

2023



# Ethics Annual Report



**COOK COUNTY**  

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**Board of Ethics**

December 2022 through November 2023



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# Letter from the Chair



**Thomas Szromba, Chair**  
**Trial Attorney**  
**United States Government**

Greetings,

The Cook County Board of Ethics (“The Board”) is pleased to provide this 2023 Annual Report to Cook County Board President Toni Preckwinkle, the Cook County Board of Commissioners, Cook County employees, and all Cook County residents.

The Board of Ethics’ mission is to promote and support compliance with our ethics code to ensure the public’s confidence and trust in County officials, employees, and programs. We do this by enforcing the County Ethics Ordinance by conducting audits, issuing confidential advisory opinions, providing regular training and reminders, and investigations.

The Board extends gratitude to the Cook County Board of Commissioners, which approved amendments to the Board of Ethics Procedural Rules on September 21, 2023. These changes provide more clarity and guidance on several provisions in the Ethics Ordinance, including the December 16, 2021, amendments to the Ethics Ordinance. Significant amendments to our rules include:

- Section 3.10 | Statements by the General Public at Board Meetings
- Section 4.5 | Form of Request for Advisory Opinions
- Section 5.9 | Notice of Investigation and Opportunity to Present Information
- Section 5.15 | Time to Complete Investigation and Suspension of Investigation
- Section 8.1 | Limitations on Contributions
- Section 9.10 | Dual Employment.

The amended procedural rules reflect efforts to continue increasing transparency and trust in County government and provide clarity to County stakeholders. We have incorporated these changes in our training and guidance materials and distributed County-wide emails to provide awareness of the new rules.

The Board of Ethics continues to focus on its outreach and training efforts by updating and creating new guidance materials and providing more educational opportunities for our stakeholders. Particularly, we created new guidance for vendors, explaining the provisions of the Ethics Ordinance that apply to them. This document is available on our website. Further, Board staff participated in the Pathways to Cook County Fair in August 2023, the County’s first vendor fair since 2019, where we distributed new vendor guidance and interacted with over 800 current and potential County contractors to raise their awareness of the Ethics Ordinance and the obligations it imposes.

Our presence at the vendor fair is complemented by the consistent outreach and training activities we conducted in 2023, which include biweekly orientations for new County employees, Ethics Lunch & Learns, refresher presentations to individual County departments by request, and County-wide email notices that had approximately 25,000 views during the 2023 reporting period.

The totality of these efforts demonstrates the Board of Ethics’ continued commitment to a culture of compliance in Cook County. Thank you to Cook County Board President Toni Preckwinkle, the entire Cook County Board, Elected Officials, employees, and residents for their ongoing support of the Board of Ethics’ mission to ensure fair and honest government in Cook County.

A handwritten signature in blue ink, appearing to read 'T. Szromba', with a long horizontal flourish extending to the right.

Sincerely,  
Thomas W. Szromba  
Chair, Cook County Board of Ethics

# About the Board of Ethics

The Cook County Board of Ethics (“The Board”) is responsible for enforcing the Cook County Ethics Ordinance (“Ethics Ordinance”). The Ethics Ordinance requires all Cook County officials, appointees, and employees to abide by a Code of Conduct that sets forth general directives to ensure fair and honest government in Cook County.

In working to ensure the public’s confidence and trust in County government, the Board enforces the Ethics Ordinance by investigating complaints of alleged violations, conducting compliance audits, issuing advisory opinions, and providing ethics training sessions. The Board issues confidential formal and informal advice to County officials, appointees, employees, contractors, and campaign donors on compliance with the Ethics Ordinance.

The Board enforces and advises on ethics issues, including the following:

- Confidential information
- Conflicts of interest and interest in Cook County Board business
- Contribution limits
- County-owned property
- Employment of relatives
- Fiduciary duty
- Financial disclosures
- Improper influence
- Newsletters, brochures, public service announcements, and promotional materials
- Prohibited political activities
- Receiving and soliciting gifts and favors
- Representation of other persons



# Board of Ethics Members

**The Board of Ethics is composed of five members appointed by the President of the Cook County Board of Commissioners with the advice and consent of the Cook County Board of Commissioners.**



**Dr. Susan Gaffney**

Retired, Associate Professor of Public Administration, Former Program Coordinator for undergraduate Political Science and graduate Criminal Justice, Political and Social Justice and Public Administration, Governors State University



**Von Matthews, Vice Chair\***

Retired, Senior Vice President and Head of Global Fraud Risk, Northern Trust Company



**Antara Nath Rivera**

Arbitrator, Illinois Workers' Compensation Commission



**Honorable Judge Marcus Salone**

Retired, Presiding Justice of the Illinois Appellate Court, First District, and 3rd Division

\*Note: Von Matthews retired from his position on the Board of Ethics prior to the time of this report's release but served on the Board for the duration of the reporting period.

