

Cook County Board of Ethics

2025 Annual Report



COOK COUNTY
Board of Ethics

Reporting Period: December 2024 through November 2025
Issued on December 16, 2025



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Letter from the Chair



Greetings:

The Cook County Board of Ethics is pleased to provide this 2025 Annual Report to Cook County Board President Toni Preckwinkle, the Cook County Board of Commissioners, Cook County employees, and all residents of Cook County.

This year was one of a fresh start for our governing board and continued growth for our staff. I am honored to have joined the Board this year, alongside my fellow Board Members, Marvis Barnes, II, Sahar Segal, and Hon. Rachael Sinnen. I am grateful for their willingness to serve and the important perspectives that they bring from their respective careers.

The Board of Ethics' mission is to promote high ethical standards and compliance within Cook County government to instill trust and public confidence in County officials, employees, appointees and programs. The Board does this by enforcing the County's Ethics Ordinance through investigations, audits, advisory opinions, and high-quality training.

Last year, the Board's staff completed the modernization efforts of the online disclosure and request forms and the searchable [Campaign Contributions – Doing Business database](#). These efforts resulted in increased proactive compliance. This year, the Board is proud to continue building on our efforts to provide additional guidance and training to support stakeholder compliance.

The Board is pleased to share that we trained 10,339 individuals this year, more than any previously recorded year through our annual ethics training, new employee training, and special topic training sessions. This year we expanded our annual training, with Offices Under the President, the Sheriff's Office, the Board of Commissioners, Board of Review, Forest Preserves and Clerk of the Circuit Court participating – enabling us to reach employees across many different areas of County government. The Board updated its website for increased accessibility and ease of navigation. Lastly, the Board issued new and revised guidance, including prohibited political activity and social media usage to support compliance in burgeoning areas of ethical questions.

In FY2026, the Board intends to simplify our processes for stakeholders and staff and reach out to more staff and officials across all County offices via annual and special topic training sessions.

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,

Seth Rau

Seth Rau, MBA, Chair
Director of Government Affairs, Cartwheel

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



A group of hands holding seedlings, signifying shared growth.

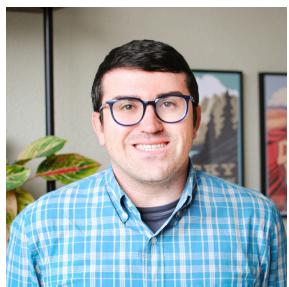
Board of Ethics Members

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. The Board currently has four members.



Marvis Barnes, II

Senior Complex Commercial Litigation Associate
K&L Gates, LLP



Seth Rau, Chair

Director of Government Affairs
Cartwheel



Sahar Segal

Litigation Associate
Quinn, Emanuel, Urquhart & Sullivan, LLP



Hon. Rachael Sinnen, Vice Chair

Arbitrator
Illinois Workers' Compensation Commission

2025 Data Highlights

For the period of December 1, 2024 to November 30, 2025

	FY23	FY24	FY25
INQUIRIES	328	257	223
STAFF OPINIONS	88	100	100
INVESTIGATIONS	2	5	3
TRAININGS	63	52	56
INDIVIDUALS WHO RECEIVED TRAINING	3,642	4,294	10,339
COOK COUNTY CONTRACTS REVIEWED	636	510	562
CAMPAIGN CONTRIBUTIONS REVIEWED	2,690	3,443	1,706
FINES COLLECTED	\$37,550	\$375	\$10,328
NEW OR Refined ETHICS GUIDANCE DOCUMENTS	2	5	4
ETHICS REMINDER EMAILS SENT	6	7	4

2025 Compliance Highlights

Ethics Ordinance & Procedural Rules Amendments

On November 21, 2024, the Cook County Board of Commissioners amended the Cook County Procurement Code. As a result, County agencies/departments entering into contracts over \$25,000 – up from \$15,000 – are required to work with the Office of Procurement to facilitate the contractual process. This impacted the Ethics Ordinance's definition of "doing business with the County", which was based on \$10,000 minimum contract value.

