



CITY OF CHICAGO  
OFFICE OF INSPECTOR GENERAL

20  
25

# Advisory Concerning Gifts Accepted On Behalf of the City

January 29, 2025

DEBORAH WITZBURG | INSPECTOR GENERAL FOR THE CITY OF CHICAGO



January 29, 2025

The City of Chicago's Governmental Ethics Ordinance (GEO) limits the circumstances under which City employees and officials may accept gifts of value. As a general rule, City employees and officials may accept gifts "given to" or "accepted on behalf of the City"—provided, however, that such gifts are "promptly" reported to the Board of Ethics (BOE) and to the City's Comptroller, who is to add such gifts to an inventory of the City's property. Based on an unwritten arrangement dating back to the administration of Mayor Eugene Sawyer, successive mayors have not reported gifts accepted on behalf of the City to BOE, but rather have been advised that such gifts could be recorded in a publicly available logbook maintained on the Fifth Floor of City Hall.

OIG visited the fifth floor of City Hall in an undercover capacity and requested access to the mayoral gift log. Mayor's Office staff denied the request and directed OIG's covert personnel to submit a Freedom of Information Act (FOIA) request for it. Again in a covert capacity, without identifying itself as the source of the request, OIG submitted a FOIA request for the log. The Mayor's Office did not timely respond, constituting a denial of the request. OIG subsequently sent an official document request for the log, and only then was it produced; the log was in the form of a spreadsheet that detailed gifts accepted "on behalf of the City," including alcohol, jewelry, clothes, and accessories. The log identified many of those gifts—including Hugo Boss cufflinks; Givenchy, Gucci, and Kate Spade handbags; a personalized Mont Blanc pen; and size 14 men's shoes—as being stored in a "Gift Room," and others in the Mayor's personal office in City Hall.

OIG subsequently visited the fifth floor of City Hall and requested access to the Gift Room to conduct an unannounced inspection. In consultation with and apparently on the advice of the City's Department of Law (DOL), Mayor's Office staff denied OIG access to the Gift Room. Thereafter, DOL—apparently representing the Mayor in opposition to OIG—persisted in denying OIG physical access to the Gift Room.

Section 2-56-090 of the Municipal Code of Chicago (MCC) makes it the duty of every elected or appointed officer, employee, department, and agency of the City to cooperate in OIG inquiries. Furthermore, pursuant to that section, "[e]ach department's premises, equipment, personnel, books, records and papers shall be made available as soon as practicable to the inspector general."

OIG recommended that the Mayor's Office comply with the generally applicable public reporting requirements for gifts accepted on behalf of the City, and make the Mayor's "Gift Room" available for inspection.

In a response dated January 24, 2025, attached at Appendix B, the Mayor's Office now indicates that it will make the Gift Room available for inspection by OIG, but only with "a properly scheduled appointment." The Mayor's Office response does not acknowledge that DOL, apparently acting on its behalf, persisted in denying OIG access to the Gift Room and does not explain why it would not have been "practicable" to provide OIG immediate access to the Gift Room, in accordance with the MCC.

The Mayor's Office further responded that it "will continue to comply with all guidance from the Board of Ethics" with respect to public reporting of gifts, and attached a letter from BOE, also attached at Exhibit B, in which BOE also "concur[red]" with OIG that the Mayor's Office should comply with the plain language of the GEO requirements on reporting gifts accepted "on behalf of the City." The Mayor's Office said it "will work closely with the Board of Ethics to transition to this new guidance."

