee reported that an email with political content was inadvertently sent to constituents from an email address used for official City business. The Board determined that this constituted a minor violation of the Ordinance and admonished the employee accordingly. The employee resent the email from an appropriate email address.	Political activity; intentionally misappropriate City property for political activity; blast mail; inadvertent action; immediate corrective action
16041.A https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec	Travel; City Property; Fiduciary Duty	This is a significant, precedential case. The Board determined that, in a hypothetical situation posited to it, the Ordinance did not prohibit a 501(c)(3) organization, which receives City funds, from underwriting the cost of a high-ranking City official (or the official's	Travel; public-private partnership funding travel; transparency; 501(c)(3); religious leader; official's spouse; official travel; gift to the City; travel expenses for a meeting or appearance related to a public purpose; church; international travel; elected officials; gift accepted on behalf of the City; <i>ex officio</i>

k%20Chairs/6/16041A.docx		<p>spouse or staff) to travel internationally to a ceremony at which a local religious leader was honored at a ceremony hosted the leader of an international church, provided that acceptance of these the travel expenses were publicly reported as required by the Ordinance. The facts that the organization does not regard itself as subject to the Freedom of Information Act, or that City funds may have been used in part to fund the travel, or that the official is the <i>ex officio</i> Chair of the organization's board, did not affect this determination.</p> <p>The Board recommended that the City work with the organization so that it voluntarily and publicly discloses the precise source and legal provenance of the funds used to underwrite travel by City officials or employees, as that would help to quell any claimed lack of transparency.</p>	<p>Chair of board of directors; use of public or taxpayer funds; public purpose; disclosure</p>
<p>16043.Q</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec%20Chairs/6/16043.Q.docx</p>	<p>Elected Officials; Financial Interest in City Business</p>	<p>An elected official was advised that the Ordinance did not prohibit the official's purchase of real estate through a scavenger sale or other tax-delinquency sale, but that the Ordinance prohibits the use of any confidential or non-public information in that process. Scavenger and other tax-delinquent property sales are conducted with a process of public notice followed by competitive bidding and are thus not prohibited by Ordinance's the financial interest in City business provision. The official was advised to consult with private counsel as to whether any state laws may apply, and</p>	<p>Elected officials; scavenger sale; property sold for taxes or assessments; tax-delinquency sale; real estate; property taxes; financial interest in City business</p>

		as to how to title any property purchased through the process.	
17003.A https://www.chicago.gov/content/dam/city/depts/ethics/general/Deck%20Chairs/6/17003A.docx	Gifts, City Council employees; Outside employment	This is a significant case. The Board determined that: (i) "City Council employees," including individuals paid by independent contract by aldermen or City Council committees, are "employees" not "contractors" for purposes of the Ordinance; (ii) the Board was unable to make a conclusion as to whether compensation received by a City council employee through a GoFundMe campaign was wholly unrelated to the services the City Council employee performed for an aldermanic office; and (iii) the Ordinance's gift restrictions apply to City employees or officials who would be beneficiaries of "GoFundMe" or other on-line funding campaigns and thus the compensation, if cash or cash equivalent, must be from personal friends or relatives, or related to the authorized outside business, employment or community activities of the City council employee.	Gifts; City Council employee; contractor; subject to the Ordinance as employees; GoFundMe; on-line funding campaigns; wholly unrelated; personal friend; soliciting or receiving anything of value in return or exchange for information about the operation or business of the City; cash or cash equivalent; any benefit resulting from the outside business, employment or community activities of the employee or official; not offered or enhanced because of the official position, candidacy or employment of the official or employee
17004.A https://www.chicago.gov/content/dam/city/depts/ethics/general/AO	Gifts	The Board, applying an equity and fundamental fairness analysis, determined that a City employee who had recently experienced the death of a covered relative (leaving the employee and a minor child as survivors) was not prohibited from: (i) receiving anonymous	Gifts; cash gifts; personal friend; covered relative; death of a covered relative; GoFundMe; equity; fairness; Homestead cases; death of a loved one; court of equity; on-line funding mechanism; minor child; survivor; family members; cash equivalent; Statement of Financial Interests

GiftsTravel/17004.A.docx		<p>cash (or cash equivalent) gifts from persons who are not personal friends or relatives, in amounts up to \$50; or (ii) could receive cash (or cash equivalent) gifts from personal friends, relatives, or other City employees and officials. The opinion explains that no gifts may be offered or accepted based on a mutual understanding the City decisions would be affected, and explains the reporting requirements on the Statement of Financial Interests.</p> <p>The opinion briefly discusses on-line funding mechanisms, such as GoFundMe and contains a detailed analysis of what constitutes a “personal friend.”</p>	
<p>17008.Q</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/Decision%20Chairs/6/17008.Q.pdf</p>	<p>Post-employment; City Council employees</p>	<p>A former City council employee/aldermanic aide who had terminated City employment 17 months prior to requesting an opinion was advised that: (i) the Ordinance’s post-employment restrictions on lobbying do not apply to former employees of the City Council; (ii) the Ordinance’s one-year subject matter prohibition had expired and thus did not apply to the person’s proposed post-City employment; (iii) the former employee had participated personally and substantially in one administrative proceeding involving the City, thus was permanently prohibited from assisting a new client or employer as to that proceeding; (iv) the former employee had not exercised contract management authority during City employment; and (v) the Ordinance did not prohibit the former employee from</p>	<p>Post-employment; contract management authority; participated personally and substantially in the subject matter; participated personally and substantially in a judicial or administrative proceeding involving the City; permanent prohibition; permit expeditor; two year lobbying prohibition; former City council employee; former aldermanic aide; one year subject matter prohibition; expired; after one year after leaving City service</p>

		engaging in the proposed post-City employment as a permit expediter.	
17009.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec%20Chairs/6/17009.Q.pdf	Outside employment	<p>This is a significant case. A City employee was advised that the Ordinance does not prohibit outside employment as a salesperson [and equipment demonstrator] for a company that sells high resolution scanners, but is subject to the following restrictions: (i) the employee must obtain all relevant department approvals; (ii) may not receive any compensation or other thing of value in exchange for advice or assistance that in any way related to the work of the employee or the employee's department; (iii) may not represent, advocate for or act as a spokesperson or salesperson for the outside, secondary employer in any formal or informal transactions or conversations with other City officials or employees; (iv) may not assist the outside, secondary employer with respect to any bids for City contracts, nor help prepare, estimate or review plans or specifications which the employer may use in submitting a bid for a City contract; (v) may not access any City records for the benefit or the outside, secondary employer, or work on any projects directly related to the employee's City department for the outside, secondary employment; and (vi) was advised of the fiduciary duty obligation and prohibitions against using any City-owned property in course of outside employment or using or divulging confidential or non-public information.</p>	<p>Outside employment; secondary employment; outside job; second job; departmental approval; salesperson; high-resolution scanners; aviation work; police work; wholly unrelated; representation of third parties; fiduciary duty; money for advice; soliciting or receiving anything of value in return or exchange for information about the operation or business of the City; wholly unrelated; confidential information; assist outside employer in preparing bids or solicitations prohibited; accessing City records prohibited</p>

<p>17010.Q</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/Deck%20Chairs/6/17010.Q.pdf</p>	<p>Outside employment; Financial Interest in City Business</p>	<p>A City employee was advised that the Ordinance does not prohibit the employee from engaging in or owning a business that develops real estate, however: (i) the employee is prohibited from representing the business in seeking a license from the employee's own City department (corporate counsel would do this); (ii) the employee would need to obtain all relevant departmental approvals; (iii) the employee may not represent or act as a spokesperson for the business in any formal or informal transaction before the City; (iv) the employee may not make or participate in any City licensing or permitting or other regulatory decisions that would benefit the outside business; and (v) the employee may not have a financial interest in the purchase of City-owned real estate, unless the property is sold pursuant to a process of competitive bidding following public notice, or the property is being sold pursuant to a program for which City employee or officials have been designated (by the Commissioner of the Department of Planning & Development) as being eligible to participate to same degree as any member of the general public.</p>	<p>Outside employment; secondary employment; outside job; second job; departmental approval; real estate developer; conflicts of interest; recusal; financial interest in City business; purchase of City-owned real estate; seeking City licenses or permits; corporate counsel; recuse; regulatory decisions; may not participate in the making of any City decision; Department of Planning & Development; eligible programs; vacant lot; ANLAP Program; sold pursuant to a process of public notice followed by competitive bidding</p>
<p>17013.Q</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/2017/17013.Q.docx</p>	<p>Elected officials; Non-profit Board Service</p>	<p>An alderman was advised of the standard restrictions applicable to serving on the board of a non-profit organization: (i) fiduciary duty; (ii) representation (and that the alderman would likely be able to do much more for this non-profit organization as an alderman, and should seriously consider whether declining this invitation may be more in the organization's best</p>	<p>Volunteer board service; non-profit organization; representation; alderman; aldermanic letterhead; fiduciary duty; confidential information; recuse; fundraising; charitable contributions; solicit;</p>

		interests); (iii) use of City-owned property, including the alderman's official title, and aldermanic letterhead; (iv) use or disclosure of confidential information; and (v) fundraising: the alderman may not solicit gifts or contributions on behalf of the non-profit from any person or entity if the alderman knows that the person or entity is seeking administrative or legislation action from or with the City and the alderman is in a position to directly affect the outcome of that action. This would, for example, preclude the alderman from "doing the ask" of any real estate developer with ongoing projects in the alderman's ward, or who have regularly permitting or zoning issues in which the alderman's office becomes involved.	
17014.A https://www.chicago.gov/content/dam/city/depts/ethics/general/2017/17014.A.pdf	Gifts	The Board advised City Council members, the Clerk and Treasurer, department heads, and other potential invitees (and the White Sox organization) that an invitation to the Chicago White Sox home opener constitutes a prohibited gift and must be declined. The offer included two (2) complementary tickets and a cocktail reception and was worth more than \$50 per recipient.	Baseball tickets; Chicago White Sox; prohibited gift; worth in excess of \$50 from a single source; cocktail reception; public appearance related to official City business; home opener
17015.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/Dec%20Chairs/6/17015Q.doc	Lobbyist Registration and Disclosure; Attorneys; Labor unions	An attorney who represents labor unions in negotiations with the City over collective bargaining agreements was advised that activity does not constitute lobbying under the Ordinance and does not require registration as a lobbyist.	Attorneys; lobbyists; lobbying; collective bargaining agreements; labor law; labor negotiations; negotiator; labor unions; non-profit; fair share; transparency; external statutory controls