Amendments to the Ethics Ordinance were approved by the Board of Commissioners at the March 13, 2025 meeting. Specifically, the definition of *Done Business or Doing Business* changed from those doing business for \$10,000 over four years to \$25,000 over four years. This change did not impact which vendors are subject to the campaign contribution limit. As amended in Section 2-585, vendors doing business of more than \$10,000 remain subject to the \$1,500 campaign contribution limit.

Additional amendments to the Board of Ethics Rules and Regulations were approved by the Board on April 24, 2025. These amendments included the addition of serving subpoenas electronically, as well as in person or by certified or registered mail, and shifts in language throughout for gender inclusivity.

New & Revised Guidance Documents

On November 12, 2025, the Board approved a series of new and revised guidance documents, several of which share important information in advance of the election season.

Social Media

The Board published guidance regarding social media usage, advising on permissible use of social media to maintain separation between elected officials' and employees' official Cook County duties and personal/political uses. This guidance is in alignment with guidance issued by peer Ethics Boards.



COOK COUNTY
Board of Ethics

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Guidance regarding Social Media Accounts and Usage

This guidance advises Elected Officials and Employees on using social media in the course of their Cook County duties and considerations for personal and official social media accounts. Relevant sections of the Cook County Ethics Ordinance include Secs. 2-571 (Fiduciary duty), 2-576 (County-owned property), and 2-583(f) (political activity).

What does social media include?

- LinkedIn,
- Meta/Facebook,
- Instagram/Threads,
- YouTube,
- Snapchat,
- TikTok,
- Bloody, and
- Any subsequent equivalent versions and platforms.

Elected Officials

Cook County elected officials can have official social media accounts, but it is important to ensure separation between social media accounts that are official Cook County accounts and personal/political accounts.

A. Official County Social Media Accounts:

Official Cook County accounts should be used to share information and resources with Cook County residents, as an elected official in your official capacity.

Should

Note your official title or use the word "Official" in the name of the account page (e.g., Jason's Official District Page)

- Only be maintained by elected official or County staff
- Include content that is predominantly information on Cook County Government services, facilities, events, and activities
- Examples: Details about district or agency events, office hours, community events, and reminders of upcoming traffic closures or infrastructure improvements

Should Not

Include political and campaign messages nor political endorsements

- Include political logos
- Be used for political solicitations or invitations to fundraising or petitioning events
- Share any non-public Cook County information
- Share any personal events, only County-related matters
- Include a link for making campaign donations or a link to a political committee

Official Cook County accounts can use the Cook County seal and/or official County headshot.

Issued on November 12, 2025

1

Social Media Guidance.

2025 Compliance Highlights



Prohibited Political Activity poster.

New & Revised Guidance Documents (cont.)

Prohibited Political Activity

The Board regularly shares information activities that are considered “prohibited political activities” in the Ethics Ordinance. In October, the Board updated guidance on Prohibited Political Activity and associated Allowable Activities.

Ethics Restrictions on County Funds

The Ethics Ordinance prohibits using County funds and resources to design, purchase, produce and/or distribute materials that include the proper name, voice, and/or image of any Cook County elected official. Some items are never allowable, while others are only restricted during an election period. In November 2025, the Board issued updated guidance regarding permanent (never allowable) and election period prohibitions for materials containing a County elected official’s name, image, and voice.

Successes of the Case Management System

The Board began using its Case Management System (CMS), which features streamlined online disclosure and request forms, in September 2024. After a year of use, Board staff have found Inquiries, Requests for Advice, and Disclosures to be more accurately recorded and responded to than the previous manual tracking system via Excel. The CMS has strengthened the Board’s operations by centralizing precedential decisions and institutional knowledge in a searchable format. While prior opinions have always been retained, the CMS now makes them easier to access by subject matter and issue, improving both efficiency and transparency. With the addition of more Board staff, the CMS has further enhanced internal information sharing and streamlined operations.



A laptop key reads “Submit Request.”

Inquiries & Staff Opinions

A key function of the Board of Ethics is to provide advice to Cook County officials, appointees, employees, and others governed by the Ethics Ordinance. The Board and its staff provide advice by responding to Inquiries and issuing Advisory Opinions.

