

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

<b>MICHAEL L. SHAKMAN, <i>et al.</i>,</b>	)	
	)	<b>Case No. 69 C 2145</b>
<b>Plaintiffs,</b>	)	
	)	<b>Hon. Edmond E. Chang</b>
<b>v.</b>	)	<b>District Judge</b>
	)	
<b>COOK COUNTY ASSESSOR, <i>et al.</i></b>	)	<b>Hon. Gabriel A. Fuentes</b>
	)	<b>Magistrate Judge</b>
	)	
<b>Defendants.</b>	)	

**SEVENTEENTH REPORT OF THE ASSESSOR  
COMPLIANCE ADMINISTRATOR FOR THE COOK COUNTY ASSESSOR**

Susan G. Feibus, Assessor Compliance Administrator for the Cook County Assessor (“ACA”), by her attorney, Matthew D. Pryor, pursuant to Section III(C) of the September 19, 2012 Agreed Order for the Cook County Assessor’s Office (“AO”), Doc. No. 3007, submits the ACA’s Seventeenth Report to the Court:

**I. INTRODUCTION**

On August 17, 2020, the ACA filed the Sixteenth Report to the Court (“Sixteenth Report”). This was her tenth report since her January 26, 2016 appointment (effective February 1, 2016). This Seventeenth Report is to update the Court as to the Assessor’s progress towards Substantial Compliance with the September 19, 2012 Agreed Order (“Agreed Order”) since the Sixteenth Report.

As the Agreed Order puts it, Substantial Compliance requires:

1. a New Employment Plan, including procedures to ensure compliance with the New Employment Plan and identify instances of non-compliance;
2. the Assessor must act in good faith to remedy instances of non-compliance that have been identified and prevent a recurrence;

3. the Assessor must not have a policy, custom or practice of making employment decisions based on political factors except for Exempt Positions;
4. the absence of material noncompliance which frustrates the Assessor's Consent Decrees<sup>1</sup> and this Agreed Order's essential purpose; and
5. the Assessor must implement procedures that will affect long-term prevention of the use of impermissible political considerations in connection with employment with the Assessor.

Doc. No. 3007 at 18.

Significant progress has been made towards Substantial Compliance since the Sixteenth Report:

- The Employment Plan has been revised.
- The Employee Handbook, including the Shakman-related policies, has been revised.
- The AO conducted the mandatory annual Employee Handbook training and, while there were issues, it is done.
- The AO commenced annual performance evaluations – for the first time in at least ten years.
- The AO's hiring continues to be largely Employment Plan compliant.

This progress towards Substantial Compliance was the result of hard work by the AO, Plaintiffs, DOC and ACA. This progress was facilitated by the improved communication and collaboration since the Deputy Assessor assumed the role of Shakman Liaison.

Challenges remain. The AO must demonstrate the ability to effectively implement the revised Shakman-related policies. Human Resources must demonstrate that it can fulfill the Assessor's Office's obligations under the Employment Plan and the Shakman-related policies in

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<sup>1</sup> The "Assessor's Consent Decrees" refer to the combination of (a) a 1972 Consent Decree which, *inter alia*, prohibited the Assessor from taking any action regarding governmental employment against any governmental employee based on political reasons or factors; and (b) a 1995 Consent Decree which incorporated the 1972 Consent Decree's prohibitions and extended those prohibitions to the Assessor's hiring practices, with certain exclusions. *See* Doc. No. 3007 at 5.

the Employee Handbook. But with continued hard work, communication and collaboration, the ACA expects the AO to meet these challenges. She remains a partner in the endeavor.

## **II. OVERVIEW OF THE ACA'S ACTIONS SINCE THE AUGUST 17, 2020 SIXTEENTH REPORT**

The ACA and her staff remain actively engaged with the AO, Plaintiffs and the DOC in the AO's efforts to achieve Substantial Compliance. In summary, the ACA's activities since the Sixteenth Report included:

- reviewed, monitored and provided regular feedback regarding many Employment Actions;
- provided feedback regarding AO training materials and monitored many training sessions;
- reviewed and monitored the Assessor's hiring under the Exempt hiring process;
- provided significant input into and monitoring of the Assessor's hiring under the Actively-Recruited hiring process;
- provided significant input into and monitoring of the Assessor's hiring under the General Hiring process;
- provided significant input and comments regarding the AO's proposed revisions to various Exempt and non-Exempt Position Descriptions;
- met and conferred with counsel for Plaintiffs on a regular basis;
- met and conferred with the Director of Compliance ("DOC") on a regular basis;
- provided significant revisions to the Employment Plan and Exhibits;
- provided significant revisions to the Employee Handbook and Forms;
- provided detailed feedback to the AO regarding issues attendant to its efforts to implement Shakman-related policies, particularly the Time and Attendance, Discipline, Performance Improvement Plan and Performance Evaluation policies;
- reviewed and commented on the new hire Employment Plan training presented by the DOC;
- conducted desk audits of various AO employees; and

- conducted exit interviews of various AO employees.

