



# EDWARD M. MOODY

RECORDER OF DEEDS / REGISTRAR OF TORRENS TITLES  
COOK COUNTY, ILLINOIS

October 29, 2019

Honorable John P. Daley  
Chairman, Finance Committee  
Cook County Board of Commissioners  
118 N. Clark Street  
Chicago, IL 60602

Dear Chairman Daley-

Please accept this as the Recorder of Deeds' response to the question brought forth by the League of Women's Voters. The Recorder of Deeds believes that it is close to achieving "Substantial Compliance" in the *Shakman* case. With this said, the determination as to whether the office is in Substantial Compliance rests solely with the Federal Judge overseeing the case. Ultimately, the office will be found to be in Substantial Compliance when the Judge determines that the Recorder's Office has met the following criteria:

1. The Recorder has implemented the New Employment Plan, including procedures to ensure compliance with the New Employment Plan and identify instances of non-compliance;
2. The Recorder has acted in good faith the remedy instances of non-compliance that have been identified, and prevent a recurrence;
3. The Recorder does not have a policy, custom, or practice of making employment decisions based on political reasons or factors except for Exempt Positions;
4. The absence of material non-compliance which frustrates the Recorder's Consent Decree and the Supplemental Relief Order's essential purpose. The Recorder's Compliance Administrator and the Court may consider the number of post-SRO complaints that have been found to be valid. However, technical violations or isolated incidents of non-compliance shall not be a basis for a finding that the Recorder is not in substantial compliance; and
5. The Recorder has implemented procedures that will effect long-term prevention of the use of impermissible political considerations in connection with employment with the Recorder.

While it is difficult, if not impossible, to put a date on when there will be a finding that the Recorder's Office is in Substantial Compliance, the Recorder's Office has made considerable

progress in meeting the factors for Substantial Compliance referenced above. To start, the Recorder's Office has established a strong "Compliance Team" that meets often to ensure continued movement toward achieving Substantial Compliance. The Compliance Team reviews pending compliance related issues and establishes a plan to resolve those issues consistent with the principles set forth in the Recorder of Deeds Employment Plan and Policy and Procedures Manual. The Compliance Team also works collaboratively with the Recorder's Compliance Administrator in an effort to address matters or concerns that impact our compliance efforts. We plan on meeting soon with the Recorder's Compliance Administrator to discuss a strategic plan to get our office in Compliance.

The Recorder's Office has had the Employment Plan in implementation since 2013 and has revised it several times to address changing needs. Additionally, the Recorder's Office revised its Policy and Procedures Manual effective as of August 12, 2019 and trained Employees on that Manual. The revised Manual includes robust policies and procedures to ensure compliance with the Employment Plan. Moreover, the Manual will ensure long-term prevention of the use of impermissible political considerations in connection with employment with the Recorder.

The Recorder's Office has acted in good faith to remedy instances of non-compliance that have been identified by taking action via policy revisions, additional training, counseling, or discipline. The Recorder's Office proactively identifies issues and the Compliance Team works with the Recorder's Compliance Administrator to resolve those issues as quickly and efficiently as possible.

The Recorder's Office does not have a policy, custom, or practice of making employment decisions for non-Exempt Positions based on political reasons or factors. At our last court status, the Office of the Independent Inspector General reported that there are no pending complaints of unlawful political discrimination or unlawful political contacts relating to the Recorder's Office. The Recorder has made it clear to the entire Recorder's Office that such actions will not be tolerated.

As noted above, the Recorder's Compliance Administrator has represented to the Federal Court that she will soon be presenting us with her strategic plan toward a finding of Substantial Compliance. We are hopeful that the strategic plan will provide us a clearer understanding of how close we are to substantial compliance. With this said, it is my belief that the Recorder's Office will be found to be in Substantial Compliance in 2020.

If you have any questions, or believe that further discussion on this topic would be helpful to Commissioners, please let me know. I thank you and the other Commissioners for your support.

Regards,



James Gleffe  
Chief Deputy Recorder  
Cook County Recorder of Deeds