

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

MICHAEL L. SHAKMAN, PAUL M.)
LURIE, KENNETH AYERS, ANN M.)
KING, INDEPENDENT VOTERS OF)
ILLINOIS-INDEPENDENT PRECINCT)
ORGANIZATION, MICHAEL)
SULLIVAN, DARRYN JONES,)
STUART MAJERCZYK, RICHARD)
GRAMAROSSA and CONNIE)
GRAMAROSSA, et al.,)

Plaintiffs,)

v.)

DEMOCRATIC ORGANIZATION OF)
COOK, THE CITY OF CHICAGO,)
RICHARD M. DALEY,)
INDIVIDUALLY AND AS MAYOR OF)
THE CITY OF CHICAGO,)
REPUBLICAN STATE CENTRAL)
COMMITTEE OF ILLINOIS,)
REPUBLICAN COUNTY CENTRAL)
COMMITTEE OF COOK COUNTY, et)
al.,)

Defendants.)

Case No. 69 C 2145
Judge Wayne R. Andersen
Magistrate Judge Schenkier

INITIAL REPORT OF THE COMPLIANCE ADMINISTRATOR

Julia M. Nowicki, *Shakman* Compliance Administrator, by and through her attorney,
Peter Monahan submits her initial report pursuant to the order of the court entered November 30,
2006.

INTRODUCTION

On November 30, 2006, pursuant to the Supplemental Relief Order (“SRO”), this court
appointed Julia M. Nowicki to serve as the *Shakman* Compliance Administrator to ensure Cook

County's future compliance with the prior consent decrees entered in 1972 and 1994 ("Consent Decrees"), respectively. The 1972 decree prohibited Cook County ("the County") from conditioning, basing or knowingly prejudicing or affecting any term or aspect of governmental employment, with respect to one who is at the time already a governmental employee, upon or because of any political reason or factor. The 1994 decree incorporated the 1972 decree's prohibitions and extended those prohibitions to include the County's hiring practices, with certain exclusions.

SUPPLEMENTAL RELIEF ORDER

The SRO, entered on November 30, 2006, orders, among other things, that the Compliance Administrator ("CA") file a report within 30 days of the appointment, recommending (1) the powers the CA should be given to ensure compliance, (2) necessary staffing needs and (3) mechanisms for ensuring that employment actions are in compliance with existing court orders. The SRO mandates that the CA study existing employment practices, policies and procedures for non-political hiring, promotion, transfer, discipline and discharge. Further, the CA is to observe actual hiring sequences, assist in formulating a new hiring plan, aid in establishing a training program to educate and train supervisors and employees on non-political hiring practices, make recommendations to the Court as to how to resolve issues regarding *Shakman* exempt positions, monitor compliance, adjudicate pre-SRO violations, file periodic reports and various other duties.

CA'S OBJECTIVES AND PROCESSES

The CA appreciates the personal cooperation and attention that President Stroger has given the endeavors of the CA. The President has met with the CA and indicated his desire and

intention to effectuate the principles set forth in the SRO. Additionally, he has invited the CA to communicate directly with his office and his Chief of Staff.

In the CA's preliminary exercise of her duty to study existing employment practices, the CA has been confronted with several complexities. First, the County functions are spread out over approximately 40 departments, each of which is involved in interviewing and selecting employees. Thus, there exist a large number of department heads and department personnel to interview. The County offices under study are divided into two groups. County officials term them corporate and health care. Under the corporate umbrella, there are over 30 departments of varying sizes. Under health care, there also are several facilities of varying sizes. Second, as is well known, the County recently has undergone the installation of newly elected Board President, Todd H. Stroger. There have been significant changes in the Human Resources ("HR") Department. Also, a number of individuals who were key to the hiring process are on "leave" from County employment.

Additionally, there is an impending budget deadline of February 28, 2007. It is public knowledge that President Stroger has asked each office and department funded by the County to reduce their individual budgets by 17 percent. To the extent that budget cuts translate into personnel layoffs or terminations, there may be *Shakman* ramifications.

The issues relating to exempt positions are complicated and important ones facing the CA. The CA foresees a time consuming process in evaluating what the *Shakman* exemptions are and how they are used. Paradoxically, however, these positions have the potential to be filled quickly; therefore, certain actions regarding exempt positions must be taken as soon as possible.

