

MTM

February 24, 2000

CONFIDENTIAL

Mr. [John Smith]

[Title]

[Department of X]

[Address]

Chicago, IL 60602

Re: Case No. 00005.Q

Dear Mr. [Smith]:

On February 7, 2000, you sent this office (by fax) a copy of a letter dated January 28, 2000 that you received from [Mr. R.], the Chairman and Chief Executive Officer of the Federal [Agency]. Mr. R's letter invites you to serve as a member of [Agency's] 2000-2001 National Advisory Council, and you asked whether the City's Governmental Ethics Ordinance would prohibit you from so serving. According to Mr. R's letter, the Council comprises leaders in the housing industry, including the CEO's of mortgage firms, banks, thrifts, and other housing industry leaders, who are asked to advise [Agency] from their own expertise and insight. Members serve a two year term; the Council meets three times per year at [Agency's] home office in Washington, D.C. Each meeting convenes on a Monday afternoon at 4:00 p.m., and concludes at 2:30 on the following day. Members are not compensated for their service, but [Agency] reimburses members for their hotel, food and airfare expenses.

Board staff orally advised you of its advice and conclusion, and you have requested written verification of our counsel. Pursuant to your request, we are sending this letter as confirmation of our earlier advice and conclusion. Based on the facts indicated in this and Mr. R's letters, staff has concluded that the City's Governmental Ethics Ordinance does not prohibit you from serving as a [Agency] National Advisory Council member and accepting reimbursement for your travel expenses. However, we also have advised you that, to help you to avoid even the appearance of any conflict of interest or impropriety, you recuse yourself from participating in any situation or decision-while acting either as a [Agency] Council member or [in your official City position] that involves transactions or programs directly between [Agency] and the City of Chicago.

Staff's conclusion is based solely on the application of the City's Governmental Ethics Ordinance to facts presented, and other laws, rules, regulations or policies may apply to this situation. If any of the facts in this letter are

MTM

Case No. 00005.Q
February 24, 2000
Page 2

incomplete or inaccurate, please inform us, as any change could alter the conclusion.

We appreciate your inquiry and concern to abide by the standards embodied in the Governmental Ethics Ordinance. Please do not hesitate to contact us if you have any further questions.

Very truly yours,
[Signed]

Dorothy J. Eng
Executive Director

20005Q-red.wpdFebruary 24, 2000 (12:15PM)