

MEH



City of Chicago
Harold Washington, Mayor

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Suite 1320
205 West Randolph Street
Chicago, Illinois 60606
(312) 744-9662

February 23, 1987

[REDACTED]

CONFIDENTIAL

CASE NO. 87008.A

Dear [REDACTED]

The Board of Ethics has reviewed your request for an advisory opinion and has determined that Executive Order 86-1 does not prohibit your participation in the decision making process regarding the [REDACTED] project.

In reaching this conclusion the Board considered Sections 4 & 9 of the Executive Order in light of (1) your husband's limited partnership interest in a J subsidiary and (2) your acceptance of a \$500 campaign contribution from an executive at J Company.

Although J is a principal in the [REDACTED] project, the Board has determined that neither your husband's limited partnership interest in J nor your acceptance of a \$500 campaign contribution from J constitute an "interest" which would require you to excuse yourself from casting a vote in regards to the [REDACTED] project.

It is the opinion of the Board that since the subsidiary of J in which your husband maintains a limited partnership interest is not in anyway involved in the [REDACTED] project, no apparent conflict on interest exists in this instance. Futhermore the Board has concluded that an "interest" as defined by Section 2 (k) if the Executive Order does not include within its definition Campaign contributions.





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Carl Shier

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Thus, the Board has determined that no

violation of the Executive Order would exist if you participated in the vote regarding the [REDACTED] project. Since your case does not present a conflict of interest situation, the Board can not advise you to refrain from voting. We do however, wish to emphasize that we are concerned with the appearance of impropriety despite the fact the no actual impropriety may have occurred.

Sincerely,

Janet Malone-Morrow
Janet Malone-Morrow
Vice Chair