



EDWARD M. MOODY

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

November 18, 2020

Edward M. Moody, Recorder
Cook County Recorder of Deeds
118 N. Clark Street – Room 120
Chicago, Illinois 60602

Cardelle Spangler, Recorder's Compliance Administrator
Office of the Compliance Administrator
69 W. Washington – Suite 830
Chicago, Illinois 60602

RE: 2020 Report – June 16, 2020 through November 15, 2020

Dear Recorder Moody and Ms. Spangler:

This is the seventh and final report by the undersigned Director of Compliance (DOC) which will discuss Cook County Recorder of Deeds Edward Moody's compliance efforts during his tenure which began on December 4, 2018. The functions of the Office of the Cook County Recorder will effectively be assumed by the Office of the Cook County Clerk on December 7, 2020.¹ I submit this report prior to December 15th as required in Section IV.C.1 of the Cook County Recorder of Deeds Employment Plan due to the impending assumption of the Recorder of Deeds Office.

Since my last report, the Recorder's Office's focus was limited to reducing the unprecedented backlog caused by the pandemic. In summary, CCRD was closed to the public on March 23, 2020 while, due to limited technological resources, Satellite Cashiers and Database Management Employees worked remotely for the first time in CCRD history. In June 2020, additional personnel were contacted to volunteer to work at the downtown office to process mail, record documents, and respond to document requests. In July 2020, CCRD's downtown office and Satellite Offices opened to employees on a rotating basis but remained closed to the public. In October 2020, CCRD offered overtime to employees to reduce the backlog. During this time, adherence to office policies lessened but I reiterate the Recorder's commendable commitment to continuing to provide essential services while protecting the health and well-being of employees and the public.

This report is an overview of the efforts made by the Moody Administration to achieve Substantial Compliance. Overall, the implementation of the Recorder's Employment Plan and the Recorder's Policy and Procedures Manual continued to be difficult for this administration both pre

¹ On November 8, 2016, the electorate of Cook County voted in favor of a ballot referendum that CCRD shall be eliminated and all duties and responsibilities will be transferred to, and assumed by, the Office of the Cook County Clerk.



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and post the ongoing COVID-19 pandemic. Notably, compliance with the Employment Plan with respect to hiring remained a strength for CCRD with few missteps. While hiring was limited due to the assumption of duties occurring in 2020, the processes for filling both Exempt and Non-Exempt Positions were consistent and transparent. Additionally, throughout Recorder Moody's tenure, there were no findings of Unlawful Political Discrimination, a noteworthy accomplishment.

In addition to the policies found in the Employment Plan relating to employment actions, CCRD's Policy Procedures Manual extensively covered the office's functions. Updates to various sections of the Manual including Performance Management, Time and Attendance, and Discipline were met with delay multiple times during this administration. The delays stemmed from 1) the administration's inability to remedy implementation issues when they were discovered, and 2) prioritize amendments to policies when they were needed. The delays decreased opportunities to demonstrate systematic adherence to those policies. This explains CCRD's inability to enter the passive monitoring stage where the monitoring of employment actions by federal monitors lessens and shifts to internal mechanisms.

Failure to effectively update various policies lessened the opportunities for increased and meaningful training, areas that CCRD struggled with since 2017. Management staff's responsibilities were often unclear, they lacked the necessary tools and training, and this continued to be a source of widespread confusion. Due to these shortcomings, significant progress in the areas of Performance Management, Time and Attendance, and Discipline did not occur. These three policies, to be discussed individually below, were implemented inconsistently at times, and partially or completely abandoned at other times.

