

# THE OFFICIAL SEAL OF THE CITY OF CHICAGO: A USER'S GUIDE



The official seal of the City of Chicago is a potent emblem. It represents the authority of City government, and often convey to persons who see it that they are seeing an official communication, bearing the City's *imprimatur*. For this reason, the City Council passed an ordinance dating back to the 1930's that controls the seal's use, and the Board of Ethics has issued various advisory opinions explaining that certain uses of the seal are prohibited. This guide summarizes allowed and prohibited uses of the seal. It is not a substitute for legal advice. For confidential legal advice, please contact the Board.

Here are the key prohibitions on using the City seal.

## **Political Use is Generally Prohibited—With an Exception for “Incidental Use”**

The Board had previously determined that use of the City seal by any person in any printed, filmed, or web-based communications to support or criticize a candidate for elected office (including websites, social media postings, stickers, printed or web-based campaign literature, signage, etc.) constitutes a *prima facie* violation of the City's ethics laws. See

[https://www.chicago.gov/content/dam/city/depts/ethics/general/AO\\_PolActvty/18036.A.1.pdf](https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_PolActvty/18036.A.1.pdf)

In July 2022, the City Council enacted a new law (which takes effect on October 1, 2022) that allows any person, including a candidate for elected City office, to use the City seal, even for political purposes, if *both* of these conditions are met:

- (i) the image of the seal in the display is incidental to the visual media viewed as a whole, as opposed to an element of primary focus; *and*
- (ii) the visual media contain a clear, written disclaimer that it is not related to official City business.

See §2-156-050:

<https://www.chicago.gov/content/dam/city/depts/ethics/general/Ordinances/GEO-2019-color%20through%20August%202022.pdf>

The Board of Ethics must, on a case-by-case basis, analyze uses of the seal to determine whether these conditions have been met. For this reason, we advise candidates wishing to use the City seal in electioneering communications to seek confidential, binding advice from the Board.

Were the Board to make a finding of a violation, the person using the seal would be subject to fines up to \$5,000 for violations occurring prior to October 1, 2022, and up to \$20,000 for violations occurring on or after that date.

## **Personal Use on Websites or Social Media**

The Board of Ethics has also recognized that websites or social media sites that display the official City seal could give the viewer the impression that the City itself approves the site and/or its content or the specific posting. This can mislead the public.

Thus, we advise that personal social media sites avoid using the City seal, but if the conditions listed above are met, the user will comply with the City's ethics laws.

## **Commercial Uses**

Should the Board become aware of any commercial or private business use of the seal in advertising or other materials or websites, the Board will refer the matter to the City's Law Department. This is because §1-8-100 of City's Municipal Code, entitled "Private use of the seal unlawful," provides:

"No person shall fraudulently forge, deface, corrupt or counterfeit the seal of the city, nor shall any person, other than the duly authorized public official, make use of said seal. Any person violating the provision of this section shall be fined not less than \$25 nor more than \$200 for each offense."

The City retains the inherent authority to determine whether its role in a partnership with a private party constitutes official action or participation by the City, such that the private party's use of the seal may be duly authorized and allowable. Thus, the Board advises any person wishing to use the seal in such a partnership with the City, for non-political purposes, to contact the City's Law Department.

# Board of Ethics



**740 North Sedgwick, Room 500  
Chicago, IL 60654  
312-744-9660**

**Brandon Johnson, Mayor  
William F. Conlon, Chair**

**[www.cityofchicago.org/Ethics](http://www.cityofchicago.org/Ethics)  
[@ChicagoEthicsBd](#)**

**[steve.berlin@cityofchicago.org](mailto:steve.berlin@cityofchicago.org)  
Steve Berlin, Executive Director**