



**BOARD OF ETHICS
CITY OF CHICAGO**

February 13, 2020

To the Chair, Vice Chair, and Honorable Members of the City Council’s Committee on Ethics and Government Oversight, I am proud to testify before you today in support of O2019-9435.

If enacted, this bill would amend the City’s Governmental Ethics Ordinance to prohibit City employees or officials who exercise contract management authority (a defined term in the law) from “moonlighting” for or receiving or deriving any work-related compensation from any person or business entity involved as a subcontractor or consultant in any City contract they manage.

Current law and the City’s Personnel Rules prohibit City employees and officials who exercise contract management authority over City contracts from having an ownership interest in any person or business entity that is a subcontractor or other party to those contracts, or from having any employment or monetary relationship with the prime contractor on such contracts. This law would expand both prohibitions by forbidding them from having any paid work with these persons or business entities even if they have no ownership interest in them.

The proposal was inspired by stories reported in the media about a former high-ranking City employee who was reportedly paid by a company to act as a consultant to it on its contracts with various suburban municipalities. This law would not directly prohibit that circumstance; existing law would prohibit City employees and officials from acting as lobbyists before any such government entity that has a lobbyist registration law. But very few in the State of Illinois do, besides the State, Cook County, and the City of Chicago itself. This proposal would not, however, require such persons or business entities to disclose to the City any City employees or officials on their payroll.

Nonetheless, the value of this amendment is that it would require those City personnel who manage City contracts to be mindful not only of the prime contractors with whom they deal, but also any subcontractors or consultants on these contracts, who may be tempted to hire them for work unrelated to the City of Chicago. This amendment would prohibit that practice.

I await your questions.

Respectfully,

Steven I. Berlin,
Executive Director