



BOARD OF ETHICS
CITY OF CHICAGO

To the Honorable Chair, Vice Chair and Members of the City Council's Committee on Ethics and Government Oversight:

It is my honor to endorse and answer your questions about O2019-8541. Our Board supports this proposal, which we see as a good government initiative. I am pleased that the City is taking a proactive stance to eliminate a type of potential conflict: that which arises from the perception, or the reality, that government personnel who act as lobbyists before governments other than their own, on behalf of private clients, could reciprocate in their official capacities on matters involving each other's private lobbying clients.

If enacted, this proposal would:

- 1) prohibit City elected officials from acting as lobbyists on behalf of private clients before any other government unit in the State of Illinois, or from receiving compensation or income from such lobbying by others; and
- 2) require City employees and officials who file annual Statements of Financial Interests with the Board to disclose the names of relatives who are registered as lobbyists not only with the City (which is current law), but also with the Illinois Secretary of State, or with the Cook County Clerk, or in any other local unit of government in Illinois; and
- 3) prohibit elected officials of any other unit of government within the State of Illinois from lobbying the City of Chicago or any of its officials, employees, agencies, departments, boards or commissions.

Note that nothing in this proposal would prohibit or inhibit government officials or employees from lobbying on behalf of their constituents, or from performing their official governmental public responsibilities, activity that could be considered "lobbying" in some jurisdictions. The proposal is also carefully drafted so as not to impinge on the practice of law by legislator-attorneys.

Steven I. Berlin
Executive Director, Board of Ethics
December 4, 2019