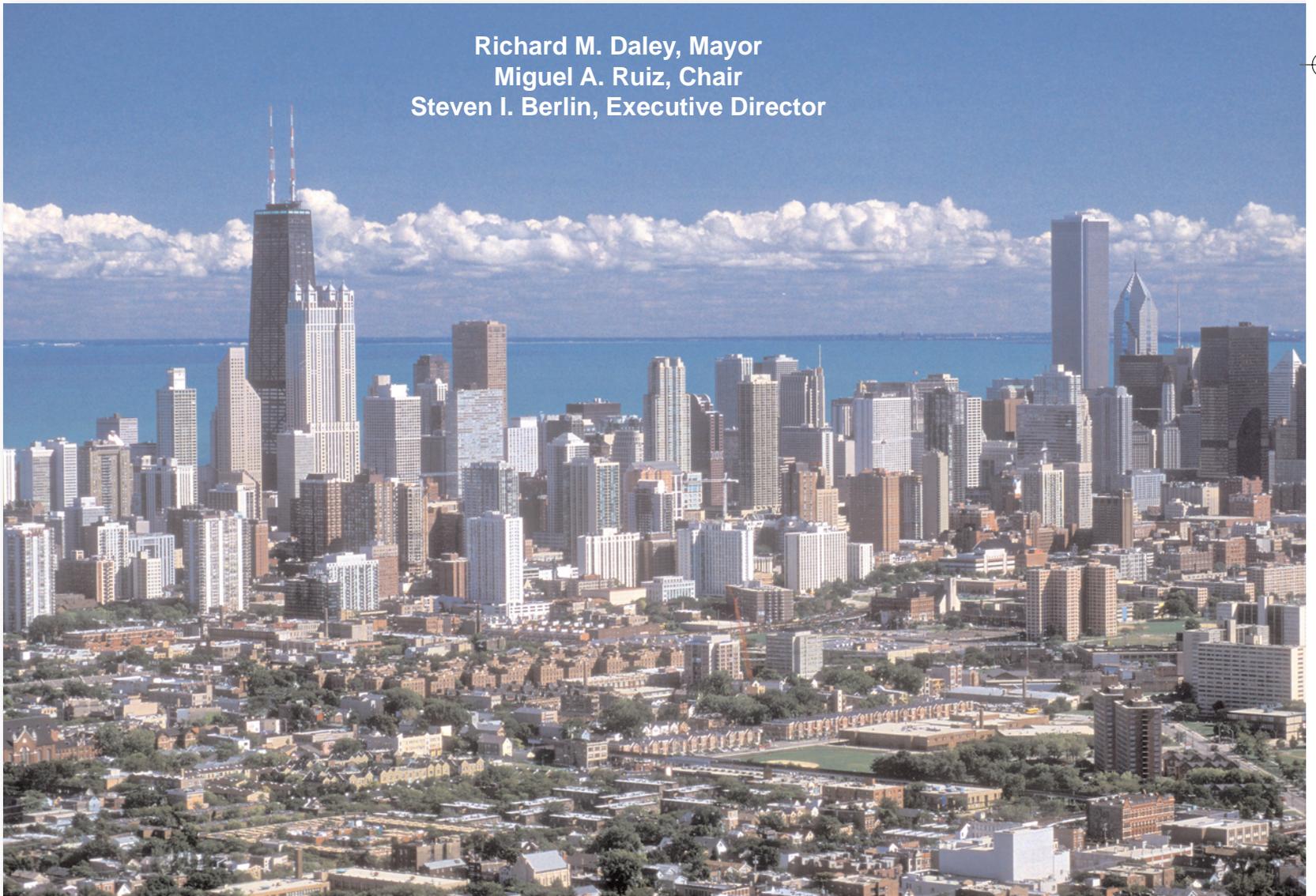


Board Of Ethics



Annual Report 2007-2008

Richard M. Daley, Mayor
Miguel A. Ruiz, Chair
Steven I. Berlin, Executive Director





Board of Ethics, 2007-2008

Board Members

Miguel A. Ruiz, Esq., Chair
Partner, Pretzel & Stouffer, Chartered
Appointed 2002

Alison C. Chisolm (through October 15, 2008)
Development Director, Young Women's Leadership Charter School
Appointed 2007

Thomas J. McCarthy, CPA
Manager, Michael J. Liccar & Co.
Appointed 2007

Michael F. Quirk
President, Christian Brothers Services
Appointed 1996

Mary Beth S. Robinson, Esq. (through May 31, 2008)
Vice President, Senior Claims Counsel
Attorneys' Liability Assurance Society of Chicago
Appointed 2002

John L. Wilhelm, M.D.
Executive Director, Infant Welfare Society of Chicago
Appointed 2006

City of Chicago Board of Ethics
740 N. Sedgwick, Suite 500
Chicago, IL 60654
312-744-9660

www.cityofchicago.org/Ethics

email: sberlin@cityofchicago.org





Board of Ethics, 2007-2008

Board Staff

Steven I. Berlin
Executive Director

Michael Haggerty (through September 30, 2007)
Deputy Director

Richard J. Superfine
Legal Counsel

Edward Primer
Program Director

Briana N. Billingslea (through November 15, 2007)
Attorney/Investigator

Courtney L. Donald Kimble
Attorney/Investigator

Carolyn Bowens
Administrative Services Officer

Pauly Sepúlveda-Casillas
Staff Assistant

Jef Johnson
Special Projects Coordinator

Doretha L. Jackson
Assistant to the Director



Board of Ethics, 2007-2008



This Annual Report summarizes the activities of the Board of Ethics from August 1, 2007 through July 31, 2008 (the “reporting year”). It is issued pursuant to §§2-156-380(j) and 2-164-070(j) of the Municipal Code of Chicago.





Board of Ethics, 2007-2008



Chicago and the Board of Ethics are proud to host the 30th Annual COGEL (Council on Governmental Ethics Laws) Conference, at the Westin River North Hotel from December 7-10, 2008. COGEL is the pre-eminent professional organization for government agencies, organizations, and individuals with responsibilities or interests in governmental ethics, elections, campaign finance, lobbyist laws and freedom of information. The Conference will draw more than 400 attendees from the U.S., Canada, Mexico, Kenya and the E.U.

For more information, see www.cogel.org





Board of Ethics, 2007-2008

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Board of Ethics, 2007-2008

I. Chair's Report

**“When a man assumes a public trust, he should consider himself as public property.”
Thomas Jefferson**

I am pleased to present this 22nd Annual Report of the City of Chicago's Board of Ethics. This past year has been one in which several notable and important trends are establishing themselves.

First, the Report chronicles the continuing increase in what the agency calls “No Jurisdiction” inquiries, cases and complaints. That is, more citizens and City personnel have been contacting the Board with concerns that do not fall within the ambit of the two Ordinances our agency administers, and thus are not within our jurisdiction. Nonetheless, people continue to contact the Board, in part because the agency offers confidentiality and independent, unbiased advice, in part because they know or have heard about our agency and its services, and that the Board of Ethics is trusted as a “go-to” resource, with a staff that knows where to refer them. I fully expect this trend to continue, and anticipate building even stronger networks of coordination with the other City agencies to address concerns laid at our agency's doorstep.

