

2/7/2020
2/12/2020

28-O-20

AN ORDINANCE

Amending Portions of City Code Sections to Remove the Requirement for Business Licenses and Implement a Business Registration Program

WHEREAS, the City of Evanston ("City"), as a home rule unit of local government as provided by Article VII, Section 6 of the Illinois Constitution of 1970 has the authority to exercise any power and perform any function pertaining to its government and affairs except as limited by Article VII, Section 6 of the Illinois Constitution of 1970; and

WHEREAS, a home rule unit may exercise any power and perform any function pertaining to its government and affairs for the protection of the public health, safety, morals and welfare, and

WHEREAS, the registration of all businesses operating within the City is a ministerial act which is necessary for the health, safety and welfare of the residents of the City; and

WHEREAS, it is necessary to obtain certain information from all businesses operating in the City to provide an effective mechanism for the City to communicate with businesses, particularly, to assist the City's Police and Fire departments in responding to accidents, natural disasters, criminal activity and other emergencies; and

WHEREAS, the registration of all businesses within the City will allow the City to create a master list of businesses operating in the City which list will serve to

benefit various businesses within the community, consumers, and potential businesses looking to locate within the community; and

WHEREAS, the registration of all businesses operating within the City will assist the City's Community Development Department with ensuring appropriate land use as called for in the City's Zoning Code and to ensure the City's building safety codes are properly followed and enforced to protect property values and the health and welfare of the City's resident; and

WHEREAS, the establishment of the registration program proposed will help to further the City Council's economic development goals by enabling the City to track the health of the business climate in the City and to measure the impact of the City's various economic development initiatives and the City's efforts to support entrepreneurship; and.

WHEREAS, the business registration program created by this Ordinance will be a centralized data gathering system that will capture pertinent data elements, determined important by city staff, that will be accessible by city personnel, when necessary for the provision of city services;

NOW BE IT ORDAINED BY THE CITY COUNCIL OF THE CITY OF EVANSTON, COOK COUNTY, ILLINOIS:

SECTION 1: City Code Title 3, Chapter 1, "General Business Registration Provision" of the Evanston City Code of 2012, as amended, is hereby further amended to read as follows:

CHAPTER 1 - GENERAL BUSINESS REGISTRATION PROVISIONS
SECTION:

3-1-1. - ISSUANCE OF REGISTRATION.

Unless otherwise provided in this Code or other applicable laws, all registration shall be approved by the City Manager or his/her designee issued by the Community Development Department. In all cases where it is not otherwise expressly provided, the Community Development Director shall have the power to hear and grant applications for said registration upon the terms specified in any of the provisions of this Code or other ordinances of the City.

3-1-2. - COMPLIANCE WITH LAWS REQUIRED.

All registration shall be subject to the provisions of this Code, other ordinances of the City, the regulations of the City Council and the statutes of the State, which may be in force at the time of the issuance thereof or during the period covered by such registration. If any person so registered shall violate any of such provisions, he/she shall be fined or may have his/her registration suspended or revoked.

Registration shall only be issued to persons who comply in all respects with the provisions of this Code and other ordinances of the City, and who are suitable and proper persons to be registered. All registrations shall be subject to the City of Evanston's Home Rule powers.

3-1-3. -REGISTRATION PROVISIONS.

- (A) *Proof of Registration.* Registration certification will be provided in electronic format as a receipt upon payment of the business registration fee and shall be made available for review upon request.
- (B) *Duration.* Expiration: No registration shall be granted at any time for a longer period than one year.

3-1-4. - PAYMENT OF FEE; PRORATION; REBATE; LATE PAYMENT PENALTY.

- (A) *Payment of Fee.* Each and every registration authorized or required by provision of this Code or other ordinance of the City and granted by the City Manager shall be issued by the Community Development Department upon payment to the City Collector of the prescribed registration fee or tax.
- (B) *Proration of Fee.* The fee to be paid for any registration which shall expire less than six (6) months from the date such registration was required to be issued, shall be one-half (½) the annual fee provided by this Code.
- (C) *Rebate or Refund of Fees.* In no event shall any rebate or refund be made of any registration fee or permit fee or any part thereof.
- (D) *Late Payment Penalty.* Failure to pay the annual renewal fee on any business registration within six (6) weeks of registration expiration shall result in an additional late charge of ten percent (10%).

