



CITY OF CHICAGO

BOARD OF ETHICS

CASE NO. 25001.W
WAIVER FROM THE CITY'S POST-EMPLOYMENT RESTRICTIONS

At its January 13, 2025 meeting, the Board, by a 4-0 vote, granted a waiver¹ from the Governmental Ethics Ordinance's (Ordinance) post-employment restrictions on assistance or representation² to Nneka Onwuzurike, a former City employee of the Mayor's Office.

In accordance with §2-156-402(b) of the Ordinance, the following is a summary of the granted waiver.³

¹ **§2-156-402. Waivers.**

- (a) When requested by a city official or employee, the Board may grant a waiver from compliance with any of the following ...
- (2) The post-employment restrictions provided in Sections 2-156-100 and 2-156-105;

² **2-156-100. Post-employment restrictions on assistance and representation.**

...

(b) No former official or employee shall, for a period of one year after the termination of the official's or employee's term of office or employment, assist or represent any person in any business transaction involving the city or any of its agencies, if the official or employee participated personally and substantially in the subject matter of the transaction during his term of office or employment; provided, that if the official or employee exercised contract management authority with respect to a contract this prohibition shall be permanent as to that contract.

³ **Board of Ethics Rule 9, entitled Waivers, states:**

(1) Pursuant to §2-156-402 of the Ordinance, the Board may grant any current or former City employee or official waiver from compliance with respect to the following provisions of the Ordinance: (i) §2-156-142(a) (gifts) to the extent the waivers apply to material or travel expense for meetings; (ii) §§2-156-100 and 2-156-105 (post-employment restrictions); (iii) §2-156-110 (financial interest in City business); and (iv) §2-156-111(d) (the reverse revolving door restrictions) as to matters related to a city official's or employee's immediate former employer or client.

(2) In order for the Board to grant a waiver, a current or former city employee or official must request it in writing. The request must include: (i) the name of the requestor; (ii) the requestor's agency and where the requestor works; (iii) the requestor's title; (iv) the requestor's responsibilities; (v) a detailed description of the situation; and (vi) permission for the Board or its staff to communicate with third parties as necessary and appropriate for the Board to determine whether to grant or deny the waiver.

(3) The Board may grant a waiver with conditions, restrictions or limitations, including that the waiver may be withdrawn or modified upon contingencies set forth in the waiver grant from the Board.

(4) The waiver itself, if granted, shall be made public in a manner prescribed by the Board. However, the request and any information or documents related to the request or the Board's determination shall not be made public and shall be and remain subject to the Ordinance's and Board's rules on confidentiality.

(5) If the waiver request discloses a past or existing violation of the Ordinance that is not minor, the Board shall share that information with the appropriate investigating authority pursuant to Rule 3-11. 1 See Miss. Code Ann. §5-8-17 and Illinois Administrative Code Title 2, Subtitle C, c. III, §560.390 (b). 29 (6) Upon receiving the waiver request, obtaining all necessary additional information, and considering the request, the Executive Director shall recommend that the Board grant or deny a complete or limited written waiver to the city employee or official. The Executive Director shall retain a copy of the grant or denial

On January 6, 2025, Nneka Onwuzurike, former First Deputy of Business and Neighborhood Development in the Mayor's Office, who resigned her City position effective December 26, 2024, requested that the Board grant her a waiver from the Ordinance's post-employment restrictions on assistance and representation, pursuant to §2-156-402(b)⁴ of the Ordinance so that she can continue her work in the field of "community wealth building" in her new job as the Executive Director of the Chicago Community Wealth Building Center, a program being launched by Community Desk Chicago. Community Desk Chicago is a local non-for-profit organization. "Community wealth building" is an alternative approach to economic development that focuses on the local, democratic and shared ownership of community assets.

While with the Mayor's Office, and through her work prior to joining the City, Ms. Onwuzurike has become a subject matter expert on community wealth building. While working in the Mayor's Office, she designed the City's pilot program to support the implementation of the City's community wealth building in Chicago. Further, she has served as an advisor regarding the subject to many organizations and governmental entities.

The Board granted the requested waiver as it applies to Ms. Onwuzurike's work on community wealth building because: (i) the Community Wealth Building Center's work in this field is inherently aligned with the best interests of the City; (ii) Ms. Onwuzurike will not personally profit from a waiver; and (iii) the expertise and experience Ms. Onwuzurike brings to community wealth building are unique, and the City and its residents will thus significantly benefit from her continued work in this field.

in the Board's files; report on the matter to the Board pursuant to the Open Meetings Act; and make the waiver public in a manner prescribed by the Board.

(6) Upon receiving the waiver request, obtaining all necessary additional information, and considering the request, the Executive Director shall recommend that the Board grant or deny a complete or limited written waiver to the city employee or official. The Executive Director shall retain a copy of the grant or denial in the Board's files; report on the matter to the Board pursuant to the Open Meetings Act; and make the waiver public in a manner prescribed by the Board.

⁴ No waiver from the Ordinance's "Post-employment restrictions on lobbying," contained in §2-156-105 of the Ordinance, was requested or necessary, given that Ms. Onwuzurike's post-City employer qualifies under §2-156-010(p)(B)(2) as a not-for-profit entity with less than \$5 million dollars in operating budget, net assets, or fund balances.