Second, the Report reflects that the Board has, in the past three years, experienced a doubling in the volume of requests for guidance received, most notably from City employees and officials. I attribute this to the success of our education programs, and view it as an important measure of our increasing success in achieving our primary mission as a City agency: promoting integrity in government. I expect that this trend, too, will continue. We are justifiably proud of our education programs--this City is “ahead of the curve” in using technology to educate.

Third, in this past year, the agency experienced a substantial increase in the number of Freedom of Information Requests received for the public documents it maintains. I attribute this also to increased awareness among Chicago's citizenry of our agency and of its important contribution to transparency in government. I certainly hope this trend continues; the agency will strive to make more records readily and electronically available, particular those filed by lobbyists.

Of course, the Board of Ethics faces the challenges of all in City government: tight resources. But, having seen what this agency has accomplished in the past year alone, I remain confident that, even in this era of scarcity, our agency, with its efficient and proficient small staff, and dedicated Board members, will continue in its noble work, and that service levels will continue to exceed each passing year's achievements.

Respectfully submitted,

Miguel A. Ruiz, Chair



Board of Ethics, 2007-2008

II. The Board of Ethics

Now in its twenty-second year, the Board of Ethics was established as an independent City department to administer and enforce the City's Governmental Ethics and Campaign Financing Ordinances. These laws were adopted in 1987 to help ensure that City officials and employees perform their public responsibilities impartially and do not use their public positions for private gain, and to foster public confidence in the integrity of City government. The Ordinances authorize the Board of Ethics to provide confidential advice, to design and conduct educational programs for City governmental personnel and others, to regulate lobbyists and campaign contributors, to distribute and maintain disclosures filed by City employees and officials, and to receive, refer or investigate complaints.

The Board has the authority to promulgate its own Rules and Regulations, including procedural rules consistent with the requirements of due process of law. All Board Rules and Regulations must be approved by City Council before they become effective. The Board's Rules and Regulations, covering nearly every aspect of its operations and legal mandates, can be found on its website:

http://egov.cityofchicago.org/webportal/COCWebPortal/COC_EDITORIAL/rules-regs-4web.html

The Board's members and its Executive Director are appointed by the Mayor and confirmed by City Council. Board members serve without pay and are independent, and can be removed only for cause, with the written approval of remaining Board members. The Board meets monthly and is staffed by eight full-time employees, including its Executive Director. The agency's operating budget for fiscal year 2008 was \$646,744.

The Board's Program Areas

Education and Training



William R. Inge said that "the aim of education is the knowledge not of fact, but of values." One of the agency's most critical responsibilities is informing City employees and officials, persons with or seeking City contracts, lobbyists and the public about the values underlying, requirements of, and standards expected by the Ordinances. Chicago is one of very few jurisdictions in the country that requires all aldermen and full-time City employees to complete annual ethics training. The Board designs and administers an on-line program, which it revises each year, and which is completed by 36,700 personnel. The Ordinance also requires about 10% of the City's workforce to attend quadrennial "face-to-face" ethics seminars designed and conducted by the Board.

These and the Board's other educational programs are summarized on pages 5-7 of this Annual Report.





Board of Ethics, 2007-2008

Advice and Guidance



By law, the Board serves as an advisory agency, enabling those with questions about complying with the Ordinances to receive reliable, confidential guidance. During the reporting year, the Board handled a record high **5,377** requests for information or specific advice. All requests and questions are handled confidentially, in accordance with the provisions of the Ordinances. The agency's goal is to advise people how to prevent and correct violations or breaches of the City's ethics laws and standards. Where appropriate, it consults and works with other departments to achieve this goal. If a person discloses facts that indicate that the Ethics Ordinance or other laws could have been violated, then the Board and its professional staff determine how to advise or make recommendations to that person, or, if appropriate under the Board's governing laws, rules and regulations, take steps to commence, conduct or refer an investigation. All Board advisory opinions, recommendations, opinions, complaints, investigations and findings are confidential. The Board not only makes them in confidence, but also, by law, makes them in reliance upon those to whom they are transmitted to abide by or enforce them. The Board does not court the media or laud its results publicly, except as provided by law. It cannot, because to do so would betray both its law and its purpose.

More detailed information about these activities can be found on pages 7-16 of this Annual Report.

Regulation and Public Disclosure

James Madison wrote that "people who mean to be their own governors must arm themselves with the power which knowledge gives." To foster knowledge of and transparency in government, the Board makes available for public examination and duplication the documents listed below. The number of requests that the Board received increased by 33% during the reporting year, and the number of documents examined doubled. The Board makes available:

- Statements of Financial Interests filed annually by approximately one-third of the City's workforce;
- Disclosure forms filed by married employees pursuant to Personnel Rule XXIX;
- Disclosures filed by City Council members regarding pending matters;
- Disclosures filed by City employees and officials regarding gifts and miscellaneous recusals; and
- Registration statements and activity reports filed regularly by 600 registered lobbyists.

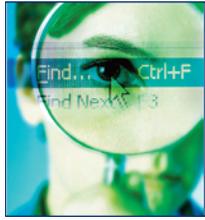
During the reporting year, the Board added a link on its website to the Campaign Contribution Disclosure database maintained by the Illinois State Board of Elections. This database allows the user to search all reported campaign contributions by date, recipient, or donor.

More detailed information about these programs can be found on pages 17-25 of this Annual Report.



Board of Ethics, 2007-2008

Investigation and Enforcement



The Board of Ethics is authorized to receive complaints and investigate alleged violations of the ethics and campaign financing laws. The Board:

- monitors contributions made to elected City officials and candidates for elected City office to ensure that contributors comply with the limitations imposed by the City's Campaign Financing Ordinance;
- commences enforcement actions or investigations based on its audits of information reported in public filings of City employees, officials, registered lobbyists, candidates for elected City office, and contributors thereto; and
- receives, assesses and refers or investigates complaints, and recommends or implements appropriate corrective action or sanctions.

More detailed information about these activities can be found on pages 21-24 of this Annual Report.





Board of Ethics, 2007-2008

III. The 2007-2008 Reporting Year

A. Education and Training

As Dr. Samuel Johnson wrote, “integrity without knowledge is weak and useless, and knowledge without integrity is dangerous and dreadful.” The goal of all Board education programs is to promote integrity in City government by informing City employees, officials, contractors and others in advance about the requirements of and standards of conduct expected by the Governmental Ethics and Campaign Financing Ordinances. These programs are:

1. Mandatory Annual Ethics Training

The Governmental Ethics Ordinance requires all aldermen and full-time City employees to complete, each year, an ethics training program designed by the Board. In 2006 and 2007, the City achieved 100% compliance with this requirement: 37,643 full-time employees and aldermen completed their 2006 training, and 36,598 employees and aldermen completed their 2007 training. For 2008, the Board produced two on-line programs: one for Aldermen; the other for City employees. In 2007 and 2008, approximately 92% of the City’s workforce completed and will have completed their training on-line. The on-line training is password-protected, accessible only from City personal computers, lasts about 35 minutes, and has five chapters covering five different subjects. The remainder complete their training through a DVD version of the training produced by the Board.

At the end of the reporting year, approximately 25,000 employees—more than two-thirds of the City’s workforce—had completed their 2008 mandatory ethics training.

To achieve this consistently outstanding result—100% compliance—the Board works closely with training administrators in every City department and aldermanic office. They provide invaluable assistance in ensuring that their personnel complete the training on schedule.

