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BOARD OF COMMISSIONERS

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## **COOK COUNTY BOARD OF ETHICS**

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### **STATEMENT BY THE BOARD OF ETHICS REGARDING AUDITS FOR CAMPAIGN CONTRIBUTIONS PRIOR TO 2021 February 1, 2022**

The Board of Ethics (“Board”) has determined that Board Staff will not conduct additional D-2 audits for campaign contributions made prior to calendar year 2021.

D-2 audits are conducted pursuant to Board’s Rules (Section 8.1), which permits periodic audits to ensure compliance with Cook County campaign contribution limits. Board Staff is in the process of completing full D-2 audits for calendar year 2021. Due to the pandemic and other factors, however, there is a brief period before 2021 in which D-2 audits were not conducted. Because the Cook County Ethics Ordinance (Section 2-591(f)) imposes a two-year statute of limitations, the Board’s ability to bring enforcement actions based on excess campaign contributions that may have occurred during that period is limited.

The Board, like any enforcement agency, has discretion to prioritize enforcement efforts based upon its resources. This decision recognizes the limited staffing and resources available to Staff, the practicalities imposed by the two-year statute of limitations, and the desire to move forward with aggressive auditing of campaign contributions during the 2022 campaign season and beyond.

Finally, we note that while this decision means that there will be a period prior to 2021 in which full D-2 audits will not be conducted, Board Staff consistently conducted vendor contribution audits during that period, which identified and corrected any excessive campaign contributions made by County contractors during that time.