It must be noted that prior to the office reopening to employees on July 6, 2020, a proposal for amendments to several CCRD policies was made by way of an Executive Order which was circulated to me, the RCA, and Plaintiff's Counsel on June 30, 2020. Additionally, on July 1, 2020 a Return to Work Schedule was circulated. Both the Executive Order and the Return to Work Schedule were provided with little to no explanation and the RCA and I were effectively kept out of the deliberative process for months.² On July 2, 2020 I emailed the administration that I had compliance questions regarding both the Executive Order and the Return to Work Schedule. Additionally, the detailed processes found in the Employment Plan regarding amendments to CCRD's policies and subsequent training were not followed. This clearly illustrated the administration's lack of commitment to collaboration regarding operational employment actions while considering compliance implications prior to the decisions going into effect. After weeks of discussion and responses from myself and the RCA regarding deficiencies that played out after

² On July 2, 2020 I requested that the administration provide me with any and all drafts of the Executive Order that were circulated prior to the draft that I received on June 30, 2020. I received seven emails/email threads containing edits, comments and changes to the draft Executive Order which was first circulated to executive staff on May 27, 2020.



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the Executive Order went into effect in July 2020, the order was revised and recirculated on September 18, 2020.

As an update regarding the progress made to prioritized compliance items included in my last report, the following items will be discussed in detail later in this report:

- CCRD procured assistance in the HR Department by way of two contractors
- The implementation and enforcement of the Time and Attendance Policy improved but significant issues remained
- The implementation and enforcement of the Discipline Policy resumed but remained inconsistent³
- The Performance Management Policy was significantly reduced due to operational needs

Human Resources:

The former Chief of HR hired in 2017 resigned her position in July 2019. Additionally, two HR Generalists resigned; the first effective March 5, 2019, and the second effective February 14, 2020, and the Director of Human Resources resigned effective December 26, 2019. Overall, the former Chief of HR, both former HR Generalists during their separate tenures, and the former Director of HR achieved noteworthy progress towards substantial compliance by way of the finalization of office-wide Job Descriptions, transparent hiring, improvements in Time and Attendance compliance, and support for management staff regarding Performance Management and annual performance evaluations.

However, following the various resignations, HR, as a significant prong of CCRD's compliance efforts, never recovered from those personnel losses. The current Chief of HR began her tenure in September 2019 and acclimated for six months when her focus shifted to managing HR functions during a pandemic. The period following the office closure in March was met with significant challenges. The Chief of HR was unable to single-handedly provide both HR support for employees during an unprecedented time and assist in the three prioritized compliance items of Time and Attendance compliance, Performance Management, and Discipline. Her focus was managing basic, yet paramount, HR functions such as payroll, FMLA, ADA, and personnel records requests from employees.

CCRD ultimately procured assistance in the HR Department by way of two contractors in July 2020. However, the contractors' ability to assist with the myriad of issues CCRD faced was limited. While the Chief of HR continued to conduct HR functions herself, matters of compliance continued to suffer as too much time and energy were wasted attempting to reinvent the wheel

³ As previously reported, all discipline ceased during the office closure (March 23, 2020 to July 6, 2020) including outstanding discipline related to Time and Attendance and Performance Management violations dating back to 2019.



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regarding Time and Attendance. A Cook County Time (CCT) Dashboard was under development for weeks, a project I and the RCA did not even know was underway until it was to be presented to management staff. Ultimately, due to various reasons including technological difficulties, lack of training for Supervisory staff, and a lack of time to implement the tool, the dashboard was never used. CCRD would have benefitted from the contractors taking the time to understand the office's policies and the challenges faced by this administration. What HR needed was for the contractors to step into the roles of the vacant HR Generalist and HR Director. Failure to fill those voids led to the continuation of widespread non-compliance in Time and Attendance.

On a positive note, since mid-February 2020, the Chief of HR processed requests related to FMLA and ADA. As reported in the past, and as illustrated in DOC Investigative Report 20-003 to be discussed later in this report, since mid-February 2020 HR has processed these requests without incident.⁴ Also on a positive note, as required by Section 4.B of the Employment Plan, HR has continued posting on the Recorder's website quarterly reports of the total number of hires, Promotions, Transfers and Terminations by Division during the preceding three-month period. The most recent Quarterly Report was posted to the Recorder's website on October 5, 2020. There were no hiring sequences during the period of this report and due to the office closure, all CCRD Positions will cease to exist after November 30, 2020.