Finally, the current investigation by the United States Attorney's Office ("USAO") must be considered by the CA. It is public knowledge that the USAO for the Northern District of

Illinois is conducting an investigation of employment practices in the County. The CA and the USAO have discussed the difficulty of overlapping investigations. The USAO expressed a preference for the CA to limit the CA's study to prospective matters. The CA notes that the SRO, as a whole, has as its objective a change in future conduct and is, therefore, prospective in nature. Thus, the USAO's request is compatible with the SRO. This does not, however, obviate the need for the CA to study the current situation in as much detail as necessary to identify the points of vulnerability so that other aspects of the SRO can be realized, such as a new hiring plan, a training strategy and monitoring.

To that end, since her appointment on November 30, 2006, the CA has established an independent office, interviewed approximately 20 individuals and obtained or requested numerous documents. Those interviewed include both the former and current Chiefs of the Bureau of HR, the current Chief's Deputy, the individual responsible for HR at Stroger Hospital, the Department Head and Deputy of the Highway Department, the head of the Juvenile Detention Center, the County Shakman Compliance Monitor, the Inspector General, the President of the Cook County Board and his Chief of Staff, a number of County Commissioners, a number of Assistant U.S. Attorneys, the Chief Training Officer for the County and several other individuals. The CA has requested and received documents the County was to have prepared and compiled pursuant to the 1994 Plan of Compliance, including HR manuals, policies and procedures; quarterly filings with the Court; annual *Shakman* compliance audits; personnel files; exempt lists; lists of those hired in the last year; a list of those who await only the "grant of authority"; a list of current open positions in the offices under the President, including the Bureau of Health Services; ordinances and proposed ordinances; and other documents.

The CA has learned that a hiring freeze was imposed on the Corporate Departments under the Office of the President in August 2006. This freeze was extended to include the Bureau of Health Services in November 2006. As a result, there are approximately 50 individuals who have been through the hiring process and are awaiting only the grant of authority to be hired. There are approximately 1,264 open positions in the departments under the Office of the President, including approximately 810 in the Bureau of Health Services.

Finally, the CA has, to date, received some unsolicited information from employees and citizens at large. It is the CA's intention to make herself more accessible through the use of a website. Plans are currently underway to get the site functioning as soon as possible. The CA fully expects and invites all interested parties to furnish any information which would inform her of relevant matters. Until the website is completed, the CA can be contacted at julianowicki@countyshakman.com.

THE COUNTY'S HIRING PROCESS

The County's hiring process for non-exempt positions is set forth in three documents: the Plan of Compliance ("Plan"), County Ordinance 06-O-52 ("Ordinance") and a Manual entitled "Hiring Procedures, Cook County Bureau of HR, December 2006" ("Manual").

A. Plan of Compliance. The Plan was prepared by the County to implement a hiring process consistent with the Consent Decrees. The Plan applies to the hiring of nonexempt employees under the jurisdiction of the Office of the President. The Plan details the requirements for public notice of job openings and availabilities. It allows for applicants to access job descriptions, job qualifications, pay and instructions on when and where to apply.

The Plan also sets forth the manner in which an application for employment is to proceed through the Bureau of Human Resources including processes for eligibility screening, interviewing and ranking the applicants. Finally, the Plan establishes within the County HR Department the position of “Compliance Monitor” who is responsible for logging and investigating all oral and written complaints regarding compliance with the Plan. Significantly, the Plan defined “Patronage Contact” and provided that all such contacts were to be reported to the Compliance Monitor.

B. County Ordinance. Pursuant to its agreement under the SRO, on November 29, 2006, the Cook County Board enacted Ordinance 06-O-52, amending Chapter 44, Article II of the County’s Personnel Policies to prohibit political discrimination in all aspects of Cook County employment, including hiring, promotion, discharge, award of overtime and transfer of employees in nonexempt Cook County positions under the Office of the President. The Ordinance applies to all Cook County nonexempt positions under the Office of the President and prohibits all exempt and nonexempt employees from directly or indirectly influencing any aspect of employment, on the basis of political considerations whether based on political affiliation, political campaign contributions and/or political support. Also prohibited is the direct or indirect influencing of the issuance of overtime on the basis of political considerations.

The Ordinance further contains the following exception: “Nothing in this section shall prohibit an elected or appointed public official from recommending individuals where they have knowledge as to relevant qualifications for a position.” Ordinance No. 06-O-52, Sec. 44-55(1)(a).