2. Mandatory Quadrennial Ethics Training

Since October 1997, the Governmental Ethics Ordinance has required all aldermen, aldermanic staff, City Council Committee staff and senior executive employees of the City to attend an ethics training seminar every four years. Approximately 10% of the City’s workforce is subject to this requirement. Persons failing to attend are subject to a \$500 fine. Upon entering City service in a position requiring attendance at ethics training, an employee or official has 120 days to attend, and then must attend again every four years. The Ordinance also mandates that the Board design and conduct training that will allow persons to satisfy this requirement. The Board identifies persons required to attend, notifies them in writing of their requirement, schedules them for classes, and confirms their attendance or non-attendance in writing. During the past reporting year, the Board conducted 25 classes for the 563 City employees and officials required to attend (the number of City personnel required to attend increased by 33% from the previous reporting year).



Board of Ethics, 2007-2008



3. Other Training

The Board designs and conducts other ethics training seminars or presentations for both City and non-City personnel—such as City contractors, visiting foreign government officials and dignitaries—upon request. This past reporting year, this program included:

- 14 customized classes, held upon request, covering the Board’s work and the Governmental Ethics and Campaign Financing Ordinances, attended by more than 350 City employees and appointed and elected officials from 7 departments and aldermanic offices (this represents double the number of classes requested and conducted for City departments over the previous reporting year);
- 6 presentations to 85 visiting journalists and government ethics officials from Angola, Cape Verde, Mozambique, the Peoples’ Republic of China, Russia and Thailand (this represents double the number of sessions requested and conducted for visiting foreign officials over the previous reporting year);
- 7 customized seminars presented to more than 640 City contractors (this represents a 75% increase in the number of seminars requested and conducted for City vendors over the previous reporting year).

4. Publications



The Board publishes and distributes a variety of materials summarizing different aspects of the Ordinances, including post-employment, outside employment, campaign financing, lobbying, and a guide for Aldermen. During this past reporting year, the Board created a new brochure for companies and persons with or seeking City contracts, and, with the cooperation of the Departments of Procurement Services, Innovation and Technology and Municipal Television, produced a training video for such companies and persons (as well as a DVD version). It is posted on the Board’s website, at the following address:

www.cityofchicago.org/Ethics/Media/EthicsTrainingProgram.html

All Board educational publications are posted on the agency’s website; hard copies are available upon request.

5. Departmental Ethics Officers

Ethics Officers from every City department and aldermanic office assist the Board by directing their fellow employees to the Board to have their questions addressed. They also perform certain invaluable services: distributing to their employees written notices informing them of the Ordinance’s post-employment restrictions, education requirements, outside employment restrictions, and the filing of Statements of Financial Interests. Forms used by departmental and aldermanic Ethics Officers are available on the Board’s website, as is a list of current Ethics Officers and their contact information.





Board of Ethics, 2007-2008

6. Other Web-based Training

In addition to the all-employee and aldermanic training programs that the Board produces and administers every year, two other interactive electronic training programs are also available. One covers the City's post-employment restrictions, and can be found at:

<http://egov.cityofchicago.org/city/postEmploymentQuiz/index.jsp>

The other covers the restrictions the Ordinances impose on City contractors, and can be found at:

www.cityofchicago.org/Ethics/Media/EthicsTrainingProgram.html

B. Guidance and Casework

The Board of Ethics provides information or confidential opinions to City employees, officials, lobbyists, contractors, campaign contributors and others on matters involving the City's Governmental Ethics and Campaign Financing Ordinances every day. The Board categorizes every request as either an "inquiry" or a "case."

1. Inquiries and Cases

➤ Inquiries

The Board handles as "inquiries" those instances where persons contact the office and request information or a confidential opinion, but do not request or receive a formal written opinion specifically approved by the Board members. This past reporting year, the Board handled **5,377** inquiries—an all-time high. Most people who contact the Board request advice so that they can comply with the City's ethics and campaign financing laws; others have more general questions. As appropriate, Board staff provides general information or an opinion or advice based on previously rendered written formal Board advisory opinions. All inquiries are handled in accordance with the confidentiality provisions of the Governmental Ethics and Campaign Financing Ordinances.

➤ Cases

The Board handles as "cases" instances where persons contact the office and request a formal written opinion or file a written complaint, and instances in which the Board commences its own investigations or preliminary inquiries. The Board will, as appropriate, render a written opinion, formally approve opinions given by Board staff, dismiss a complaint, or commence and conduct an investigation and then issue a report containing its determinations and recommendations. All cases are handled in accordance with the confidentiality provisions of the Governmental Ethics and Campaign Financing Ordinances.

This past reporting year, the Board approved or issued opinions in 40 cases, dismissed or referred 17 complaints, and issued 258 reports containing determinations or recommendations resulting from concluded investigations.



Board of Ethics, 2007-2008

Table I - Subject Matter of Inquiries/Yearly Comparisons

Table I shows the subject matter of inquiries received and handled by the Board during the reporting years ending July 31, 2006, 2007 and 2008.

Inquiries Received/Handled For the Years Ended July 31:			
Subject Matter	2006	2007	2008
Outside Employment	73	107	94
Post-Employment	94	79	97
Gifts/Travel/Honoraria	247	304	332
Interest in City Business	71	36	38
Campaign Financing	52	132	59
Lobbying	414	439	584
Financial Interest Disclosure	2547	2396	3135
Political Activity	29	60	48
City Property	18	50	51
Fiduciary Duty	19	26	22
Conflicts/Improper Influence	38	38	46
Money for Advice	2	24	21
Representation	20	22	38
Employment of Relatives	52	40	53
Confidential Information	51	14	9
General Information	13	76	79
No Jurisdiction†	59	73	130
Prohibited Conduct	9	9	8
Other	48	54	61
Classes/Education	787	693	447
Freedom of Information	57	61	25
TOTAL	4700	4733	5377

† Where possible, the Board refers these matters to other City, governmental, or private agencies.





Board of Ethics, 2007-2008

Table II -Subject Matter of Cases Resolved/Yearly Comparisons

Table II shows the number and subject matter of the cases resolved¹ by the Board for the reporting years ending July 31, 2006, 2007 and 2008.

Cases Resolved For The Years Ended July 31:			
Subject Matter	2006	2007	2008
Outside Employment	2	1	5
Post-Employment	20 ²	16 ³	10 ⁴
Gifts/Travel/Honoraria	5	11	5
Interest in City Business	4	6	4
Campaign Financing	33 ⁵	58 ⁶	55 ⁷
Lobbying Activity/Disclosure	92 ⁸	26 ⁹	3 ¹⁰
Financial Interest Disclosure	126 ¹¹	35	200 ¹²
City Property	1	5	2
Fiduciary Duty	7	4	2
Conflicts/Improper Influence	3	3	2
Representation	2	0	0
Employment of Relatives	2	5	8
No Jurisdiction ¹³	14	15	15
Political Activity	0	1	0
Ethics Education	0	1 ¹⁴	0
Freedom of Information	0	1	0
Money for Advice	0	1	5
TOTAL	311	189	316



Board of Ethics, 2007-2008

Notes to Table II:

1. As in past years, these figures include all cases in which oral or written advice or opinions were issued, and 1 case in which a request for an advisory opinion was withdrawn. It also includes 17 complaints dismissed and/or referred to other agencies, preliminary investigations, and cases in which the Board issued written reports resulting from concluded investigations.
2. This includes 2 withdrawn requests for written advisory opinions.
3. This includes 1 complaint that the Board declined to investigate after determining that the alleged conduct was already under investigation by another City agency.
4. This includes 1 withdrawn request for an advisory opinion.
5. This represents 33 concluded investigations pertaining to contributors' violations of the contribution limitations in the City's Campaign Financing Ordinance, and 1 case in which the Board rendered written advice. It does not include 15 cases commenced with respect to contributors alleged to have violated the contribution limitations but not concluded during this reporting year.
6. This includes 55 concluded investigations and preliminary inquiries pertaining to contributors' violations of the Campaign Financing Ordinance, and 1 case in which the Board rendered a written interpretation of the law, and 2 complaints received, investigated and closed, both involving allegations that candidates for elected City office had not filed their Statements of Financial Interests as required.
7. This includes 38 cases closed after corrective action was achieved; 5 cases in which the elected official brought the contributor into compliance without formal Board corrective action; 5 preliminary inquiries commenced but dismissed after the Board determined there was no violation of the Campaign Financing Ordinance; and 7 cases in which the Board vacated its determination that the contributors had violated the Ordinance.
8. This includes 1 staff request for a Board interpretation (pertaining to recording lobbyists' filings), 3 complaints (all of which were dismissed for lack of reasonable cause to investigate), and 88 investigations commenced and concluded during the reporting year, all pertaining to timely lobbyists' filings.
9. This includes 1 case in which written advice was given and approved by the Board, and 25 investigations commenced and concluded during the reporting year (all of which pertained to timely lobbyists' filings).
10. This includes 2 investigations commenced and concluded during the reporting year, pertaining to timely lobbyists' filing, and one advisory opinion.
11. This includes 31 cases closed involving individuals who, the Board determined, violated the Ordinance for failing to timely file their 2005 Statements of Financial Interests, and 95 cases closed involving individuals who filed their 2006 Statements prior to a Board determination that they had violated the Ordinance for failure to timely file.
12. This includes all 112 of the investigations commenced and concluded with respect to employees and officials determined to have violated the Ordinance for failure to timely file 2007 Statements of Financial Interests, and all 88 of the remaining investigations concluded with respect to employees and officials for failure to timely file 2006 Statements of Financial Interests.
13. Where possible, the Board referred these cases to other City, governmental, or private agencies.
14. Pursuant to § 2-156-405(a) of the Governmental Ethics Ordinance, the Board suspended its investigation upon being informed that a law enforcement agency was investigating the matter.





Board of Ethics, 2007-2008

2. Summaries of Notable Opinions



All of the following summaries are based on actual opinions given or issued by the agency during the reporting year. They are included here for educational purposes only—they are not intended to constitute legal advice. Opinions may be relied upon only by persons involved in the specific transactions or activities with respect to which the opinions are rendered. Any person with a question about a specific situation should contact

the Board.

Board opinions concern only the application of the City's Governmental Ethics and Campaign Financing Ordinances to the facts presented in the opinions, and do not analyze other rules or laws that may apply. The Board handles all inquiries in accordance with the confidentiality requirements of the Ordinances. To the extent that these summaries differ from the language of the Ordinances or Board opinions, the language in the Ordinances and opinions controls.

Want to read a Board opinion? Every formal written Board advisory opinion issued since the Board's establishment in 1986 is available in .pdf format on the Board's website with identifying and other confidential information removed. They are indexed by subject matter. See www.cityofchicago.org/Ethics

Gifts

The Governmental Ethics Ordinance prohibits any person from offering or giving, and any City employee or official from accepting, anything of value based on a mutual understanding that the recipient's City decisions or actions would be influenced thereby. It also prohibits any person with an economic interest in a specific City business or transaction from giving cash or gifts to City personnel whose decisions or actions may affect that business or transaction (and it prohibits these City personnel from receiving such cash or gifts). This prohibition, however, does not apply to non-cash gifts worth less than \$50; the Ordinance also limits or "caps" at \$100 in a calendar year the value of the total amount of gifts a City employee or official may accept from any such person.

Question 1:

An old friend of a City employee invites the employee to his company's White Sox skybox. The company does not do business with or have any contracts or dealings with the City, though it may have customers or clients licensed by the City. The employee asks whether the Ordinance prohibits him from accepting the offer.

Advice:

The Ordinance does not prohibit him from accepting the offer, because this company does not have any dealings or transactions with the City that he could affect, and there is nothing to indicate a mutual understanding that his City judgments or decisions would be affected by the gift. Nonetheless, he is advised to discuss this with his department head to ensure that the department does not prohibit him from accepting the offer.



Board of Ethics, 2007-2008

The Ordinance also requires any City official or employee who receives any gift or money for participating in the course of his or her public employment in speaking engagements, lectures, or discussion forums to report it to the Board of Ethics within 5 business days.

Question 2:

A City employee asks whether she can accept travel expenses and a \$400 honorarium for giving a speech at a conference hosted by a university in a nearby state. Her presentation will be on a topic relevant to her City work.

Advice:

Her acceptance of these travel expenses themselves are not prohibited by the Ordinance, if reasonable, because they are furnished by the sponsor of this public event. Because the \$400 is an honorarium, she must report acceptance of the money to the Board of Ethics within 5 business days. She is advised to seek and receive her department head's approval before accepting any expense or offer, however.

Campaign Financing

The Campaign Financing Ordinance limits at \$1,500 the amount that certain persons or business entities may contribute to: 1) candidates for elected City office during a single candidacy; 2) elected City officials during a "reporting year" (July 1 through June 30); and 3) City officials or employees seeking election to any other office. Among the persons subject to this limitation are those who have "done business" with the City or its "sister agencies" (the CTA, Board of Education, Chicago Park District, Metropolitan Pier and Exposition Authority and City Colleges) within the previous four reporting years (meaning sales, purchases, leases or contracts to, from or with the City in excess of \$10,000 in any consecutive twelve month period). The Ordinance also provides that, for purposes of this \$1,500 limitation, an employee, officer, director or partner of an entity subject to these limitations shall not be considered the same person as that entity for purposes of campaign contributions if they are reimbursed by the entity for these contributions, but explicitly does not prohibit contributions made by such individuals for which they are not reimbursed by the entity.

Question 1:

The principal shareholder of a company that does business with the City wishes to contribute to an alderman's political fundraising committee. She says the company has already contributed the \$1,500 maximum amount to the committee, but she wishes to make an additional \$500 contribution during the same reporting year from her personal account. Does the Ordinance prohibit her additional contribution?

Advice:

It depends. Her additional contribution to the alderman's committee would not be aggregated with the company's, and thus **not** violate the Ordinance, **unless**: 1) she is reimbursed for the contribution by the company doing business with the City; or 2) she herself is **personally** subject to Ordinance contribution restrictions as a registered lobbyist or a person doing or seeking to do business with the City or any of the "sister agencies."





Board of Ethics, 2007-2008

Question 2:

A representative of a company that does business with the City asks whether it can make a \$500 political contribution to a City elected official in the form of paying for a complimentary admission for the official and a guest to a charity event.