17017.CF

<https://www.chicago.gov/content/dam/city/depts/ethics/general/AOCampaignFinancing/17017.cf.doc>

Campaign Financing

This is a significant case, one of the most important campaign financing cases ever issued by the Board of Ethics. The Board determined that:

(i) various businesses constituted “affiliated companies for purposes of the Ordinance’s limitations on political contributions, based on factors set for in previous Board opinions 03010.55.CF; 13043.A;

(ii) to take no further action as to contributions made to an elected City official’s authorized political committee by individual executives, employees, or owners of the contributor and/or its various businesses, because nothing in the record before the Board caused it to believe that these contributions constituted even potential violations of the Ordinance. Rather, there would be violation from an individual executive’s or owner’s, etc. contributions if and only if, at the time the individual made a contribution exceeding \$1,500 to the authorized political committee, he or she was either individually doing or seeking to do business with the City or a named sister agency, or was a registered lobbyist, or was at any time reimbursed for the contributions by the business or employer;

(iii) affiliated companies of the contributor, which were named in documents transmitted to and then approved by City Council in an ordinance enabling these

Campaign contributions; airports; concession agreements; food or retail business; airport; “affiliated companies”; “seeking to do business”; \$1,500 political contribution limitation; campaign financing ordinance; individual contributions; reimbursement; registered lobbyist; piercing the corporate veil; owner; executive; officer; director; doing business with the City; privity of contract; within six months of the matter pending before City Council; tenant; Subtenant; named in documents transmitted to City Council; refund of excess contribution; erase violation; by operation of law; three times the amount in excess of \$1,500; 3x; treble damages; fines

companies to operate retail or food concessions at one of Chicago's airports, were "seeking to do business" with the City because they had a "matter pending before the City Council involving concession agreements" in the six months prior to the date other affiliated companies made contributions in a calendar year exceeding \$1,500 to the authorized political committee of an elected official – they had a matter "involving concession agreements." Thus, as a matter of law, to be deemed to be seeking to do business with the City by virtue of having had a matter involving concession agreements pending before City Council, a concessionaire must be named in the documents transmitted to City Council as a tenant, subtenant, etc.;

(iv) these named concessionaires or "Subtenants" were not "doing business with the City," because they did not have privity of contract with the City. See Case No. 16006.A;

(v) there was an Ordinance violation by both the contributor and elected City official's political committee, because affiliated companies had contributed in excess of \$1,500 in a calendar year to the committee within six months of the period in which the matter involving concession agreements (in which affiliated companies were named concessionaires) was pending before City Council;

		(vi) the Board advised the political committee and contributor to take the steps prescribed under the Ordinance to effect a refund of the excess amount contributed, thus erasing a violation by operation of law, or present the Board a valid reason why reimbursement was or should not be effected, and that, if neither a refund nor valid reason for no refund was presented, the Board would impose the penalties prescribed in the Ordinance, namely a fine of three times (3x) the amount of the excessive contribution, imposed on each: the contributor and committee.	
17017.CF Reconsideration https://www.chicago.gov/content/dam/city/depts/ethics/general/AOCampaignFinancing/17017.cf-recon.docx	Campaign Financing	<p>The political committee and contributor in Case No. 17017.CF requested that the Board reconsider its determination in its June 1, 2017 opinion. It argued that the affiliated companies named in documents submitted to City Council never intended to own operate stores at the City facility and would thus not be subtenants or sublessees at the airport, but instead intended, pursuant to a Letter of Intent, to license the concepts, trade dress, know-how and trademarks to a separate entity, which would own and operate the stores at the City facility, and thus did not have a matter pending before City Council.</p> <p>The Board rejected this argument, and refused to reconsider its initial determination, on the basis that the three affiliates were in fact named in the documents, and that as practical matter it made no difference to the City department which proposed the</p>	<p>Request for reconsideration; campaign contributions; airports; concession agreements; food or retail business; airport; “affiliated companies”; “seeking to do business”; \$1,500 political contribution limitation; campaign financing ordinance; individual contributions; reimbursement; registered lobbyist; piercing the corporate veil; owner; executive; officer; director; doing business with the City; privity of contract; within six months of the matter pending before City Council; tenant; Subtenant; named in documents transmitted to City Council; refund of excess contribution; erase violation; by operation of law; three times the amount in excess of \$1,500; 3x; treble damages; fines; trademark law; franchisor; franchisee; licensor; licensee; trade dress; trademarks; degree of control; subtenant; sublessee; real party in interest</p>

		<p>ordinance to the City Council, or to the City Council, or to the general public that these stores would be licensed or franchised, and the umbrella company is the real party in interest in the concession agreement and that all good will (or bad will) would redound to the licensor, not to the unknown licensee.</p> <p>The Board again advised the political committees and the contributor to return excess contributions within 10 days to erase a violation as a matter of law.</p>	
<p>17044.C</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/AOInterestCityBusiness/17044.C.pdf</p>	<p>Financial Interest in City Business; Minor Violations; City Council Employees</p>	<p>The Board determined that an executive branch employee violated the Ordinance by having several independent services contracts with an aldermanic office, paid with City funds, that were worth more than \$1,000 to the employee. However, the Board also determined that the violation was minor, because: (i) the employee terminated the contract immediately upon being informed of the potential violation; and (ii) both the aldermanic office and the employee's own department had approved the outside/secondary employment and had not contacted the Board, which would have advised that the contract was prohibited.</p> <p>The case is noteworthy because the Board also held that a financial interest means an ownership interest worth more than \$1,000 in a calendar year, not over the entire term of a contract.</p>	<p>Personal services contract; financial interest in a contract, work or business of the City; paid with City funds; aldermanic independent contractor; minor violation; contract worth more than \$1,000; calendar year; personal services contract; estoppel; fairness</p>
<p>17052.Q</p>	<p>Campaign financing; elected officials</p>	<p>In late 2017, a City elected official's political committee received through the US Postal Service a \$1,500 check in a</p>	<p>Political contributions; campaign contributions; \$1,500; calendar year; damaged check; damaged envelope; Illinois</p>

https://www.chicago.gov/content/dam/city/depts/ethics/general/AOCampFinancing/17052Q.docx		<p>damaged envelope; the check was from a person doing business with the City (the contributor made no other contributions to the committee in 2016). However, the check was in a damaged envelope delivered by the US Postal Service, postmarked in December 2016 and the check was dated December 2016, but never received and deposited. As more than 180 days passed since the date of the check, it was no longer negotiable. Because the Illinois Election Code does not prohibit accepting this check in 2017 but crediting it as a donation received in the previous calendar year, the elected official was advised that his political committee could accept this “second” \$1,500 political contribution if re-drawn by the contributor, in late 2017, even though his committee had already accepted \$1,500 in contributions from this same contributor in 2017 and recorded as a 2016 contribution. The rationale is that the contributor intended to contribute \$1,500 in 2016, but, due to <i>force majeure</i> – factors beyond the parties’ control – that contribution was never received.</p>	<p>Election Code; Illinois State Board of Elections; <i>force majeure</i>; factors beyond the parties’ control; Act of God; prior year’s contribution; US Postal Service; damaged mail; intent of the parties</p>
<p>18003.Q</p> https://www.chicago.gov/content/dam/city/depts/ethics/general/AOElectedOfficials/18003.QL.docx	<p>Elected officials; Non-profit Board Service</p>	<p>An alderman was advised of the relevant restrictions on serving as President of a non-profit board, including fiduciary duty, representation, fundraising, and use of City title, resources, and property.</p>	<p>Volunteer board service; non-profit organization; representation; alderman; aldermanic letterhead; fiduciary duty; confidential information; recuse; fundraising; charitable contributions; solicit; officer</p>

18006.A

https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_ElectOfficials/18006.A.docx

Elected officials;
Attorneys;
Conflicts of
Interest/Improper
Influence

This is a significant case. The Board determined that an alderman with an outside law practice did not violate the Ordinance's conflict of interests or improper influence provisions by stating, on the record of a City Council meeting, that an order proposed by other aldermen should be referred to a committee other than the one to which it was originally assigned. The Board's determination was based on an affidavit from the alderman that he did not know that persons his law firm had represented were named in the order at the time he made the statement on the record, and discovered that after the meeting, not having been informed of this by his colleagues, or anyone else until after the meeting.

The Board determined that, as a matter of fundamental fairness, the provisions of the Ordinance's conflict of interests and improper influence require that a City employee or official have knowledge of a potential conflict before becoming involved in a City Council or other action. The Board did not need to reach the issue of whether the sequence of events at the meeting constituted a "decision" or a "discussion," but did conclude that it constituted an "action."

The Board also noted that a media reporter does not have standing to receive an advisory opinion from the Board of Ethics unless the reporter is personally involved in the situation.

Alderman; lawyer; attorney; real estate tax; Cook County Assessor; Cook County Board of (Tax) Review; conflict of interests; improper influence; "calling" a committee' Committee on Committees, Rules and Ethics; assessments; Law Department; properties; City Clerk; aldermanic orders; scienter; knowledge; chance to review legislation; City Council Rule 42; affidavit; media; press; reporter; standing; advisory opinion; Board Rules; fundamental fairness

18007.A

https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_ElectOfficials/18007.A.pdf

Elected Officials;
Representation;
Conflicts of Interests;
Outside
Employment;
Fiduciary Duty;
Attorneys

This is a significant, precedential opinion. The Board addressed City Council members engaged in private law practice, in order to clarify how the Ordinance applies to: (i) City Council members who practice law; (ii) Council member-attorneys whose outside law firms represent clients in matters pending before City Council or other City departments; and (iii) City Council members who themselves or whose firms represent clients in judicial or administrative proceedings before courts or administrative agencies, in which the City may be a party.

Citing the Illinois Supreme Court's 1990 opinion in *in re Vrdolyak*, the Board determined that the Ordinance does not prohibit City officials or employees from maintaining outside law practices and representing clients in suits or proceedings against government entities other than the unit of government to which they were elected: here, the City, including in tax abatement proceedings, until and unless the City intervenes and becomes a party.

The Board also stated that the question of whether laws governing these representations by City employees and elected officials should be amended to prohibit this kind of representation outright is a question for the City Council.

