



BOARD OF ETHICS CITY OF CHICAGO

Good morning, Honorable members of the Joint Commission on Ethics and Lobbying Reform of the 101st General Assembly. It is my honor to testify before you and I thank you for the opportunity.

Now in our 33rd year, the City's Board of Ethics administers, interprets and enforces Chicago's Governmental Ethics Ordinance. Under the leadership of our Board members and Executive Director, we promote integrity, transparency and accountability in City government by giving thousands of pieces of confidential advice each year, educating City employees and officials, vendors, lobbyists, and others subject to the Ordinance, regulating their conduct, and enforcing the Ordinance by adjudicating cases involving violations of the law.

- ♦ Through our guidance and casework program, we receive requests for and issue more than 4,100 confidential advisory opinions yearly (the vast majority from City employees and officials) on complying with the letter and spirit of the City's ethics laws and responsibly handling potential conflicts of interests.
- ♦ Through our educational programs, we provide annual training for the entire City workforce and all registered lobbyists, thereby raising awareness of ethics standards, promoting a workplace free from sexual harassment, and helping to foster knowledgeable City workers, lobbyists, and regulated communities.
- ♦ Through our enforcement program, we: (i) find probable cause to conclude that the Ordinance was violated where information available to us indicates apparent Ordinance violations and no factual investigation by the City's Inspector General ("IG") is needed; (ii) as appropriate, refer complaints alleging violations for factual investigation; (iii) dismiss, settle, or adjudicate ethics investigations completed by the IG, as well as all Board-generated enforcement actions, make final, public determinations as to whether violations occurred, and impose penalties as provided by law; and (iv) administer ethics training and filing requirements for lobbyists and City employees, officials, and candidates for City elected office, and assess penalties and/or issue recommendations for corrective action.
- ♦ Through our regulatory program, we foster transparency and accountability by making public thousands of disclosures filed by governmental personnel, and annual registration and quarterly activity reports filed lobbyists. These reports indicate which City departments or agencies the lobbyist lobbied, which matters were lobbied upon, a statement of the compensation the lobbyist received and the amount expenditures the lobbyist made for lobbying the previous quarter, and all gifts and political contributions to City elected officials or candidates for elected City office made in the previous quarter. Note that registered lobbyists are prohibited from making political contributions to Mayor Lightfoot or her political committee (by Executive Order) and by Ordinance prohibited from making in excess of \$1,500 in political contributions in a calendar year to any other City elected official or candidate for City elected office.



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The City's Governmental Ethics Ordinance is in its way a living document, reflecting both reactivity but also projecting bold proactivity. It has been amended 34 times since its enactment in August 1987.

Mayor Lightfoot has continued the push for reforms, and, under her leadership and that of the City Council's Committee on Ethics and Governmental Oversight, the City has enacted what I believe to be a far-reaching prohibition on "cross lobbying." On December 18, 2019, the City Council voted into law several Ordinance amendments, in which the Board played a major role in drafting. These take effect on April 14, 2020, and:

- ♦ Prohibit City elected officials and employees from acting as lobbyists on behalf of private clients before any other government unit in the State, or from receiving compensation or income from such lobbying by others (the Ordinance has always prohibited them from "lobbying" or "representing" any person before any City department or agency, whether compensated or not, unless that work is in the course of their duties as City employees or elected officials).
- ♦ Require City employees and officials who file annual Statements of Financial Interests with the Board of Ethics to disclose the names of relatives who are registered as lobbyists not only with the City (which is current law), but also with the Secretary of State, Cook County Clerk, or in any other local unit of government in Illinois.
- ♦ 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.
- ♦ The amendment does not 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), nor impinge on the practice of law by legislator-attorneys.

I urge the General Assembly to enact similar legislation, and pledge to assist in any way our agency, or the Council on Governmental Ethics Laws (COGEL, of which I am currently President) can.

I await your questions.

Steven I. Berlin, Executive Director

City of Chicago Board of Ethics
740 N. Sedgwick Ave., Suite 500
Chicago, IL 60654
phone: 312-744-9660
cell: 773-329-1967

steve.berlin@cityofchicago.org
[@ChicagoEthicsBd](#)
www.chicago.gov/Ethics/