Advice:

It depends—whether this is a political contribution or an offer of a gift to the official is, finally, the decision of the elected official. The Campaign Financing Ordinance defines a “political contribution” in relevant part as anything of value given “for purposes of influencing in any way the outcome of any election.” If the official considers this a political contribution, then it must be reported as required by state law, and would accrue toward the company’s \$1,500 limit on contributions to this official for the current reporting year. But if the official considers this a gift, then it would be a prohibited gift if the company has any business transactions which the official is in a position to substantially affect.

Employment of Relatives or Domestic Partners



The Governmental Ethics Ordinance prohibits City employees from “employing” or advocating for employment any of their relatives (or their domestic partner) in a City agency in which they serve or exercise authority. “Employ” means, in part, supervising, making, taking part in or approving promotion, vacation, salary or leave decisions about another. This prohibition applies to City Council Committee staff, but not to personal staff of an alderman.

Question:

Can an alderman hire his immediate family member to serve as a member of his personal staff under the so-called “1012” payroll rubric? (“1012” is the identifier of the payroll used to pay certain workers hired by the City Council as either employees or City contractors. In this case, the relative would be hired using a “Personal Services Contract,” which provides, among other things, that it would be entered between the City, acting through the alderman, and the individual, referred to as the “Contractor.”)

Advice:

The Ordinance: 1) **does not prohibit the alderman** from hiring or employing his relative as either a City employee or City contractor under the “1012” payroll rubric to serve as a member of his personal staff, provided that neither he nor any other elected City official (nor his/their spouses/domestic partners or any entities in which he or any of them or their spouses/domestic partners have a financial interest) have a business relationship with the relative; and 2) **does prohibit him** from hiring or employing his relative as either a City employee or City contractor under the “1012” rubric to serve on any City Council Committee on which he serves or exercises authority, supervision or control. Also, under § 2-156-115 of the Ordinance, the aldermen or his designee must maintain daily records of his personal employees’ attendance, and certify them as correct.



Board of Ethics, 2007-2008

Lobbyist Regulation

The Governmental Ethics Ordinance requires all “lobbyists” to register annually with the Board. It defines “lobbyist” as any person who, on behalf of any person other than himself, or as any part of his duties as another’s employee, undertakes to influence any “legislative” or “administrative” action. It also defines “legislative action” and “administrative action,” but it contains certain exceptions to the term “lobbyist.”

Question:

An officer of an arts organization asks whether, under the City’s Governmental Ethics Ordinance, he or any other employee or Board member of the organization would be required to register as a lobbyist were they to meet with City employees and/or aldermen as to zoning, real estate or other matters while representing the organization’s interests. The entity is a non-profit organization under the Internal Revenue Code of 1954, as amended.

Advice:

When he, or his fellow employees or the organization’s Board members meet with City employees or elected officials and attempt to influence City legislative or administrative action on the organization’s behalf, they are not acting as or considered “lobbyists” for purposes of the Ordinance. The conclusion is based on the exception to the definition of “lobbyist” in the Ordinance. It provides that “an employee, officer or director of a not-for-profit entity who seeks to influence legislative or administrative action on behalf of such an entity shall not be considered a lobbyist” for purposes of the Ordinance.

Interest in City Business/Conflict of Interest/Outside Activity

The Governmental Ethics Ordinance prohibits City employees from having a “financial interest” in their own or another’s name in any contract, work or business of the City. “Financial interest” means, in relevant part, any interest: i) as a result of which the owner receives or is entitled to receive more than \$2,500 per year; or ii) with a cost or present value of \$5,000 or more. There are a few exceptions. One is that a City employee’s spouse or domestic partner may have such an interest, as long as it is related to the spouse’s or domestic partner’s independent occupation, business or profession. The Ordinance also prohibits City employees from representing any person or business in any nonministerial City transaction, and from participating in, influencing or making City decisions in which they have an “economic interest” distinguishable from the general public’s. “Economic interest” means any interest that has monetary value—it has the same exception for a spouse’s independent occupation, business or profession.

The following **two** questions are based on this fact situation:

The spouse of a City employee is an officer of a nonprofit arts organization that employs dozens of people, and the employee himself is an uncompensated Board member of the organization. The organization wishes to relocate to a building situated in a Tax Increment Financing (TIF) district, and is interested in purchasing the building, from a private owner, and taking advantage of whatever TIF assistance the City can offer.





Board of Ethics, 2007-2008

Question 1:

The employee asks whether he would have a prohibited financial interest in City business if this transaction proceeds, and whether he must resign from the organization's Board.

Advice:

No. Because he serves on the organization's Board, this is not his spouse's "independent business, occupation or profession." But neither he nor his spouse are owners of this organization, which is a non-profit. Thus, neither of them have a "financial interest" in the organization or its City business. Moreover, because the organization is large, with dozens of employees and a Board, it cannot be considered the "alter ego" of his spouse, such that she would be deemed the effective owner of the organization.

Question 2:

If this transaction proceeds, does the Ordinance impose any restrictions on this City employee's conduct?

Advice:

Yes. Because his spouse is a paid employee of the organization, and he himself serves on its Board, he has an "economic interest" in it, as it is not his wife's independent occupation, business or profession. The Ordinance would not prohibit him from continuing to serve as a board member in the event that the organization purchases this building or secures TIF assistance or funds. But the Ordinance does prohibit him from making, participating in or attempting to use his City position to influence this or any other City decision involving the organization, or from representing the organization (as a Board member) in any meetings, negotiations, or presentations with or to City of Chicago officials or employees regarding the organization or its proposed purchase of this building, or from signing any documents to be submitted to the City with respect to it.

Post-Employment Restrictions



The Governmental Ethics Ordinance does not prohibit a person leaving City employment (whether by retirement, voluntary severance or otherwise) from working for any particular new employer or client. But, it does restrict those matters on which the former employee may work. For one year after termination of the official's term of office or employment, the former City employee or official or may not assist or represent any person in a business transaction involving the City if he or she participated personally and substantially in the subject matter of the transaction during City employment. And, a former City employee or official is barred permanently from assisting or representing any person as to a City contract if he or she exercised contract management authority with respect to that contract during City employment or office.



Board of Ethics, 2007-2008

Question 1:

A former employee served in City employment from 1989 until 2001, when she resigned. Three years later, in 2004, she was rehired by the City, in a different department, where she worked until she resigned from City employment again. She joined a City contractor four months ago. She now asks whether she would still be subject to the Ordinance's one-year post-employment restrictions as to her City responsibilities during her first "stint" or term of City employment, given that she was not employed by the City for 3 years, between 2001 and 2004, or only as to her second "stint."

Advice:

City Personnel Rule XIII, Section 1 states that when an employee resigns, the employment relationship with the City is terminated and the employee has no right to be rehired. And, the City considers a break from City service of longer than one year to be a "permanent" break, such that, if the individual is rehired, a new start date of continuous service occurs. For purposes of the Ordinance, then, because this former employee resigned from City service and was out of City service for longer than one year before being rehired, she has had two separate "terms of employment." Thus, any one-year post-employment restrictions to which she would now be subject would **stem only from her second term of City employment**. She is subject to the Ordinance's one-year restrictions as to her second "stint" of employment, and to the Ordinance's permanent post-employment prohibitions as to her entire City career.

Question 2:

An employee of the Department of Aviation, working at Midway airport, asks whether he would be restricted by the Ordinance were he to resign and accept full-time employment with the company/consortium that wins the "privatization" contract to lease and administer Midway Airport. He would perform essentially the same or similar functions and would assume the same or similar responsibilities he has currently as a City employee.