### **III. THE ASSESSOR'S PROGRESS TOWARDS SUBSTANTIAL COMPLIANCE**

#### **A. The Employment Plan**

##### **1. The Employment Plan Has Been Revised**

Section II(D) of the Agreed Order requires the creation and implementation of an Employment Plan as a pre-condition to Substantial Compliance. Agreed Order at III(F)(8)(1). The AO, Plaintiffs and ACA negotiated revisions to the Employment Plan since shortly after Assessor Kaegi took office in December 2018. The process came to a close on September 4, 2020, when the Court entered an order approving a revised Employment Plan.

#### **B. Assessment of the Assessor's Hiring Practices**

A significant component of the Employment Plan relates to its five separate hiring processes: (1) Exempt; (2) Actively Recruited; (3) General Hiring; (4) DOC; and (5) Executive Assistant. Substantial Compliance requires a demonstrated ability by the AO to hire in compliance with these schemes. Since the Sixteenth Report, the AO has hired employees under the Exempt, Actively Recruited and General Hiring processes:

##### **1. Exempt Hiring**

Per the amended Exempt List entered by the Court on October 28, 2020, the AO has 31 Exempt positions.

The AO filled seven positions through the Exempt hiring process since the Sixteenth Report:

- Director of Legal: October 1, 2020 date of hire
- Senior Legal Counsel: October 1, 2020 date of hire
- Legal Counsel: October 1, 2020 date of hire

- Director of Data Analytics: October 13, 2020 date of hire
- Director of Operations and Budget: October 26, 2020 date of hire
- Legal Counsel: November 16, 2020 date of hire
- Director of Special Projects – Valuations: November 16, 2020 date of hire

These hires were conducted in accordance with the Employment Plan.

Three Exempt positions currently are vacant:

- Legal Counsel: vacant since October 1, 2020
- Special Assistant (reporting to Deputy Assessor): vacant since October 26, 2020
- Legislative Coordinator: new position

## **2. Non-Exempt Hiring: Actively Recruited Hiring**

The AO filled two positions through the Actively Recruited hiring process since the Sixteenth Report:

- Manager of Commercial Valuations: offer pending
- Manager of Special Properties: offer pending

As these hiring sequences are not completed, the ACA will provide feedback in the next report.

Hiring for the Manager of Divisions position under the Actively Recruited hiring process is underway.

## **3. Non-Exempt Hiring: General Hiring Process**

The AO filled four positions through the General hiring process since the Sixteenth Report:

- Taxpayer Information Specialist (three vacancies): September 28, 2020 date of hires
- Assistant Manager of Data Collection f/k/a Commercial Field: September 28, 2020 date of hire
- Residential Field Inspector (four vacancies): October 26, 2020 date of hires

- Industrial Commercial (“IC”) Field Inspector (five vacancies): October 26, 2020 date of hires

While the hiring for these positions generally was Employment Plan compliant, the issues repeatedly identified by the ACA (and conveyed to the AO through feedback) include:

- Interview Panelists’ failure to ask follow-up questions, which the Employment Plan encourages. The DOC also has mentioned the almost total lack of follow-up questions in his periodic reports to the Assessor.
- Human Resources’ failure to put all required documents into the Posting File.
- Human Resources failure to make clear what documents (*e.g.*, school transcripts, driver’s licenses) must be provided by Candidates prior to interviews and failure to enforce those requirements. This has resulted in certain otherwise-qualified Candidates being allowed to interview while others have been disqualified.

Hiring is underway for six positions under the General Hiring Process: (1) Residential Junior Analyst (three vacancies); (2) Industrial Commercial Junior Analyst (four vacancies); (3) Manager of Records Management; (4) Industrial Commercial Valuations Group Leader; (5) Residential Group Leader; and (6) Manager of Data Collection.