All requests for advise are confidential and may be addressed directly by staff or the Board. Routine questions or those that have been opined on by the Board previously are addressed by staff as a Staff Opinion. Board Advisory Opinions are issued in response to complex or novel questions by request or on its own motion. Board Advisory Opinions are legally binding and are made publicly available online with redactions to protect the requester's identity. Staff Opinions are not made public but are maintained to ensure consistency of advice given.

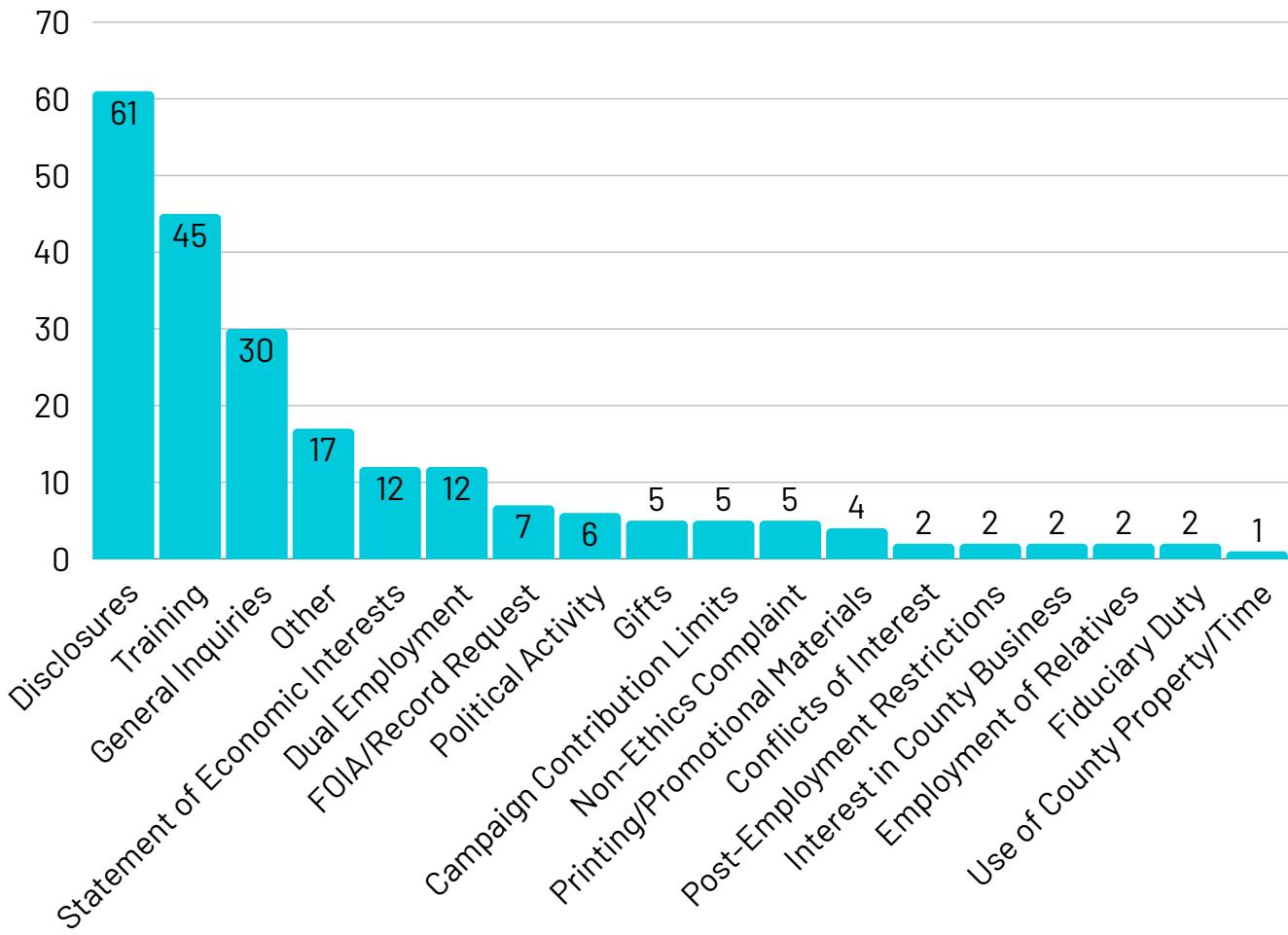
In 2025, the Board of Ethics issued 1 Board Advisory Opinion, 100 staff opinions and answered 223 inquiries.