Advice:

No, he it would not be restricted—as a matter of Illinois law, he can take this position if offered it. Under Illinois Public Act 094-750, signed by the Governor in May 2006, the company/consortium that wins the Midway deal "must offer employment, under substantially similar terms and conditions, to the employees of the municipality who are employed" at the time of the transaction, "with respect to the facility property used for airport purposes." The Act also has a Home Rule preemption provision, which in effect supersedes the application of the City's Governmental Ethics Ordinance to this situation. This Illinois law permits him to work with whatever company wins this contract, performing the same or similar responsibilities, the Ordinance's post-employment restrictions notwithstanding.





Board of Ethics, 2007-2008

C. Regulation and Enforcement Activities

1. Campaign Financing

The City's Campaign Financing Ordinance limits the amount of money that certain persons may contribute during a political reporting year (July 1 through June 30) to candidates for elected City office, elected City officials, and City employees and officials seeking election to any other office (or to any of their authorized committees). These persons are: 1) lobbyists registered with the Board; 2) those who, within the last four political reporting years, have done business with the City or one of its "sister agencies" (these are the Chicago Transit Authority; the Chicago Public Schools, the Chicago Park District, the Chicago City Colleges and the Metropolitan Pier and Exposition Authority) and 3) persons seeking to do business with the City or one of its sister agencies.

The Board monitors contributors' compliance with these limitations by reviewing campaign financing disclosure reports that candidates' political committees file with the Illinois State Board of Elections (pursuant to state law). The Board compiles a database of contributors who have exceeded the limitations, then compares this database with City and sister agency contract records, matters referred to the City Council and/or Council committees, and lobbyists' registration statements, to determine whether these contributors were subject to the Ordinance's contribution limitations during the relevant time period.

During the reporting year, the Board commenced 39 investigations with respect to excess contributions to elected City officials during the 2005-2006 political reporting year. In each case, the Board determined that the contributors had violated the Campaign Financing Ordinance. At the end of the reporting year, all but 9 of these cases remained open. The Board also closed 4 cases commenced during previous reporting years.

At the end of the reporting year, the Board was continuing its review of contributions made during the 2006-2007 political reporting year (an election year). It had already identified a total of 47 contributors who had made contributions in excess of \$1,500 to City elected officials or candidates during that political reporting year. As a result, the Board expected to commence at least 26 investigations into excess political contributions. Eleven of these matters arose with respect to contributors who had done business with the City's sister agencies, and are based upon the Board's review of records provided by those sister agencies.



Board of Ethics, 2007-2008



2. Statements of Financial Interests

City employees whose annual salary rate is at or exceeds the rate set by the Board each year (for 2008, the rate is \$73,550) and certain elected and appointed City officials are required to file Statements of Financial Interests with the Board each Spring (aldermen file their forms with the City Clerk), in accordance with Article 2 of the Governmental Ethics Ordinance. The Board distributes, collects, and reviews these Statements for compliance with the Ordinance.

➤ The 2008 Filing Year

For 2008, 14,010 City employees and officials were required to file Statements of Financial Interests by May 31. Those required who filed after May 1 were required to pay a \$20 late filing fee, as mandated by the Ordinance. During the reporting year, the Board collected \$10,660 in late filing fees. This represents a 32% decrease from the amount collected during the previous reporting year. During the reporting year, the Board commenced 96 investigations of employees and officials for failure to timely file their 2008 Statements, and determined that they had all violated the law. As of July 31, 2008, 25 employees and 2 appointed officials still had yet to file their 2008 Statements of Financial Interests, and all 96 cases remained pending.

➤ The 2006 and 2007 Filing Years

During the reporting year, the Board received reports of discipline imposed by the departments with respect to all of the remaining cases regarding employees and appointed officials who, it had previously found, violated the Ordinance for failing to timely file 2006 and 2007 Statements of Financial Interests: 88 from 2006, and 112 from 2007. All these cases were closed.





Board of Ethics, 2007-2008

3. Lobbyist Registration and Activity

The Board of Ethics regulates persons who lobby City government. Article 3 of the Governmental Ethics Ordinance requires all lobbyists to register with the Board each January 20, and file reports about their lobbying activities with the Board each January 20 and July 20. The Ordinance also requires all registrants to pay a \$200 fee per person identified as a lobbyist in their registration statement. During the reporting year, the Board collected \$131,800 in lobbyist registration fees.

Persons determined by the Board of Ethics to have failed to register as lobbyists as required are subject to fines, as are persons who retain or employ them. The Ordinance provides that a City contract performed or entered into with any person who has retained or employed a non-registered lobbyist for the purpose of negotiating, soliciting or otherwise seeking the contract, shall be voidable as to the City. During the reporting year, the Board commenced and closed 2 investigations with respect to lobbyists who had failed to timely file their reports. Both resulted in determinations that the lobbyist had violated the Ordinance, and in termination of the registrations. In each case, the Board has reserved the right to levy fines in the event the persons desire ever to re-register.

In their filings, lobbyists are required to identify their clients, list their lobbying-related compensation and expenditures, the City agencies they lobby and which legislative and administrative actions are the focus of their lobbying activity, provide itemized lists of gifts they have given to City officials and employees, and furnish a copy of any written agreement of retainer or employment pursuant to which they lobby, or a written statement of the substance of any oral agreement pursuant to which they lobby.

In accordance with state law and the Ordinance, all lobbyists' filings are available for public inspection and duplication. The Board of Ethics maintains lobbyist filings for seven years following the date of filing.



Board of Ethics, 2007-2008



Number of Lobbyists

At the end of the reporting year (on July 31, 2008), there were **602** persons registered as lobbyists with the Board. During the reporting year, **69** lobbyists terminated their lobbyist registration. Together, these lobbyists represented **3,140** clients.

Lists of lobbyists and their clients

The Board maintains a current list of registered lobbyists and their clients on its Website. The list is updated monthly. To view it, see:

<http://www.cityofchicago.org/Ethics>

Gifts from Lobbyists

The Ordinance requires registered lobbyists to provide itemized lists of all gifts they have given to City officials and employees during the previous six month period. Filed reports shows that, during the period July 1, 2007 through December 31, 2007, 15 lobbyists gave 53 gifts to 32 City officials and employees, with a total value of \$2,358.15. The reports also show that, during the period January 1, 2008 through June 30, 2008, 9 lobbyists gave 72 gifts to 62 City officials and employees, with a total value of \$4,229.08.

Who Retains Lobbyists?

The Governmental Ethics Ordinance requires registered lobbyists to disclose the name and business interests of all clients on whose behalf they lobbied during the six months prior to filing their semi-annual activity reports.