# Appendix A | OIG Letter



Deborah Witzburg | Inspector General  
City of Chicago  
Office of Inspector General  
231 S. LaSalle Street, 12th Floor  
Chicago, IL 60604  
Phone: (773) 478-7799

## Via Electronic Mail

December 13, 2024

Brandon Johnson  
Mayor of the City of Chicago  
121 N. LaSalle Street, 5th Floor  
Chicago, IL 60602

Dear Mayor Johnson:

The City of Chicago Office of Inspector General (OIG) writes to bring to your attention concerns regarding the handling of gifts by the Mayor's Office, including compliance with section 2-156-142 of the Governmental Ethics Ordinance (GEO). Based on an unwritten arrangement with the Board of Ethics (BOE) dating back to the administration of Mayor Eugene Sawyer, the mayor has not reported gifts to BOE, even when a disclosure to BOE is required under the plain language of the GEO. Records of those gifts are not readily available for public inspection, and certain gifts accepted by the Mayor are reportedly being stored in a room in the Mayor's Office to which OIG was denied access.

## 1 | The City's Gifts Rules

Under the GEO, City officials—including the Mayor—are generally prohibited from accepting gifts with a value exceeding \$50, except in a few circumstances expressly enumerated in the GEO itself. One such circumstance is that a City official may accept gifts that are "given to" or "accepted on behalf of the City." Municipal Code of Chicago (MCC) § 2-156-142(d)(8). However, the GEO mandates that such accepted gifts must be "promptly" reported "to the Board [of Ethics] and to the Comptroller, who shall add such gifts to an inventory of the City's property." Another circumstance in which City officials may accept gifts is when they accept "material or travel expense[s] for meetings related to a public or governmental educational purpose." MCC § 2-156-142(d)(10). In this case, the GEO requires both reporting and approval by the BOE "in advance" and then additional reporting to BOE "within 10 days of completion." *Id.* As discussed below, a third circumstance where City officials may accept gifts is in the form of "travel and expenses, entertainment, meals or refreshments furnished in connection with meetings, appearances or public events or ceremonies related to official City business" when "furnished by the sponsor of" the event. *Id.* § 2-156-142(d)(12). However, these must also be "approved in advance by the [B]oard" and "reported to the [B]oard within 10 days of acceptance thereof." *Id.* § 2-156-142(d)(12). BOE publicly posts on its website all gift disclosures that it receives from City employees and officials.<sup>1</sup>

<sup>1</sup> Notably, BOE states on its website that, "[t]o foster knowledge of and transparency in government, the Board receives and makes available for public examination and duplication...[d]isclosures filed by City

## 2 | The Mayor's Office's Unwritten Arrangement

OIG has been informed by BOE of a 1989 arrangement made between BOE and Mayor's Office during the administration of Mayor Eugene Sawyer.<sup>2</sup> This arrangement, never codified in the text of the GEO as a further exception to the general rule prohibiting accepting gifts and never adopted in a formal BOE advisory opinion, allows the Mayor to disregard provisions of the GEO that require gift disclosures to BOE. Instead, pursuant to this unwritten agreement, successive mayors have been advised by BOE that they may keep a publicly available log of gifts instead of making statutorily required gift disclosures to BOE. This unwritten arrangement purported to relieve successive mayors from their responsibility of obtaining approvals from BOE and making disclosures to BOE that are expressly required of all City employees and officials by the GEO. According to BOE, this informal arrangement has continued until the present day and is communicated by BOE to mayoral staff during ethics trainings and in informal ethics opinions. BOE's website does not clarify that gifts to a mayor would not be disclosed on BOE's website due to the arrangement between BOE and the Mayor's Office.

The arrangement between BOE and the Mayor's Office, which excuses mayors from making statutorily required disclosures to BOE, is contrary to the plain language of the GEO and undermines requirements of the GEO that promote accountability and public transparency. BOE communicated to OIG that, pursuant to the arrangement, the mayor should log gifts "in a publicly available log book" which is "kept in the 5<sup>th</sup> floor suite of offices in City Hall."

## 3 | OIG's Efforts to Oversee the Mayor's Office's Gifts Practices

On June 28, 2024, OIG appeared at City Hall in an undercover capacity—that is, as a member of the public—to request access to the mayoral gift log. OIG appeared in an undercover capacity because it sought to assess the actual public accessibility of the mayoral gift log. OIG, in this undercover capacity, was denied access to the gift log and was instead directed to send a Freedom of Information Act (FOIA) request.