Given that the fairness of Cook County property tax assessment processes has

Alderman; lawyer; attorney; real estate tax; Cook County Assessor; Cook County Board of (Tax) Review; conflict of interests; improper influence; public duties; *In re Vrdolyak*; Illinois Rules of Professional Conduct; *pro bono*; fiduciary duty represent; receive or derive compensation from the representation of; judicial proceedings; quasi-judicial proceedings; adverse party; where the City's interests are adverse; recusal; receive or derive income or compensation from the matter; question for City Council; Illinois Supreme Court; party; not a party; property tax abatement proceedings

		been publicly questioned, the Board recommended to the City Council that it consider what steps it can take to bolster confidence in those practices and processes.	
18008.LOB https://www.chicago.gov/content/dam/city/depts/ethics/general/AOLobby/2017/18008.LOB.doc	Lobbyist Registration and Disclosure	A membership-based non-profit advocacy organization, operating nationwide, sent an open letter to all members of the City Council advocating that they vote against a proposed package of financial assistance being offered by the City to a business. Board staff wrote the organization that there was probable cause to believe that two employees who authored and sent the letter were lobbying on behalf of the organization's membership and required to register. In response, the organization stated that all of its members are natural persons, and none is a corporation or other entity. Staff concluded that the two employees were not required to register as lobbyists.	Lobbying; not-for-profit entity; membership-based organization; advocacy; for-profit entities; individuals engaged in a for-profit enterprise; individual members; natural persons; not lobbying; corporate members
18010.A https://www.chicago.gov/content/dam/city/depts/ethics/general/AOSexHarr/18010.A.pdf	Sexual harassment	The Board determined that it had no jurisdiction to address allegations that a City official violated the Ordinance's sexual harassment and duty to report corrupt or unlawful actions provisions, because the acts alleged to constitute sexual harassment occurred prior to the date on which the sexual harassment provisions took effect. The Board also declined to exercise its jurisdiction to issue an opinion addressing whether there may have been violations of other Ordinance provisions unless and until the	Sexual harassment; <i>ex post facto</i> law; duty to report criminal or corrupt activity; jurisdiction; City elected official; Inspector General

		<p>Inspector General conducts a full investigation.</p> <p>The Board stressed that its opinion is not intended to lessen nor should be interpreted to lessen the seriousness of sexual harassment, even if it occurred prior to the Ordinance's amendments prohibiting it.</p>	
<p>18011.A</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/AOSexHarr/18011.A.pdf</p>	Sexual harassment	<p>This is a significant opinion. The Board interpreted the Ordinance's newly enacted sexual harassment provisions, which make clear that their purpose is to make it a violation of the Ordinance if a City elected official engages in sexual harassment <i>while acting or being reasonably perceived to be acting as a City elected official</i>. For a situation to fall under the purview of the Ordinance's sexual harassment provisions: (i) there must be a clear connection between the elected official's conduct (whether action or inaction) alleged to constitute sexual harassment and either a City decision or action, or the official's authority as a City elected official; or (ii) the action or inaction allegedly constituting sexual harassment – whether in a City governmental workplace or other setting – must have some clear connection to the City official's governmental actions, decisions, or actual or perceived authority as a City elected official; or (iii) the conduct allegedly constituting sexual harassment must affect the working environment of the person alleging <i>harassment while this person is working with the City elected</i></p>	<p>Sexual harassment; City elected officials; ambit; purview; purpose; legislative intent; <i>acting or being reasonably perceived to be acting as a City elected official</i>; clear connection between conduct; action; inaction; City decision; City action; official's actual or perceived authority; qua City elected official; hostile working environment; lobbyist; CTA patron; singles' bar; sexual intent</p>

		<i>official in the official's capacity as a City elected official.</i>	
18013.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_ConflictOfInterest/18013.Q.pdf	Prohibited Conduct	A City employee was advised that he was not in violation of the Ordinance's two-year reverse revolving door ban on making or participating in City governmental decisions with respect to the non-profit entity of which he had been the volunteer Executive Director immediately prior to beginning his City employment, because he had actually quit the position before starting with the City and was not paid for the position in the first place. Still the Board concurred in the advice he had received from his own department, to recuse himself for two years from dealing in his City job with this entity, to avoid even the appearance of impropriety.	Reverse revolving door; pre-City employer; volunteer Executive Director; unpaid position; financial interest; derive income or compensation; two-year ban; conflict of interest; appearance of impropriety; non-profit organization;
18022.A https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_CampaignFinancing/18022.A.doc	Campaign Financing	This is a significant, precedential case. The Board determined that the \$1,500 per candidate/per calendar year campaign contribution limit in §2-156-445(a) of the Ordinance does not apply to a person who would make charitable donations directly or indirectly to the City and/or a City sister agency, even though these donations are memorialized in written contracts – in other words, those contracts do not cause the person to be "doing business with the City" or a sister agency. The Board concluded that such contracts, analogous to collective bargaining agreement negotiated by labor unions (see Case No. 15041.A) are not the type of procurement contracts that are meant to be covered in the definition of	Campaign contributions; campaign financing; political contributions; doing business with the City; doing business with a sister agency; charitable donations; collective bargaining agreements; pay-to-play; procurement contracts; intent of the statute; contractor; Internal Revenue Service; tax treatment; procurement contracts; procurement process

		"doing business with" the City or a sister agency.	
18027.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/AOPostEmploy/18027.Q.pdf	Post-employment	<p>A former City employee who wished to serve as a volunteer for their former City department was advised that the one-year subject matter prohibition still applies: the Ordinance makes no distinction between those who would volunteer to work on transactions involving the City in which they were personally and substantially involved versus being paid for such work. The opinion also reiterates that "transaction involving the City" means the business of the City department, not just contracts for good or services in which money trades hands. The former employee was advised that there is no right to volunteer for one's former City department, and that the only way this could occur would be if the City seeks the former employee's services and the conditions set forth in Case Nos. 93018.A and 99010.A.</p>	<p>Post-employment; consulting agreement between the City and a former employee; Executive branch; owe sole fiduciary duty to the City; written agreement; independent contractor; City seeks the service of the former employee; language obligating the former employee to act at all times in the City's best interests; subject matter; exemption or exception from the post-employment provisions; purpose of the post-employment or revolving door restrictions; volunteer with former department; no right to volunteer</p>
18031.C https://www.chicago.gov/content/dam/city/depts/ethics/general/AOPolActvty/18031.C.doc	Political Activity; Pension Funds	<p>The Board received an anonymous voicemail from a person who said she is a City employee, claiming that, at her department's offices during worktime, a fellow employee asked co-workers to sign his petitions to appear on the ballot to be re-elected as a trustee of a Pension Board.</p> <p>Assuming an investigation by the Office of Inspector General ("IG") sustains these facts, a threshold issue here is whether the employee violated the Ordinance by</p>	<p>Prohibited political activity; anonymous complaint; trust of a Pension Board; Inspector General; IG; OIG; elective office; intentionally performing prohibited political activity during compensated time; City-owned property</p>

		<p>performing “prohibited political activity” on City time and/or using City property.</p> <p>Staff concluded that the Pension Board position for which this employee was campaigning is not an “elective office” under the Ordinance, and thus this activity would not violate the Ordinance’s provisions prohibiting City employees from intentionally performing any prohibited political activity during compensated time. See <i>also</i> Case No. 92026.A.</p> <p>However, this conduct may violate the City’s Personnel Rules, or the Ordinance’s “unauthorized use of City property” provisions. Accordingly, the Board referred the matter to the IG.</p>	
<p>18032.A</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_PolActivity/18032.A.pdf</p>	<p>Political Activity; Contributions on City Property</p>	<p>The Board addressed the limitations on those holding political events in City-owned buildings like City Hall, including events where political banners are displayed or candidates make speeches about their positions on issues important to the electorate.</p> <p>It determined that any person or candidate may, without violating the Ordinance, engage in this type of political activity in City Hall or other City-owned property, provided the person or candidate: (i) duly reserves or books the space through the appropriate City authority and pays fair market value for the particular space (which could be zero); and (ii) there is no intentional solicitation, acceptance, offer, or making</p>	<p>City property; political activity; prohibited political activity; solicitation of political or campaign contributions; political banners; political speeches; City Hall; new conferences; political event; political rally; absolute prohibition</p>

		of political contributions on City property, as this prohibition is absolute.	
18033.A https://www.chicago.gov/content/dam/city/depts/ethics/general/AOCampFinancing/18033.A.pdf	Campaign Financing	<p>The Board addressed the question of whether owners of other key personnel from entities subject to the \$1,500 per year/per candidate restriction contribution restriction are subject to contribution limitations, and if so, which.</p> <p>Say a company C does business with the City and is thus subject to this limitation. Say C's shares are 100% owned by one individual, O. C contributes the maximum annual amount, \$1,500, to Mayoral candidate M's authorized candidate committee in a calendar year. May O also contribute to M's authorized candidate committee in this same year?</p> <p>The answer: provided O: (i) is not a registered lobbyist; or (ii) has not individually done business with the City or its named sister agencies in the last four (4) years; or (iii) is not individually seeking to do business with the City or its named sister agencies; or (iv) is not reimbursed for the contribution by C or any of C's affiliated entities nor has O treated C and its operating assets in such a way that the corporate veil could be pierced, then the only limits on O's contributions to M or to any other candidate(s) for the February 2019 election are those imposed by the Illinois Election Code. The Board understands that those state law limits (which would otherwise be \$11,100 for C and \$5,600 for O during the current election cycle, subject to adjustment on</p>	<p>Straw man contributions; political contributions; key personnel; owners; directors; senior management; reimbursement of contributions; Illinois Election Code; "caps are blown"; Mayoral candidates; 2019 Consolidated Municipal election; 100% owner; affiliated entities; corporate contributions; doing business with the City; registered lobbyist; seeking to do business with the City; home rule; <i>Berrios v. Cook County v. Board of Ethics</i>; piercing the corporate veil</p>

		<p>January 1, 2019) were eliminated entirely from the 2019 Mayoral and several aldermanic races because one or more candidate(s) contributed in excess of \$100,000 to their own authorized candidate committees. Thus, in effect, O may make unlimited contributions to M and/or any other candidates for Mayor or aldermen in those races (see fn. 1, above) in the upcoming election, provided conditions (i)-(iv) listed above in this paragraph are satisfied.</p> <p>The Board commented that, while the law is clear, the Board is sensitive that these circumstances may be perceived as a “loophole” allowing unlimited funding and thus potentially undue influence on Mayoral and/or aldermanic candidates by wealthy individuals or other interests. Pursuant to the Board’s power and duty to recommend legislative action under §2-156-380(f) of the Ordinance, the Board will at the appropriate time present to the City’s policy-makers proposals to bring Chicago’s laws more in accord with those of other jurisdictions that have addressed this issue.</p>	
18036.A1 https://www.chicago.gov/content/dam/city/depts/ethics/general/AOPolActivity/18036.A.1.pdf	City-Owned Property; Political Activity	This is a significant opinion. The Board determined that reproductions or facsimiles of the official seal of the City of Chicago may not be used in campaign literature, stickers, signs or other printed, broadcast, or web-based materials or communications promoting a candidate for City elected office.	Official City Seal; prohibited political activity; City-owned property; potential to mislead; New York City Conflicts of Interest Board; electioneering communications; candidate for City elected office; aldermanic candidate; Mayoral candidate; private use of City seal; campaign buttons; campaign signs; campaign mailings; campaign stickers; web-based communications; broadcast communications