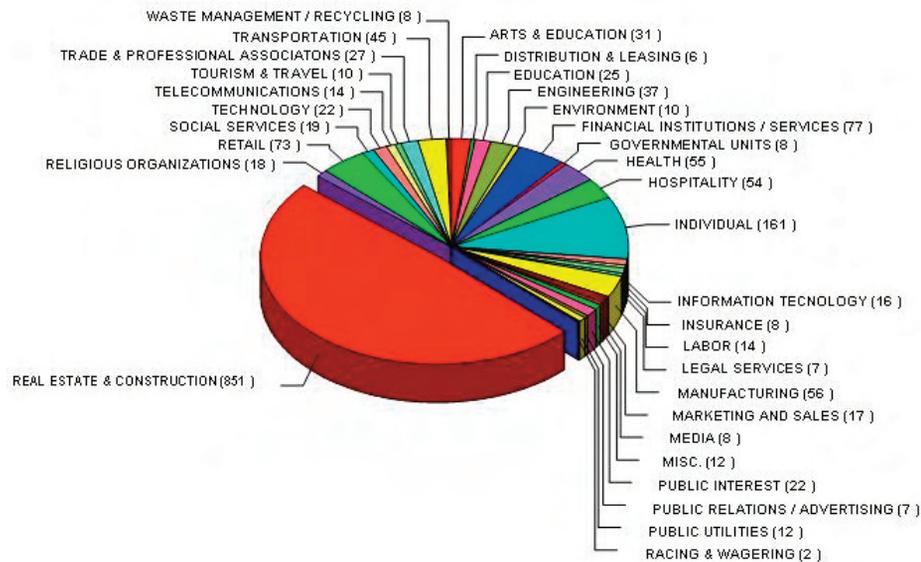


Board of Ethics, 2007-2008

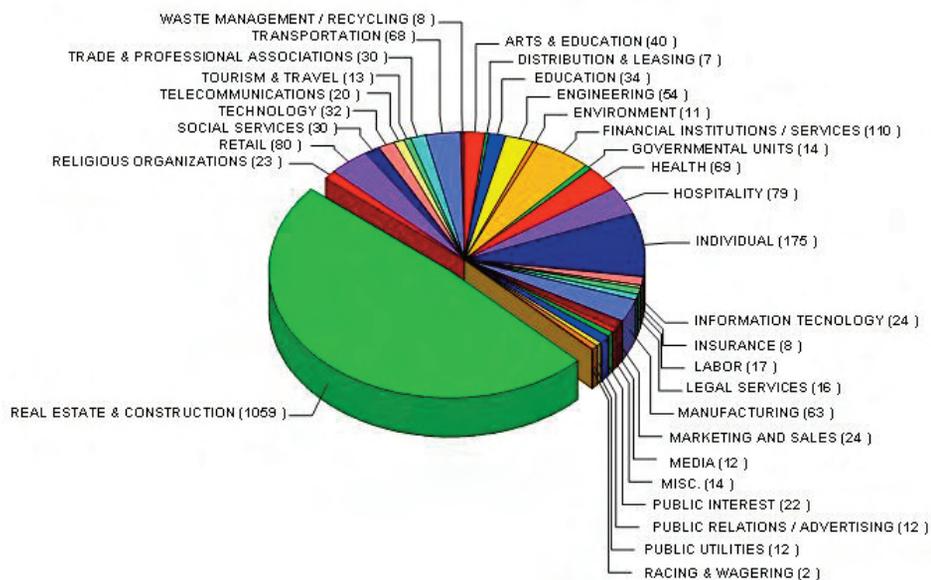
Table III: Lobbyists' Clients' Business Interests

The following two charts show the number and business interest of clients represented by lobbyists in the First Reporting period (the six months ending December 31, 2007) and Second Reporting Period (the six months ending June 30, 2008).

JULY 1, 2007 THROUGH DECEMBER 31, 2007
FIRST PERIOD



JANUARY 1, 2008 THROUGH JUNE 30, 2008
SECOND PERIOD





Board of Ethics, 2007-2008

4. Complaints, Preliminary Investigations, and Investigations



The Board has the authority to receive complaints, refer them to other City investigative agencies, or initiate preliminary inquiries, conduct investigations into alleged violations of the Ordinances, issue subpoenas during the course of its investigations, make determinations into whether violations have occurred, and recommend or impose appropriate sanctions or further action.

All Board complaints, inquiries, investigations, reports and recommendations are subject to the confidentiality requirements of the Ordinances. As required by both Ordinances, the Board prepares written reports of all concluded investigations, and sends these reports to the appropriate persons as specified by law, and in all instances to the Corporation Counsel.

➤ Filed Complaints

The Board received 17 complaints during the reporting year—15 were referred to other City investigative agencies. In accordance with the Ordinances and the Board's Rules and Regulations, Board legal staff promptly (within two business days) reviewed and assessed each complaint and determined whether there was reasonable cause to initiate an investigation into the allegations. The determination as to whether there is reasonable cause to initiate an investigation is based on this question: if the allegations in the complaint turn out to be true (construing all inferences in favor of the complainant), would they amount to a violation of either Ordinance? If no, the Executive Director dismisses the complaint and, where possible, notifies the complainant of the dismissal. If yes, the Executive Director recommends that the Board commence an investigation. The Board may refer any investigation, complaint or complainant to another City investigative agency. The Board has the authority to investigate only written complaints that contain: 1) the identity of the person against whom the complaint is filed; 2) a clear description of the essential facts and circumstances constituting the alleged violation of the City's Governmental Ethics or Campaign Financing Ordinances; 3) the identity of the person entering the complaint; and 4) allegations sufficient to conclude that there is reasonable cause to initiate an investigation. Complaints against aldermen must be signed and sworn.

The Executive Director dismissed 15 of these 17 complaints because they raised issues outside the Board's jurisdiction. However, in 13 of these, the complainant or complaint was referred to other investigative agencies: in one case, the Chicago Police Department, in two cases, jointly to the Office of Compliance and the Inspector General's Office, and in seven cases, directly to the Inspector General's Office.

The Executive Director dismissed the 2 remaining complaints, each alleging violations of the Employment of Relatives/Domestic Partners provision, for failure to conform to the Board's Rules and Regulations. But he then referred one of them to Inspector General's Office, and the other jointly to the Inspector General's Office and the Office of Compliance, because it alleged conduct which, if true, would constitute violations of other City Ordinances.





Board of Ethics, 2007-2008

➤ Preliminary Investigations



Each year, the Board audits information disclosed on public documents filed with it (and with the Illinois State Board of Elections) by City officials, employees, lobbyists and candidates for elected City office. These documents include Statements of Financial Interests, Lobbyist Registration Statements and Activity Reports, disclosures filed by City Council members, and campaign contribution reports filed by City elected officials and candidates for elected City office. If, based on the Board's review (which is sometimes occasioned by a filed complaint), a possible violation of the Governmental Ethics or Campaign Financing Ordinance is indicated, the Board commences a preliminary inquiry. From a preliminary inquiry, the Board may conclude that: i) there is reasonable cause to conclude that one or more provisions of the Ordinances may have been violated, in which case it will initiate an investigation; or ii) the inquiry should be closed on the basis that there is no reasonable cause to conclude that there is a potential violation (in such cases, the Board may advise the subject of the relevant provisions and penalties contained in the Ordinances).

During the reporting year, the Board did not commence any preliminary inquiries based on its review of Statements of Financial Interests filed by City employees and officials, lobbyists' filings, or City Council members' disclosures.

Based on its review of campaign contribution reports filed with the Illinois State of Board of Elections, City contract records, information provided by the sister agencies, and matters referred to City Council Committees, the Board commenced 6 preliminary inquiries into whether campaign contributors had violated the City's Campaign Financing Ordinance. In 1 of these, the Board concluded that there was reasonable cause to commence an investigation; and after the investigation was conducted, the contributor was determined to have violated the Ordinance, and compliance was achieved. In the remaining 5 cases, the Board received information showing that there was no violation, and dismissed the matters before determining that the contributors had violated the Ordinance.