HR Employment Plan Violations Related to Working Within Job Descriptions:

There were two instance of Employment Plan non-compliance within the HR Department which occurred in 2020. Section IV.I of the Employment Plan requires that "Job Descriptions must be accurate and kept up-to-date." First, following the resignation of the Director of HR in December 2019, during an interview related to an investigation, the former HR Generalist informed me that she began working outside her Job Description in that she was managing and processing 2020 FMLA applications.⁵ The Essential Job Duties of administering CCRD employees' FMLA and managing the FMLA process (including receipt and review of FMLA applications, analysis of whether an employee meets the criteria for FMLA per CCRD policy, timely correspondence and clear direction to employees during the application period, approval or denial of applications) are listed in the Job Description for the Director of Human Resources. I informed the Chief of HR that the HR Generalist must cease all duties that are outside of her Job Description.

Second, on September 14, 2020, during a discussion related to a Time and Attendance compliance, I learned that the Executive Assistant to the Director of HR was also working outside of his Job Description in that he was adjusting employees' time cards and entering comments in

⁴ It must be noted that the form required by the accommodation policy was never drafted or utilized by CCRD.

⁵ The Job Description the HR Generalist was operating under was a draft version for a second HR Generalist from March 2019 which was never finalized. The Job Description for the position of which this HR Generalist was hired under did not contain any FMLA related duties.



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the CCT system.⁶ At some point in 2020 this Executive Assistant was granted higher level access to CCT allowing him to enter and edit information when he previously had read-only access. The Essential Job Duties of recording employee time accurately on employee timecards and assisting with the maintenance of the daily time swipe reports to ensure completeness and accuracy are listed in the Job Description for the HR Generalist.⁷ I informed the Chief of HR that the Executive Assistant could not and should not be performing duties related to entering or editing information in CCT.

One may contend that these two Employment Plan violations were a result of a short-staffed HR Department, but these instances cannot be overlooked or excused away. It is worth noting that there are mechanisms in place for allowances to be made in a more transparent way (e.g. a documented temporary assignment). The lack of planning and inability to follow available processes in the Employment Plan or procure assistance for HR for a prolonged period resulted in these blatant examples of disregard for the Plan.

Training following Job Description Updates:

The Supervisor of Microfilm Library and Tract and the Supervisor of Frontline Cashiering and Certified Copies Job Descriptions were finalized and provided to the employees in September 2020. Training was offered to both Supervisors. The Supervisor of Frontline Cashiering and Certified Copies training was completed in October 2020. The Supervisor of Microfilm Library and Tract expressed that he did not need to be trained in any areas of his amended Job Description. There was significant delay in finalizing these Job Descriptions, but I am happy to report that this matter was resolved.

Time and Attendance Compliance:

Since my last report, I continued to monitor and assist with CCRD's Time and Attendance compliance. Overall, this administration struggled to adhere to Time and Attendance policies both before the pandemic and during it for various reasons. The inability to recognize the inconsistencies of application and remedy those issues swiftly cost CCRD greatly. This administration repeatedly expressed the desire to shift the responsibility of monitoring employees' time and attendance to their direct supervisors. I fully support this position, but the office never came close. Management staff never received comprehensive CCT training, something that was discussed several times over the years.

Prior to the office reopening to employees on July 6, 2020, Time and Attendance policies were completely abandoned in that employees who worked remotely were not required to account for their time, nor were employees working at CCRD locations required to swipe in or out. It

⁶ The Director of HR position remained vacant following the resignation effective December 26, 2019.

⁷ The HR Generalist position remained vacant following the resignation effective February 14, 2020.



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remained unclear what tracking mechanisms were in place while all CCRD employees were in a paid status. The lack of communication regarding the expectations of employees caused a complete breakdown of transparency and accountability.

Following the office reopening on July 6, 2020, non-compliance with CCRD's swiping policies by employees followed by management's failure to counsel or discipline as required by the Discipline Policy continued. Improvements were made when, in October 2020, HR resumed providing notification to supervisors regarding violations ranging from unauthorized absences, unauthorized accruals of comp time, failure to follow call-in procedures, and missed swipes on two or more dates in a 30-day period. Unfortunately, some supervisors acted while others did not. As employees returned to work and continued to work remotely, HR's efforts in October were welcomed, but effectively too late. This directly illustrates that supervisors continued to fall short in ensuring compliance even when provided with direct information that violations occurred.