<p>18036.C</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/AO-City%20Owned%20Property/18036.C.doc</p>	<p>City-Owned Property; Political Activity; Minor Violations</p>	<p>The Board determined that an aldermanic candidate committed a minor, technical violation when a campaign staffer placed a political decal on his car; the decal had an image of the official City seal. The candidate's violation was unknowing and was corrected immediately.</p>	<p>Official City Seal; prohibited political activity; campaign signage; electioneering communications; private use of City Seal; minor violation; unknowing; immediate correction</p>
<p>18038.A1</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/AO-City%20Owned%20Property/18038.A.1.pdf</p>	<p>City-Owned Property; Elected Officials; Political Activity</p>	<p>This is a significant, precedential case. The Board addressed: (i) the use of social media accounts by City of Chicago elected officials and Chicago Police Department personnel, and, by extension, City employees and officials generally; and (ii) what content can be posted to each type of social media account, consistent with the Ordinance. There are three (3) essential types of these accounts or sites discussed: (i) official, (ii) political/campaign, and (3) "personal" ones displaying elements of the first two. The Board determined that:</p> <p>1. City elected officials' "political/campaign" websites or social media accounts may include content regarding City/ward business, provided these website or accounts: (i) are not funded or maintained with City resources; (ii) do not take on the character of an "official" City website or page, such as including the City seal or links to the City's website or City services in such a manner as users could reasonably think it is a City page; and (iii) contain appropriate disclaimer language on the main page</p>	<p>Social media; Facebook; Twitter; aldermen; elected officials; websites; Chicago Police Department members; political websites; campaign websites; personal websites; social media accounts; official websites; ward websites; electioneering content; political content; City seal; not funded with City funds; political or campaign funds; assume the character of an official City site; political commentary; sample ballots; political endorsements; blocking users; blocking followers; delete followers; delete users; disclaimer language; CPD insignia; CPD intellectual property; obscene; profane; libelous; defamatory; commercial content; posted to sell goods or services</p>

identifying the accounts as personal, non-governmental accounts that do not represent the official policies or positions of the City of Chicago.

2. City elected officials may post political or electioneering content on their “personal” (and, course, their “political/campaign”) accounts or websites, including friendly or critical commentary on other politicians or their policies, campaign donation links, sample ballots, candidate endorsements, etc., provided these accounts or pages: (i) are not funded or maintained with City resources; (ii) do not take on the character of an “official” City website or page, such as including the City seal or links to the City’s website or City services in such a manner as users could reasonably think it is a City page; and (iii) contain appropriate disclaimer language on the main page identifying the accounts as personal, non-governmental accounts that do not represent the official policies or positions of the City of Chicago.

3. If City elected officials’ “official” or “personal” websites or social media accounts (as described below) do include the City seal and/or other indicia of an “official” City or ward website and otherwise meet the criteria described above, they must remain free of “electioneering” content, such as “Reelect me for the following reasons ...” and may have no links to any political committee or for making campaign donations, even if

		<p>the sites or accounts are funded fully with political or campaign funds and include any legally mandated language about their funding.</p> <p>4. Elected officials whose “personal” social media accounts include political content, such as political endorsements and/or opinion pieces on topics related to official City business, or include no political content but include postings commenting on public affairs or matters involving City government, should not block or delete followers from accessing such pages or delete critical or negative comments, unless the comments are obscene, profane, libelous or defamatory, or are commercial and posted to sell goods or services.</p> <p>5. Chicago Police Department (“CPD”) personnel are prohibited, pursuant to a departmental order, from posting intellectual property of the CPD or the City of Chicago, such as badges and logos, on their personal social media accounts.</p>	
<p>18038.A.1 Supplemental</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/supp_info/18038A1-SupplAO.pdf</p>	City-owned Property; Elected Officials	<p>This is a significant opinion. The Board concluded that elected official may use email lists acquired through official City business channels (e.g., from efforts to ask residents for their email addresses for purposes of receiving a regular Ward newsletter) may be used only for official City business purposes, but not for electioneering purposes or communications.</p>	Incumbent elected officials; electioneering communications; email addresses from residents; newsletters; City-owned property; use or permit the use of City-owned property for electioneering communications; political activity

<p>18038.A2</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/AOElectOfficials/18038.A.2.pdf</p>	<p>Political Activity; Elected Officials</p>	<p>The Board addressed whether aldermen may provide government-related or constituent services from a “political” or campaign office, and advised that:</p> <p>-- as a “best practice,” if a constituent asks an alderman about constituent, City or other governmental services while in their political office, the alderman should: (i) clarify that they are in the political office (and not in their City ward office); (ii) state that he or she can provide only informal advice (to avoid the appearance of an official City action); and (iii) once the issue or their informal advice becomes more substantive, refer the constituent back to the official City office or handle the matter in a non-political, non-City-owned location, like a coffee shop, restaurant, etc.</p> <p>--aldermen may provide general information about City services while attending a political event, but to avoid giving the impression of performing official City or aldermanic action while there, should refer the constituent to the appropriate official City office for handling.</p>	<p>Alderman; political office; campaign office; constituent services; City services; appearance that campaign contributions are necessary to receive City services; informal services; formal services; Ward office; neutral location</p>
<p>18040.A</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/AOElectOfficials/18040.A.1.pdf</p>	<p>Gifts; Prohibited Conduct; Fiduciary Duty</p>	<p>The Board considered whether City employees or officials who are interviewing with prospective post-City employers may accept travel expenses to conduct these interviews, and under what circumstances. It determined that, as a</p>	<p>Board’s inherent equity authority; fundamental fairness; travel expenses; interviewing with a prospective post-City employer; negotiating post-City employment; recuse; reimbursement; job opportunity; gift; prohibited gift; prohibited conduct; fiduciary</p>

matter of fundamental fairness, City employees or officials *may* accept reimbursement for travel from a person or entity with has interest in possibly employing them in order to facilitate the long-distance interviewing process, ***but with a critical proviso***: the interviewing City employee or official must recuse him- or herself from any City matters involving the prospective employer from the moment the interviewing process identifies a possible post-employment job opportunity with a particular entity, and must advise others at the City of his or her recusal and be screened from any involvement between the City and that possible employer.

Should the interview/negotiation process be ended without an offer of employment being extended, the City employee or official should not return to participating in his or her City position in pending matters involving the would-be employer without first considering discussing this with City superiors, and should be mindful that the Ordinance’s aspirational code of conduct requires them to “act impartially in the performance of their duties, so that no organization or individual is given preferential treatment” – the Board noting that this principle also applies where a City employee or official might harbor *negative* bias toward a would-be future employer if no job offer was forthcoming. Finally, the Board concluded that the fiduciary duty provision requires them to “put the best interests of the City before

duty; bias; negative feelings toward a would-be post-City employer; Homestead cases; principles of equity and justice

		any personal feelings they may have for the [would-be prospective employer] ... Any [City employee or official] who cannot exercise unbiased judgment, and therefore, would not properly perform their duties as City [employees or officials] should recuse themselves.	
19008.C https://www.chicago.gov/content/dam/city/depts/ethics/general/AO-City%20Owned%20Property/19008.C.pdf	City-owned Property; Minor violations	<p>An aldermanic candidate was found to have committed a minor violation by using the official City seal on apparel the candidate was wearing in two political mailers and sent a letter of admonition. In coming to the determination that the violation was minor, the Board focused on the relative insignificance of the seal within the overall mailings, and the fact that the candidate self-reported to the Board. See <i>also</i> Case No. 18036.A.1.</p> <p>Note: mailers also contained images of Chicago Fire Department insignia and equipment, and a person who appeared to be in a Chicago Police Department uniform. The Board did not conclude that these images violated the Ordinance, but instead will work with those departments and the Law Department to issue definitive guidance on the use in political or campaign communications of CFD and CPD equipment, personnel and insignia.</p>	Minor violation; self-reporting of violation; official City seal; electioneering communications; campaign mailer; political mailer; private use of City seal; campaign mailings; Chicago Fire Department personnel and equipment; Chicago Police Department uniforms, personnel and equipment
19021.A https://www.chicago.gov/content/dam/city/depts/ethics/general/AO-FiduciaryDuty/19021.A.pdf	Fiduciary Duty; Aspirational Code	An alderman wrote the Board's Executive Director and Chair expressing serious concerns about statements made in a 22-minute interview given by a department head to a media reporter, in which the department head discussed his personal friendship with the Mayor-Elect, and requested an opinion addressing issues	Media appearances; conflict of interest; personal friendship; candidate for elected City office; fiduciary duty; appearance of impropriety; run for elected office; bias; act impartially in the performance of City duties; preferential treatment; Cook County State's Attorney; Media reporter; consultation with Board staff

		<p>raised by the interview, including the friendship and its effect on the department head's work, and the department head's statements about potentially running for elected office.</p> <p>The Board: (i) commended the department head's sensitivity to possible conflicts of interests; (ii) determined that there were no violations of the Ordinance; (iii) advised the department head to be mindful of his department's own enabling ordinance, and refer to it in future interviews in which the question of running for elected office arises, as that law prohibits the department head from becoming a candidate for elected office in any jurisdiction which includes the City; and (iv) advised the department head to consult with Board staff, who are experts in conflicts of interests and can serve as neutral ethics advisers.</p>	
<p>19023.A</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/AOCampFinancing/19023.A.pdf</p>	Campaign Financing	The Board determined that a person who files a Form D-1 with the Illinois State Board of Elections thereby qualifies as a "candidate" for purposes of the Governmental Ethics Ordinance, because by so filing, the person has publicly "given consent for any other person to receive contributions or expenditures with a view toward bringing about his or her nomination for election, or election to," a City elected office.	"Candidate for City office"; Candidate; D-1; Illinois State Board of Elections; "Statement of organization"; Illinois Election Code; given consent for any other person to receive contributions or make expenditures"
<p>19027.A; 19027.A Reconsideration</p>	Attorneys; Elected Officials; Fiduciary Duty; Representation;	This is a significant, precedential case. The Board of Ethics determined that the fiduciary duty provision of the City's Governmental Ethics Ordinance prohibits City Council members who are licensed	City Council members; aldermen; attorneys; criminal law; criminal defense work; lawyer; referral fees; conflict of interest; fiduciary duty; Chicago Police Department; witness; evidence custodian; arresting officer;

<https://www.chicago.gov/content/dam/city/depts/ethics/general/AO-ElectOfficials/A19027.A.pdf>

<https://www.chicago.gov/content/dam/city/depts/ethics/general/AO-Attorneys/19027.AReconsid.pdf>

Powers and Duties of the Board of Ethics

attorneys from personally representing or receiving or deriving compensation or anything else of value from the representation by others of persons in traffic or criminal cases in which there is participation by Chicago Police Department (“CPD”) personnel, as, for example, arresting officers, executors of search warrants, investigators, witnesses, or custodians of evidence.