# 2023 Highlights

FOR THE PERIOD OF DECEMBER 1, 2022 TO NOVEMBER 30, 2023.

	FY22	FY23	YOY change
<b>INVESTIGATIONS</b>	8	2	-75%
<b>TRAININGS</b>	58	63	+8%
<b>INDIVIDUALS WHO RECEIVED TRAINING</b>	3889	3642	-6%
<b>COOK COUNTY CONTRACTS REVIEWED</b>	570	636	+11%
<b>STAFF OPINIONS</b>	94	88	-6%
<b>FINES COLLECTED</b>	\$12,800	\$37,550	+193%
<b>ETHICS REMINDER EMAILS SENT TO STAKEHOLDERS</b>	9*	6	-33%
<b>NEW OR REFINED ETHICS GUIDANCE DOCUMENTS</b>	7*	2	-71%

\*Additional ethics reminders and guidance documents attributed to the 2022 Election Periods.

# 2023 Amendments to the Ethics Procedural Rules

The Board of Ethics amended its Procedural Rules to streamline ethics procedures and align with December 2021 Amendments to the Cook County Ethics Ordinance. The Procedural Rules were approved by the Cook County Board of Commissioners and went into effect September 21, 2023.

The following sections were amended:

- Section 3.10 | Statements by the General Public at Board Meetings
  - To provide more clarity and access to the public comment process.
- Section 4.5 | Form of Request for Advisory Opinions
  - To clarify the Board's process for issuing Advisory Opinions.
- Section 5.9 | Notice of Investigation and Opportunity to Present Information
  - To preserve confidentiality in investigations and support broad trust in the Board's investigative process.
- Section 5.15 | Time to Complete Investigation and Suspension of Investigation
  - To allow the Board to suspend an investigation under reasonable circumstances.
- Section 8.1 | Limitations on Contributions
  - To clarify definition of 'receipt of contribution.'
- Section 9.10 | Dual Employment
  - To inform County employees of the rules, expectations, and parameters around secondary employment and to clarify the process for reporting secondary employment and maintaining dual employment records.

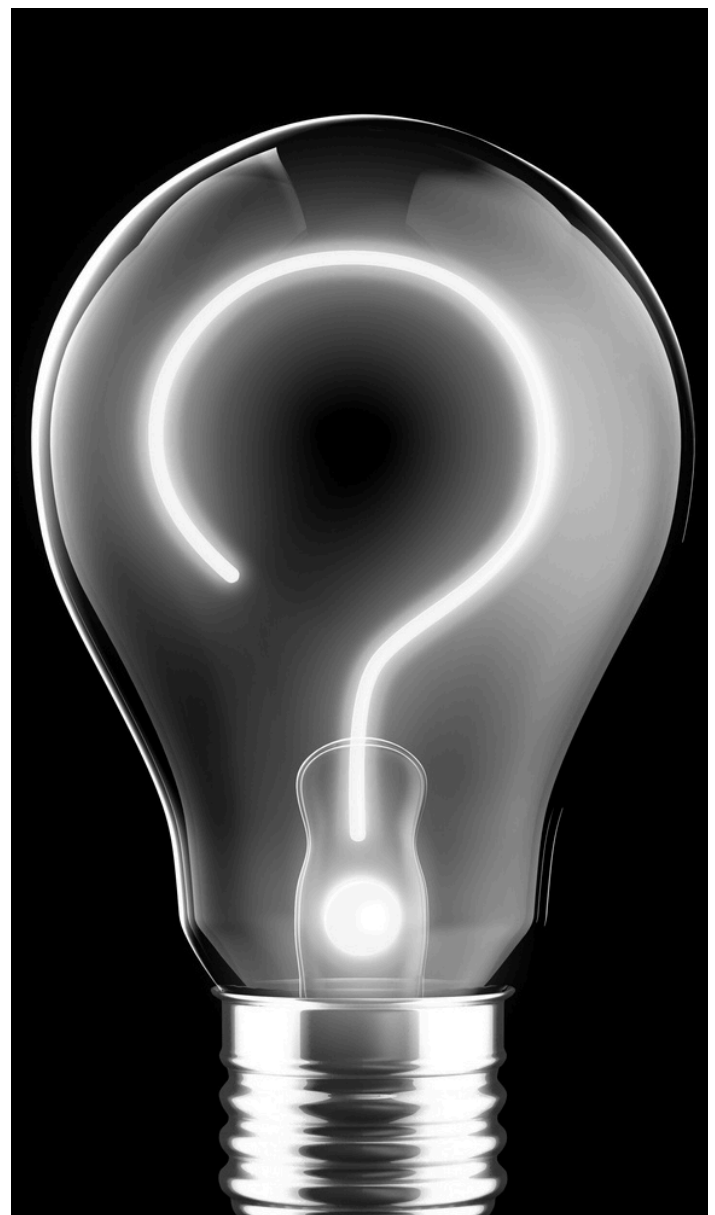
The Board launched a communications and training campaign to announce the updates and anticipate questions from County staff. As an initial measure, Board staff sent a mass email notification to inform approximately 19,000 County employees of the Procedural Rules amendments. Board staff coordinated with the Bureau of Human Resources to host an Ethics Lunch & Learn on October 26, 2023, which attracted 108 registrants from Offices Under the President.

