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June 6, 2001

CONFIDENTIAL

VIA FAX AND FIRST CLASS MAIL

City of Chicago  
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Michael F. Quirk  
Joseph E. Samson

Suite 500  
740 North Sedgwick Street  
Chicago, Illinois 60610  
(312) 744-9660  
(312) 744-2793 (FAX)  
(312) 744-5996 (TTY)  
<http://www.ci.chi.il.us>

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Re: Case No. 01024.Q  
Travel - [Alpha Seminar]

Dear [John]:

This letter is in response to your request of June 1, 2001 for a letter from the Board of Ethics on the issue of whether you, as [supervisor ] of the [department's Bureau X ], may accept an offer from [Alpha ] to pay your expenses (airfare, one night's lodging and meals) to attend a [seminar ] on June 14 and 15, 2001 at [Alpha's ] Research Center in [ ]. The seminar topics relate to the latest technologies in [ ] and [ ], and will include a "night demonstration," as well as a "hands-on [ ] demonstration" of [Alpha] products.

In your conversation with staff, you said that although [Alpha] is not a vendor to [Bureau X ], [Alpha] is a vendor to [Bureau Y ], and that, as [supervisor of the Bureau X ], you may have occasion to specify the use of [Alpha] products in joint projects with [Bureau Y ]. You also said that, in your department's opinion, attendance at the seminar would assist you in carrying out your City responsibilities as [supervisor of Bureau X].

Based on the information you provided, it is Board staff's opinion that nothing in the Ethics Ordinance prohibits you from accepting [Alpha's] offer, as long as neither [Alpha's] offer, nor your acceptance, is based upon any mutual understanding that your City decisions or actions concerning [Alpha] would be influenced by the offer, and as long as the expenses accepted are reasonable and reasonably related to the purposes and functioning of the seminar, and serve to benefit the City, rather than benefit you personally.

Staff's conclusion is consistent with past Board cases, in which manufacturers and suppliers have provided expenses of travel and accommodations for City employees to attend educational seminars and demonstrations relating to



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advances in technology in the products the companies offer, and the department has said that attendance at the seminars will assist it in carrying out its City responsibilities. (*See, e.g.*, Case Nos. 98039.Q, 97014.Q, 96020.Q, 94010.Q and 91075.Q.)

Staff's opinion is not necessarily dispositive of all issues relevant to this situation, but it is based solely on the application of the City's Governmental Ethics Ordinance to the facts stated in this opinion. If the facts stated are incorrect or incomplete, please notify the Board immediately, as any change may alter our determination. Other laws or rules also may apply to this situation. Be advised that City departments have the authority to adopt and enforce rules of conduct that may be more restrictive than the limitations imposed by the Ethics Ordinance.

We appreciate your sensitivity to the standards embodied in the Ethics Ordinance and your willingness to comply with them. If you have any further questions, please do not hesitate to contact us.

Very truly yours,

[Signature]

Mary Rose D. Silva  
Attorney/Investigator

Approved:

[Signature]

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Dorothy J. Eng  
Executive Director