Inquiries & Staff Opinions by Requester

Requester	Inquiries	Staff Opinions
Assessor's Office	2	0
Board of Commissioners	7	9
Board of Review	3	0
Clerk	8	2
Clerk of the Circuit Court	8	7
Cook County Health	4	3
Cook County Land Bank Authority	1	1
Cook County Vendors	55	1
External	57	2
Forest Preserves of Cook County	3	6
Office of the Chief Judge	1	0
Office of the Independent Inspector General	1	0
Offices Under the President	47	50
Other	5	4
Political (Committees, Candidates)	3	0
Public Defender	12	9
Sheriff's Office	5	5
State's Attorney's Office	1	1
Treasurer's Office	0	0

Inquiries

Inquiries by Subject



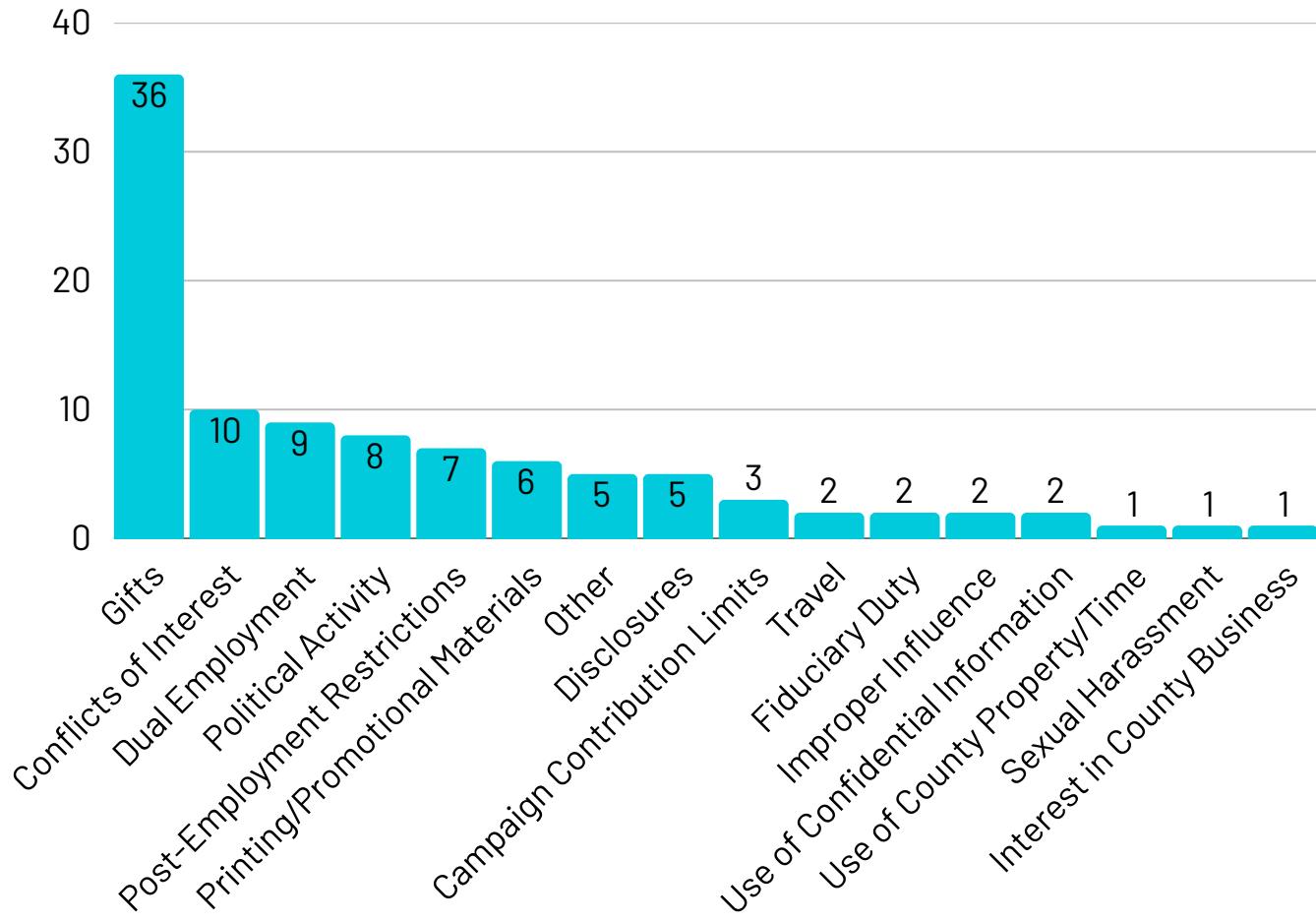
The most common inquiries Board staff responded to were regarding Disclosures, Training, and General Inquiries. This is consistent with the Board's efforts to help employees with proactive compliance. This year the Board also tracked the number of inquiries regarding Statement of Economic Interests (SEI), which are not received nor monitored by the Board. For any questions regarding SEI, please contact the Cook County Clerk's Office.