#### **4. New Non-Exempt Position**

The AO has proposed the new position of Manager of Computer Assisted Mass Appraisal. Discussions are ongoing between the parties, DOC and ACA regarding the minimum qualifications for this position.

#### **C. The Employee Handbook Has Been Revised**

To implement and ensure compliance with the Employment Plan, Substantial Compliance requires employment policies and procedures (“Shakman-related policies”) and the ability to identify instances of non-compliance with these policies. Agreed Order at II(D), III(F)(8)(1). The Employment Plan requires the Shakman-related policies to be included in the AO’s Employee

Handbook,<sup>2</sup> which is to be revised and maintained by HR and distributed to all employees. *See* Section IV.B.

While an Employee Handbook was in effect when Assessor Kaegi took office in December 2018, negotiations between the parties and the ACA regarding revisions to the Shakman-related policies have been ongoing since. This resulted in a revised Employee Handbook in September 2019. Negotiations continued and a revised Employee Handbook, including Shakman-related policies, was issued on November 16, 2020. While efficacy must be tested through use, the Shakman-related policies were given a great deal of thought, based on the nearly two years' of experience with these policies.

**1. Mandatory Annual All Employee Handbook Training Was Conducted on November 17 and 19, 2020**

Section IV(F) of the Employment Plan requires the Director of Human Resources or Designee, in conjunction with the Chief Administrative Officer (“CAO”), Director of Training and the DOC, to conduct annual “comprehensive, mandatory training of all Employees to ensure that they are aware of and knowledgeable about...the Employee Handbook.” This training was conducted on November 17 and 19, 2020.<sup>3</sup>

Despite the ACA's requests for a preview of the Employee Handbook training before it was finalized, and no indication that would not be provided, the CAO sent an agenda and a lengthy training deck to the ACA on Thursday, November 12, 2020 at 6:15 p.m. for training to begin on

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<sup>2</sup> The AO's Employee Handbook includes the Shakman-related policies and other personnel policies that are not required by the Employment Plan. The AO's Shakman-related policies are Reclassification; Performance Evaluation; Overtime; Layoff and Recall; Interim Assignment; Temporary Assignment; Training; Performance Improvement Plan; Time and Attendance; and Discipline.

<sup>3</sup> Human Resources/DOC last conducted this mandatory annual Employee Handbook training in September 2019. As the Employee Handbook was in the process of revisions, training was conducted after the revised Employee Handbook was issued.

the morning of Tuesday, November 17, 2020. The agenda indicated that the total duration of training time was 95 minutes.

Plaintiffs, the ACA, DOC and AO spent most of Friday, November 13, 2020, on the content and duration of the training, which the AO agreed to extend. It was apparent that the ACA could not reasonably be expected to provide substantive comments on the lengthy training deck in what effectively was one business day.

The ACA's take-aways from the live online training sessions, which her monitors observed, include:

- The training lasted approximately three hours and, even at that, certain sections were rushed.
- Many participants did not have their cameras on and the number diminished as the training went on; one employee was called on and did not respond. This raises questions about the AO's inability to ensure that its employees were actively engaged – or even watching.
- The Time and Attendance policy training, presented by the Director of Human Resources, was misleading in that the slides and the Director of Human Resources' comments repeatedly referred to "best practice" and what supervisors "should" do – where the policy is clear that the conduct is required.
- The Time and Attendance policy training was not comprehensive and focused only on policy revisions; this resulted in a failure to outline clear expectations for employees in the various policy areas (and we fear left them more confused than when they started).
- The Director of Human Resources barely discussed several policies: Overtime and Compensatory Time (3 minutes); Interim Assignment and Interim Pay (4 minutes); Temporary Assignments (5 minutes); Reclassification (3 minutes); Layoff and Recall (3 minutes). That employees gleaned much, if anything, from these presentations seems doubtful.
- The Standards of Conduct section, presented by the Director of Human Resources, appropriately covered all, not just the three new, standards.
- The Performance Evaluation and Performance Improvement Plan training, presented by the DOC, was comprehensive as it focused on the policies as wholes and was not limited to policy revisions.