3-1-5. - TRANSFER OF REGISTRATION; FEE.

Except as specifically provided for otherwise, any person to whom a registration has been issued under any provision of this Code or other ordinance of the City may, with

the written consent of the City Manager or his/her designee, assign and transfer the same to any other person, and the person to whom such registration shall have been so transferred shall thereupon surrender such registration and a new registration, covering the unexpired term of such old registration, shall thereupon be issued to such assignee; provided, that in all cases the party applying for such new registration shall give a bond, with good and sufficient sureties, in like sum and to be approved in like manner as the bond given by such original registrant. The fee for transferring a registration shall be fifty dollars (\$50.00) to be paid to the City Collector for the use of the City.

3-1-6. - BUSINESS REGISTRATION REVOCATION.

Unless otherwise specifically provided, a business registration issued pursuant to the provisions of this Code may be revoked for cause, and the premises or operation may be closed, after an opportunity for the registrant to be heard in his/her own defense has been given. Charges shall be investigated and brought before the City Manager or his/her designee at public hearing. The findings and decisions of the hearing officer shall be transmitted to the registrant and enforcement of such decision shall be undertaken. The Corporation Counsel may adopt and publish rules of procedure for such hearings. The City may revoke a registration for cause upon a preponderance of the evidence standard.

SECTION 2: City Code Title 3, Chapter 5, Section 2, "Registration Required; Application" of the Evanston City Code of 2012, as amended, is hereby further amended to read as follows:

3-5-2. - REGISTRATION REQUIRED; APPLICATION.

No person shall manage, conduct, operate or carry on a public place of amusement without first having obtained a license therefore.

The application for a license for the business of managing, conducting, operating or carrying on a public place of amusement shall conform to the provisions of this Code relating to applications for food establishment business license and/or a liquor license. Such application shall specify the location of the building or place in which it is proposed to keep such public place of amusement and the seating capacity of such building or other place. Every such application shall be approved by the Director of Community Development and the Public Health Director, or their designees, before a license shall be issued.

SECTION 3: City Code Title 3, Chapter 6, "Theaters, Shows and Exhibitions" of the Evanston City Code of 2012, as amended, is hereby further amended to read as follows:

CHAPTER 6 - THEATERS SHOWS AND EXHIBITIONS

3-6-1. - CLASSIFICATIONS.

Theaters, shows and exhibitions. For the purpose of providing for the registering and taxing of theatricals, shows, amusements and all public exhibitions offered, operated, presented or exhibited for gain or for admission to which the public is required to pay a fee, the same are hereby divided into three (3) classes, which shall be known as the first, second and third classes as follows:

First class: All entertainments of a theatrical, dramatic, variety or spectacular character; all concerts or other musical entertainments; all exhibitions of natural or artificial curiosities, mechanical toy exhibitions or miniature engineering demonstrations where a charge is made for the privilege of operating such article.

Second class: All exhibitions of motion pictures or cinematography and all automatic picture devices or other similar devices.

Third class: Circuses, menageries, caravans, concerts or musical entertainments given under a covering of canvas; automobile shows; all exhibitions and displays of fireworks, exhibits or contests of balloons or aeronautic devices.

3-6-2. - BUSINESS REGISTRATION REQUIRED; APPLICATION

It shall be unlawful for any person to give, conduct, produce, present or offer any of the entertainments mentioned in this Chapter for gain without a business registration for that purpose first had and obtained. For entertainment given by citizens of the City, not engaged in the giving of such entertainments as a business nor for personal gain or entertainment, the proceeds of which are for the benefit of any charitable object, no fee shall be required to be paid for such license registration.

Any person desiring to produce, present, conduct, operate or offer for gain or profit any of the classes of entertainment described in Section 3-6-1 at any place within the City shall make application for a business registration Community Development, in writing, setting out the full name and address of the applicant, if an individual, and if a corporation the full name and residence of its principal officers. Such application shall contain a description of the place where it is intended to produce, present, conduct, operate or offer such entertainment and a description of the kind and class of entertainment.

