

TONI PRECKWINKLE

PRESIDENT

EARLEAN COLLINS
ROBERT STEELE
BUTLER
AM M. BEAVERS
DEBORAH SIMS
JOAN PATRICIA MURPHY
JESUS G. GARCIA
EDWIN REYES

1st Dist. PETER N. SILVESTRI
2nd Dist. BRIDGET GAINER
3rd Dist. JOHN P. DALEY
4th Dist. JOHN A. FRITCHEY
5th Dist. LARRY SUFFREDIN
6th Dist. GREGG GOSLIN
7th Dist. TIMOTHY O. SCHNEIDER
8th Dist. JEFFREY R. TOBOLSKI
9th Dist. ELIZABETH ANN DOODY GORMAN
10th Dist.
11th Dist.
12th Dist.
13th Dist.
14th Dist.
15th Dist.
16th Dist.
17th Dist.



PATRICK M. BLANCHARD

INSPECTOR GENERAL

69 West Washington
Suite 1160
Chicago, Illinois 60602
TEL (312) 603-0350
FAX (312) 603-9948

January 26, 2011

Via Hand Delivery

Honorable Robert Steele
Chair, Human Relations Committee
Cook County Board of Commissioners
118 N. Clark Street, Room 567
Chicago, Illinois 60602

Re: Proposed Amendment to the *Ethics Ordinance*

Dear Commissioner Steele:

This letter is written to respectfully request your consideration as the Chair of the Human Relations Committee of the Board of Commissioners for a proposal by this office to amend section 2-585(a) of the Ethics Ordinance.

Section 2-585(a) states that no person who has done business with the County within the preceding four years or is seeking to do business with the County shall make contributions in an aggregate amount exceeding \$750.00:¹

- (1) To any candidate for County office or elected County official during a single candidacy; or
- (2) To an elected official of the government of the County during any nonelection year of his or her term.
- (3) To any local, state, or federal campaign committee that is controlled by, or established in support of, a candidate for County office or an elected County official.

Pursuant to section 2-585(a), a contractor or vendor doing business or seeking to do business with Cook County is not prohibited from making a campaign contribution to a third-party, such as a Political Action Committee ("PAC"), that subsequently makes a contribution to the candidate or elected official. Accordingly, while a contractor or vendor may be hindered from making a direct campaign contribution exceeding \$1,500; the contractor or vendor could seek to circumvent the Ordinance by making a contribution to a PAC that subsequently makes a campaign contribution to a designated candidate.

¹ Pursuant to Section 2-585(a), the combined effect of these provisions is intended to limit contributions to \$1,500 per calendar year in which a candidacy occurs.



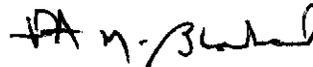
Honorable Robert Steele
January 26, 2011
Page 2

In an effort to prevent contractors or vendors from circumventing the Ordinance by exceeding the campaign contribution limitation, I offer the following proposed additional language for inclusion by amendment to section 2-585(a):

- (4) To any candidate for County office or elected County official during a single candidacy through a political action committee or other third party.

Thank you for your time and attention to this matter. Should you have any questions or wish to discuss these issues further, please do not hesitate to contact me.

Very truly yours,



Patrick M. Blanchard
Inspector General

cc: Honorable Toni Preckwinkle
 Honorable Peter N. Silvestri
 Honorable Larry Suffredin
 Mr. Kurt Summers Jr., Chief of Staff
 Ms. Laura Lechowicz Felicione, Legal Advisor to the President
 Ms. MaryNic U. Foster, Executive Director, Board of Ethics