Additionally, as part of the Board's CMS, a separate form is used for Requests for Investigations. Requests for Investigations can be filed with the Board by individuals who witness or perceive violations of the Ethics Ordinance. Fifteen Requests for Investigations were submitted this year.

The Board is happy to respond to General inquiries with appropriate referrals, as they contribute to broad compliance throughout Cook County.

Staff Opinions

Staff Opinions by Subject



The most requested staff opinions were regarding Gifts (Section 2-574), Conflicts of Interest (Section 2-578), and Dual Employment (Section 2-573).

Requested Staff Opinions involve more thorough inspection and responses than inquiries. As examples, Board Staff review gift receipts, email correspondence, newsletters, flyers, reports, travel plans, conference schedules, and other pertinent documents before issuing an opinion on whether an intended action or publication is permissible within the Ethics Ordinance.

Board staff encourage those who are subject to the Ethics Ordinance to continue contacting the Board for advice. Each inquiry and opinion issued demonstrates the County's commitment to fostering a culture of compliance with the Ethics Ordinance.

Audits & Disclosures

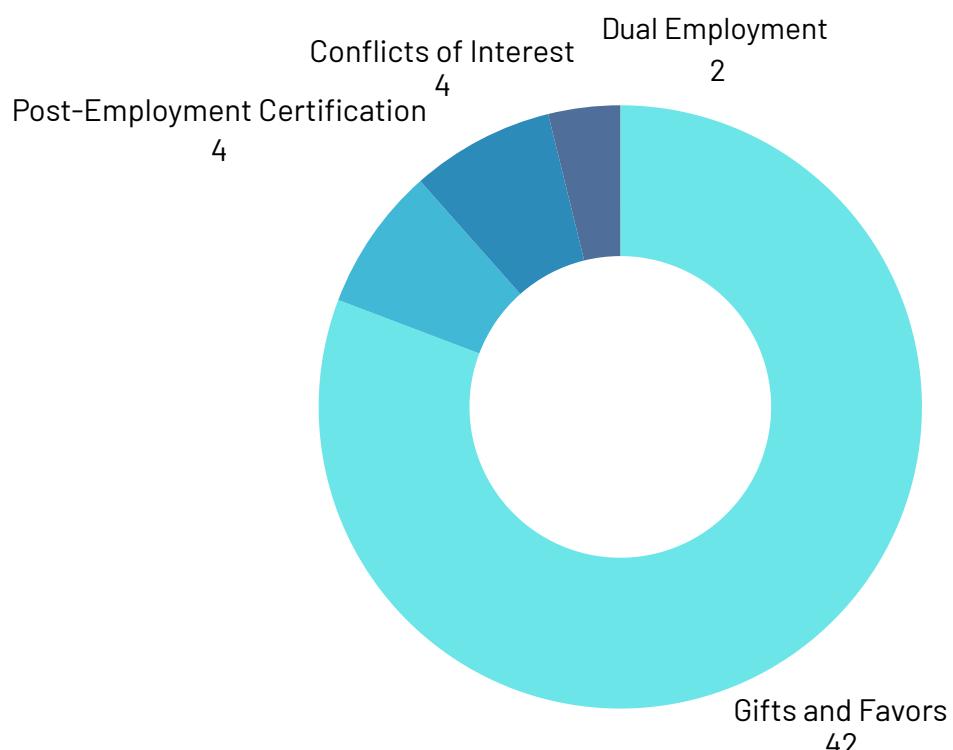
A significant role of the Board of Ethics is to conduct audits and reviews to ensure broad compliance with the Ethics Ordinance. The Board conducts many audits, including reviews of contracts for goods and services over \$25,000, Cook County vendor familial relationships for potential conflicts of interest and proposed legal settlements over \$500,000 prior to Cook County Board of Commissioner approval.

