

Mr. Chairman and Members of the Committee:

I am Holly Ambuehl, the Director of Policy and Government Affairs at Forefront. Forefront is the only statewide nonprofit association in Illinois. We represent all operating nonprofits and foundations in the state.

I've personally been heavily involved in negotiating the updates to Chicago's lobbying regulations - as they pertain to nonprofit entities.

Please refer to our analysis in your meeting packet.

The substitute ordinance makes significant improvements to the existing underlying law. Most of the changes in it are good ones, and they should remain in place.

We generally support this substitute ordinance as it is, but I'd like to emphasize two key points for your ongoing consideration.

First: The Chicago regulations vary greatly from the state's regulations.

Specifically, Chicago's requirements go much further than the state's. Chicago requires more narrative detail and indirect expense reporting.

These variations have resulted in pervasive confusion, redundancy, and administrative complexity for many organizations that must register in both jurisdictions. We urge you to continue examining how to streamline the process for everyone in the future, by aligning as many regulations as possible with the state.

Two: The Chicago regulations are complex.

The ordinance is difficult for people to understand, which makes compliance challenging. While the Board of Ethics has been responsive to questions, we've received conflicting information from BOE staff in the past, as recently as last week.

For that reason, we urge you to require the Board to provide thorough public education before the effective date. We also urge this committee to continue examining how to reduce reporting complexity in the future.

In closing, we are tremendously grateful to Chairman Martin, the Law Department, Office of Inspector General, and Board of Ethics for engaging in good faith on this ordinance and doing a tremendous amount of related work. I know we all agree a more ethical Chicago benefits everyone, and Forefront will continue to do our part to educate our sector about the rules of engagement.

Please contact me if you have any questions. Thank you, that concludes my remarks.