



Chairman: Jay Stewart  
Members: Ed Bedore, Ricardo Morales, Larry Ivory, Bill Black

June 16, 2015

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

Re: 50-35 Potential Conflict of Interest, 039-150-174

Dear Mr. Hahn,

In accordance with the requirements of Section 50-35 of the Illinois Procurement Code, I have reviewed your request received June 16, 2015 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 prime vendor P.H. Broughton & Sons, Inc.
- 2) The contract pertains to construction related services.
- 3) The vendor was selected via competitive sealed bids.
- 4) The disclosure form submitted on behalf of the vendor indicates the following:
  - a. Jennifer Broughton, daughter of John R. Broughton, 48.64% owner, is employed with the Illinois Department of Transportation as a Technical Manager IV. She has been with IDOT since 2008 and does not make more than \$106,447.20.
  - b. Sarah E. Shike, daughter of Wm. Perry Broughton, 47.42% owner, is employed by Western Illinois University as a Management & Marketing Instructor. She has been teaching at Western Illinois University since 2005 and does not make more than \$106,447.20.
- 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 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 the above-named vendor.

Sincerely,

Will Blount  
Executive Director

Cc: EEC General Counsel