

COOK COUNTY BOARD OF COMMISSIONERS
TONI PRECKWINKLE, PRESIDENT

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|--------------------|-----------------------|----------------------------|------------------------|
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| Robert Steele | 2 nd Dist. | John P. Daley | 11 th Dist. |
| Jerry Butler | 3 rd Dist. | John A. Fritchey | 12 th Dist. |
| William M. Beavers | 4 th Dist. | Lawrence Suffredin | 13 th Dist. |
| Deborah Sims | 5 th Dist. | Gregg Goslin | 14 th Dist. |
| Joan P. Murphy | 6 th Dist. | Timothy O. Schneider | 15 th Dist. |
| Jesus G. Garcia | 7 th Dist. | Jefferey R. Tobolski | 16 th Dist. |
| Edwin Reyes | 8 th Dist. | Elizabeth Ann Doody Gorman | 17 th Dist. |
| Peter N. Silvestri | 9 th Dist. | | |



**COOK COUNTY
GOVERNMENT**
69 WEST WASHINGTON STREET
CHICAGO, ILLINOIS 60602-3007

**COOK COUNTY OFFICE OF THE
INDEPENDENT INSPECTOR GENERAL**
PATRICK BLANCHARD
INSPECTOR GENERAL

COOK COUNTY BOARD OF ETHICS
MARYNIC U. FOSTER
EXECUTIVE DIRECTOR

December 20, 2010

Honorable Toni Preckwinkle
and Members of the Board of Commissioners of Cook County
118 North Clark Street, 5th Floor
Chicago, Illinois 60602

Re: Cook County Ethics Ordinance – Sec. 2-582 (Employment of Relatives)

Dear President Preckwinkle and Members of the Board of Commissioners:

This letter is written to apprise you of our interpretation of the statutory restrictions pertaining to the hiring and immediate supervision of employees who are related to an official or employee of Cook County government being involved in the hiring and/or supervision of the related employee. *See* Code of Ordinances, Cook County, Illinois, Ethics, section 2-582.1

Specifically, section 2-582 states, in pertinent part:

Employment of Relatives.

- (a) No official or employee shall participate in a hiring decision, in any agency over which such official or employee either serves or exercises immediate supervision with respect to any person who is a relative of the official or employee.
- (b) No official or employee, on behalf of any County agency, shall participate in a decision whether to contract with any person with whom or in which the official or employee knows that a relative of that official or employee has a financial interest.
- (c) ...
- (f) For purposes of this section, relative shall mean a person who is related to an official or employee as spouse or any of the following, whether by blood, marriage, or adoption: parent, child, brother, sister, aunt, uncle, niece, nephew, grandparent, grandchild, father-in-law, mother-in-law, son-in-law, daughter-in-law, brother-in-law, sister-in-law, stepfather, stepmother, stepson, stepdaughter, stepbrother, stepsister, half-brother or half-sister.

¹ This letter is advisory in nature and is not the direct product of a specific investigation.

Importantly, the ordinance does not create a distinction between "exempt" and "non-exempt" positions in Cook County government and we are unaware of the existence of other authority that would permit the hiring and/or supervision of a covered relative in an "exempt" position. Similarly, we are unaware of an employment protocol that would support a deviation from the ordinance when the covered employee possesses a high degree of competence and qualification for a position wherein, the hiring and/or supervision is carried-out by a related official or employee.

It is our belief that the same principles that support the prohibitions contained in this ordinance apply equally to exempt and non-exempt public positions in the government. As such, adherence to these prohibitions only serves to strengthen Cook County government and avoid even the appearance of impropriety.

We hope this information proves helpful to all members of Cook County government. Of course, should you have any questions or wish to discuss this issue further please do not hesitate to contact either of us. Thank you.

Very truly yours,



Patrick M. Blanchard
Independent Inspector General
(312) 603-0364



MaryNic U. Foster
Executive Director,
Human Rights, Ethics and Women's Issues
(312) 603-1106

cc: Honorable Anita Alvarez
Honorable Joseph Berrios
Honorable Dorothy Brown
Honorable Thomas Dart
Honorable Eugene Moore
Honorable David Orr
Honorable Maria Pappas
Honorable Daniel Patlak
Honorable Larry R. Rodgers, Jr.