

MEH



August 5, 1987

City of Chicago
Harold Washington, Mayor

Board of Ethics
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Executive Director

Robert C. Howard
Chair

Janet Malone Morrow
Vice-Chair

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

[REDACTED]

Case Number 87049.Q

CONFIDENTIAL

Dear [REDACTED]

The Board of Ethics has received 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 attend a seminar in [REDACTED] from [REDACTED]

through [REDACTED]. The purpose of this seminar is to inform public finance officials and corporate representatives of the sale and distribution of state and local government securities in offshore (i.e., international) markets.

It is the understanding of the Board of Ethics staff that: (a) the seminar is co-sponsored by the A & B [REDACTED] and the [REDACTED]; and (b) A & B [REDACTED] have offered to pay for all seminar related expenses, if you attend the seminar.

The acceptance of this invitation is governed by Section 26.2-4 of the Ethics Ordinance (attached). Although this section prohibits City officials and employees from accepting gifts in exchange for favorable treatment regarding City business, it also prescribes several circumstances under which the acceptance of gifts will be deemed appropriate. Pertinent to this case is Section 26.2-4(d)(iv) which allows employees to accept an invitation which involves "reasonable hosting, including travel and expenses, entertainment, meals or refreshments furnished in connection with public events, appearances or ceremonies related to official City business, if furnished by the sponsor of such public event".



After reviewing the facts of this case, the Board of Ethics staff has concluded that you may accept the [REDACTED] invitation to pay for your expenses connected to the seminar which will be held in [REDACTED]

This conclusion is based on the following facts:
(1) the seminar is a public event in so far as other public finance officials and corporate representatives are invited to attend the seminar;
(2) the seminar is related to official City business in so far as your position as City Comptroller requires you to obtain knowledge of all available markets for the sale of municipal debt instruments; and (3) the seminar related expenses will be paid by the sponsors of the seminar.

If you have any questions regarding this matter, please contact the Board at 744-9660.

Sincerely,

Judith A.M. Scully
Judith A.M. Scully
Deputy Director