At its October 2019 meeting, the Board denied an alderman’s request for reconsideration of this opinion. The Board recognized: (i) it can issue an advisory opinion at the request of any Board or staff member, which is what occurred here, even if the subject did not formally ask for an opinion; (ii) the alderman’s request for an answer from the Board was not subject to the “legislative deliberative process privilege,” “legislative immunity” or “speech and debate” clauses of the Illinois Constitution; and (iii) advising an alderman that he or she cannot represent criminal defendants in cases where the CPD was involved does not impair the alderman’s fiduciary duty as an alderman to represent constituents in CPD matters as an alderman; and (iv) should the Board receive credible evidence that an alderman is engaging in the practice of representing criminal defendants in cases involving the CPD, it will be required to initiate enforcement actions, and if there is finding of a violation it could invite enforcement action from the Illinois

executor of search warrant; ARDC; Attorney Registration and Disciplinary Commission; Rules of Professional Conduct; RPC; concurrent conflict of interest; municipality; elected officials; advisory opinion; request for an advisory opinion; written request; City employee; City official; Board-initiated advisory opinion; Board staff-initiated advisory opinion

		Attorney Registration and Disciplinary Commission.	
19037.A.1 19037.A.2 19037.A.3 https://www.chicago.gov/content/dam/city/depts/ethics/general/AOLobby/19037.A1-3.pdf	Lobbyist Registration and Disclosure	<p>In a series of 3 opinions, the Board addressed 46 different hypotheticals, determining whether the activities described therein constitute lobbying as defined under the amended Governmental Ethics Ordinance to be implemented on April 20, 2020.</p> <p>Among other things, the Board determined that the following activities do not constitute lobbying:</p> <ul style="list-style-type: none"> -Serving on a City task force, commission, or advisory council, unless as a member the individual is advocating for their own employer to receive City contracts, grants, programmatic aid, etc. -Making “routine asks” on behalf of an employer or community group that are subject to standardized processes in City administration, including applying for any permits or licenses. Common activities that fall in this category are block party or parade permit applications, street signs, speed bumps, or requests for additional garbage carts. -Participating as a reviewer of responses for City-issued Request for Proposals (RFP), Request for Information (RFI), or Request for Qualifications (RFQ). -Accessing City resources that are generally available to the public, for example placing an order with a local 	Lobbyist; lobbying; nonprofit; 501(c)(3); internet; social media; twitter; Facebook; serving on a City advisory board or council; task force; constituent services; serving on RFP or RFQ committee; block party permits; inviting City employees or officials to events; coalition of nonprofits; signing letter of support; direct communication; indirect communication; direct communication

alderman's office for cleaning supplies so that one's employer can work on cleaning the neighborhood.

-Merely inviting a City official to an event, or to visit a business or community meeting. If, at the event, there are requests made for specific City administrative or legislative action, only the person "doing the ask" or pressing for the action would be required to register as a lobbyist and file quarterly activity reports.

-Acting as a language interpreter when accompanying an employee or anyone else to a meeting with City officials or employees.

-Communicating any message to a City official indirectly, such as through general newsletters, social media posts, or newspaper ads.

-Meeting with aldermen or other City officials on behalf of a coalition of organizations if an individual is representing only the coalition, and does not state their affiliation with their employer, and is not paid by the coalition.

-Signing a letter of support for policy change if one is doing as part of optional volunteer activity that is not part of one's job responsibilities, even if one's nonprofit employer supports the change.

		<p>The advisory opinions further clarify that the following activities do constitute lobbying activity:</p> <ul style="list-style-type: none"> -Making any direct communication to a City employee or official that would constitute lobbying [as defined] if done in person, including sending emails or letters or direct messages on social media or other messaging application through non-public message portals. -A paid employee who, on behalf of their employer, a nonprofit, signs onto a letter of support for policy change submitted to a City official or employee. 	
<p>20003.A</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/AOLobby/2017/20003.A.pdf</p>	Lobbyist Registration and Disclosure	<p>The Board addressed 14 different hypotheticals, determining whether the activities described therein constitute lobbying as defined under the amended Governmental Ethics Ordinance to be implemented on April 20, 2020.</p> <p>It held that the following activities would constitute lobbying:</p> <ul style="list-style-type: none"> -individuals paid by a nonprofit who seek to renegotiate a contract, grant, or Memorandum of Understanding (“MOU”) that would require the execution of a revised document, if not issued by the City pursuant to a process involving competitive bidding, such as an RFP or RFQ -serving on a panel discussion with City employees or officials where there is a 	<p>Lobbyist; lobbying; nonprofit; 501(c)(3); internet; social media; twitter; Facebook; direct communication; media appearance; media quotes; seeking to renegotiate a contract or grant; merely performing a contract or grant; panel discussion; City “sister agencies”; Chicago Park District; Chicago Public Schools; Chicago Transit Authority; specific legislation; specific policy; position paper</p>

specific City policy, rule or ordinance being debated, if a paid nonprofit employee or agency urges the City personnel to adopt a particular position for or against the policy.

The Board also determined that the following activities would **not** constitute lobbying:

- paid nonprofit employee who provides assistance to a City Council Caucus by supplying general information, not a position on specific legislation, although the nonprofit may be taking a position on that legislation

- attempting to influence decisions by the City's "sister agencies," such as the Chicago Public Schools or Chicago Park District

- conducting "grassroots outreach in which a nonprofit's paid staff educate and encourage City residents to contact their aldermen

- legal staff of a nonprofit who provide the City with assistance in acquiring parcels of real estate for public purposes, like a new park

- placing a position paper on a nonprofit's website or social media sites

- a nonprofit employee who is quoted in the media

<p>20006.Q</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/AOPostEmploy/20006.Q.pdf</p>	<p>Post-employment; Attorneys</p>	<p>An attorney was advised that if she accepted the position for which she was interviewing (with a major multi-national corporation) she would not be subject to Ordinance’s one-year subject matter ban nor the permanent bans on (i) judicial or quasi-judicial proceedings in which she was counsel of record or participated personally and substantially, or (ii) contracts over which she exercised management authority.</p>	<p>Attorney; lawyer; participated personally and substantially; subject matter; judicial or quasi-judicial proceedings; counsel of record; contract management authority; one-year prohibition; permanent prohibition</p>
<p>20008.C</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/AOMinorViolations/20008.C.pdf</p>	<p>Political Activity; Minor Violations</p>	<p>The Board found that a City employee committed a minor violation of the Ordinance by mistakenly forwarding a birthday event invitation for a State Representative from his work email address to a few of his contacts and did not notice that it was also a fundraising event. The employee self-reported this to the Board. He was sent a confidential admonishment reminding him that the Ordinance prohibits City officials or employee from “intentionally misappropriat[ing] any property or resources of the city in connection with any prohibited political activity.” Intentionally using a City email address to send political content, or even to respond to political content, is prohibited. See <i>a/s/o</i> Case Nos. 15014.C; 21037.C.</p>	<p>Minor violation; inadvertently forwarding email to political fundraiser; mistakenly forwarding; self-reporting potential ethics violation; intentionally misappropriating City property or resources; prohibited political activity;</p>
<p>20009.A</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/AOLobby/2020/20009A.pdf</p>	<p>Lobbyist Registration and Disclosure</p>	<p>In a series of 15 hypotheticals, the Board determined, among other things, that</p> <p>-- Merely asking what a City Department’s position is, without any advocacy, is not lobbying, nor is asking whether the department has taken a position on an issue. But if individuals paid by nonprofits</p>	<p>Lobbying; granting organization; recipient of a grant; posting position papers on social media; sending position papers to organizational staff; non-profit organization; grantor; grantee; website; meeting with aldermen; City department’s position; “white paper”; advocacy</p>

state: "We understand your position, and think you should change it" – or words to that effect -- that may well constitute lobbying, unless it is accompanied by a white paper going through both sides of an issue and possibly coming down on one side or other;

-- It is not lobbying if a City department writes a fact sheet with the City logo, which also includes the names of supporting nonprofit groups, and posts it on the department's website, and publishes it on the department's social media sites; nor is it lobbying if the City department distributes that fact sheet directly to aldermen; or if the non-profit organizations post it on their websites or distributes it to its members, funders, or staff;

-- If one organization gives a grant to another organization to engage in lobbying in Chicago (and one of more of the grantee's staff registers as lobbyists), the grantor does not need to be listed on the grantee's lobbyists' disclosure report, or need to file a registration under the City's regulations because the grantor is not giving the grant to the grantee for the grantee to lobby on its, the grantor's, behalf, but rather giving a general grant, some of which the grantee may use for lobbying. If they grantee's staff meet the criteria for being required to register as lobbyists (as defined), then *they* will need to register, but the Governmental Ethics Ordinance does not call for them to

		disclose who funds them, <i>unless</i> they are lobbying on the <i>grantor's</i> behalf, thereby making the grantor a lobbying <i>client</i> . If that is the case, then the grantor would be listed as a client in the lobbying registration(s) of the grantee's personnel. But, unlike some other lobbying laws, Chicago's does not have client registration, though lobbyists must disclose who their lobbying clients are and how much they are being to lobby per calendar quarter on those clients' behalf.	
20012.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_GiftsTravel/202012.Q.pdf	Gifts	<p>This opinion makes clear that City employees and officials may solicit or receive donated medical supplies, equipment, pharmaceuticals, or services as gifts to the City to aid in the City's response to the COVID-19 virus, with 3 conditions:</p> <ol style="list-style-type: none"> 1. There can be no explicit or implicit understanding between any City employee or official and any person, firm, or business that donates such supplies, equipment, pharmaceuticals, or services that any official City actions, decisions, or judgments as to any of the donor's matters involving the City would be influenced thereby; and 2. The accepting City employee or official or their department or Ward office must, as soon as practicable after the donation is made, disclose the acceptance of the donation in writing to the Board of Ethics and Comptroller, by listing the date of the 	Gift to the City; solicitation of gifts; donations to the City; Comptroller; COVID-19; Coronavirus; Department of Public Health; medical supplies; medical services; pharmaceuticals; respiratory therapy services; <i>quid pro quo</i> ; disclose as gift to the City

