STATE OF ILLINOIS
PPB
PROCUREMENT POLICY BOARD

Chairman: David Vaught
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October 25, 2013

Fred Hahn
Chief Procurement Officer
Capital Development Board
377C Stratton Office Building
Springfield, Illinois 62706

COPY

Re: 50-35 Potential Conflict of Interest, SQBS29

Dear Mr. Fred Hahn,

In accordance with the requirements of Section 50-35 of the Illinois Procurement Code, I have reviewed your request received October 25, 2013 and understand the facts to be as follows:

1) The Capital Development Board has issued a request for a review and comment on potential conflicts of interest disclosed by Asaturian Eaton & Associates.

2) The contract pertains to the sub-contractor to the prime A&E (FGM) for the design and construction administration of University housing residence halls.

3) Asaturian Eaton & Associates was selected using contractor sub-contractor agreement.

4) The disclosure form submitted on behalf of Asaturian Eaton & Associates indicates the following:

   a. Asaturian Eaton & Associates P.C. identified owner Robert Eaton as having 35% interest in the vendor. Mr. Eaton identified his son, John R. Eaton, as being employed by the Illinois Department of Transportation as an Engineering Tech with an annual salary under $100,000.

5) The Capital Development Board confirmed that none of the disclosed individuals were in a position to influence the award of this contract. The Capital Development Board and CPO Fred Hahn indicate that it would be in the best interest of the State to approve this conflict of interest due to the using agency's needs and the value of the contract.

Based on the foregoing, you are requesting my review and comment pursuant to the Illinois Procurement Code.

Review and Comment

After careful review of the documentation provided, I do not view the relationships disclosed above as creating a conflict of interest sufficient to preclude the Capital Development Board from entering into a contract with Asaturian Eaton & Associates for the services outlined in your letter received October 25, 2013.

Sincerely,

Aaron Carter
Executive Director

Cc: EEC General Counsel

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