3-6-3. - PREREQUISITES TO ISSUANCE OF BUSINESS REGISTRATION

(A). Examination of Applicant's Place. Upon application being made for a business registration to register a business, as provided in the preceding Section, the City Manager or his/her designee shall make or cause to be made an examination of the applicant's premises, and if all of the provisions of this Code and other ordinances of the City relating to the giving of entertainments and the location, construction and maintenance of the premises or building where such entertainments are given are complied with, the City Manager or his/her

designee shall cause to be issued a business registration to such applicant, which registration shall entitle the Registered Business to conduct, produce, present, operate or offer the class of entertainment specified in Section 3-6-1 at the premises designated in the application and for the period of time specified in such application, upon the payment of the business registration.

- (B). *Approval of City Manager; Grounds for Refusal of Business Registration.* If the premises or building at which it is desired to offer any of the entertainments described in Section 3-6-1 hereof be not a fit or proper place and not constructed, maintained, operated or conducted in accordance with the provisions of this Code and other ordinances of the City governing and controlling such places, or if the granting of the business registration would, in the sole discretion of the City Manager or his/her designee, be contrary to the public health, safety or general welfare, such application may be denied. No business registration shall be issued by the Community Development Department except with the prior approval of the City Manager or his/her designee.

3-6-4. - BUSINESS REGISTRATION FEES.

The fee to be charged for a business registration to produce, present, conduct, operate or offer any of the classes of entertainment mentioned in this Chapter shall be as follows:

First Class	\$125.00 per year
Second Class	\$50.00 per year
Third Class	
For each circus or circus and menagerie	\$63.00 per day
For each concert or musical entertainment	\$25.00 per day
For each concert or musical entertainment	\$25.00 per day
For each automobile show	\$25.00 per day
For other entertainments, exhibits or performances	\$25.00 per day

Where any entertainments embrace two (2) or more of the classes specified herein, such entertainments shall be classified and charged for as wholly belonging to that class for which the highest business registration fee is fixed.

3-6-5. - BUSINESS REGISTRATION CONDITIONS AND RESTRICTIONS

- (A). *Posting business registration.* Every business registration issued under the provisions of this Chapter shall at all times during the life thereof be made available for review. Registration certification will be provided in electronic format as a receipt upon payment of the business registration fee. Posting is not required.
- (B). *Owner or Lessee to Preserve Order.* It shall be the responsibility of the owner or lessee of every registered theater, hall or other building, being in control thereof, to keep and preserve good order in and about the premises.
- (C). *Hours of Operation.* The premises wherein the business registered licensed by this Chapter is conducted, shall close and business therein shall cease between the hours of one o'clock (1:00) A.M. and seven o'clock (7:00) A.M.

3-6-6. - FAILURE TO OBTAIN BUSINESS REGISTRATION.

It shall be the duty of every proprietor or lessee of any theater, hall or other building, where public entertainments are given, who shall not have taken out a business registration as provided for in this Chapter before he/she permits any person to use the same for the purpose of giving any entertainment therein for gain, to obtain the business registration herein required either in his/her own name, or in the name of the person proposing to give such entertainment.

SECTION 4: City Code Title 3, Chapter 13, "Secondhand, Junk, and Antique Dealers" of the Evanston City Code of 2012, as amended, is hereby further amended to read as follows:

RESERVED.

SECTION 5: City Code Title 3, Chapter 15, "Dry Cleaning Establishments" of the Evanston City Code of 2012, as amended, is hereby further amended to read as follows:

CHAPTER 15 - DRY CLEANING ESTABLISHMENTS

RESERVED.

SECTION 6: City Code Title 3, Chapter 21, of the Evanston City Code of 2012, as amended, is hereby further amended to read as follows:

RESERVED.

SECTION 7: City Code Title 3, Chapter 27, "General Business License of the Evanston" City Code of 2012, as amended, is hereby further amended to read as follows:

CHAPTER 27 - GENERAL BUSINESS REGISTRATION

3-27-1. - DEFINITIONS.

The following definitions apply to this Chapter:

