

*Aldermen  
conflicts of interest; impl/f*

\_\_\_\_ xx, 20\_\_

**Confidential**

Alderman Jones  
123 Main  
Chicago, IL 606\_\_

Re: Property Leases, Case # 05047.Q

Dear Alderman Jones:

On \_\_\_\_\_ xx, 20\_\_, you called the Board of Ethics to ask whether, under the City's Ethics Ordinance, you are prohibited from leasing two business property sites from \*\*\* Partners ("Partners").

In that conversation, you stated that "Partners" leases approximately 30 real estate sites from the Chicago Transit Authority ("CTA"). Partners in turn then leases these same sites to individuals and businesses (donut [shops], etc.). You are interested in two of these property sites. Both are on the \*\*\* Side of Chicago—one at \_\_\_ St., the other at \_\_\_ St. You also stated that to the best of your knowledge, Partners does not have any business before or contracts with the City.

After reviewing the facts presented, staff has concluded that, under the Ethics Ordinance you are not prohibited from leasing these sites from Partners. However, if the sites are or become the subject of a license or permit that comes before the City Council or any Council Committee upon which you sit, you must adhere to the requirements of §2-156-080(b) of the Ethics Ordinance, that is: (1) you must disclose your relationship on the record of any council or committee proceedings (2) you must notify the Board of Ethics in writing; and (3) you must recuse yourself from consideration or voting on the matter. In addition, we recommend that, should Partners itself be the subject of any matter before the City Council or a Committee upon which you sit, you recuse yourself from consideration or voting on the matter.

Our conclusions in this matter are based solely on the application of the City's Ethics Ordinance to the facts stated in this letter. If the facts stated are incorrect or incomplete, you should notify us immediately, as any change could alter our determination. Moreover, other laws or rules may also apply to this matter; therefore our conclusion may not be dispositive of all relevant issues.

We appreciate your willingness to abide by the requirements of the City's Ethics Ordinance. If you have further questions, please advise.

Very truly yours,

Dorothy J. Eng  
Executive Director  
RJS 05047Q redact.wpd  
H://case #05047.Q-.doc