Under the Ordinance, it is the duty of every County employee who learns of any unlawful political discrimination or who believes that such unlawful political discrimination has occurred

or is occurring to report this information to the Cook County Inspector General's Office. The Inspector General is responsible for conducting an investigation of the complaint. Any person who willfully violates the Ordinance may be subject to discipline, up to and including discharge. The Ordinance becomes effective January 1, 2007.

C. **HR Manual**. In the course of her study, the CA was advised of a hiring process utilized by HR but which had not been reduced to writing. The CA requested that the new HR Bureau Chief prepare a draft setting forth the actual hiring process utilized by the County for nonexempt employees under the jurisdiction of the Office of the President. The CA received a document entitled "Hiring Procedures, Cook County Bureau of Human Resources, December 2006."

A summary of the procedure outlined in the Manual follows, but it should be noted that the procedure set forth in the Manual is that, in fact, described to the CA in interviews and also appears on its face to be in substantial compliance with the Plan.

The procedure outlined in the Manual is initiated when a department with a vacancy sends a request to hire to the Bureau of HR. The request includes a statement setting forth the reasons why there is a need to fill the vacancy, the duties and responsibilities of the stated position and how the Hiring Department intends to fund the position. HR notifies the Examination and Selection Division to prepare a job posting or Notice of Job Opportunity. The Examination and Selection Division prepares the notice and sends it to HR for review. HR and the requesting department review and then post the notice on a job vacancy board. The Examination and Selection Division is to publish postings on line at www.cookcountygov.com/employment and update the job hotline at (312) 603-6598. The posting is to be displayed for no fewer than 14 days.

Applications are available in person in Room 834 of the County building and on the County's website. All applications must be returned in person. Applications are not accepted via the Internet, facsimile transmission or mail. Submitted applications are time-stamped and the applicant is given a time-stamped receipt. After ensuring that the application is complete, it is logged as received by date and time. The Examination and Selection Division screens all applicants, enters them into TRAC, HR's electronic database, and manually reviews each applicant to determine that minimum qualifications have been met. All applicants determined to be eligible are placed on an eligibility list and referred to the hiring departments in the order in which the application was received at the front desk. The hiring department schedules interviews and makes the hiring decision. The hiring decision is documented on a "decision to hire" form, which lists the applicant selected for hire over the other eligible applicants. The form is signed by all supervisors, directors, and department heads involved in the interview and screening process.

D. Bureau of Health Services.

The CA has had the benefit of an extensive interview with the individual most knowledgeable about the hiring process applicable to Stroger Hospital. The hiring process for nonprofessional nonexempt employees at Stroger is substantially similar to that described above. The hiring process for attending physicians, residents, some nursing positions and some promotions within nursing differ from that described above.

The Bureau of Health Services encompasses a number of entities. The CA has been advised that the County is currently engaged in an effort to centralize the hiring process for all of the entities in the Bureau of Health Services. The CA has been invited to participate in the process to ensure compliance with *Shakman*.

PRELIMINARY FINDINGS

The CA wishes to note that the following findings are preliminary only. It is clear from her initial study that she needs to investigate a great deal more before making final or comprehensive findings.

1. **Hiring and other Employment Actions.** (a) **Long-Term.** On its face, the County's current hiring plan appears to guard against political considerations in hiring. However, the system in place, as any system would be, is vulnerable to abuse. Each step in the hiring process presents challenges which no system can address without oversight. For example, there is nothing in the Plan, the Rules and Regulations or the Manual that insures that some individuals do not acquire advance notice of a job posting. Likewise, there is nothing that prevents the manipulation of the recording of the order in which applications are filed. There is no personnel specifically assigned to oversee that matters checked in the Eligibility and Selection Section are verified. Grading at the individual interview level is subjective. There is little oversight on how the lists are processed before return to the HR Department. Thus, there are many opportunities to abuse the system if an individual is so inclined.

The CA is unable to make definitive conclusions regarding *Shakman* violations at this time. According to information gathered, different departments appear to be more vulnerable at certain stages than others. The CA must still interview many more department heads to get a better idea where the problems lie. In addition, the HR Department informs the CA that it is looking to design a new hiring process in some respects. This comports with the SRO, which predicts that a new hiring plan may be inevitable. (SRO, p. 6).

Based on the CA's observations thus far, she finds it difficult to envision any system that will self-verify that no direct or indirect *Shakman* violations have occurred. Thus, it appears that

lack of independent oversight will be an issue in any new plan that might be implemented. Suffice it to say, whatever system is in place in the future, it will need to be extensively monitored.