- The Performance Evaluation and Performance Improvement Plan training was well presented; employees were engaged as the DOC often paused to allow for questions to which he provided direct and thorough answers.
- The Director of Human Resources and the DOC used hypotheticals, which can be useful; usefulness was diminished when the Director of Human Resources provided an incorrect response to one of his hypotheticals, which the Chief Legal Counsel corrected.
- The Training policy training, presented by the Director of Training, was not effective: she could not share her screen, which resulted in slides not being presented; the slides were not visually engaging; her presentation focused on her duties under the Training policy, not the employees'; her delivery was choppy; she did not look at the camera; and she could not effectively answer employee questions.
- The AO did not seek employee feedback about the session as evaluation forms were not part of the training; this deprived the AO of useful information about the training's efficacy.

**2. Mandatory Annual Supervisory Employee Handbook Was Conducted on December 11 and 14, 2020**

Section IV(E) of the Employment Plan requires the Director of Human Resources or Designee, in conjunction with the CAO, Director of Training and the DOC, to conduct annual “comprehensive, mandatory training for all Supervisors to ensure that they are aware of and knowledgeable about...the Employee Handbook.” This training was conducted on December 11 and 14, 2020. As this training is being presented as the ACA writes this report, comments will be provided in the next report.

**D. Assessment of AO's Implementation of Shakman-related Policies**

While promulgating Shakman-related policies is a necessary step towards Substantial Compliance, it is not sufficient. Substantial Compliance requires consistent and effective policy implementation. Agreed Order at III(F)(8)(1).

The ACA's prior reports have commented on AO Shakman-related policy implementation and noncompliance based on the ACA's monitoring of all AO employment actions regarding

Shakman-related policies. The ACA also gives the AO regular written feedback on policy implementation issues.

Given that the new Employee Handbook is less than a month old, it seems reasonable to reset and allow the AO the opportunity to demonstrate its ability to comply (or not) with the revised Shakman-related policies.

The ACA will comment on the Performance Evaluation policy as the parties and the ACA agreed to a revised policy on September 2, 2020 and the AO began conducting the annual performance evaluations on September 3, 2020.

The ACA monitored the first tranche of 35 annual Performance Evaluations between September 3, 2020 and October 19, 2020. The second tranche began on December 2, 2020 and will be reviewed in the next report. Overall, these performance evaluations were more policy-compliant than the 90-day and 180-day performance evaluations discussed in the Fifteenth and Sixteenth Reports.

The ACA's take-aways from these performance evaluations include:

- Only two of the 35 Performance Evaluations monitored were conducted in compliance with every provision of the policy.
- Section 2 of the policy states: "The objective of the Assessor's Office is the continual improvement in the performance of each employee." One objective of the Performance Evaluation process is "to develop an employee's goals and objectives for future growth." Supervisors did not always allow enough time during the Performance Evaluation Meetings for employees to provide comments and ask questions. Additionally, several employees asked how they could improve their performance during their Performance Evaluation Meetings. Their Supervisors did not always have answers for them – instead using phrases like, "Just keep doing what you are doing." By not providing enough time for employees to ask questions and not providing satisfactory answers to employee questions, Supervisors are failing to meet the stated objectives of the policy.
- Section 3.1 of the Policy requires the Performance Evaluation Form to have a written explanation for all scores provided for each category. Of the 35 Performance Evaluations reviewed, 28 were compliant and seven were non-compliant.

- Section 3.5 of the policy requires the ACA and DOC to be copied on every email that a Supervisor exchanges with his/her Immediate Supervisor concerning the drafting of the evaluation. Approximately ten Supervisors did not copy the ACA and DOC until the last email sent, which precluded the ACA and DOC from monitoring whether the Form was revised throughout the process.
- Section 4 of the policy requires Supervisors to provide written notice to their employees of a Performance Evaluation Meeting no later than close of business the day prior to the Meeting. The ACA was not always copied on this correspondence which precluded the ability to monitor compliance with this provision.
- Section 4 of the policy requires Supervisors to provide the ACA and DOC with copies of the supervisor-signed Performance Evaluation Forms in advance of the Performance Evaluation Meeting so they have enough time to provide feedback and, if necessary, the Forms can be corrected in advance of the Performance Evaluation Meeting. That did not happen approximately 14 times.
- Section 5 of the policy requires HR to provide the ACA with copies of the final, employee-signed Performance Evaluation Forms. Of the 35 annual Performance Evaluations monitored, the ACA initially received only 24 employee-signed Forms.
- It seemed that a Taxpayer Services Supervisor was acting as the CAO's designee for most of the Taxpayer Services Performance Evaluations. If so, this was not always clear from the Performance Evaluation Forms. The role of each Supervisor in an employee's chain of command should be clear from the Form – *e.g.*, a Director acting as the Deputy's Designee should sign the Form on the Deputy signature line.