Disclosures

The Board receives and reviews disclosures regarding potential Conflicts of Interest, Gifts or Favors, and Employment of Relatives. Disclosures are a critical compliance tool for the Board, as they give the opportunity to share advice to prevent ethical violations and inform the Board of ethical questions that arise while employees are fulfilling their County duties.

Additionally, the Board collects and reviews Public Officials Dual Employment Disclosures and agency certifications for the necessity of contracting with prior County employees.

This year, the Board received 52 disclosures. Approximately ten disclosures were not counted in this total because they were duplicates or filed with the wrong office (e.g., they should have been filed with their direct supervisor, not the Board). Gifts and Favors were the most frequent disclosure type, constituting 81% of all disclosures filed. While the number of disclosures filed this year is perceived to be significantly higher than in previous years, a unique benefit of the CMS is that it will allow the Board to track year-over-year progress in receiving proactive disclosures.



SCAN HERE



Please use the online form if you need to file a Disclosure with the Board.

Audits & Disclosures

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 Cook County office. This provision requires Board staff to conduct regular campaign contribution audits, which ensures that donations do not exceed the limits set forth by the Ordinance. In 2025, the audit was conducted twice, each covering two fiscal quarters.

The Board of Ethics maintains the searchable [Campaign Contributions – Doing Business database](#) which includes County vendors subject to the \$1,500 yearly contribution limit. The database is available to Cook County elected officials and candidates as a tool to aid in self-auditing campaign contributions received from Cook County vendors.

Board staff reviewed 1,526 campaign contributions during FY2025. Of the campaign contribution reviews conducted during this reporting period, Board staff identified 16 potential excessive contributions and are working towards resolution.

Annual Vendor Familial Relationship Disclosures



COOK COUNTY
GOVERNMENT

November 2024 | Cook County Board of Ethics

NOTICE OF UPCOMING 2024 Annual Vendor Familial Relationship Disclosures

Dear County Vendor or Contractor:

This is a notice of the upcoming deadline for the 2024 Cook County Annual Vendor Familial Relationship Disclosure. Vendors with an active contract with Cook County in effect between January 1, 2024, to December 31, 2024, are required to file an Annual Vendor Familial Relationship Disclosure with the Co

Email notice of 2024 Annual Vendor Familial Relationship Disclosures.



An individual reviews a stack of paper.

Section 2-582(e) of the Ethics Ordinance mandates that County vendors disclose familial relationships on an annual basis to eliminate conflicts of interest while doing business with the County. During the 2024 audit for the period of January 1, 2024 to December 31, 2024, Board staff sent notices to 785 vendor contacts and received 154 responses from Cook County vendors by the January 2025 deadline. The list of vendor contacts is known to be overinclusive, with some vendors having multiple primary contacts. The Board of Ethics perceives the 20% response rate to be a positive reflection of compliance.