For an in-depth review of the updated Board of Ethics Procedural Rules, please visit the [Cook County Board of Ethics Rules & Regulations](#) tab on the Board of Ethics homepage.

# Ethics Advisories & Staff Opinions

One of the key functions of the Board of Ethics is to render advice to Cook County officials, appointees, employees, and others governed by the Ethics Ordinance. The Board and its staff provide this advice by responding to routine inquiries, providing Staff Opinions, and issuing confidential formal and informal advisory opinions.

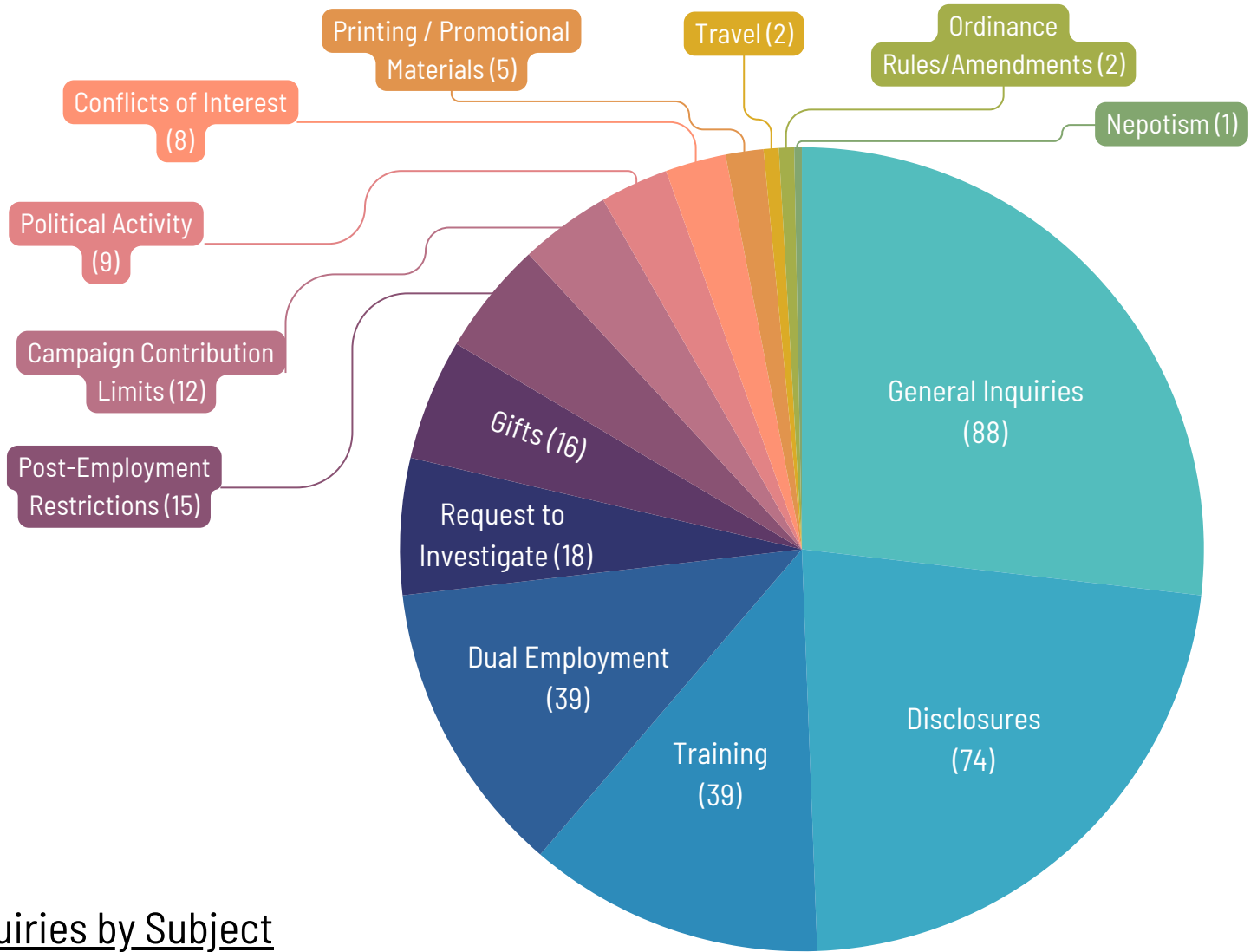
Cook County officials, appointees, employees, and others governed by the Ethics Ordinance may request informal advice from Board of Ethics staff on routine issues. Additionally, the Board may issue formal opinions in response to specific questions or on its own motion. These opinions are legally binding on those governed by the Ordinance. Formal opinions are made public, in full text, with names and other identifying information redacted. Informal opinions are not made public but are logged, kept, and used for training and future advisory purposes. The subject of advisory requests and inquiries informs changes to current guidance documents and the addition of new informational and educational materials. In Fiscal Year 2023, the Board of Ethics issued 2 formal board advisories, 88 staff opinions and answered 328 routine inquiries.