In addition to the issues that existed since my last report including the adequate completion of required authorization paperwork in a timely manner, there have been significant issues related to overtime. The policy requiring that supervisors maintain a spreadsheet of overtime to ensure equitable distribution never materialized. Without CCT training, supervisors lacked the tools to identify or track overtime and HR never initiated or implemented this component. Additionally, there have been significant concerns raised about the inability to accurately calculate and pay employees for overtime work. As the opportunities for earning overtime significantly increased in October and November 2020, the lack of tracking, combined with reported system errors, caused widespread confusion and panic. Since CCRD seems to be improving in this area, employees are urged to trust that they will be paid what they are owed upon the office closure on November 30, 2020. The administration acknowledging that this is a tall order during an extremely difficult time for employees set to lose their jobs would go far. As of the date of this report, discrepancies are still being reported regarding employees' checks as some employees have not yet been paid for overtime worked in October and November 2020. Employees, the RCA, and I have inquired about the status of these issues and while the administration states that they are working diligently with various departments within Cook County to rectify the discrepancies, there does not appear to be a clear direction on how to remedy these issues. Also, I have requested information from the administration regarding instructions to employees, so they know who to contact outside of CCRD if these issues are not resolved by November 30, 2020.

Performance Evaluations:

Since my last report, I continued to monitor CCRD's progress regarding implementation and compliance with the Performance Management Policy. For months, it remained unclear what consequences would follow for supervisors who failed to complete their evaluations in a timely manner or if at all. In April 2020, CCRD extended all deadlines for outstanding performance evaluations, pivoting from the administration's commitment expressed in March 2020. Following the office closure in March 2020, I continued to assist supervisors complete drafts of the many



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outstanding annual performance evaluations. With few exceptions, those finalized draft performance evaluations were never issued to employees. No communication regarding the importance of adhering to the policy caused a complete breakdown related to Performance Management.

The Performance Management Policy was amended and circulated on September 9, 2020. In the revised policy, the circumstances requiring evaluations were: a) for all new hires, every 30 days during the 90-day probationary period; b) for all employees placed in a different position after an RIF; and c) for all employees in a new position pursuant to a job posting. One employee was in her probationary period. Her Supervisor and Deputy Recorder completed the 30, 60, 90 Day Performance Evaluations thoughtfully and, for the most part, timely.

As a result of this administration's poor planning, the policy was effectively abandoned, arguably well before the suspension and ultimate removal of annual evaluations from the Performance Management Policy. Disappointingly, after years of painstaking commitment by few and inconsistent commitment by others, over 60 CCRD employees never received an annual performance evaluation.

Discipline:

Since my last report, I continued to monitor CCRD's implementation and compliance with the Discipline Policy. For months during the office closure, outstanding disciplinary matters were not completed. Following months of discussion, the Discipline Policy was amended and distributed to employees on September 18, 2020. As required by Section IV.F of the Employment Plan, written notification of the changes was emailed to all employees. Commendably, a detailed list was included in the communication as there would be no training related to the changes.

The Employment Plan required that I monitor all facets of the discipline processes, including monitoring Discipline Hearings and attending Level III Union Grievances. During this reporting period, I attended Pre-Disciplinary Hearings and I monitored the issuance of Incident Reports with few exceptions and continued to track counseling and progressive discipline.

CCRD continued to work through instances of inconsistencies in discipline, and many of those were never resolved. Ultimately, CCRD fell short of ensuring that discipline was administered when violations occurred and, in some instances, discipline was not administered consistently. Under this administration, in addition to instances of inconsistent discipline for Time and Attendance Violations dating back to 2019, including but not limited to ones documented in DOC Investigative Report 19-013, the following disciplinary items remained outstanding as of the date of this report:

- Supervisors who failed to timely issue Performance Evaluations in 2019 were never counseled or disciplined;



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- Supervisors who failed to initiate discipline as reported in DOC Investigative Report 20-001 were never counseled;
- In October 2020, two Supervisors and their respective Immediate Supervisors received notice of Time and Attendance violations for subordinate staff and no action was taken; and
- In October 2020, HR failed to provide notices of instances of violations of Unauthorized Absences and Call-In Violations until they were raised by the DOC.

