
2022

ANNUAL ETHICS REPORT

Cook County
Board of Ethics





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FROM THE CHAIR

Greetings:

The Cook County Board of Ethics is pleased to provide this 2022 Annual Report to Cook County Board President Toni Preckwinkle, the Cook County Board of Commissioners, Cook County employees, and all residents of Cook County.

The Board of Ethics' mission is to promote and support the highest ethical standards and integrity within Cook County government to instill public confidence and trust in County officials, employees, and programs. We do this by enforcing the County's Ethics Ordinance through our investigations and audits, issuing confidential advisory opinions, and providing consistent and clear training.

On December 16, 2021, the Cook County Board of Commissioners approved several significant amendments to Chapter 2 Administration, Article VII Ethics ("Cook County Ethics Ordinance").

Notable amendments included:

- Additional disclosures for Elected Officials regarding secondary employment (Sec. 2-573) and supervisors regarding conflict-of-interest resolutions (Sec. 2-578);
- Updates to post-employment restrictions, printed promotional materials periods, and campaign contribution limits; and
- Prohibition of sexual harassment.

These efforts represent important opportunities to continue increasing transparency, trust, and accountability – critical factors of good governance. The Board of Ethics commends the Cook County Board of Commissioners for enacting these amendments.

Throughout 2022, the Board of Ethics incorporated these amendments into its administration of the Cook County Ethics Ordinance. Board staff also created guidance documents, trainings, and County-wide emails to publicize these new changes. Finally, we are in the process of amending our Rules in order to take into account the Ordinance amendments, and hope to finalize and promulgate those Rules by early 2023.

The Board continues to modernize and innovate its operations. This includes digitizing and centralizing disclosure forms, making them more accessible and user-friendly. The public can now view dual employment disclosures by Cook County elected officials online. We've also moved supervisor and elected officer training to an online, on-demand platform.

As part of our efforts to instill a culture of compliance, the Board continues to concentrate on preventive measures. We do this with a robust library of ethics resources, frequent guidance communications, regular trainings, and, as requested, confidential advisory opinions. With our outreach efforts, staff opinions have increased from 28 in 2021 to 94 in 2022.

In addition, we are proud to report that, as of print, 3,889 individuals have completed ethics training this year, and 296 preemptive inquiries were resolved.

Thank you to all the Cook County officials, employees, and residents who support our work in ensuring fair and honest government in Cook County.

Respectfully,



Thomas W. Szromba
Chair, Cook County Board of Ethics



Thomas W. Szromba
Trial Attorney
United States Government

ABOUT THE BOARD

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

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.

The Board of Ethics works toward **public confidence and trust**.



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 County's 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.

ABOUT THE BOARD



Von Matthews
Senior Vice President & Head of Global Fraud Risk
Northern Trust Company
Vice-Chair, Cook County Board of Ethics



Antara Nath Rivera
Arbitrator
Illinois Workers' Compensation Commission



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



Justice Marcus R. Salone
Retired, Presiding Justice of the Illinois Appellate Court,
First District, and 3rd Division

2022 HIGHLIGHTS

For the period of
December 1, 2021 to
November 30, 2022.

	2021	2022	YOY Change
Investigations	11	8	-27%
Trainings	35	58	+66%
Individuals who Received Training	2,373	3,889	+64%
Contracts Reviewed	636	570	-10%
Campaign Contributions Reviewed	3,366	5,640	+68%
Staff Opinions	24	94	+292%
Fines	\$1,000	\$12,800	+1,180%
Ethics Reminder Emails Views	19,712	41,863	+112%
New or Refined Ethics Guidance Documents	3	7	+133%
Number of General Inquiries	322	296	-8%

AMENDMENTS TO THE COOK COUNTY ETHICS ORDINANCE

Rollout & Progress

Summary of Amendments

On December 16, 2021, the Cook County Board of Commissioners approved several significant amendments to Chapter 2 Administration, Article VII Ethics (“the Ethics Ordinance”). The Board of Ethics edited guidance documents, provided additional training, and created new disclosure forms and webpages to ensure broad knowledge of and compliance with the amendments.