The AO will have the opportunity to demonstrate increased compliance through the remaining annual performance evaluations, as well those required for new employees at 90-day and 180-day intervals. But initiating these annual reviews was a significant accomplishment as this these are the AO's first in at least ten years.

#### **F. Assessment of the Director of Compliance**

In the Fifteenth and Sixteenth Reports, the ACA commented on the DOC's job performance pursuant to Section V(D) of the Employment Plan ("the ACA may monitor any and all aspects of the DOC's job performance"). The DOC's essential job duties are described in Section V(A) of the Employment Plan and the DOC position description. Since an effective DOC

is integral to achieving Substantial Compliance, the ACA includes an assessment based on the DOC's assigned duties and her interactions and observations.

The DOC seems to be taking a more active role in counseling the AO on Shakman compliance issues. He has taken a particular interest in performance management as he presented that portion of the Employee Handbook training and has been providing useful counsel to managers regarding performance evaluations and Performance Improvement Plans ("PIPs"). He recently conducted the required Employment Plan training for new employees. The ACA continues to encourage the DOC to identify Shakman issues and to be proactive in offering solutions.

While the Sixteenth Report expressed concern that the AO was not including the DOC in initiatives with Shakman implications, the ACA is unaware of such exclusion since the Sixteenth Report. The ACA understands that the DOC has regular meetings with Assessor and Senior Staff and this access is important.

Equally important is serious consideration of the DOC's counsel. The DOC issued a report in February 2020, based on an extensive investigation, which found significant potential abuse of sick time by AO employees. The Assessor's September 14, 2020 response was inconclusive about taking measures to address the identified issues. The DOC also issued an Investigation and Recommendation Report on August 14, 2020, regarding an inappropriate 180-day self-evaluation by an AO Manager, and recommended that the employees involved receive counseling as to the importance of the performance management process, particularly as it relates to Shakman compliance, and the Director of Human Resources receive counseling as to the language of the Employment Plan that commits the Office to complying with the spirit and law of the Plan and

Agreed Order.<sup>4</sup> The Assessor did not adopt those recommendations.

The AO has recognized that the DOC needs assistance to effectively be responsible for Shakman compliance and has indicated that a Compliance Analyst position, to be filled under the Actively Recruited hiring process, will be posted in January 2020. This new position should give the DOC the means to begin assuming primary responsibility for monitoring – starting with hiring - subject to determining the specifics of how that will be accomplished and how feedback will be given. This would be a first step towards ACA passive monitoring.

**G. Assessment of the Human Resources Function**

Section III.I of the Employment Plan requires the Assessor to “maintain an HR staff of experienced and knowledgeable professionals...[who] will be responsible for fulfilling the Assessor’s Office’s obligations under this Employment Plan and the Employee Handbook.” The ACA’s prior reports have expressed concern about the AO’s Human Resources staff’s ability to fulfill these obligations. Those concerns continue.

The CAO ultimately is responsible for the Human Resources function. Also responsible are: (1) the Director of Human Resources, who reports to the CAO; (2) two Senior Human Resources Generalists and one Human Resources Generalist, who report to the Director of Human Resources; and (3) the Director of Training, who, along with others, is responsible for Employment Plan-mandated training, and reports to the CAO.

First, the CAO hardly is involved with Shakman compliance. She was designated the Shakman Liaison following her March 2020 hiring but never performed in that capacity. This gave rise to communication from multiple AO sources, which was untenable and in derogation of the Agreed Order. As indicated above, the Deputy Assessor has assumed the Shakman Liaison

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<sup>4</sup> The August 14, 2020 DOC report was referenced in the Sixteenth Report at pp. 12 - 13 and 19 - 20.

role. While that has improved the communication issue, the CAO has no apparent responsibility for and little involvement with Shakman compliance. To the ACA's knowledge, the CAO was not involved in the revisions to the Employment Plan and her only involvement with the revisions to the Shakman-related policies was the Performance Evaluation policy.

Second, while the Director of Human Resources is involved in Shakman compliance, the ACA has raised concerns about his understanding and/or willingness to embrace the AO's obligations under the Employment Plan and the Employee Handbook, beginning with the October 2019 Fourteenth Report, which was two months after he was hired. The Director of Human Resources appears to be less involved with Shakman compliance since the Deputy Assessor assumed the Shakman Liaison role. But that does not eliminate the ACA's concern about the Director of Human Resources' willingness to disregard the spirit, if not the language, of the Employment Plan and the Shakman-related policies.