That being said, there are a couple of points that are important to emphasize in this section of the report. First, in the course of her study, the CA interviewed a number of employees. Without question these people were hard working and sincere public servants. It is not the intention of the CA that the above-noted vulnerabilities act to disparage the employees she spoke with in any way. Secondly, what has been referred to as “key” employees on leave are most likely to have direct information as to abuses in the system, and the CA does not have access to them. As stated earlier, the SRO is largely prospective in its intent and purpose. So, to some extent it is more useful to look at areas of potential vulnerability rather than past problems.

(b) Short-Term. As noted earlier in this report, there are several recent or impending changes within the County, such as, a new administration, a looming budget deadline, a budget which the President intends to cut, a hiring freeze which has resulted in over 1,200 open positions and an outdated *Shakman* exempt list. These conditions all portend immediate changes in personnel. It is the CA’s position that it is far better to anticipate future violations and take immediate action to ensure that they do not occur, rather than passively allow violations and then attempt to formulate a potentially costly remedy at a later date. To that end, the CA, in a letter dated December 29, 2006, recently requested from President Stroger that the CA be privy to any processes by which any employee is hired, fired, laid off or promoted before any final decisions are made in this regard.

2. Training. **(a) Long-Term.** The CA is advised that certain employees at the County received training in *Shakman* compliance technique and procedures in 1994 and again in 1996 or 1997. It appears that training is an extremely significant aspect of the SRO. As to a

long-term solution, the CA will need to engage in further study as to the particular needs of each department. To that end, the CA will be asking for input from the Chief of HR, the current Training Coordinator and other Cook County HR employees. The CA may also seek the assistance of a HR consultant. There may also exist federal and state training programs that can provide assistance. That being said, the CA foresees that all Commissioners and their staff, HR employees, department heads and their deputies, and interview staff will need to participate in initial and periodic updated training.

At this time, it is impossible to estimate a cost for this endeavor. However, the CA is hopeful that, once the training materials are developed, much of the manpower necessary to execute the plan can be handled in house by HR employees and attorneys from the Cook County State's Attorney's Office. There might also be a need for an outside consultant to assist in the development of training materials and to participate in training.

(b) Short-term. In the course of her study, the CA has observed that there is some confusion as to the application of the *Shakman* principles. Therefore, interim training should be done prior to any layoffs or terminations. In furtherance of this proposition, the CA recommends that the CA prepare, within seven days, a memo outlining the nature and scope of a *Shakman* violation. Subsequently, the *Shakman* parties should have a short period to review and make recommendations to modify the CA's memo. Immediately thereafter, the finalized memo should be disseminated to all HR personnel, department heads and their deputies, interim staff and the President's staff.

(c) Layoffs. As mentioned earlier, the proposed layoffs widely publicized in the press also must be studied and observed to ensure compliance with *Shakman*. The CA is advised that each department is to suggest to the President a method of reducing its budget by a target of 17

percent. To the extent that this may involve the hiring, termination, change in status or grade, transfer within or between departments, or other lateral moves, *Shakman* may be implicated and, therefore, the CA should observe this process as well.

(d) Exempt Positions. As stated earlier in this report, the *Shakman* decree(s) prohibit conditioning, basing or knowingly prejudicing or affecting any term or aspect of employment because of a political reason or factor. The decrees exclude a certain number of so-called exempt positions. As to these exempt positions, the above proscriptions do not apply. However, according to the decrees, in order to qualify as an exempt position, the position must involve policymaking or require confidentiality to an extent that political affiliation is an appropriate consideration for the effective performance of the job.

Pursuant to the decrees there are 500 exempt positions. A list of those positions was attached to a decree as an exhibit. This list was the product of negotiation between the parties to the decree. It is the CA's understanding that there does not exist any written document setting forth the basis for which each of the exempt positions qualifies as one which involves policymaking or requires confidentiality to an extent that political affiliation is an appropriate consideration. It is also the understanding of the CA that the parties intend to generate such a list of justifications in the near future.

It is not difficult to envision how use of the exempt list could be intentionally or unintentionally abused. For example, it is the CA's understanding based on her study that there exists at least one County office where there are instances where individuals are hired as exempt employees and then later moved to non-exempt positions. This practice allows the County to hire and rehire using the same exempt position. It is the CA's understanding that this practice has not been reviewed by any Court in the context of a *Shakman* violation. This practice raises a

number of issues. One issue is whether this practice of reassigning employees from exempt to non-exempt positions, if it exists, constitutes a *Shakman* violation, and, if so, what the possible ramifications are for the employees in terms of his or her status.