# Ethics Advisories & Staff Opinions

## FY23 Inquiries



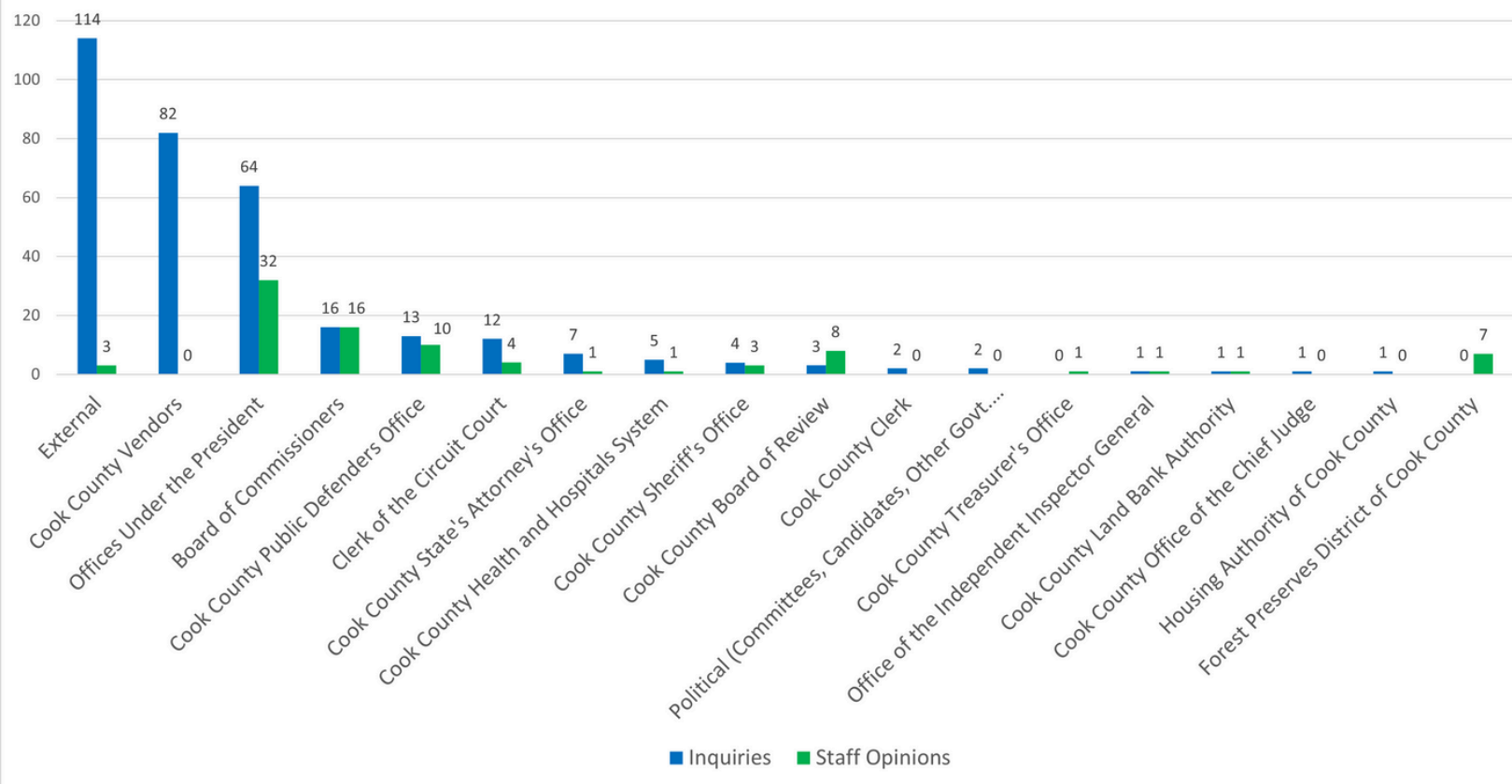
### Inquiries by Subject

General inquiries are questions Board staff receive from individuals inquiring about a particular section of the Ethics Ordinance, need guidance finding Ethics guidance materials or requesting referrals to other agencies and departments. The most common inquiries received during FY 2023 were related to (1) Disclosures, (2) General Questions, and (3) Dual Employment. This is a shift from FY 2022, as the most responded to inquiries were related to printing/promotional materials and gifts.

The increase in inquiries related to disclosures is likely the result of the streamlined process for the Annual Vendor Familial Relationship Disclosure requirement under the Ethics Ordinance. The increase in inquiries regarding Dual Employment is the result of the September updates to the Ethics Procedural Rules. Section 9.10 of the procedural rules highlights the responsibilities County employees have while retaining secondary employment. Additionally, it ensures that department heads understand the process of maintaining dual employment records.