Amendments to the Ethics Ordinance provided significant updates to the provisions, refined enforcement powers for the Board of Ethics, and made required alterations to align with the 2021 State of Illinois Lobby Law amendments and ethics reforms associated with SB0539.

A summary of the December 2021 Ethics Ordinance Amendments can be accessed [here](#).

Additional Training

The Cook County Board of Ethics offered a special training for the Offices Under the President, in collaboration with the Bureau of Human Resources, to share information regarding the December 2021 Ethics Ordinance Amendments and their impacts on regular operations.

Board of Ethics staff supported ethics update trainings given by the Forest Preserves of Cook County, Clerk of the Circuit Court of Cook County, and Department of Revenue. Board of Ethics staff hosted nine sessions of virtual office hours open for any office or department leadership to attend to ask questions regarding the amendments.

AMENDMENTS TO THE COOK COUNTY ETHICS ORDINANCE

Continued...

Updated Disclosures and Webpages

The Cook County Board of Ethics made considerable additions and edits to webpages to align with the December 2021 amendments to the Cook County Ethics Ordinance. The following webpages were created:

- [Board of Ethics Public Disclosures, Reports, & Statements](#)
- [Information for Cook County Candidates](#)
- [File Disclosures and Requests with the Board of Ethics.](#)

All disclosures and requests that were previously provided to the Board of Ethics in an email or using a PDF were transitioned to online forms, in anticipation of the Board's transition to a Case Management System. New forms were created for the Cook County Officials Dual Employment Disclosure requirement and new employee Cook County Ethics Ordinance acknowledgement.



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.

In FY 2022, the Board issued three formal opinions, 94 informal opinions, and responded to 296 routine questions. 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.