BUSINESS.	Any individual or entity "doing," "conducting," "engaging in," "maintaining," "operating," "carrying on" or "managing" a business, occupation or for-profit activity, such terms or one or more of such terms, shall include any person who holds himself/herself forth as being engaged in the business, occupation or activity, or who solicits patronage therefor, either actively or passively or who performs or attempts to perform any part of such business, occupation or activity in the City; and the omission of one or more of these terms shall not be deemed to exclude the activities described by the other terms where such activities are in fact carried on by such person. The term business shall not include any of the following:
	(A) An entity which is exempt from income taxation under Section 501 of the Internal Revenue Code.
	(B) An entity which does not maintain a place of business in a building within the City, except for the following which shall be registered: pickup and delivery of laundry or dry cleaning at dwelling units, garbage or refuse pickup
	(C) A governmental unit.
	(D) A public utility or cable television company which is subject to regulation by the Federal Communications Commission or the Illinois Commerce Commission and which operates in the City pursuant to a franchise agreement with the City.
OWNER.	Any individual, firm, association, partnership, corporation, trust or any other legal entity having sufficient proprietary interest in any establishment to maintain and manage its operation.
PERSON.	Any individual, partnership, corporation, or entity.
POP UP RETAILERS	"Pop-up retail user" means any merchant who occupies or leases for ninety (90) days or less a fixed indoor or outdoor retail space in the City of Evanston for the sale of merchandise or provision of services, unless otherwise allowed and regulated in Section 6-4-8-3 of this Title.

3-27-2.- BUSINESS REGISTRATION REQUIRED.

All businesses as defined herein for which a business registration is not otherwise required under any other provisions of this Code shall be required to register their business. A separate business registration shall be required for each separate place of business. Businesses that have a liquor license pursuant to Chapter 4 of this Title, or a cigarette and tobacco product license pursuant to Chapter 14 of this Title, must also register their business.

3-27-3.-APPLICATION.

An application for a general business registration shall be made in writing under oath to the City on a form prescribed by the Director of Community Development. Each application shall contain the following information and such other information as may be required to determine whether the business registration should be granted.

- (A). The name, residential address, and phone number, and email address of the applicant, who shall be the principal owner in the case of a noncorporate entity or the president in the case of a corporate entity.
- (B). The name of the company/business and the address(es) of the permanent place(s) of business within the City covered by the application, or, if there are no permanent places within the City, the address of the permanent place or location most closely involved with the business or activity covered by the application.
- (C). The name, phone, and email address of business manager or primary business contact.
- (D). A description of the business for which the license is requested.
- (E). Minority Women Evanston Business Enterprise (MWEBE) status
- (F). Total number of employees

3-27-4. - BUSINESS REGISTRATION.

The Community Development Director may issue a general business registration pursuant this Chapter if the application is in proper form, the use is compliant with zoning regulations, and the appropriate business registration fee is paid in advance. All new businesses must undergo a Fire Life Safety inspection in order to complete the registration process, unless a certificate of occupancy is issued. The inspection is administered by the City of Evanston Fire Department staff. The Community Development Director may also issue a conditional business registration when an investigation or inspection discloses a condition which must be corrected, provided that the applicant has provided satisfactory assurance that the condition will be corrected within a reasonable time, and the conduct of the business or activity pending the correction of the condition will not endanger the public health, safety or welfare.

3-27-5.-TERM OF BUSINESS REGISTRATION RENEWAL.

All business registrations issued pursuant to this Chapter shall expire on December 31 following the date of issuance. General business registrations may be renewed upon payment of the required fees at least six (6) weeks prior to the expiration of the license business registration; however, the failure of any business registered under this Chapter to comply with any provisions of this Chapter, or with any applicable provision of local, state, or federal law, may constitute grounds for nonrenewal of the business registration, in the sole discretion of the City Manager or his/her designee.

3-27-6.-LICENSE REGISTRATION FEES.**(A). General Fee**

1.Home Based Businesses	\$0.00	Per Year
2.Evanston-based businesses	\$50.00	Per Year
3. Contractors and others not maintaining a place of business within the City	\$50.00	Per Year
4. Pop Up Retailers	\$25 per location	Per 90 day period
5. Fire Life Safety Inspection	\$150.00	As required ¹

¹ Required for all new businesses unless a Certificate of Occupancy is issued

(B). *Proration Of Fees.* The fee to be paid for any business registration which shall expire less than six (6) months from the date such registration business registration was required to be issued, shall be one-half (½) the annual fee provided by this Section.

(C). *Late Payment Penalty.* Failure to pay the annual renewal fee on any business registration within six (6) weeks of business registration expiration shall result in an additional late charge of ten percent (10%).

3-27-7.-REGULATIONS.

(A). No business registration shall be assigned, sold or transferred, nor shall any business registration authorize any person other than the applicant to conduct business under such business registration.

(B). The applicant or business registration shall have a duty to notify the City Collector Community Development Director of any changes in the information contained in an application which is pending or which was the basis for the issuance of business registration.