		<p>donation, a description of what was donated, and the donor's name; and</p> <p>3. The receiving City department or office must use the donated items or services for official City business in the normal course.</p>	
<p>20020.A</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_GiftsTravel/20020A.pdf</p>	<p>Gifts; Fiduciary Duty; Statements of Financial Interests; Conflict of Interests</p>	<p>The Board was asked to review a completed investigative report from the Office of Inspector General (OIG), and determined that it adduced facts warranting the finding that there is probable cause to conclude that a building inspector violated the "money for advice" provision, § 2-156-142(f), on numerous occasions by accepting payment from property owners and other businesses for designing repairs to correct building code violations that in some cases he had found, and that this conduct also violated his fiduciary duty, and that he knowingly failed to report outside income in excess of \$1,000 in the previous year on two of his Statements of Financial Interests.</p> <p>The opinion contains a detailed analysis of the conflict of interests provision and explains why the OIG's "conclusion" that this provision was violated on numerous occasions is incorrect.</p> <p>The Board recommended bringing charges against the building inspector for violations of the gifts (money for advice), fiduciary duty, and Statements of Financial Interests provisions.</p>	<p>Building inspector; bribery; money for advice; conflict of interests; Office of Inspector General; Personnel Rule XVII section 1, 45; fiduciary duty; outside employment; wholly unrelated; accepting money or anything of value; in return for giving advice or assistance concerning the business of the City; violations; building code violations; referrals; repairs; "complying" violations; discharge from City employment; OIG investigation; Summary Report</p>

<p>20024.Q</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/AO-OutsideEmployment/20024.Q.pdf</p>	<p>Outside Employment</p>	<p>A City Council staffer was advised that the Ordinance does not prohibit him from acquiring a license to be a residential real estate agent, but that he is subject to the all the restrictions in the Ordinance as to outside employment, in particular: on representing other persons before City government, and that while serving and for 12 months after receiving any compensation from clients, he cannot participate in any way in ward or other City governmental matters involving those clients, regardless whether they are located in his ward or another ward.</p>	<p>Secondary employment; real estate license; real estate broker; real estate agent; residential; conflicts of interest; confidential information; recuse; compensation; 12 months; money for advice; ward matters</p>
<p>20029.A</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/AO-City%20Owned%20Property/20029.A.pdf</p>	<p>City-owned property</p>	<p>This is a significant, precedential case. The Board determined that the Ordinance's City-owned property provision prohibits a City elected official from hosting and, on the official's office's official City social media accounts, re-broadcasting and promoting a prayer session, and sending invitations to join the prayer session from official City email accounts.</p> <p>The Board also determined that directing City employees to assist in these efforts while they are on compensated time also constitutes an unauthorized use of City-owned property, in violation of the Ordinance.</p> <p>The Board advised the official to take down its Facebook posts and delete its Twitter and Instagram communications advertising and streaming the prayer session. The Board also advised the official that, if this is not done within the</p>	<p>Separation of Church and State; religious use; City-owned property; prayer session; Twitter; Facebook; Instagram; email invitations; unauthorized use of City-owned property; compensated time; directing staff to use City-owned property; Establishment Clause; First Amendment; enforcement proceedings; social media accounts; City email accounts</p>

		<p>time specified in the opinion, the Board would consider commencing enforcement proceedings, subjecting the official to a fine of up to \$5,000.</p> <p>After the official's office removed the posts, the Board voted to take no further action.</p>	
<p>21010.A</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/AOPostEmploy/21010.A.pdf</p>	<p>Post-employment; Attorneys</p>	<p>This is a significant, precedential case.</p> <p>The Board determined that:</p> <ol style="list-style-type: none"> 1. A former City attorney (or the attorney's firm) is not prohibited by the Ordinance from representing the City in judicial or administrative proceedings once they leave City service, even in proceedings in which they participated personally and substantially or were counsel of record; 2. As to City legal matters that are <i>not</i> administrative or judicial proceedings (that is, "a transaction," or "transactional work," such as contracts, grants, City, State or Federal regulatory matters, registrations and permitting, etc.), the Board has long recognized that, despite the Ordinance's one-year "subject matter" prohibition, which would, on its face, prohibit a former City employee or official, including an attorney, from assisting or representing even the City with respect to business transactions in which they were personally and substantially involved, the City may contract with that former City employee, official, or attorney (or their firm) at any time, even during the attorney's first post-City first year, for the 	<p>Revolving door; judicial proceedings involving the City; administrative proceedings involving the City; counsel of record; participated personally and substantially; "subject matter" of a business transaction involving the City; litigation; one-year prohibition; permanent prohibition; attorneys; lawyers; Department of Law; representing clients who interests are adverse to the City; Rules of Professional Conduct; RPC; Illinois Supreme Court; contracts; grants; regulatory matters; law firm; fiduciary duty</p>

attorney to assist or represent it in business transactions, subject to conditions the Board has set out in previous cases. This is true even if the attorney “participated personally and substantially” in the “subject matter” of the “transaction involving the City.”

3. In contrast, the answers are quite different for a departing City attorney who wishes to assist or represent a client whose interests are *adverse* to the City. There, the former City attorney is:

(i) *permanently* prohibited from assisting or representing clients in administrative or judicial proceedings if their client’s interest is *adverse* to the City *and* they were counsel of record or participated personally and substantially in the proceedings or litigation;

(ii) prohibited for one year from their last date of City service from assisting or representing clients in a “transaction involving the City” *if* they participated personally and substantially in the “subject matter” of the “transaction” during their City service; and

(iii) *not* restricted from assisting or representing clients whose interests are adverse to the City in proceedings or transactions provided: (a) they were not were counsel of record, and (b) did not participate personally or substantially in those proceedings or transactions, nor (c) in the subject matter of those proceedings

		or transactions, (d) provided the City grants a waiver to the departing City attorney per the Rules of Professional Conduct promulgated by the Illinois Supreme Court.	
21011.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_OutsideEmployment/21001.Q.pdf	Elected officials; Non-profit Board Service	<p>An alderman what restrictions that would apply were he to take an unpaid position as a board member of non-profit organization located his alderman's ward.</p> <p>The alderman was advised:</p> <p>(i) while the Ordinance does not prohibit such service, the Board has long advised aldermen from joining boards of non-profits located in their ward; and</p> <p>(ii) the fiduciary duty provision would prohibit him from voting in favor of initiatives that, in his judgment, run counter to the City's best interests; and</p> <p>(iii) he could not "represent" the organization in any formal or informal transactions before any City agency, department, employee or official, or be paid for such representation, and that, in effect, he could not act as the organization's alderman, and that, by declining this offer he would actually be able to assist the organization more as its alderman than as its board member.</p>	Elected official; volunteer board service; non-profit organization; recuse at both ends; fiduciary duty; representation of third parties; non-profit located in the ward; alderman; formal or informal transaction before any City agency, department, employee, official
21012.A https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_OutsideEmployment/21001.Q.pdf	Elected officials; City-owned property	<p>This is a significant, precedential opinion.</p> <p>The Board determined that:</p>	Use of staff time; personal errands; prohibited political activity; compensated time; staff time as City-owned property; supervisory employee; subordinate employee; member of an elected official's

i) a City employee's compensated time and efforts made during that time constitute City property, both tangible and intangible, for purposes of the Ethics Ordinance;

ii) any use of a City employee's time and/or efforts that is not strictly for City purposes is unauthorized; thus

iii) a City elected or appointed official or supervisory employee may not ask a City employee they supervise, or who is a subordinate member of their staff or agency, to perform a task that is a personal matter for the official or supervisor and not related to the employee's job duties -- such requests are prohibited. This is a bright-line rule.

iv) While the rule is clear and certain, the Board recognized that unforeseen and urgent situations occur in all of our lives, and may compel, on rare occasions, a City elected or appointed official or supervisory employee to reach out to a subordinate employee for assistance. The Board will analyze and evaluate each situation on its own merits. Any violation of this prohibition will result in an appropriate sanction.

v) To accommodate true unforeseen and urgent situations, the Board advises that if presented with a complaint alleging a violation of this rule, it will consider the presence, or absence, of all of the

personal staff; unforeseen, urgent situation; voluntary assent; demeaning or disrespectful to the employee; meaningfully detract from an employee's duties;

