

MEH



August 14, 1987

City of Chicago
Harold Washington, Mayor

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Board of Ethics
Harriet McCullough
Executive Director

Robert C. Howard
Chair

Case Number 87058.Q

Janet Malone Morrow
Vice-Chair

CONFIDENTIAL

Sol Brandzel
Rev. Harry Gibson
Nola Hicks
Vennie Lyons
Beatrice Pizana

Dear [REDACTED]

Suite 1320
205 West Randolph Street
Chicago, Illinois 60606
(312) 744-9660

I am writing you this letter to confirm the decision of the Board of Ethics regarding your request for an advisory opinion. As you know, we have reviewed your request for an advisory opinion to determine whether the Governmental Ethics Ordinance (Chapter 26.2 of the Chicago Municipal Code) will prohibit you from accepting an invitation to participate in an inaugural flight to [REDACTED] Country X by Co. A.

This offer to pay your airfare to Country X is a "gift" as defined by Section 26.2-1(k) of the Ethics Ordinance. Accordingly, this case is governed by Section 26.2-4 of the Ethics Ordinance, entitled "offering, receiving and soliciting gifts, favors".

Section 26.2-4(c) prohibits City officials from accepting anything of value from persons who have an economic interest in a specific City business, service or regulatory transaction involving the City. In so far as Co. A ~~Business~~ maintains an interest in City business by virtue of their contractual agreement with your departments, you will be prohibited from accepting this trip in accordance with Section 26.2-4(c) (attached).

For your information, please note that Section 26.2(d) of the Ordinance prescribes several circumstances under which the acceptance of gifts will be deemed appropriate. Specifically, Section 26.2-4(d)(iv) states that "any reasonable hosting, including travel expenses, entertainment, meals or refreshments furnished in connection with public events, appearances or ceremonies reasonably related to official City business" will be deemed an appropriate gift. This exception to the general



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prohibition against City employees accepting gifts from individuals with an interest in City business is not applicable in your case since the invitation which you received from Co. A is not furnished in connection with a public event and is not in any way related to City business.

If you have any questions regarding this or any other matter, please contact the Board at 744-9560.

Sincerely,

Judith Scully
Judith A.M. Scully
Deputy Director

JS/jh-██████████