On July 9, 2024, OIG—again in an undercover capacity as a member of the public—filed a FOIA request with the Mayor's Office in which OIG requested a log, list, or records sufficient to show all disclosures filed by or on behalf of Mayor Johnson or former Mayor Lori Lightfoot from February 1, 2022 to March 31, 2024 regarding receipt or reimbursement of: travel expenses for meetings related to a public or governmental educational purpose; gifts given to or accepted on behalf of the City; or hosting, including travel and expenses, entertainment, meals or refreshments furnished in connection with meetings, appearances or public events or ceremonies related to official City business. OIG also issued a similar request to the City Comptroller for disclosures made by the Mayor's Office regarding gifts to be added to the City inventory; the Comptroller informed OIG that it held no responsive records.

The Mayor's Office did not timely respond to OIG's FOIA request which, pursuant to applicable law, constitutes a denial of the request.<sup>3</sup> On August 14, 2024—over a month after submitting the FOIA

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employees and officials regarding gifts [and], business travel...." BOE, Enforcement and Regulation, <https://www.chicago.gov/city/en/depts/ethics/provdrs/reg.html> (last visited Dec. 6, 2024).

<sup>2</sup> June 24, 2024 email from BOE Executive Director Berlin to OIG.

<sup>3</sup> 5 ILCS 140/3(d) ("Failure to comply with a written request, extend the time for response, or deny a request within 5 business days after its receipt shall be considered a denial of the request.")

request--OIG received a response from the Mayor's Office in the form of a spreadsheet that detailed gifts accepted on behalf of the City. The log included, for some but not all gifts: the date received, a brief description, where the gifts were stored, and information about the source of the gift. Notably, a response to the FOIA request OIG submitted as a member of the public came only after OIG also issued a compelled document request to the Mayor's Office seeking the same information. OIG received in response to its document request records that matched the records it received in response to its undercover FOIA. Notably, neither log received by OIG lists any reimbursed travel-related expenses.

#### 4 | Gifts Accepted by the Mayor's Office

The logs provided to OIG list gifts received by the Mayor's Office during a period from February 2, 2022 to March 20, 2024. The logs include space to record information about each gift received, including: date the gift was received, gift description, location of the gift, information about the gift giver (including name, associated organization, and address), and whether a thank you note has been written and sent. For the time period that OIG requested, former Mayor Lori Lightfoot's logs include entries for 144 gifts received. The logs OIG received contain 236 entries for gifts received by Mayor Johnson. All but 15 of the entries from both logs have a date listed.

Of the 380 logged gifts, many are listed with a location designation of "Gift Room." Those gifts reportedly being stored in the Mayor's "Gift Room" include:

- "Hugo Boss cuff links" from June 12, 2023
- "Personalized Mont Blanc pen" from June 12, 2023
- "2023 U.S. National Soccer Team Jersey" from June 16, 2023
- "Airpods, tote bag, notepad" from October 3, 2023
- "Gucci Tote bag and crossbody bag" from March 18, 2024
- "Givenchy Bag, Kate Spade Red Purse, Carrucci Size 14 Burgandy Men's Shoes" from March 19, 2024

Other items, such as "Bottle of Uncle Nearest 1856 Premium Aged Whiskey" from April 22, 2022, and "Superare 'ONE OF ONE' TSHIRTS" from March 1, 2024, are marked as being located in Room 507, which OIG believes to be the Mayor's private office. Additionally, some items are marked as being located in "kitchen" or "upstairs." For many items, including "Always 24Kt Idols Pearl and Gold Elephant," the storage location is unclear. Nearly 75% of the gifts on former Mayor Lightfoot's logs do not list a location where they are stored, while only 12% of gifts received by Mayor Johnson do not list a location.