		<p>following factors in imposing any appropriate penalties:</p> <ol style="list-style-type: none"> 1) whether there was, in fact, a true unforeseen and urgent situation; 2) whether the personal task given to the employee was demeaning or disrespectful to the employee; 3) whether the employee's assent to perform the task was truly voluntary; and 4) whether the time commitment required of the employee to perform the personal task meaningfully detracted from the employee's normal job duties. 	
<p>21018.A</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/AO-City%20Owned%20Property/21018.A.pdf</p>	City-owned property	<p>The Board determined that a City employee violated the Ordinance's prohibition on using City-owned property by:</p> <ol style="list-style-type: none"> i) featuring the official City seal on a curtain-backdrop with the employee speaking in the foreground in a video blog the employee posted on the internet, in which the employee criticized the City; ii) wearing a helmet with his departmental insignia on it while filming the video iii) identifying himself as a City employee in the video blog post; and iv) using the City seal for personal reasons. <p>See <i>also</i> Case No. 18036A.1.</p>	Official City seal; video blog; City employee's personal use of the official City seal; misuse; proper authority; criticism of City departmental insignia; helmet featuring departmental insignia
21022.A	Financial interest in City business	The Board determined that a City employee violated the Ordinance by	Financial interest; in the name of another person; in one's own name; ownership of a

https://www.chicago.gov/content/dam/city/depts/ethics/general/AOInterestCityBusiness/21022.A.pdf		<p>having a 70% ownership interest in a company that was paid tens of thousands of dollars over a 10-year period from the City's Aldermanic Expense Allowance account for goods and services delivered to various City offices. The employee had an interest "in the name of another," that is, the company of which he owned 70%.</p> <p>Under relevant Board jurisprudence, an employee's interest in City contracts, work, or business is calculated by taking the employee's percentage of ownership in an entity or firm that is paid by the City and multiplying it by the amount of the contract. If the product of that multiplication is more than \$1,000 in a calendar year, then the employee violated the Ordinance.</p> <p>The Board also noted that the City has the right to pursue an action for an accounting and for any pecuniary benefits obtained by the employee in violation of the Ordinance, pursuant to §2-156-485.</p>	<p>company; City contract; City work; City business; authorized by Ordinance; paid with funds belonging to or administered by the City; Aldermanic Expense Allowance; good and services; 70% ownership interest; pecuniary benefit; accounting; more than \$1,000 in a calendar year; employee's ownership percentage; multiplication by the amount of payments from the City.</p>
<p>21023.Q</p> https://www.chicago.gov/content/dam/city/depts/ethics/general/AOOutsideEmployment/21023.Q.pdf	<p>Outside Employment</p>	<p>An employee working at one of the City's airports was advised that the Ordinance prohibits them from taking a part-time, secondary position with a company operating at the facility unless the position's duties are wholly unrelated to the employee's City job responsibilities, as the employee is prohibited from accepting anything of value, including wages, in return for giving advice or assistance about City business unless that advice is wholly unrelated to the employee's City job responsibilities. The</p>	<p>Secondary employment; outside job; department approval; recuse; represent third parties before the City; formal or informal transaction; wholly unrelated; airport; money for advice</p>

		<p>employee was also advised of the other restrictions that apply, namely, that the employee must receive approval for this job from their department head, must recuse from any City decisions or matters involving the outside employer, and may not use or divulge confidential or non-public information or represent the outside employer in any formal or informal City transactions.</p>	
<p>21025.A</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_GiftsTravel/21025.A.pdf</p>	<p>Gifts; Campaign Financing; Elected Officials</p>	<p>This is a significant, precedential case. The Board determined that, while the Ordinance does not prohibit a City employee or official from establishing [or having another person establish for them] a legal defense fund, monetary donations to such a fund, or directly to the employee's or official's criminal defense attorneys, constitute gifts to the employee or official for purposes of the Ordinance. Thus, the employee or official could accept such cash or cash equivalent gifts only if they are from personal friends or relatives.</p> <p>The Board also determined that the Ordinance does not address the use of political funds from an elected official's candidate committee(s) for these purposes, as that is governed by the Illinois Election Code, but advised that, per Article VI of the Ordinance, contributors to these funds would be certain contributors remain subject to the Ordinance's \$1,500 political contribution limit per calendar year.</p>	<p>legal defense fund; criminal law; personal friend; gifts; relative; business friend; Illinois Election Code; \$1,500 contribution limit; candidate committee; cash; cash equivalent; gift card; campaign funds; political funds; professional expense funds; San Diego Ethics Commission; New York City Conflicts of Interest Board; Philadelphia Board of Ethics; Illinois Gift Ban Act</p>

		Finally, the Board reaffirmed that the exception in §2-156-142(d)(6), for gifts from “personal friends,” is to be construed narrowly and does not include “business friends.”	
21026.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_GiftsTravel/21026.Q.pdf	City property; Elected officials; Gifts	This is a significant, precedential case. An elected official was advised that use of the City seal at a community event organized to raise funds for various causes is not prohibited, but it does then mean that all funds raised are property of the City and can be accepted as a gift to the City (and must be duly reported to the Board of Ethics and Comptroller) and distributed only in accordance with existing policies and/or laws.	Elected official; community fundraising event; use of City seal; City-owned property; other City laws or policies; monies collected; cash collected
21028.C https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_MinorViolations/21028.C.pdf	Minor Violations; Representation of Other Persons	A City employee was advised that signing a permit application document on behalf of a private client and then submitting that application to a City department different from the employee’s department, on work that was unrelated to the City employee’s work, and that had begun before the employee began City service, constituted a minor violation of the Ordinance’s representation provision. The employee was also advised that he could derive no compensation for work done on this permit after he began his City employment.	Representation of other persons; signing and submitting permit documents to the City; unrelated; minor violation; derive any income or compensation
21036.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_ConflictOfInterest/21036Q.pdf	Elected officials; Conflicts of Interest; Appearance of Impropriety; Interest in City Business	A City Council member asked how the Ordinance would apply were he to sell a piece of property located within the ward. The member is a trustee and beneficiary of a trust that owns the property. The Ald. was advised that:	Elected official; alderperson; City Council member; sale of property located in Ward; financial interest in City business; sale to the City; private real estate sale; recusal; twelve month period; conflicts of interests; direct aldermanic staff; straw purchaser problem

		<p>i) Ordinance §2-156-110 prohibits the trust from selling the property to the City, as doing so would result in the member having a financial interest in a City contract;</p> <p>ii) Ordinance §§ 2-156-030(b) and §2-156-080(b)(2) require that the member recuse from any City matters involving the purchaser for one year after receiving the last purchase payment for the property. This remains the case even if the purchaser has matters not involving City Council, but other departments, such as the Department of Buildings—the member would be prohibited from contacting those departments or directing aldermanic staff to contact them; and</p> <p>iii) If the purchaser then turns around and sell the property to another person or entity, the member is still subject to these restrictions as to that new purchaser for the twelve month period following the last purchase payment (to avoid a “straw purchaser” problem).</p>	
21037.C https://www.chicago.gov/content/dam/city/depts/ethics/general/AOPolActivity/21037L.pdf	Minor Violations; Political Activity	A City official was determined to have committed a minor, technical violation of the Ordinance by inadvertently forwarding an invitation to a political fundraiser from an official City email account, and then, minutes later, self-reporting the matter to the Board. See also Case 20008.C.	Minor violation; inadvertently forwarding email to political fundraiser; mistakenly forwarding; self-reporting potential ethics violation; intentionally misappropriating City property or resources; prohibited political activity
22005.A	Campaign Financing	This is a significant, precedential case, in which the Board enumerated factors it will consider in determining whether a political	PAC; political action committee; Illinois Election Code; candidate’s authorized candidate committee; political fundraising

<https://www.chicago.gov/content/dam/city/depts/ethics/general/AOCampFinancing/21033.AO.pdf>

fundraising committee *other* than a candidate's or elected official's *official* candidate committee—for example a PAC (Political Action Committee) organized as such under the Illinois Election Code—will *also* constitute the candidate's or official's committee, thereby subjecting its contributors to the contribution limitations in the Governmental Ethics Ordinance.

The Board will analyze each case on its own, according to these factors:

(1) Does the candidate/elected official solicit contributions for the PAC, or appear as a featured guest at the PAC's fundraising events?

(2) Do the PAC's solicitation materials include the candidate's name, quotes, words, or photos?

(3) Do the PAC and the candidate's *official* committee share the same office space or officers, directors, employees or volunteers?

(4) Are solicitations from each committee sent from the same email or mailing address or from the same telephone number(s) or website?

(5) Does the PAC use the candidate's name or any reasonably recognizable portion thereof?

(6) Do the PAC and *official* committee have logos that are substantially similar?

committee; coordinated committees; solicitation of political contributions; fundraising committee of an elected official or candidate; connected committee; a candidate's authorized political committees; committee logos; Illinois State Board of Elections; ISBE; campaign financing law; pay-to-play

(7) Do the PAC's solicitation materials explain that certain persons, such as persons doing or seeking to do business with the City or certain "sister agencies" like the Chicago Transit Authority, Chicago Park District, or Chicago Public Schools/Board of Education, or registered lobbyists, are limited to \$1,500 in annual contributions to the PAC?

(8) Do the PAC and candidate's *official* political fundraising committee employ a common political or fundraising consultant during the election cycle?

(9) Do the PAC's expenditures go beyond the PAC's stated purpose and, for example, support the elected official as a City elected official, such as going to pay for City governmental-related operations or expenses?

(10) Does or did the candidate, a member of the candidate's immediate family, or any official of the candidate's *official* candidate committee have a role in establishing or managing the PAC, or appearing at PAC functions?

(11) Do the PAC and *official* candidate committees use strategic information or data from a common vendor of each?

(12) Have the PAC and candidate participated in strategic discussions together?

		<p>(13) Does the candidate approve these materials?</p> <p>(14) Does the candidate receive information from the PAC on who has contributed to the PAC, aside from what is publicly reported by the Illinois State Board of Elections (“ISBE”)?</p> <p>(15) Does the candidate approve, participate in deciding, or receive notice regarding (other than what is reported publicly by the ISBE) expenditures or transfers made by the PAC, or have the authority to veto any of them?</p> <p><i>See also</i> Case 141280.A, upon which this case expands.</p>	
<p>22006.A</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/AOP/ProhibitedConduct/22006.A.pdf</p>	Prohibited Conduct (“Reverse Revolving Door”)	<p>The Board determined that the “reverse revolving door” provisions in §2-156-111(d) do not apply to City officials or employees whose immediate pre-City employer was another government agency, whether a City “Sister agency” such as the Chicago Public Schools, Chicago Transit Authority, etc., or federal, state or local government.</p> <p>The actual revolving door prohibitions, in §2-156-100 and -105, explicitly do not apply to departing City personnel who accept employment with another government agency.</p>	Prohibited conduct; revolving door, reverse revolving door; sister agency; other government agency; immediate former employer
<p>22007.C</p> <p>https://www.chicago.gov/content/</p>	Minor Violations; Representation of Other Persons	The Board determined that a City employee (who self-reported to the Board after completing annual on-line ethics training) committed a minor violation of	Represent; officer of a not-for-profit; City employee; communications with City Council members; minor violation; community organization; President; Vice President; self-

dam/city/depts/ethics/general/AO_MinorViolations/2007.C.pdf		<p>§2-156-090(a) by having frequent communications with City Council members on behalf of a non-profit organization, for which the employee served as an officer.</p> <p>The Board sent the employee a confidential letter of admonition, per §2-156-070(b). <i>See also</i> Case Nos. 88125.A; 89144.A; 91047.A; and 08029A.</p>	<p>report; annual ethics training; representation of other persons;</p>
<p>22014.A</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_CampFinancing/22014A.pdf</p>	<p>Campaign Financing</p>	<p>The Board determined that an entity doing business with the City (and thus subject to the Ordinance's \$1,500 per committee/per calendar year limit on political contributions) that contributed in excess of \$1,500 to a Ballot Initiative Committee connected with the Ward Remap Process did not thereby violate the Ordinance, because the Ballot Initiative Committee at issue was not an authorized committee or political fundraising committee of any candidate for City elected office. <i>See also</i> Case no. 22005.A</p>	<p>PAC; Ballot Initiative Committee; Illinois Election Code; candidate's authorized committee; political fundraising committee; coordinated committees; solicitation of political contributions; fundraising committee of an elected official or candidate; connected committee; a candidate's authorized political committees; Illinois State Board of Elections; ISBE; campaign financing law; pay-to-play; Ward Remap Process</p>
<p>22026.A</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_PolActivity/22026.A.pdf</p>	<p>Prohibited Political Activity; Unauthorized Use of City property</p>	<p>This is a significant, precedential opinion. The Board determined that the Ordinance does not prohibit a Mayor from making use of a City vehicle assigned to them, or of a Mayoral Assistant and the Mayoral security detail, at all times, including when attending local campaign/political events, and that there is no requirement that a Mayor then reimburse the City for fuel or staff expenses. The Board's analysis is based on the fact a Mayor requires security 24/7, and is constantly on call to address City issues, even when attending political or campaign events.</p>	<p>Mayor; City-owned vehicle; political activity; political rally; campaign event; security detail; Assistant to the Mayor; City emergencies; 24/7 security; New York City Conflict of Interest Board; reimbursement</p>