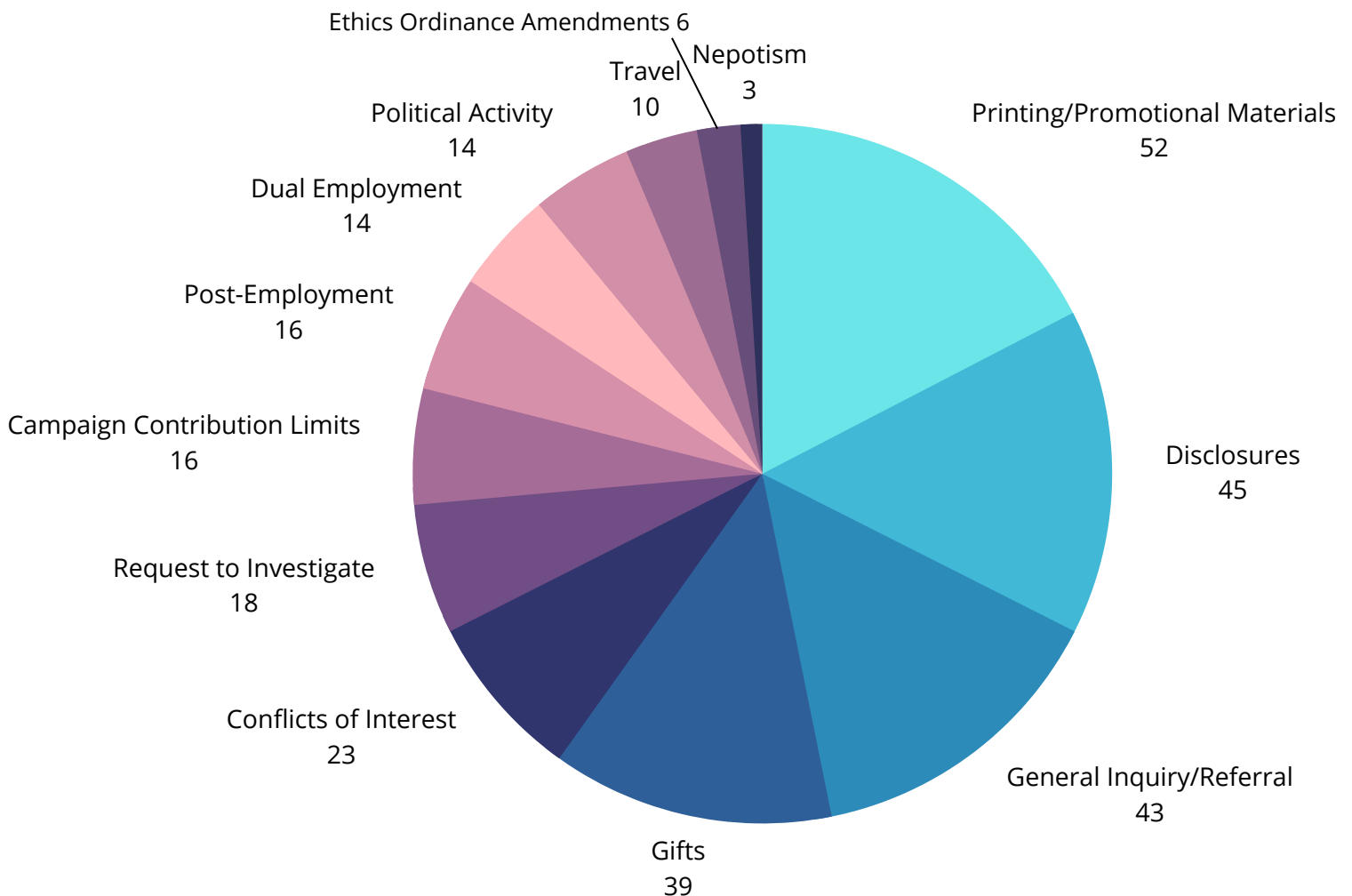


ETHICS ADVISORIES & STAFF OPINIONS

Continued...

The most common inquiries were regarding Printing and Promotional Materials (Sec. 2-586), Disclosures (including, as examples, Economic Interest and Familial Relationship disclosures), general inquiries or referrals, and Gifts (Sec. 2-574). Increases in these topics were anticipated, as 2022 was an election year and candidates wanted to ensure they complied with the printing and disclosure requirements of the Ethics Ordinance. As Sec. 2-586 was amended in December 2021, Board of Ethics staff were encouraged by the number of inquiries regarding Printing and Promotional Materials.

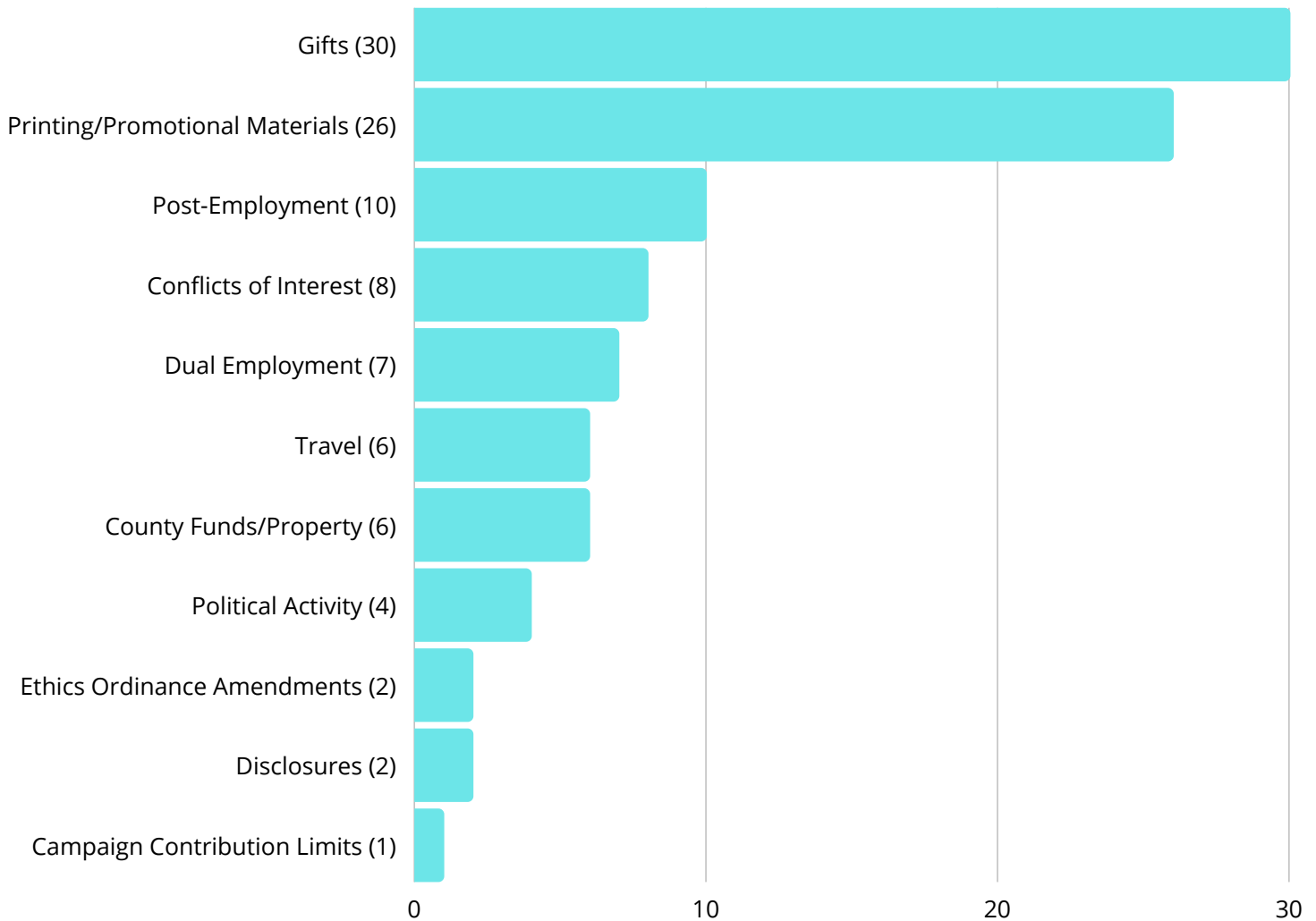
General inquiries and referrals included, as examples, individuals who contacted the Board of Ethics to inquire about a topic or agency that is outside the Board's jurisdiction.