There undoubtedly are other issues that might arise that have not yet been considered. In any event, however, the potential for *Shakman* abuse, intentional or unintentional, direct or indirect, exists. The CA has spoken to both the plaintiffs and defendants regarding these issues. The SRO provides that the exempt positions are to be determined by the parties and that the CA is to break any impasse. Both plaintiffs and defendant agree, however, that abuse of the exempt positions may have *Shakman* implications, and thus the CA interprets the SRO such that these would come under her purview.

(e) Ordinance Exception. In the opinion of the CA, the exception contained in Ordinance No. 06-O-52, allowing public officials to make recommendations, carries a potential for confusion or abuse. The CA recognizes the potential advantages to the County of recruitment and reliable recommendations for employment of qualified individuals by those knowledgeable of a candidate's credentials and the requirements of the position. Distinguishing between a "recommendation" allowed by Ordinance No. 06-O-52 from a "patronage contact" as defined by the Plan, however, will require precise knowledge of the conduct permitted under *Shakman* by all of those involved in the hiring process and by the political person making such a recommendation. Explaining these distinctions presents a monumental challenge.

The CA recognizes that the Human Resources Ordinance, enacted as amended in April and October of 2000, gives the Chief of Human Resources broad rule-making powers to develop procedures to comply with applicable federal law. The CA recommends that the Chief

promulgate such rules, including the public posting of the recommendations allowed by the ordinance and the weight to be given any such recommendations in the employment decision.

3. Monitoring.

The CA anticipates utilizing individual monitors who will engage in in-depth monitoring of the County's employment practices. Their duties will include attending interviews and writing reports. The CA estimates that monitoring will require a substantial number of hours over the two year compliance period. The CA also anticipates hiring one full-time monitor to supervise and oversee the activity of the monitors and the day-to-day processes of the County Building and Stroger Hospital.

4. Adjudicating.

Until the number of class members is known, it is impossible for the CA to make more than minimal recommendations regarding the adjudicative aspect of the SRO. However, at a minimum, the CA recommends that she be supplied with office space sufficient to conduct hearings, file complaints, and store documents collected pursuant to investigations related to any complaint. The CA recommends that the space be associated with the federal court system or government, not local government. Next, the CA recommends that there be an administrator for this process and an investigator to handle collection of documents and other related investigatory matters.

5. Powers required by the CA.

Although the County and its employees and attorneys has been cooperative in producing personnel for interviews and producing documents, the CA should be granted the power or discretion to (1) subpoena County documents; (2) compel employees for interviews; (3) monitor county hiring practices, including the power to select when and where to place monitors and for

what duration; (4) define appropriate and inappropriate hiring practices; (5) make interim reports to the court; (6) submit written questions to the parties; (7) bring disputes regarding the CA's power or role before the court by motion; and (8) the CA requests that she be granted the powers of a special master not otherwise enumerated herein.

6. Staffing and Budget.

To date, the CA has been functioning with the assistance of her attorney and one part-time attorney/paralegal/administrative assistant, at a rate of \$40 an hour. However, as the CA's recommendations for further study become realized, the CA likely will require additional staff. The CA and her counsel anticipate requiring the assistance of two full-time monitors to oversee day-to-day hiring practices and supervise and coordinate the activities of 6-8 monitors who will be responsible for observing and reporting on the County's hiring practices; and a part-time law clerk and 1-2 full-time paralegals to assist with information organization, document analysis, monitoring of the website and responding to individuals who communicate through the website and research. The CA may need the services of an investigator for both the initial and adjudicatory stages of her duties. The CA may also need another full or part-time attorney to assist in all stages of this process. The rates of pay will be determined at a later date. The CA also may require the services of additional consultants with specialized expertise. The CA will notify and consult with the County before hiring any consultants or experts whose costs are anticipated to exceed \$10,000.

The CA estimates monthly office costs of approximately \$2,000.00. The CA's office has not received invoices for all of the items included in the start-up costs of the office. However, the CA estimates a start-up cost of approximately \$3,000.00.

