



City of Chicago
Richard M. Daley, Mayor

Board of Ethics

Dorothy J. Eng
Executive Director

Darryl L. DePriest
Chair

Angeles L. Eames
Vice Chair

Mark E. Christensen
Eileen T. Corcoran
Martin E. O'Donovan
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>

SIB

CONFIDENTIAL

February 16, 2001

[John
Address line 1
Address line 2
City, state, zip code]

Re: Case No. 01003.Q

Dear [John],

This letter is in response to your memorandum of January 29, 2001. You stated that [Department] employees are required to travel from time to time to meetings sponsored by the [Alpha Association] and the [Beta Association], and are reimbursed for their travel expenses by those organizations. The [Department] has requested our approval for employees to participate in these meetings and receive reimbursement of expenses. You said that the [Department] is a member of both organizations and pays annual dues to both, and that these organizations allot a portion of dues received to a fund that is used to reimburse participants for their expenses in traveling to and attending the meetings. The [Alpha Association] and [Beta Association] support regulatory and legislative activities related to [industry-specific] issues, and [Department] employees who attend the meetings participate in those activities, and receive no compensation from either organization for their efforts. You stated that the [Department] is a beneficiary of the outcome of these activities.

Deputy Commissioner [Mary] has explained, further, that neither of these organizations is or seeks to be a City vendor. Through the [Department's] membership in these organizations, a limited number of the Department's employees receive complimentary individual memberships that allow them to participate in the meetings. Additionally, some employees who do not have these complimentary memberships purchase individual memberships at their own expense in order to participate. The Department does not require these employees to purchase individual memberships, nor does it pay for the individual memberships. [Mary] also said that attendance at these organizations' meetings is not mandated by departmental policy, but that the Department does support the participation of those who attend. Those who attend the meetings do so on "educational duty" time. This means that they are not paid by the City for the time spent attending these meetings, but they are also not required to use their vacation time for it, because the activities in which they participate are regarded as educational and, thus, beneficial both to the Department and to their work as City employees.

Based on the facts you have provided and the reasoning followed by the Board in similar cases in the past, staff concludes that nothing in the Ethics Ordinance prohibits your employees from accepting reimbursement for the travel expenses incurred by attending meetings of the [Alpha Assoc.] or the [Beta Association], as long as (as it appears) the expenses for which reimbursement is accepted are reasonable and reasonably related to the purposes and functioning of these meetings. See Case Nos. 98050.Q, 98039.Q, and 91075.Q.

Staff's conclusion is based solely upon the application of the City's Governmental Ethics Ordinance to the facts stated in this letter. Other City policies or regulations may apply. If the facts presented are inaccurate, please notify us, as any change in the facts may alter our conclusion.

We appreciate your concern to abide by the standards of the Ethics Ordinance. If you have any further questions, please contact us.

Very truly yours,
[signature]

Steven I. Berlin
Deputy Director

Approved:
[signature]

Dorothy J. Eng
Executive Director