ETHICS ADVISORIES & STAFF OPINIONS

Continued...

The most common Staff Opinions that were issued were regarding Gifts (Sec. 2-574), Printing and Promotional Materials (Sec. 2-586), and Post-Employment restrictions (Sec. 2-580). These subject matters align with what the Board of Ethics would hope to issue Staff Opinions regarding, as these likely involve specific questions regarding whether an official, appointee, or employee can move forward in a matter. As examples, Staff Opinions are issued regarding conference and travel fees that are gifted to Cook County employees to attend meetings to discuss County business, and specific outreach materials that are distributed during election periods.



ETHICS ADVISORIES & STAFF OPINIONS

Continued...

Inquiry Requester	Number of Inquiries
External	87
Offices Under the President	71
Cook County Board of Commissioners	42
Political - Political Committees, Candidates, Other Government Officials	14
Cook County Health	13
Cook County Public Defender	12
Forest Preserves of Cook County	10
Cook County Sheriff	10
Cook County Clerk	9
Cook County Land Bank Authority	6
Cook County Assessor	6
Clerk of the Circuit Court	6
Office of the Independent Inspector General	3
Cook County Board of Review	3
Cook County State's Attorney's Office	2
Office of the Chief Judge of the Circuit Court	1
Cook County Treasurer	1
Total	296

The value of formal and informal advisories and responses to routine inquiries cannot be understated, as they contribute to our solid ethical foundation through a shared understanding that it is always best to ask the Board of Ethics about a matter before acting.

Staff Opinion Requester	Number of Opinions Issued
Offices Under the President	39
Cook County Board of Commissioners	12
Cook County Public Defender	11
Cook County Health	6
Forest Preserves of Cook County	5
Clerk of the Circuit Court	5
External	4
Cook County Land Bank Authority	3
Political - Political Committees, Candidates, Other Government Officials	2
Cook County Clerk	2
Office of the Independent Inspector General	2
Cook County Board of Review	2
Cook County Treasurer	1
Total	94

AUDITS & TRAININGS

Audits

A significant role of the Board of Ethics is to conduct audits and compliance reviews to ensure broad compliance with the County's Ethics Ordinance. The Board conducts many audits, including Campaign Contribution Reviews (formerly known as D-2 Audits), Vendor Compliance Reviews, Certification Reviews, and, most recently, 2022 Annual Familial Disclosure Reviews and Public Officials Dual Employment Reviews.