Almost 70% of the 380 logged gifts received from February 2, 2022 to March 20, 2024, do not list the identity of the gift giver. The log indicates that the "2023 U.S. National Soccer Team Jersey" from June 16, 2023, was gifted by a representative of Nike, and the "Airpods, tote bag, notepad" from October 3, 2023, were from an executive with the United States Conference of Mayors. However, the entries for the "Hugo Boss cuff links" and "Personalized Mont Blanc pen" received on June 12, 2023, "Gucci Tote bag and crossbody bag" from March 18, 2024, and "Givenchy Bag, Kate Spade Red Purse, Carrucci Size 14 Burgandy Men's Shoes" from March 19, 2024, all fail to include information regarding the identity of the gift giver.

## 5 | Denial of Access to the Gift Room

On November 8, 2024, OIG personnel appeared at the 5th floor of City Hall and requested access to the Gift Room. OIG sought to conduct an unannounced inspection of the manner in which gifts are stored, to audit the presence of gifts that were purportedly stored in the Gift Room as stated in the gift log, and to review controls around access to the Gift Room. OIG was met by Chicago Police Department officers and, following an explanation of OIG’s request to view the Gift Room, told to wait in the elevator lobby. Eventually, while continuing to wait in the elevator lobby of the 5th floor, OIG spoke with multiple senior members of the Mayor’s Office regarding the request to access the Gift Room. OIG presented a written request for access to the Gift Room and stated that it sought to access the Gift Room. Following further delay, Mayor’s Office personnel approached OIG and stated that they had spoken to the Corporation Counsel and relayed a message, reportedly from the Corporation Counsel, that OIG would not be granted access to the Gift Room that day and that OIG must make an appointment to access the Gift Room.

MCC § 2-56-090 makes it the duty of every elected or appointed officer, employee, department, and agency of the City to cooperate in OIG inquiries. Furthermore, pursuant to that section, “[e]ach department’s premises, equipment, personnel, books, records and papers shall be made available as soon as practicable to the inspector general.”

Following that denial, OIG engaged in further conversations with the Department of Law (DOL) regarding access to the gift room. Ultimately, DOL—apparently representing the Mayor in opposition to OIG—communicated that OIG would not be granted access to the Gift Room. OIG was therefore unable to inspect the manner in which gifts are stored, audit the presence of gifts that were purportedly stored in the Gift Room as stated in the gift log, or to review controls around access to the Gift Room.

## 6 | Conclusion and Recommendations

The gift disclosures required by the GEO promote transparency and accountability. In contrast, the unwritten arrangement between the Mayor’s Office and BOE contradicts GEO disclosure requirements and has undermined public transparency and accountability around decades of gifts received by successive mayors. When gifts are changing hands—perhaps literally—in a windowless room in City Hall, there is no opportunity for oversight and public scrutiny of the propriety of such gifts, the identities and intentions of the gift-givers, or what it means for gifts like whiskey, jewelry, handbags, and size 14 men’s shoes to be accepted “on behalf of the City.”

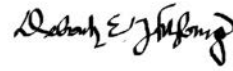
OIG recommends that the Mayor’s Office:

1. comply with the plain language of the GEO gift disclosure requirements, including at sections 2-156-142(d)(8), d(10), and d(12); and
2. make any gifts accepted on behalf of the City available for inspection, announced or unannounced, by OIG.