The ACA's continuing concern is not without basis. The Director of Human Resources' training on the Time and Attendance policy at the annual Handbook training – where he repeatedly instructed Supervisors that it is the “best practice” or they “should” do something where the policy is clear that the conduct is required - reasonably creates doubt that he accepts the AO's obligations under that policy.

In the hiring realm, although one of the Candidates for the TPI Specialist positions did not provide proof of his educational degree before the interview, as required by the position's Notice of Job Opportunity, Human Resources allowed him to be interviewed.<sup>5</sup> Following the interview, the DOC expressed his view to the Director of Human Resources that the Candidate should have

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<sup>5</sup> As noted above, Human Resources repeatedly has failed to make clear what documents (*e.g.*, school transcripts, driver's licenses) must be provided by Candidates prior to interviews and failure to enforce those requirements. This has resulted in certain otherwise-qualified Candidates being allowed to interview while others have been disqualified. *See*, p. 6, *infra*.

been disqualified. (The ACA concurred with the DOC's analysis.) While the Director of Human Resources acknowledged the Employment Plan required disqualification, he claimed the discretion to permit the interview based on Human Resources' email to the Candidates (which was inconsistent with the Employment Plan) that said they "may" be disqualified if they do not provide the required documentation prior to the interview. The Director of Human Resources' claim contravenes the Employment Plan, which expressly disqualifies Candidates who do not submit required documentation within the timeframe required by the Notice of Job Opportunity. This attempt to use an erroneous email to manufacture discretion for himself – that the Employment Plan does not confer – was another instance where the Director of Human Resources ignored both the letter and spirit of the Employment Plan.

Third, the ACA has questions about the Director of Training's ability to carry out her responsibilities required for the AO to fulfill its obligations under this Employment Plan and the Employee Handbook. The ACA conducted a desk audit of the Director of Training on July 24, 2020, because of observed performance issues. The desk audit showed that Director of Training was not performing 10 of the 17 (Director-level) Essential Job Duties in her position description, including creating training content, and that she spends the bulk of her time on administrative tasks. The results of the ACA's desk audit are consistent with the ACA's assessment of her participation in the annual Handbook training, discussed above. *See p. 9, infra.*

The ACA provided the AO with feedback on the Director of Training's desk audit on September 22, 2020. Based on the results of the Director of Training's annual performance evaluation, which has not been scheduled, the ACA will conduct another desk audit, if appropriate, and provide further feedback to the AO.

**IV. THE ACA'S ACTIVITIES AS (FORMER) INTERIM DOC SINCE THE SIXTEENTH REPORT**

On December 4, 2018, the Court appointed the ACA to simultaneously serve as the Interim DOC as a result of the DOC's resignation. The ACA held that post until April 29, 2019, when the new DOC's AO employment began.

On April 25, 2019, in the role of Interim DOC, the ACA issued an Investigation and Recommendation Report raising improprieties regarding the hiring of the Executive Assistant to the Chief Deputy Assessor. On June 24, 2019, the Assessor provided a response challenging the report's findings and recommendations. On December 10, 2020, the ACA, in her role of former Interim DOC, issued a supplemental Investigation and Recommendation Report. Based on the supplemental report, the ACA/former Interim DOC presumes the matter is closed, subject to any response by the Assessor.

**V. RECOMMENDATIONS**

As has been her practice, the ACA makes the following recommendations:

- A. Recommendation No. 1** – The Court should encourage the AO to take all possible actions to facilitate compliance with Shakman-related policies, including additional training, if necessary, even if not required by the Employment Plan.
- B. Recommendation No. 2** – The Court should encourage the AO to assess its Human Resources personnel for its ability to be responsible for fulfilling the Assessor's Office's obligations under the Employment Plan and Shakman-related policies in the Employee Handbook.

Dated: December 15, 2020

Respectfully submitted,  
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**CERTIFICATE OF ELECTRONIC FILING**

I, Matthew D. Pryor, the undersigned, do hereby certify that on December 15, 2020, I electronically filed a true and correct copy of the foregoing **Seventeenth Report of the Assessor Compliance Administrator for the Cook County Assessor** using the CM/ECF system, which sends notification of such filing to all registered users.

/s/ Matthew D. Pryor  
Counsel to the ACA