In 2022, the Board of Ethics shifted to online form collection to centralize and streamline many of the disclosure and request forms the Board of Ethics collects and reviews. The Board implemented a new process for collecting the Cook County Officials Dual Employment Disclosure based on changes made to the Ethics Ordinance in December 2021. The Ethics Ordinance provides that, "any official that holds employment outside their elected office shall disclose such employment, or any change in employment to the Ethics Director and the Board of Ethics within 30 days of engaging in such employment or change in employment." (Sec. 2-573 (e)) In accordance with this section, the Board of Ethics created a new form made available to officials on February 25, 2022, to collect dual employment disclosures, and the Board makes all responses publicly available on the Board's website.

The Board of Ethics initiated a new compliance process to enforce the annual requirement to disclose familial relationships of those doing business with the County. As outlined in Sec. 2-582(e), "[a]ny person or persons doing business with the County shall be required, upon execution of a contract with the County of Cook, 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..." each calendar year by January 1. The Board of Ethics updated the previous familial disclosure form to align with the Ordinance and created an online form to accept responses, modernizing the process and improving user experience.



AUDITS & TRAININGS

Continued...

Utilizing a streamlined Campaign Contribution Review procedure, the Board of Ethics has made its campaign contributions audit more efficient than in previous years. Further, the Board provided more information to enable elected officials and candidates to self-audit contributions outside of the Board's regular audits. The Board reviews campaign contributions that are made within a calendar year. In the first quarter of 2022, 3,223 contributions were reviewed and 40 were identified as potential excessive contributions from prohibited sources. All excessive contributions were determined to not be a violation by Board staff or resolved after initial notification by the Board of Ethics, a testament to broad compliance efforts. The Board is continuing its current review for 2022.

The Board of Ethics reviews contracts for County services and goods over \$15,000 and Cook County State's Attorney's Office proposed settlements over \$500,000 prior to Cook County Board of Commissioners approval. The Board also reviews gift disclosures, supervisor conflict of interest disclosures, post-employment waivers and certification, requests for exemption from the Gift Ban for conference and travel fees to discuss County business, and salvage donations.

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.

In 2022, the Board of Ethics gave a significantly greater number of trainings than in 2021 by offering online, in addition to in-person trainings. The Board of Ethics created several self-paced online Ethics trainings that cover a variety of topics including prohibited activities during election periods, ethical responsibilities of supervisors, and avoiding potential conflicts of interest. Almost 4,000 employees across nine different County offices took online ethics training using the new modules.

The Board released new educational materials regarding the December 2021 Ethics Ordinance amendments, prohibited political activities during election season, Cook County campaign regulations for political candidates, and limitations on the creation and distribution of newsletters, brochures, public service announcements, and promotional materials by Cook County employees, appointees, and officials.



CONCLUSIONS & GOALS

From our yearly review, the Board of Ethics presents the following conclusions:

[1] Significant enforcement improvements were made through the December 2021 Cook County Ethics Ordinance amendments and associated implementation.

[2] Regular audits and trainings, strategic communications and guidance documents, and responses to general inquiries continue to foster an environment where officials, appointees, and employees are committed to acting within the highest ethical standards in their professional roles.

[3] The creation of online training, disclosure forms, and other online resources has more than doubled the number of officials, appointees, and employees who reviewed Board of Ethics materials in FY 2022 compared to FY 2021.

The Board presents the following goals for 2023:

01

The continued growth of the current training campaign for all County supervisors, elected officials, and vendors.

02

The comprehensive use of the Department of Human Rights and Ethics' data-driven Case Management System, which will continue to increase the productivity and robustness of our operations.

03

The increased collaboration across all County offices and departments through inquiry and advisory responses, audit procedures, and trainings offered.

04

The consideration and review of ethics rules and guidance around social media usage.



ACKNOWLEDGEMENTS

This work would not be possible without the efforts of Cook County Board President Toni Preckwinkle, the Cook County Board of Commissioners, Cook County elected officials, Cook County appointees and employees, and the people of Cook County.

We thank you for your efforts in making Cook County a place of honest and ethical conduct.

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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