(C). Registration certification will be provided in electronic format as a receipt upon payment of the business registration fee and shall be made available for review.

- (D). No person shall add to, alter, deface, forge or counterfeit any registration which has been issued by the City.
- (E). All registered businesses shall comply with all applicable City, State and federal laws. Failure to do so may result in the revocation or nonrenewal of a general the business registration as provided herein.

3-27-8.-SUSPENSION AND REVOCATION.

In addition to any other penalty which may be authorized by this Chapter or other City ordinances, the Finance Director, City Manager or his/her designee may suspend, revoke or decline to renew any general business registration issued pursuant to this Chapter for.

- (A). Failure to comply with any provisions of this Chapter and any applicable provisions of the City Code;
- (B). Failure to comply with any applicable state and federal laws;
- (C). Failure to allow a required inspection.

Suspension or revocation shall occur in accordance with the rules and procedures promulgated by the City Manager or his/her designee and available from the City upon request.

3-27-9.-SUMMARY SUSPENSION.

Where the Finance Director, City Manager is presented with sufficient evidence demonstrating probable cause to believe that the business registration holders has violated the provisions of applicable provision of local, state, or federal law, and the City Manager has a reasonable belief that said violation immediately threatens the public health, safety, or welfare, the City Manager may, without prior notice or hearing, issue a written order, including the reasons therefore, closing the registered premises and summarily suspending the general business registration pending a public hearing and final determination on suspension or revocation. Said hearing shall be commenced not more than seven (7) days following entry of such an order, unless the business registration holders shall agree to a longer period of time. Upon entry of an order of summary suspension, the business registration holders shall be served with a copy of the order and notice of violation and hearing in the manner provided in this Chapter.

3-27-10.-NOTICE OF HEARING.

Prior to suspension or revocation of a general business registration, other than by summary suspension pursuant to Section 3-27-9, the business registration holders shall be served with written notice of the nature of the violations. Such notice shall also advise the business registration holders that a public hearing will be provided if the business registration holders files a written request for such a hearing with Finance Director, City Manager within ten (10) days of service. If a written request is filed within ten (10) days, a hearing date shall be set within ten (10) days of receipt of the request. If

no written request for a hearing is filed within ten (10) days, the suspension or revocation is sustained without further action.

3-27-11.-HEARINGS.

Public hearings pertaining to the suspension or revocation of a general business registration shall occur in accordance with the rules and procedures promulgated by the City Manager or his/her designee and available from the City upon request Finance Director. The Finance Director, City Manager or his/her designee shall make a final decision in writing, including the reasons for such decision, and shall serve said decision on the business registration no more than ten (10) days after conclusion of the hearing.

- (A). Any person who violates or fails to perform any duty imposed by this Chapter may be fined not less than five hundred dollars (\$500.00). A separate offense shall be deemed committed for each day that a violation occurs.
- (B). The Finance Director, City Manager or his/her designee may seek to enjoin violations of this Chapter.

SECTION 8: City Code Title 4, Chapter 2, Section 3, "Building Contractors" of the Evanston City Code of 2012, as amended, is hereby further amended to read as follows:

- (A) *Definition.* The term "building contractor" means any person, individual, company, or corporation engaged in the business of constructing, enlarging, altering, removing, or remodeling any structure including constructing, maintaining, repairing or installing landscape systems by furnishing of labor, material, and methods necessary to accomplish a given result, and who retains for himself/herself the control of the means, method, and manner of accomplishing this desired result.
- (B) *Registration Required.* Any person engaged in the business of building contractor within the City for which a building permit is required must register with the Community Development Department. Any person engaged in the business of constructing, maintaining, repairing or installing landscape systems is required to register with the Community Development Department.

Registration must be submitted on forms available from the City and must include the following information:

1. Contractor's name;
2. Business name;
3. Business address;
4. Business telephone;
5. Business email address
6. Federal Employer Identification Number (FEIN);
7. Whether the business is a sole proprietorship, partnership or corporation, and registered agent, if applicable;
8. Whether the contractor is required to be licensed by the State of Illinois, a copy of the current license number and an original certificate of insurance as detailed in this Section;
9. Electrical contractors must be licensed by an accredited licensure commission, a copy of the current license with the license number, and an original certificate of insurance as detailed in this Section;
10. An original certificate of insurance or policy declaration documenting that the contractor carries general liability insurance with a minimum of three hundred thousand dollars (\$300,000.00) per occurrence, bodily injury insurance with a minimum of one hundred thousand dollars (\$100,000.00) per occurrence, property damage insurance with a minimum of one hundred thousand dollars (\$100,000.00) per occurrence and workers' compensation insurance at the statutory minimum amounts.