Board of Ethics, 2007-2008

➤ Concluded Investigations

As summarized in Table IV, on page 25, during the reporting year, the Board concluded all remaining cases—200 in total—with respect to City employees and officials who failed to file 2006 and 2007 Statements of Financial Interests within the time prescribed by law. All of these investigations were commenced during prior reporting years.

During the reporting year, the Board concluded 55 investigations with respect to persons who exceeded the political contribution limitations of the City's Campaign Financing Ordinance. This includes 38 cases closed after corrective action was achieved with respect to contributions made during the 2005-2006 political reporting year, 3 made during the 2004-2005 political reporting year, and 1 from the 2003-2004 political reporting year. It also includes 5 cases in which the elected official brought the contributor into compliance without formal Board corrective action; 5 preliminary inquiries commenced but dismissed after the Board determined there was no violation of the Campaign Financing Ordinance; and 7 cases in which the Board vacated its determination that the contributors had violated the Ordinance. Two of these were vacated because the elected official's committee had mistakenly reported the excess contribution, and then duly amended their filings with the State Board of Elections; four were vacated because the Board received proof that corrective action had been achieved prior to the Board's determination; the remaining case was dismissed after the contributor successfully rebutted the Board's finding that it was subject to the Ordinance's contribution limitations.

The Board also commenced and concluded 2 cases with respect to lobbyists who had not filed activity reports or registration statements as required by the Ordinance. Both resulted in determinations that the lobbyist had violated the Ordinance, and in the termination of the registrations. In each case, the Board has reserved the right to levy fines in the event the persons desire ever to re-register, pursuant to §2-156-270 of the Ordinance.





Board of Ethics, 2007-2008

TABLE IV - Subject Matter of Investigations, Complaints and Preliminary Investigations

Table IV shows the subject matter of complaints received, preliminary inquiries commenced and/or concluded, and investigations both initiated and concluded by the Board during the reporting year.

Subject Matter	Formal Complaints Received	Preliminary Inquiries Commenced or Concluded	Investigations Commenced	Investigations Concluded
Financial Interests Disclosure	-		96 ¹	200 ²
Campaign Financing	-	6	39 ³	55 ⁴
Lobbyist Registration/ Disclosure	-	-	2	2 ⁵
No Jurisdiction	15	-	-	-
Employment of Relatives/Domestic Partners	2 ⁶	-	-	1 ⁷
TOTAL	17	6	137	258

Notes to Table IV

1. This represents cases involving 81 employees and 15 appointed officials with respect to whom the Board commenced investigations for failure to file 2008 Statements of Financial Interests. The Board determined that each of them had violated the Ordinance. All 96 cases remained open at the end of the reporting year.
2. This includes 88 cases concluded with respect to individuals determined to have violated the Ordinance for failure to file 2006 Statements of Financial Interests, and 112 concluded with respect to those determined to have violated the Ordinance for failure to file 2007 Statements.
3. This represents investigations brought with respect to excess political contributions during the 2005-2006 political reporting year. In each case, the Board determined that the contributors had violated the Campaign Financing Ordinance.
4. This includes 38 cases closed after corrective action was achieved, including 1 case brought as a result of preliminary investigation; 5 cases in which the elected official brought the contributor into compliance without formal Board corrective action; 5 preliminary inquiries commenced but dismissed after the Board determined there was no violation of the Campaign Financing Ordinance; and 7 cases in which the Board vacated its determination that the contributors had violated the Ordinance.
5. This figure represents investigations commenced and concluded with respect to 2 lobbyists who failed to timely file Activity Reports. In both cases, the Board determined that the lobbyists had violated the Ordinance; this resulted in the termination of the registrations. In each case, the Board has reserved the right to levy fines in the event the persons desire ever to re-register.
6. This figure represents 2 complaints, both dismissed and referred to the Offices of the Inspector General and Office of Compliance.
7. This figure represents 1 investigation that the Board formally closed during the reporting year, based on a complaint filed in a previous reporting year. In this case, the Board determined that there had been a violation, and, as required by Ordinance, sent its report and recommendations to the employee's department and the Corporation Counsel.



Board of Ethics, 2007-2008

5. Personnel Rule XXIX Disclosures

Personnel Rule XXIX (formerly Mayoral Executive Order 97-1, effective December 1, 1997), imposes restrictions on the conduct of employees in all executive departments, the Mayor's Office, the Mayor's security detail and City department heads. It also requires employees in executive departments to make written disclosure to the Board of Ethics each year of their spouses' ownership interest in entities that contract with persons doing City business. During the reporting year, the Board published the disclosure form (which is also posted on the Board's website), coordinated the distribution of notices of the requirement to file the form to all City employees, collected and audited all returned forms, and referred to the Law Department 6 forms requiring further review.

6. City Council Members' Disclosures

The Conflicts of Interest provision of the Governmental Ethics Ordinance requires members of City Council to file written notice with the Board of Ethics as to certain matters pending before the City Council or its committees in which they have an interest, and to disclose their interests in these matters on the records of Council proceedings and abstain from voting on them. After receiving these disclosures, the Board reviews records of Council proceedings and other documents to ensure compliance with the law. As provided by law, the Board also maintains and makes these disclosures available for public inspection upon request. In the reporting year ended July 31, 2008, the Board received 37 of these disclosures, covering 174 distinct pending matters or items.

D. Examination of Public Filings



To help achieve transparency in City government, and to assist the Board in regulating the conduct of those who are subject to the City's ethics and campaign financing laws, the Board maintains and makes available for public inspection, under its own Ordinances and the Illinois Freedom of Information Act (FOIA), all Statements of Financial Interests, City Council members' and other miscellaneous disclosures, plus advisory opinions and lobbyist filings.

During the reporting year, the Board received a total of 53 FOIA requests. These comprised requests to examine 997 Statements of Financial Interests filed by 214 individual City employees and 5 appointed officials, 3 requests to examine 965 aldermanic disclosures (two were for all aldermanic disclosures), and requests to examine a total of 838 distinct lobbyist filings. The Board also received 1 request to view advisory opinions and 9 requests to view records not in the agency's control.

Note: these figures represent a 33% increase in the number of FOIA requests received by the agency from the previous reporting year, a near doubling of the number of City employees and officials whose Statements of Financial Interests were requested, and a doubling of the number of lobbyists' forms requested.



For More Information

Board of Ethics staff members are available to answer any inquiries you may have about the Board, or to provide you with confidential guidance about the requirements of the City's Governmental Ethics or Campaign Financing Ordinances. To reach us, please call 312-744-9660 (TT/TDD 312-744-5996), send us a FAX at 312-744-2793, or email the Executive Director at sberlin@cityofchicago.org

To obtain an advisory opinion or guidance about a specific situation, or to file a complaint, please contact **Steven I. Berlin, Executive Director**, or write or stop in to the Board's office:

CITY OF CHICAGO BOARD OF ETHICS
740 North Sedgwick, Suite 500
Chicago, Illinois 60654

Also, please visit our web site: www.cityofchicago.org/Ethics

There, you will find complete texts of the Governmental Ethics and Campaign Financing Ordinances, Board Rules and Regulations, profiles of Board members, the Board's last eight Annual Reports, the current list of registered lobbyists and their clients, blank downloadable copies of all Board forms, educational brochures, and instructions on how to file requests to examine or receive documents maintained by the Board.