



CHICAGO DEPARTMENT OF AVIATION  
CITY OF CHICAGO

January 8, 2014

Erin Gruver  
Aeroterm  
201 West Street, Suite 200  
Annapolis, MD. 21401

Dear Mr. Gruver,

On behalf of the Chicago Department of Aviation (CDA), I would like to thank you for the very thoughtful gift of a \$50 gift card to Amazon. While I appreciate the gesture, I cannot accept your gift based upon the CDA's Ethics Policy.

Therefore, I am returning the gift card back to you via US Postal Mail.

We have a zero-gift policy at the CDA, which is described in the attached brochure from the City of Chicago Board of Ethics. In essence, CDA personnel are prohibited from offering or receiving gifts, regardless of their value, to or from contractors or consultants.

Sincerely,

Jonathan Leach  
Chicago Department of Aviation

Attachment

cc: Chicago Board of Ethics  
Document Control  
Angela Manning

## OTHER RELEVANT LAWS

A City employee or elected official cannot have an ownership interest in any City contract, if that interest has a cost or present value of \$5000 or more, or if that interest entitles the owner to receive more than \$2500 a year.

If your company is wholly or partly owned by a City employee or elected official and the employee's or official's interest in your company's City contract exceeds these limits, the contract can be canceled by the City.

If you hire a City employee or official, City law prohibits that person from giving you advice or assistance on a City contract unless the advice is wholly unrelated to his/her City duties.

If your company hires a former City employee or official

- that person cannot assist your company on a City contract if, while working for the City, he/she personally helped to formulate or supervise that contract.
- Nor can that person, for one year after leaving City service, assist your company on any matters involving the City, if while with the City, he/she was personally and substantially involved in the same or similar matters.



If your company employs or contracts with a relative or domestic partner of a City official or employee, that City official or employee cannot oversee or supervise your company's City contracts.

## COMPLAINTS AND INVESTIGATIONS

Any person can file a complaint with the Board of Ethics relating to an alleged violation of the Ordinances by persons subject to their provisions, and the Board of Ethics can investigate these complaints. To file a complaint contact the Board of Ethics (see contact information below).

## ADVISORY OPINIONS

Confidential advisory opinions from the Board of Ethics are available upon request.



## QUESTIONS AND ANSWERS

If you have any questions regarding the Ordinances or you would like more information, call or write:

City of Chicago Board of Ethics  
Steven I. Berlin, Executive Director  
740 North Sedgwick Street, Ste. 500  
Chicago, Illinois 60654-8488

Telephone: (312) 744-9660  
TTY: (312) 744-5998  
FAX: (312) 744-2793

[www.cityofchicago.org/Ethics](http://www.cityofchicago.org/Ethics)

On-Line Training web site:

<http://www.cityofchicago.org/Ethics/Media/EthicsTrainingProgram.htm>

Monday - Friday  
8:30 AM - 4:30 PM

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# ETHICS IN CITY GOVERNMENT

CHICAGO DEPARTMENT OF AVIATION  
AND THE  
O'HARE MODERNIZATION PROGRAM

TRAINING FOR  
CDA/OMP CONTRACTORS,  
VENDORS AND EMPLOYEES

Presenter:  
**Steven I. Berlin**  
Executive Director, Board of Ethics



Rosemarie S. Andolini  
Commissioner



Rahm Emanuel  
Mayor

## ETHICS IN CITY GOVERNMENT

A GUIDE FOR STAFF, CONTRACTORS AND VENDORS  
OF THE

CHICAGO DEPARTMENT OF AVIATION

AND THE

O'HARE MODERNIZATION PROGRAM

In addition to the obligation to perform duties in a satisfactory manner, there are other legal and ethical restrictions and obligations that apply to you as contractors and vendors of the City.

*It is also important that you understand the ways in which not only your conduct, but the conduct of others, can affect your ability to obtain and keep a City contract. This guide outlines some of those restrictions and obligations. It is not intended to be all-inclusive and provides general information only.*

*For authoritative guidance on specific questions, consultation with the Board of Ethics is recommended.*

### DUTY TO COOPERATE

Every contractor, subcontractor, and applicant for a City program or contract has a duty to cooperate with, and shall not interfere with any investigation or hearing conducted by, or willfully refuse to comply with a subpoena issued by, either the Inspector General's Office or the Board of Ethics.

### PENALTIES FOR VIOLATIONS

Violations of City law or Department policy can lead to cancellation of any contract obtained, or entered into and can also lead to additional penalties such as fines, judicial and criminal penalties.

## GIFTS AND LOANS

### GENERAL CITY LAW

City law contains several restrictions, including prohibitions on cash and anonymous gifts, and on any gifts given with a mutual understanding that actions or decisions concerning City business will be influenced or affected.

Please be aware that individual departments may impose policies regarding gifts that are more stringent than those included in the Municipal Ordinance. If such a policy is implemented by a department, the departmental policy supercedes the Municipal Ordinance.

### "CDA/OMP" POLICY

The Commissioner of Aviation has implemented department policies in regards to gifts that are more restrictive than the Municipal Ordinance. Those policies prohibit any gifts by vendors or prospective vendors to department employees and their families.

*CDA/OMP policy prohibits its Program staff from offering or giving gifts, regardless of their value, to any employee whose duties or responsibilities involve the CDA/OMP. This means that consultant/contractors who have or are seeking an economic interest in the CDA/OMP are prohibited from offering or giving a gift, regardless of value, to any City official or employee whose duties or responsibilities involve the CDA/OMP.*



### CONTRACT INDUCEMENTS

No subcontractor, or any person acting on a subcontractor's behalf, can make any payment, gratuity, or offer of employment, in connection with any City contract, to any prime contractor or higher tier contractor, or to any persons associated with them, as an inducement for the award of a subcontract or order.

## LIMITATIONS ON CAMPAIGN CONTRIBUTIONS

City law also limits the type and amount of campaign contributions that can be made to an elected official or candidate for elected City office.

Cash contributions cannot exceed \$250.

Anonymous contributions or those made in someone else's name are unlawful.

There is a \$1500 limit on the amount of money registered lobbyists and persons doing business or seeking to do business with the City or any of its sister agencies can contribute to any candidate or elected official of the City in a reporting year.

By Executive Order of Mayor Richard M. Daley, City contractors are prohibited from contributing to his campaign fund.

NOTE: Additional restrictions on contributions are imposed by state law, namely, the Illinois Election Code, as amended. Consultation with qualified counsel is recommended.



### LOBBYIST REGULATIONS

If a person lobbies the City or hires a lobbyist to assist in seeking a City contract, the person who lobbies must register annually with the City of Chicago, and pay the \$350 annual fee (plus \$75 for each client after the first).

If someone employs or retains an unregistered lobbyist, or hires a lobbyist on a contingency basis, that person can be fined up to \$2000 a day, and any City contract in place with that person's company may be canceled by the City.