Monitoring CCRD's compliance efforts regarding discipline remained difficult. Often, only after the RCA or I raised examples of disparities would this administration respond and rectify the issues. This administration failed to establish that proper tracking mechanisms were in place and substantial compliance related to Discipline was never achieved.

Training:

CCRD Employment Plan Training:

Section IV.F of the Employment Plan required that all employees receive training no later than 90 days following the beginning of employment and no less frequently than annually thereafter. The last office-wide training sessions occurred in April 2019. In violation of the Employment Plan, there was no training offered in 2020. Importantly, the Deputy Recorder of Communications, an Exempt Employee, hired effective June 12, 2020 never received Employment Plan training.

CCRD Policy and Procedures Manual Training:

As required by Sections IV.E & F of the Employment Plan, the last office-wide training sessions covering topic-specific portions of the CCRD Policy and Procedures Manual occurred in August 2019. In violation of the Employment Plan, there was no CCRD Policy and Procedures Manual training in 2020. Importantly, the Deputy Recorder of Communications, an Exempt Employee, hired effective June 12, 2020 never received Policy and Procedures Manual training.

DOC Investigations / Notices of Violation:

In accordance with Section IV.M of the Employment Plan, the following is a summary of the DOC's investigative activity during this reporting period (this includes DOC Investigations, Notices of Violation and Referrals):

Update RE Referral Summary Report 18-007 (issued on May 5, 2020):

The DOC referred this matter to the Director of Operations on October 19, 2018 who found that an employee violated the courtesy policy in place at the time of the incident and recommended



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that the employee receive discipline. An Incident Report was issued to the employee on November 16, 2018. Following the issuance of the Incident Report, the employee did not receive a Notice of Hearing and therefore was not effectively disciplined. As this matter dates back to 2018, disciplinary action for the employee was not possible due to untimeliness. Therefore, I recommended that, consistent with the training provided to CCRD management staff, whenever Labor Counsel receives an email or becomes aware of information involving Incident Reports, ongoing or outstanding discipline, he reviews the information, and ensures that matter is properly responded to and any requirements of the Plan and/or Manual are completed and in timely manner. Following a request for an extension, CCRD accepted my recommendations on June 5, 2020.

Notice of Violation (issued on July 7, 2020):

This Notice of Violation of the Policies and Procedures Manual was a result of the HR Department failing to provide written notification to an employee upon the conclusion of her Temporary Assignment as required by Section XV.C.5 of the CCRD Policy and Procedures Manual.

HR offered the employee an extension of the Temporary Assignment via email, which could only occur if the employee agreed. The employee did not respond and therefore, HR was required to terminate the Temporary Assignment and return the employee to her original position on March 30, 2020, or a reasonable time after. Instead, the paperwork terminating the employee's Temporary Assignment was not done until 84 days after the original end date of March 30, 2020. As a consequence of the delayed termination of the Temporary Assignment, the employee was contacted, in the capacity of her original position, to volunteer to work at the downtown office prior to receiving notification that her Temporary Assignment in a different position had ended.

I reiterated my 2019 recommendation (which CCRD previously accepted in April 2019) that upon HRD's approval of a Temporary Assignment, an HRD Employee be assigned to track the applicable dates and be responsible for all required written notification. While the policy does not state that the Chief of HRD is specifically required to perform this duty, it requires completion by HRD. As the only HR professional employed at CCRD since February 2020, the Chief of HR was responsible for this duty. CCRD accepted my recommendations on September 8, 2020.