		<p>The Board's opinion and reasoning closely follow that of the New York City Conflicts of Interest Board.</p> <p>The opinion and Board determination are limited to a Mayor, and do not necessarily apply to use of City vehicles or other property by other City elected officials.</p>	
<p>22027.W</p> <p>https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_PostEmploy/22027.W.pdf</p>	<p>Post-employment restrictions on assistance and representation;</p> <p>Post-employment restrictions on lobbying</p>	<p>The Board determined that a former City official who would like to do volunteer work for two non-profits: i) would be prohibited from assisting or representing the two non-profit organizations, for one year following the official's effective termination date from City service, in business transactions involving the City; ii) exercised contract management authority with respect to a City grant contract for one of these organizations, but that contract expires within the official's first post-City year and thus is subsumed into the one-year subject matter prohibition; iii) would not be prohibited from assisting or representing these non-profits with respect to transactions before the City's sister agencies, and to fundraising efforts from private sources; and iv) the Ordinance's post-employment restrictions on lobbying would not apply because the former official would be a volunteer for each non-profit (though the one-year subject matter prohibition effectively prohibits the former official from lobbying the City for one year); and v) the former official's request for a waiver did not meet the criteria set out in previous waiver requests from the</p>	<p>Former City official; post-employment; revolving door; contract management authority; waiver; waiver request; non-profit organization; City grant contract; contract management authority; business transaction involving the City; fundraising from private sources</p>

		Ordinance's post-employment restrictions, and was denied.	
22033.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_EmployRelatives/22033.Q.pdf	Action on behalf of Relatives or Domestic Partners; Elected Officials	This is a significant, precedential opinion. A City Council member was advised that: (i) their relative was not prohibited from becoming employed by a business that might do work in the official's ward or elsewhere in the City, but that the official would need to recuse from participating or making any City administrative or legislative action or decision involving the relative's employer; and (ii) if any matter involving the relative's employer becomes pending before the City Council or any of its committees, or any City department, the official may not participate in any discussions or decisions on the matter and must file all required disclosures with the Board or City Clerk, and would need to delegate any required aldermanic approvals to a colleague and fully recuse from such decision or action.	Aldermen; City Council member; relative; domestic partner; action involving a relative's employer; recuse; recusal; City administrative or legislative action; nepotism; expanded anti-nepotism provisions
23007.C https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_PolActivity/23007.L.pdf	Minor Violations; Political Activity	A City official was determined to have committed a minor, technical violation of the Ordinance by inadvertently forwarding political fundraising solicitations from their official City email account, but from their personal, non-City laptop, and then, minutes later, self-reporting the matter to the Board. See also Cases 20008.C; 21037.C.	Minor violation; inadvertently forwarding email containing fundraising solicitations; mistakenly forwarding; self-reporting potential ethics violation; intentionally misappropriating City property or resources; prohibited political activity
23031.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/AO	Confidential information	The Board advised a City official that the Ordinance did not prohibit the official from translating and republishing a report prepared by a City agency that was confidential, but had already been leaked in full to the media and published by the media, and thus was no longer	Confidentiality; confidential document; report; leak; use or disclosure of confidential information

RepresentingOthers/23031.Q.pdf		confidential for purposes of the Governmental Ethics Ordinance.	
23034.A https://www.chicago.gov/content/dam/city/depts/ethics/general/AOInterestCityBusiness/23034.A.pdf	Financial Interest in City Business	The Board determined that a City employee and a company in which they have an ownership interest were not prohibited from purchasing City-owned real estate, and that the sale would not give the employee a prohibited financial interest in the purchase of City-owned property, on the basis that the real estate was sold pursuant to a process of competitive bidding following public notice. The City advertised the proposed sale, with the purchaser's name and purchase price, was published in the Chicago Tribune on three separate dates, asking for alternative bids, but received none.	Financial interest in a City contract, work, or business; sale of real estate; City-owned property; a process of competitive bidding following public notice; property that belongs to the City
23036.A https://www.chicago.gov/content/dam/city/depts/ethics/general/AOInterestCityBusiness/23036.A.pdf	Financial Interest in City Business Elected Officials	The Board determined that a City employee who was elected to a City office could receive the stipend that others elected to that office are entitled to receive, per City ordinance, even though the stipend amount is paid with City funds and exceeds \$1,000 per calendar year.	Financial interest in City business; stipend authorized by City ordinance; elected official; statutorily authorized; in excess of \$1,000 per calendar year; legislative intent
23037.A https://www.chicago.gov/content/dam/city/depts/ethics/general/AOMinorViolations/23037.A.pdf	Minor violations; Political activity	The Board determined that a City official committed a minor violation of §2-156-140(c) by participating in drafting a Request for Proposals (RFP), and, in the official's non-City, full-time position, working on processing their employer's political contributions. However, the official did not engage in fundraising or in the process by which their employer determined which candidates would	Political fundraising committee; contract management authority; processing political contributions; outside, non-City job; drafting RFP; minor violation

		receive contributions—the Board focused on this fact in determining that there was a minor violation.	
24006.Q https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_PostEmploy/24006%20Q%20redacted.pdf	<p>Post-employment restrictions on assistance and representation;</p> <p>Post-employment restrictions on lobbying</p>	<p>A departing high-ranking City employee was advised of the post-employment restrictions to which they are subject: i) the permanent prohibition as to assisting any person other than the City in any ongoing judicial or administrative proceeding if they participated personally and substantially in them; ii) the one-year subject matter prohibition, which, based on past Board opinions, prohibits them from assisting or representing any new client or employer in any matters, transactions or contracts involving the employee's department; iii) the permanent prohibition as to City contracts over which the employee had or exercised contract management authority as defined; iv) the two-year City-wide lobbying ban; and v) the permanent ban on using or divulging confidential or non-public information.</p> <p>The advice also makes clear that the former employee is not prohibited from accepting employment with any firm, or taking on any particular new client, and that the prohibitions are personal to the employee, and advises the employee to take care to adhere to an impermeable ethical screen to ensure they do not work on any prohibited contracts, project, or matters.</p>	<p>Post-employment; consulting firm; permanent prohibition; ethical screen; confidential information; non-public information; one-year subject matter prohibition; contract management authority; participate personally and substantially; revolving door; City-wide lobbying ban</p>
24019.Q	Offering, receiving and soliciting of gifts or favors;	An attorney and registered lobbyist was advised that their client could offer, and designated City employees and officials	Lobbyist; lobbying; boat tour; Chicago River; real estate developer; anchor tenant; gifts; tchotchkes; lobbyist activity reports; lobbying

https://www.chicago.gov/content/dam/city/depts/ethics/general/AOGiftsTravel/24019%20QL.pdf	Lobbyist registration and disclosure	could accept, a boat tour of a site of a potential real estate development along the Chicago River, provided: (i) each City recipient duly disclosed their attendance to the Board as required (the opinion explains that Mayoral disclosures are kept on the 5 th Floor of City Hall pursuant to a long-standing arrangement dating back to Mayor Eugene Sawyer's administration); (ii) any individual City recipient could receive gifts ("tchotchkes") totaling no more than \$50; (iii) if any lobbying occurred on behalf of either the proposed developer or the proposed anchor tenant of the site, it must be reported as lobbying expenditures on their 3 rd quarter activity reports, and that if any gifts were given, they must be reported as gifts by the lobbyists on their 3 rd quarter activity reports, itemized by value and recipient.	expenditures; itemized list of gifts; Mayoral gift log
25004.C https://www.chicago.gov/content/dam/city/depts/ethics/general/AOMinorViolations/25004C%20Redacted.pdf	Minor violation; Post-employment	An attorney who formally worked for the City was advised that they committed a minor violation of the Ordinance's revolving door provision when they worked on two (2) loan extensions in late 2025, and had prepared the original loan documents in 2002 and 2003. The attorney had exercised management authority with respect to these contracts decades before. The Board considered both the time that elapsed between the transactions, and that the former employee had reported the matter to the Board voluntarily soon after discovering their mistake.	Minor violations; post-employment; loan documents; revolving door provision; time elapsed between transactions; attorney; lawyer; contract management authority; permanent prohibition; loan extension
23045.IG	Elected officials; Fiduciary Duty; City-owned property	After an investigation by the Office of Inspector General, and hearing from the subject of the investigation, the Board	Alderman; City Council member; weed citations; improper use of City-owned property; preponderance of the evidence;

<https://www.chicago.gov/content/dam/city/depts/ethics/general/AOPolActivity/23045.1G.pdf>

found that an alderman committed 10 violations of the fiduciary duty and City-owned property provisions of the Ordinance and fined the alderman \$10,000. The case arose due to allegations that the alderman had improperly directed other City employees to issue citations from the Department of Streets and Sanitation, knowing they would be unfounded. The alderman challenged the Board's determination in an administrative hearing and the Administrative Law Judge found that the City did not meet its evidentiary burden, and issued a Report to the Board recommending that the Board dismiss the matter. The Board voted 5-0 to dismiss the matter in its opinion, issued in June 2025.

Office of Inspector General; abuse of power; abuse of authority; evidentiary hearing; ethics trial; fiduciary duty; burden of proof; Department of Streets and Sanitation

June 2025