PRELIMINARY RECOMMENDATIONS

A. Hiring.

1. Long-term. The SRO envisions a new hiring plan being devised in six months.

This plan should be designed to be as transparent, uniform and have as many features as possible that are designed to detect *Shakman* violations. The CA predicts that even the most ideal plan will require a long-term comprehensive oversight plan. As this time, the CA recommends that the oversight plan include two full time monitors, initially hired by the CA, located at the County Building and Stroger Hospital, respectively. There also should be monitors available on a part-time basis to observe and monitor interviews in the individual departments.

2. Short-term. In summary, based on the findings in this report, the CA recommends that she be apprised of all hiring, firing and related employment actions in sufficient time in advance of any final decisions so that she can assess, review and make appropriate objections. Specifically, this recommendation applies to both exempt and nonexempt positions. This recommendation also applies to layoffs pursuant to the 17 percent budget cuts or for any other reason.

As to the 17 percent budget cuts, the County should also apprise the CA of the process by which employees are being laid off, what standards are being applied and what notice the employees are being given. Within seven days of this report, the parties and the CA shall develop a plan to as to what documentation is necessary for the CA to review so that she can make her assessment regarding this issue.

As to the exempt list, the CA recommends that the parties compile a new exempt list as soon as possible. This list should be supported with written justifications for each claimed

exempt position. This list and supporting documents should be forwarded to the CA immediately.

As to all of the above recommendations, the CA should receive the required information in sufficient time to assess the situation and make objections if she deems them appropriate.

Additionally, the CA recommends that all of those individuals involved any employment decision, including the applicant, be required to execute a certification swearing that there has not been a *Shakman* violation associated with his or her decision. (A sample Certification is attached to this report).

B. Training.

1. Long term. The CA recommends that a training program be devised that meets the specific needs of the County of Cook. To that end, the CA recommends that the CA and County conduct a thorough study as to how best meet that goal. Once the training materials are developed, the CA recommends that all relevant personnel be required to complete the training. The plan should provide for all necessary periodic updating of the materials and training. The CA also recommends that the plan provide for a mandatory reporting process by which the department heads are required to inform the HR Department regarding all changes in its department which might necessitate training of personnel.

2. Short-term. The CA recommends that a brief legal memorandum be prepared for immediate dissemination to all relevant personnel defining the scope and application of the *Shakman* principles.

C. Miscellaneous.

1. Ordinance No. 06-O-52. The CA recommends that this ordinance undergo further study. Once the study concludes, the CA recommends that the Chief of HR promulgate rules in accordance with the conclusions of the study and that the rules be made public.

CONCLUSION

The CA wants to thank the County for its cooperation and assistance thus far. To be especially noted is the County's willingness to embrace a change; this sentiment is well exemplified by the head of the administration, President Todd Stroger. His leadership in this regard will be crucial to the success of the SRO.

It is clear that the issues surrounding *Shakman* exempt positions call for both long-term and short-term solutions. For instance, the SRO anticipates a new hiring plan within six months. It also appears to the CA that the training aspect will most likely be the most dominant feature of the execution of her duties. Although a final training program is something that needs to be well thought out, there also are exigencies that require immediate attention.

The CA is hopeful that the parties will be able to resolve all of these long-term and short-term issues amicably. However, in the event they cannot, the CA will be asking the Court to assist in urgent situations, whether in a conference with the Court or injunctive action upon proper notice and motion.

Respectfully submitted,

/s/ Julia M. Nowicki

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/s/ Peter A. Monahan

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SHAKMAN CERTIFICATION

With respect to all County jobs that are **not exempt** from the *Shakman* decrees, all County employees are strictly prohibited from directly or indirectly,

1. Conditioning, basing, or knowingly prejudicing or affecting any term or aspect of County employment of an existing County employee, upon or because of any political reason or factor;
2. Affecting the hiring of any individual as a County employee because of any political reason or factor; and
3. Knowingly inducing, aiding, abetting, participating in, cooperating with or encouraging the commission of any act which is proscribed by the *Shakman* decrees.

Political considerations may not enter, in any manner whatsoever, into personnel decisions for *Shakman* covered positions in the County of Cook.

I certify that I am aware of and am in full compliance with the above-stated prohibitions regarding personnel decisions by the County of Cook. I certify, under penalty of perjury, as provided for by law, that, to the best of my knowledge, political considerations did not enter into the employment actions documented herein. I understand that failure to comply with the above prohibitions and/or failure to submit an accurate Shakman Certification form may result in sanctions, including disciplinary action and other sanctions.

Signature

Printed Name

Date