



CITY OF CHICAGO

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BOARD OF ETHICS

CONFIDENTIAL

December 13, 2021

[City Official]

Chicago, IL 606

Re: Case No. 21037.C; Letter of Admonition; Prohibited Political Activities

Dear [City Official],

On [date], you emailed me, explaining that you had, in error, [just] minutes before, emailed to a single recipient, from your official City of Chicago email account, an invitation to [an] upcoming political fundraising event, and wished to self-report this violation. I emailed you back and advised that you re-send the email from an appropriate email address, and that I would present the matter to the Board at its December 13 meeting with the recommendation that the Board determine this to be a minor violation of the City's Governmental Ethics Ordinance (the "Ordinance"), and that, if the Board so determines, you would be sent this letter of admonition advising you not to repeat the mistake.

At its meeting this afternoon, the Board considered this matter, and, after deliberating, determined that sending this invitation did constitute a "minor" Ordinance violation.¹ The Board then directed me, pursuant to §2-156-070(b) of the Ordinance, to send you this confidential letter of admonition. Accordingly, you are hereby admonished that §2-156-135(b) of the Ordinance prohibits City officials or employees from "intentionally misappropriat[ing] any property or resources of the City in connection with any prohibited political activity." Intentionally using a City email account to send political content is prohibited. The determination of a minor violation is consistent with Board Case 20008.C, where the Board advised a City employee that they had committed a minor violation by inadvertently forwarding an invitation to a political fundraising event for a member of the Illinois General Assembly to their contacts from their City of Chicago email account as well. See <https://www.chicago.gov/content/dam/city/depts/ethics/general/AOMinorViolations/20008.C.pdf>.

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 you 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 honesty and desire to comply with the standards embodied in the Ordinance. Please contact me with any questions.

Yours very truly,

Steven I. Berlin, Executive Director

¹ In Case 14006.A, the Board set out the factors to consider as to whether a violation is minor: (i) would determining that the violation was minor still uphold the spirit of the Ordinance; (ii) would a third party view the violation as technical; and (iii) was there a pattern evidencing a negligent disregard of the Ordinance.