Exceptions:

- a. Sole proprietorships and partnerships with no employees are exempt from the workers' compensation insurance requirement with submission of an affidavit.
- b. Contractors required to maintain insurance as part of their State licensure must provide proof of insurance in forms and amounts required by State law.
- c. Contractors who are engaged to perform work in the public right-of-way must carry general liability insurance with a minimum of one million dollars

(\$1,000,000.00) per occurrence and name the City of Evanston as an additional insured.

- (C) *Registration Fee.* The amount of the annual registration fee for persons engaged in the business of building contractor shall be established from time to time by action of the City Council.
- (D) *Renewal of Registration.* Registration is valid for one (1) year from the date of issuance. Registration may be renewed based upon an application for renewal and the payment of the annual registration fee. The City Manager or his/her designee is authorized to review a renewal request in the same manner as the initial application.
- (E) *Amended Registration.* Registered individuals must notify the Community Development Department within twenty (20) business days of any change in the registration information by filing an amended registration statement on a form provided by the Community Development Department for such purpose. There is no additional fee for filing an amended registration.
- (F) *Suspension or Revocation of Registration.*
1. If any person shall violate any of the provisions of this Chapter or the Code adopted hereby, he/she shall be liable to be prosecuted against for any fine or penalty imposed thereto and his/her registration may be suspended or revoked by the City Manager.
 2. No such registration shall be so revoked or suspended except after a hearing by the City Manager or his/her designee with a three (3) business day notice to the registered person affording the registered person an opportunity to appear and defend. The notice shall specify the reason for the contemplated suspension or revocation and shall give the date, time, and room number in the civic center of the hearing. Notice shall be sufficient if sent to the address stated on the registered person's application.
 3. If the Building Official certifies to the City Manager that he/she has reason to believe that immediate suspension of the registration is necessary to prevent the threat of immediate harm to the community, the City Manager may, upon the issuance of a written order stating the reason for such conclusion and without notice or hearing, order the registration suspended for not more than seven (7) days. The City Manager may extend the suspension during the pendency of a hearing upon a written determination that doing so is necessary to prevent the aforesaid harm to the community.
 4. Hearings shall be conducted in accordance with procedures on file with the City Clerk.

5. The City Manager shall issue his/her decision within ten (10) business days after the close of the hearing. In reaching a decision, the City Manager may consider any of the following:
 - a. The nature of the violation.
 - b. The nature and extent of the harm caused by the licensee's action or failure to act.
 - c. The factual situation and circumstances surrounding the violation.
 - d. Whether or not the action or failure to act was willful.
 - e. The record of the registered person with respect to violations.
6. The City Manager may suspend a registration for a period of up to ninety (90) days. A registered person whose registration has been revoked shall not be eligible to reapply for a registration until the expiration of one (1) year after the effective date of the revocation.

SECTION 9: All ordinances or parts of ordinances in conflict herewith are hereby repealed.

SECTION 10: If any provision of this Ordinance 28-O-20 or application thereof to any person or circumstance is held unconstitutional or otherwise invalid, such invalidity shall not affect other provisions or applications of this Ordinance that can be given effect without the invalid application or provision, and each invalid application of this Ordinance is severable.

SECTION 11: Ordinance 28-O-20 shall be in full force and effect after its passage and approval.


SECTION 12: The findings and recitals contained herein are declared to be prima facie evidence of the law of the City and shall be received in evidence as provided by the Illinois Compiled Statutes and the courts of the State of Illinois.

Introduced: February 24, 2020


Adopted: March 9, 2020

Approved:

March 13, 2020

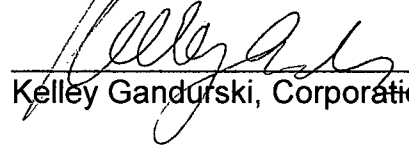

Stephen H. Hagerty, Mayor

Attest:



Devon Reid, City Clerk

Approved as to form:



Kelley Gandurski, Corporation Counsel