Trainings & Outreach

In-Person & Online Trainings

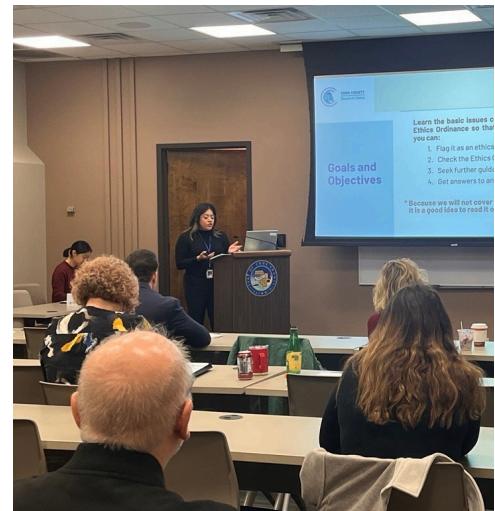
Through regular trainings and outreach activities, informing and reminding County employees, appointees, and Elected Officials of their obligations under the Ethics Ordinance is a critical function of the Board of Ethics.

FY2025 was a significant year for training across Cook County agencies. The Board of Ethics trained **10,339**

Cook County employees across different departments throughout FY2025, more than double the previous year.

Along with regularly scheduled training to Offices Under the President, Ethics staff provided annual training to additional County agencies including:

- The Sheriff's Office,
- Board of Review,
- Forest Preserves, and
- Clerk of the Circuit Court.



Bianca Diaz, Outreach & Training Coordinator, provides a new employee training.



Online Ethics training modules.

Board staff were also invited to conduct ad hoc trainings for other County agencies. Departments like the Law Library, Department of Revenue, and the County Clerk's Office requested refresher training on sections of the Ordinance and prohibited political activity. Board staff also provided training to several newly elected County officials and their senior staff during this period using updated materials.

Trainings & Outreach

2025 Cook County Vendor Fair

To complement training efforts, the Board also pursued in-person and digital outreach throughout the year. On August 6, 2025, Cook County Government hosted its Pathways to Cook County Vendor Fair at the University of Illinois-Chicago's Dorin Forum. Board Staff attended to share information about vendor obligations under the Ethics Ordinance. Created during FY2024, staff distributed the Vendor Ethical Requirements handout to business owners who are current or prospective County contractors.



Attendees at the 2025 Cook County Vendor Fair.

Updated Website Features & Communications

In 2025, the Board of Ethics furthered efforts to increase the user-friendliness and accessibility of its website pages. Specifically, icons have been added to the Board of Ethics main page to increase the visibility of the disclosure form, posted advisory opinions, the request for advisory opinion form, and the investigations page.

In addition, the language under the "Candidate and Elected Officials' Election Guidance" ribbon and the "Ethics Guidance Documents and Videos - Restrictions on Use of County Funds" sections were updated to provide a clearer distinction between election period restrictions and permanent restrictions (which always apply).



Board of Ethics main webpage icons.

Separately, the Board sent several announcements via GovDelivery to over 20,000 Cook County employees throughout the fiscal year. These included updates to the Ethics Ordinance in April 2025 and reminders about pension board elections in September 2025.

Conclusions & Goals

Throughout 2025, the Board of Ethics championed:

1

Administrative Efficiency & Transparency -

Utilized productivity and efficiency of the Case Management System

2

Greater Compliance - Aligned audits with updated Cook County Procurement Code, searchable campaign contribution database and website improvements

3

Continuing Ethical Education - Creation of additional and Updated Guidance and expanded ethics training



The Board of Ethics presents the following goals for 2026:

1

Encourage employees and Elected Officials to seek proactive guidance on ethics matters by reducing Advisory Opinion response times.

2

Strengthen resources for employees, vendors, and stakeholders through the creation of new guidance materials and the updating of existing ones.

3

Enhance opportunities for ongoing annual and periodic ethics education by expanding the annual training requirement to all employees across every County agency and department.





Acknowledgements

The Cook County Board of Ethics would like to express gratitude to Cook County Board President Toni Preckwinkle, Cook County Board of Commissioners, Cook County elected officials, appointees, 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

Marvis Barnes, II

Seth Rau, Chair

Sahar Segal

Hon. Rachael Sinnen, Vice Chair

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