# Ethics Advisories & Staff Opinions

Breakdown of Requesters, Inquiries & Staff Opinions

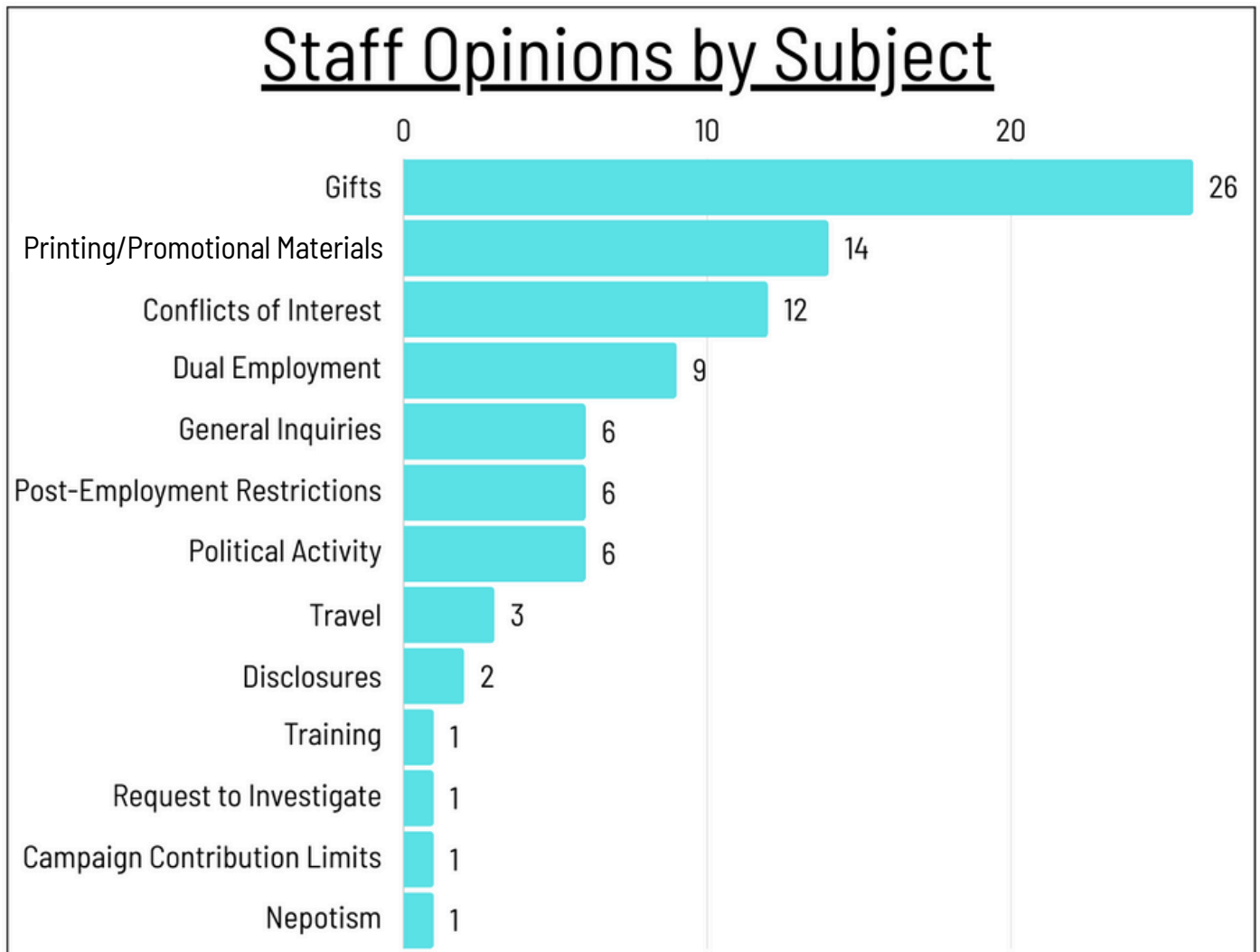


Board staff issued 88 informal opinions and responded to 328 inquiries in FY 2023. The three Cook County offices below most frequently contacted the Board for guidance:

1. Offices Under the President,
2. The Cook County Board of Commissioners, and
3. The Cook County Public Defenders' Office.

Board staff welcome County employees, Elected Officials, contractors, and others to continue contacting the Board with questions. Each inquiry and opinion issued demonstrates the County's commitment to fostering a culture of compliance with the Ethics Ordinance, a core mission of the Board of Ethics.

# Ethics Advisories & Staff Opinions



## Staff Opinions by Subject

Simultaneously, the most issued staff opinions during the reporting period were:

1. Gifts (Section 2-574),
2. Printing and Promotional Materials (Section 2-586), and
3. Conflicts of Interest (Section 2-578).

This demonstrates County stakeholders' continued efforts to comply with the Ethics Ordinance, as they come to the Board for advice before moving forward on a matter. For example, Staff Opinions are issued regarding conference and travel fees that are gifted to Cook County employees to attend and discuss County business, and specific outreach materials that are distributed during election periods.

# Audits & Trainings

The Board of Ethics' primary goal is to ensure compliance with the Ethics Ordinance. To that end, a significant portion of the Board's work is providing regular training and conducting audits. Through this work, we empower County employees, officials, and other stakeholders with the information and opportunity to maintain compliance with the County's Ethics Ordinance.

## Audits

The Board conducts many audits, including reviews of contracts for goods and services over \$15,000 and proposed legal settlements over \$500,000 prior to Cook County Board of Commissioner approval. Further, the Board collects and reviews Public Officials Dual Employment Disclosures and agency certifications for contracting with prior County employees to serve a critical operational need. Below are highlights of two recurring audits performed by the Board.

## Campaign Contribution Reviews

Section 2-585 of the Ethics Ordinance limits campaign contributions, or the total amount of funds a prohibited source can donate to support the campaign for candidates running for County office. This provision equips Board staff to conduct quarterly campaign contribution audits, which ensures that donations do not exceed the limits set forth by the Ethics Ordinance.