DOC Investigative Report 20-003 (issued on September 29, 2020):

This investigation involved an allegation by a Database Management Employee that the former Director of HR failed to respond to the employee's 2019 FMLA requests. Based on the interviews conducted and the documents which were reviewed, this allegation was sustained as several matters related to the employee's two 2019 FMLA certifications were never resolved and one 2019 FMLA certification was received and utterly ignored. The former Director of HR failed to perform her essential job duties as listed in her Job Description and failed to satisfy the requirements of Section IV.C.5.d of the Manual three separate times regarding this employee. I



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recommended, considering the that the subject of the investigation was no longer employed by CCRD, that CCRD acknowledge that in 2019 the former Director of HR violated Section VI.C.5.d of the CCRD Policy and Procedures Manual with regards to the Database Management Employee, and ensure that proper remedies continue regarding the timely processing of employees' requests for FMLA. CCRD accepted my recommendations on October 14, 2020.

DOC Referral 20-002:

This investigation involved an allegation of Violence in the Workplace and was referred to Labor Counsel on March 20, 2020. Due to the office closure and significant delay in interviewing the subject employee due to a medical leave, this investigation was not concluded. The subject employee retired effective October 31, 2020.

Other Investigations:

As of the date of this report, a handful of matters were in review at various stages. Unfortunately, my review and investigation of these matters were not concluded nor was it determined if these matters should have resulted in Investigations, Notices of Violation, or Referrals. These matters included:

- A potential Courtesy Policy violation involving a Frontline Cashier and a Plat and Declaration Review Employee;
- Video surveillance unsubstantiated a claim that an employee was unfairly disciplined for an unauthorized absence;
- A potential violation of the office's technology policy as a Frontline Cashier alleged that she was instructed to use another employee's password; and
- Two employee relations complaints from a Database Management Employee who often retracted her statements or failed to provide additional information.

Relations / Conclusion:

The transition CCRD is facing, combined with the pandemic, has taken its toll on employees. It is disappointing that there has not been more clarity as the impending office closure will greatly impact the lives of all employees. I continued to offer my support, guidance, and assistance whenever and however I could. Because developments regarding the assumption of duties were not widely known to CCRD employees, this caused confusion and panic for several Non-Exempt/Union CCRD staff.

I am proud to report that during my tenure at CCRD, I worked well with CCRD Employees, the RCA, and the OIIG. While my interactions with the Recorder and his administration were limited in 2020, I appreciated Recorder Moody's consistent message that compliance was a priority to him. The actions of his administration, however, were not consistent with that message



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in 2020. Failing to follow the processes in place found in both the Employment Plan and the Policy and Procedures Manual both before and during the pandemic resulted in little to no compliance progress.

Yes, CCRD faced unprecedented times as did the rest of the world. Yet, time after time, opportunities were missed, especially during the months that the office was closed where significant compliance progress could have been made. Longstanding compliance items remained in 2020, new and alarming ones arose, and the trust of the employees dwindled. CCRD failed to embrace the commitment of compliance as an ideal which requires buy-in and cooperation from all parties. I commend this administration for having no substantiated claims of Unlawful Political Discrimination. However, without evidence of consistent enforcement of their policies, something that worsened in 2020, it remains unclear whether UPD occurred. As illustrated in each of my reports from 2017 to date, CCRD's policies were never consistently enforced while some were not enforced at all. Even with regards to the policies CCRD committed to continue enforcing, improvements were needed, and inconsistencies occurred.

It was my pleasure to serve as CCRD's Director of Compliance. I enjoyed working with the staff and supporting the office in any way that I could. From my perspective as the DOC, I offer to any agency embarking on the path to substantial compliance that the road is long, and the work is difficult, but the reward is worth attaining. While CCRD did not get to substantial compliance, great strides were achieved through the finalization of office-wide Job Descriptions, office-wide training on the Plan and the Manual, and the embarking of the performance management process. Employees were comforted knowing that someone internally was looking into compliance matters and was accessible and accountable to them.

I recommend that other offices strengthen their HR Departments, embrace the role of an independent Director of Compliance, provide their DOC with enough resources to be impactful, enforce their policies consistently and transparently, and most importantly conduct all employment actions while avoiding unlawful political discrimination.

Sincerely,

/s/ Alexis L. Serio

Alexis L. Serio

Director of Compliance

Cook County Recorder of Deeds

Cc: Matt Pryor, Counsel to the Recorder Compliance Administrator