



City of Chicago  
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Board of Ethics

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Chicago, Illinois 60610  
(312) 744-9660  
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September 29, 1992

C O N F I D E N T I A L

[REDACTED]

Re: Case No. 92036.Q

Dear Mr. [REDACTED]:

In a letter dated [REDACTED], 1992, you stated that you are a shareholder of a sales representative firm that is attempting to obtain a City contract on behalf of the company the firm represents. You also stated that your firm has designated you as the person to deal with the City of Chicago. You requested a copy of the opinion, from case no. 90058.A, which we have enclosed for your review. That opinion addresses the issue of whether employees or consultants hired by a company to market and sell its products and services to the City must register as lobbyists with the Board of Ethics. In that case, the Board determined "that sales and marketing efforts directed towards efforts in connection with the award of a City contract do not in themselves constitute lobbying." Therefore, the Ethics Ordinance does not require persons to register as lobbyists with the Board of Ethics for engaging in such activity.

Given the limited information you provided about the sales firm and the work you are doing on behalf of that company, it is impossible for us to determine whether this opinion indicates that you do not have to register as a lobbyist for that work.

Please be advised that:

An advisory opinion rendered by the Board may be relied upon by (1) any person involved in the specific transaction or activity with respect to which such advisory opinion is rendered, and (2) any person involved in any specific transaction or activity which is indistinguishable in all its material aspects from the transaction or activity with respect to which such advisory opinion is rendered.

City of Chicago Board of Ethics Rules and Regulations, 3-4.

EMUS

Note: This case was superseded by 2000 amendments to § 2-156-010(P)



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If the enclosed opinion does not provide you with adequate guidance as to whether you are required to register as a lobbyist or if you have any other questions, please feel free to contact me.

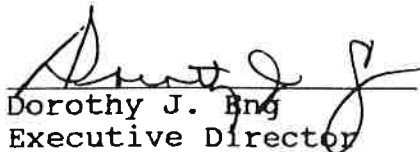
We appreciate your willingness to uphold the ethical standards embodied in the Governmental Ethics Ordinance. I have enclosed a copy of the Ordinance for your convenience.

Sincerely,



Ellen M. W. Sewell  
Legal Counsel

Approved by:



Dorothy J. Eng  
Executive Director

Enclosure

cc: Kelly Welsh, Corporation Counsel