Board staff reviewed 2,690 campaign contributions throughout FY2023. Of the campaign contribution reviews conducted during this reporting period, only six resulted in potential excessive contributions to political campaigns. Upon further review, Board staff found that none of these contributions exceeded the limit under Section 2-585. In addition to the ongoing review of campaign contributions, Board staff collaborated with the department's 2023 Data Fellow to implement a streamlined audit procedure for long-term use.

## Annual Vendor Familial Relationship Disclosures

Section 2-582(e) of the Ethics Ordinance states that upon the execution of a County contract, persons are required to "...disclose to the Board of Ethics the existence of familial relationships such person may have with all persons, defined as a relative in Section 2-562, holding an elected office associated with the County of Cook..." This section mandates that County vendors disclose familial relationships on an annual basis to eliminate conflicts of interest while doing business with the County. During the 2022 audit, Board staff received 461 responses from Cook County vendors by the January 2023 deadline. The Cook County State's Attorney's Office represented the Board as it pursued fines against vendors that did not meet the disclosure deadline. These matters were sent to the Cook County Department of Administrative Hearings and resulted in collection of \$37,550 in fines.

# Audits & Trainings

## Trainings

The Board of Ethics presents annual ethics training and develops ethics guides and educational materials to promote knowledge and awareness of the Ethics Ordinance. This critical Board function furthers our goal to maintain a culture of compliance among all segments of Cook County government.

Ethics staff trained 3,642 Cook County employees across different departments throughout FY2023 through its online modules to satisfy the annual training requirement. Board staff also offered various presentations throughout the year, including:

- Biweekly new employee training to Offices Under the President and Clerk of the Circuit Court,
- Ethics overview presentations to various Cook County departments, by request, and
- Ethics Reminders for the annual United Negro Fund Walk for Education fundraiser.

## 2023 Vendor Fair

On August 8, 2023, Cook County Government hosted its Pathways to Cook County Vendor Fair at the University of Illinois-Chicago's Dorin Forum, which shared information for current and prospective County vendors. Board staff attended the Fair and educated current County vendors and business owners interested in contracting with Cook County of the Ethics Ordinance provisions applicable to them, enhancing the Board's outreach efforts.

Board staff developed a new guidance document highlighting vendor duties under applicable sections of the Ethics Ordinance. This document was distributed at the Vendor Fair and is available on the Board's website. The new vendor guidance explains the following sections and how they apply to vendors:

- Section 2-574 | Receiving and Soliciting Gifts and Favors
- Section 2-580 (c) | Post Employment Restrictions
- Section 2-582 (e, f, & g) | Familial Relationship Disclosure Provision
- Section 2-585 | Limitations on Campaign Contributions to Candidates for County Office.

The Board of Ethics intends to continue identifying opportunities for in-person and virtual outreach and creation of additional vendor guidance materials to complement its training efforts in 2024.

# Conclusions & Goals

From our annual review, the Board of Ethics draws the following conclusions:

- 1 In addition to regular training for County officials and employees, the Board provided Lunch & Learn sessions on provisions of the Ethics Ordinance and increased outreach efforts to County vendors.
- 2 Completion of inaugural County Vendor Annual Familial Relationship Disclosure audit, with a total of 461 timely disclosures filed in the first year conducting this audit.
- 3 Significant website improvements to facilitate greater ease in locating helpful guidance and resources.

The Board of Ethics presents the following goals for FY 2024:

- 1 Increase productivity and efficiency via implementation of new Case Management System.
- 2 Publication of new online database of Cook County vendors to aid officials and candidates in self-audits of campaign contributions received.
- 3 Expand training and public outreach efforts for County officials, employees, and all stakeholders, including updating and developing new guidance documents.



# Acknowledgements

The Cook County Board of Ethics would like to express a special thank you to Cook County Board President Toni Preckwinkle, the Cook County Board of Commissioners, Cook County elected officials, Cook County appointees, employees, and the people of Cook County. The work described throughout this report was only possible with their efforts.

## Board of Ethics Members

Dr. Susan Gaffney  
Von Matthews, Vice Chair\*  
Antara Nath Rivera  
Hon. Marcus Salone  
Thomas Szromba, Chair

## For Inquiries and Questions regarding this Report

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