



CITY OF CHICAGO



BOARD OF ETHICS

CONFIDENTIAL

April 12, 2022

Re: Case No. 22007.C

Dear [City employee]:

On [date] 2022, you emailed our Executive Director and explained that you were taking your mandatory online employee ethics training and you had become aware of §2-156-090(a), “Representation of other persons,” in the Governmental Ethics Ordinance. You explained that since 2018, among other things, you had “frequent communication with various alderman [*sic*]” in connection with your representation as president and vice-president of a not-for-profit [community organization] [“NFP”]. By email, our Legal Counsel advised you that staff would present the matter to the Board of Ethics at its March 2022 meeting and, at that time, the Board would determine whether [your actions] violated -090(a), and if so, constituted a minor violation of that provision. He further advised that you cease any representation of the organization before any City employee or official and perform no representation to the City agencies except representing yourself as a private citizen/homeowner.

At its March and April 2022 meetings, the Board, after deliberating, determined that your actions, summarized above, did constitute a “minor” violation. At its April 2022 meeting, the Board directed me, pursuant to Ordinance §2-156-070(b), to send you this confidential letter of admonition. Thus, you are hereby admonished that §2-156-090(a) prohibits any City official or employee from “represent[ing], or deriv[ing] any income or compensation from the representation of, any person other than the city in any formal or informal proceeding or transaction before any city agency in which the agency's action or non-action is of a nonministerial nature.” Representing [NFP as one of its officers] in communications with City Council members, their staffers, or other City employees or officials is prohibited.

Please also be advised that, if this minor violation is repeated, the Board would be required by law to consider it a non-minor violation and would then advise that you may self-report it to the Office of Inspector General, and, if you did not, the Board would be required to do so and make this minor violation part of the record of that report.

On behalf of the Board, I appreciate your bringing the matter to our attention, your conscientiousness, and your desire to comply with the standards embodied in the Ethics Ordinance. Please contact me with any questions.

Yours very truly,

Steven I. Berlin
Executive Director