OIG invites the Mayor’s Office to respond in writing before January 10, 2025. Any such response will be made public together with this advisory.<sup>4</sup>

<sup>4</sup> Section 2-56-110(a)(b) of the MCC authorizes OIG to make public statements “if an investigation, audit or review concerns inefficient or wasteful management.” BOE publicly posts on its website gift disclosures from City employees and officials. It is an inefficient use of resources for the Mayor’s Office to separately maintain a

Respectfully



Deborah Witzburg  
Inspector General  
City of Chicago

cc: Steven Berlin, Executive Director, Board of Ethics  
Cristina Pacione-Zayas, Chief of Staff, Mayor's Office  
Jessica Higgins, Assistant Deputy Mayor, Mayor's Office  
Nathaniel Wackman, General Counsel, OIG

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gift log that must then additionally require review, consideration, and response to individual FOIA requests every time a member of the public seeks to access gifts received by the Mayor's Office on behalf of the City. It is also inefficient management—a waste of the public's resources—to require that individual members of the public submit a FOIA request and wait for over a month each time someone seeks gift information that, for any other City employee or official, is elsewhere made immediately publicly available by BOE. Furthermore, items "accepted on behalf of the City" are, by law, "the City's property," and the circumstances described here present material risks of inefficient and wasteful management thereof. MCC § 2-156-142(d)(8).



# Appendix B | Department Responses



CITY OF CHICAGO • OFFICE OF THE MAYOR

MAYOR BRANDON JOHNSON

January 24, 2025

Deborah Witzburg  
Inspector General  
Office of the Inspector General  
City of Chicago

Re: OIG Advisory Concerning GEO Compliance

Dear Inspector General Witzburg:

The Mayor's Office has carefully reviewed the recommendations provided by the Office of Inspector General concerning compliance with the Governmental Ethics Ordinance (GEO). The responses from the Mayor's Office are as follows:

**OIG Recommendation One:**

Comply with the plain language of the GEO gift disclosure requirements, including section 2-156-142(d)(8), d(10), and d(12).

**Response:**

This administration has and will continue to comply with all guidance from the Board of Ethics related to MCC § 2-156-142. Our duty to do so is without objection. The enclosed letter from Board of Ethics Executive Director Steve Berlin provides updated guidance pertaining to the GEO, and our office will work closely with the Board of Ethics to transition to this new guidance.

**OIG Recommendation Two:**

Make any gift accepted on behalf of the City available for inspection, announced or unannounced, by OIG.

**Response:**

In accordance with the plain language of MCC § 2-56-090, the Mayor's Office shall make gifts available for inspection by the OIG *as soon as practicable*. The MCC does not require the Mayor's Office to make gifts available for unannounced inspections, and the GEO contains no mandate requiring the Mayor's Office to accommodate such visits. Notwithstanding the forgoing, the Mayor's Office remains fully committed to ensuring that gifts are available for inspection through a properly scheduled appointment at the earliest practicable time.

Thank you for your work on this matter, and please feel free to reach out with any questions or if you need any further information.

Sincerely,

Cristina Pacione-Zayas  
Chief of Staff

Enclosed: Letter from Steve Berlin, Executive Director, Board of Ethics



CITY OF CHICAGO

BOARD OF ETHICS

**CONFIDENTIAL**

January 21, 2025

The Honorable Brandon Johnson, Mayor  
Christina Pacione-Zayas, Chief of Staff  
Suite 509  
121 N. LaSalle St.  
Chicago, IL 60602

Deborah Witzburg, Inspector General  
Office of Inspector General  
231 S. LaSalle St. 12<sup>th</sup> FL  
Chicago, IL 60604

**Re: Reporting of gifts accepted on behalf of the City, et al.**

Dear Mayor Johnson, Chief of Staff Pacione-Zayas, and Inspector General Witzburg:

On the evening of Friday, December 13, 2024, I, as Executive Director of the Board of Ethics (“Board”), received via email a “cc” of an “Advisory Concerning GEO Compliance” (“Advisory”) from the Office of Inspector General (“OIG”). In it the OIG recommended that the Mayor’s Office comply with the specific reporting requirement for gifts accepted on behalf of the City, reasonable hosting, and third-party paid travel set forth in the City’s Governmental Ethics Ordinance (“Ordinance”). The relevant Ordinance provisions are §§2-156-142(d)(8), (10), and (12).<sup>1</sup> This letter constitutes the Board’s response.

First, some history is in order. I have been with the Board since September 1, 1993. At that time, and, in fact, until November 1, 2012, §2-156-040 of the Ordinance, now repealed, required, in subsection -040(f), only that any gift accepted on behalf of the City be reported to the Board of Ethics and the Comptroller, who shall add it to the inventory of City property.<sup>2</sup> It was my understanding since I started at the Board that an agreement was made between the Board and the Administration of the late former Mayor Eugene Sawyer that the reports of such gifts could be kept in a “Mayoral log book” within the 5<sup>th</sup> Floor Suite of City Hall offices, and made available for public inspection, and need not be transmitted to the Board of Ethics. To that end, our office advised Mayoral staff accordingly through the years.

Then, effective November 1, 2012, the Ordinance was amended to require not only the disclosure to the Board of gifts accepted on behalf of the City, but also, “within 10 days of acceptance thereof,” of “reasonable hosting, including travel and expenses, entertainment, meals or refreshments furnished in connection with meetings, appearances, public events or ceremonies related to official City business, if furnished by the sponsor [of the event, etc.]” And, also as of November 1, 2012, a similar reporting requirement began to apply to “any material or travel expense for meetings related to a public or governmental educational purpose.”<sup>3</sup> At that time, the Board advised the Administration of then-Mayor

<sup>1</sup> The current version of the Ordinance, showing the most recent amendments, effective October 20, 2024, is posted on the Board’s website, here:

<https://www.chicago.gov/content/dam/city/depts/ethics/general/Ordinances/GEO%20OCTOBER%202024%20CONFORMED%20COPY.pdf>

<sup>2</sup> This historical version of the Ordinance is posted on the Board’s website, here:

<https://www.chicago.gov/content/dam/city/depts/ethics/general/Ordinances/GEO-DEC2011.pdf>

<sup>3</sup> The Board makes all such disclosures available on its website as soon as practicable after receiving them; they are posted on the Board’s website by year dating back to 2012, here: <https://www.chicago.gov/city/en/depts/ethics/provdrs/reg/svcs/REQ-20201.html>

Rahm Emanuel that these additional disclosures could also be kept in the "Mayoral log book," and need not be transmitted to the Board, but should also be made available to the public, as with gifts accepted on behalf of the City. The Board has advised successive Mayoral administrative staff accordingly.

Second, having studied the OIG's December 13 Advisory, the Board now concurs that the Mayor's Office should report *to the Board* all gifts accepted by the Mayor on behalf of the City "promptly," as well as all reasonable hosting or travel paid in full or part to the Board within 10 days of acceptance thereof, as per the terms of §2-156-142(d) of the Ordinance. The Board and its staff are committed to educating and assisting appropriate Mayoral staff on complying with these provisions. The Board also recommends that any gifts accepted on behalf of the City that remain within the Mayoral Suite of offices or within City Hall be accessible for viewing by the public on reasonable terms set by the Mayor's Office. The Board will, of course, publish on its website all such disclosures it receives, as it has with other analogous disclosures it has received since November 2012.

The Board looks forward to working with the Mayor's Office to ensure a smooth transition regarding these disclosures and appreciates the importance of these matters.

Please contact me with any questions.

Yours very truly,

A handwritten signature in blue ink, appearing to read "S. I. Berlin".

Steven I. Berlin, Executive Director



**Bryce Carlson**  
Assistant Inspector General

The City of Chicago Office of Inspector General is an independent, nonpartisan oversight agency whose mission is to promote economy, efficiency, effectiveness, and integrity in the administration of programs and operations of City government.

OIG's authority to produce reports of its findings and recommendations is established in the City of Chicago Municipal Code §§ 2-56-030(d), -035(c), -110, -230, and -240.

For further information about this report, please contact the City of Chicago Office of Inspector General, 231 S. LaSalle Street, 12th Floor, Chicago, IL 60604, or visit our website at [igchicago.org](https://igchicago.org).

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