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June 13, 2001

CONFIDENTIAL

VIA FAX AND FIRST CLASS MAIL

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**Re: Case No. 01026.Q
Travel - [Alpha Seminar]**

Dear [John]:

This letter is in response to your request of June 13, 2001 for a letter from the Board of Ethics stating whether the [department] may accept an offer from [Alpha] to pay expenses (airfare and meals) for [Michael], [supervisor] of the [department's bureau], to attend a [seminar] on [] at [Alpha's] Training Facility in [] on June 15, 2001. [Michael] would travel to [] by air on the morning of June 15 and return to Chicago the same day.

In Board staff's conversation yesterday with [James], Director of Administrative Services for the [bureau], [James] stated that [Alpha] is a current vendor to [the department's bureau]: he explained that the Bureau has two term agreements with the company. He also acknowledged that, as [supervisor] of the Bureau, [Michael] is in a position to affect [Alpha's] City business. Finally, he indicated that, in the opinion of the Department, the seminar topics are integrally related to the work of the Bureau and would assist [Michael] in carrying out his City responsibilities as [supervisor].

Based on the information provided, it is Board staff's opinion that nothing in the Ethics Ordinance prohibits [Michael] from accepting [Alpha's] offer, as long as neither [Alpha's] offer, nor his acceptance, is based upon any mutual understanding that his City decisions or actions concerning [Alpha] would be influenced by the offer, and as long as the expenses accepted are reasonable and reasonably related to the purposes and functioning of the seminar, and serve to benefit the City, rather than benefit him personally.



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Staff's conclusion is consistent with past Board cases, in which manufacturers and suppliers have provided expenses of travel and accommodations for City employees to attend educational seminars and demonstrations relating to advances in technology in the products the companies offer, and the department has said that attendance at the seminars will assist it in carrying out its City responsibilities. (*See, e.g.,* Case Nos. 98039.Q, 97014.Q, 96020.Q, 94010.Q and 91075.Q.)

Staff's opinion is not necessarily dispositive of all issues relevant to this situation, but it is based solely on the application of the City's Governmental Ethics Ordinance to the facts stated in this opinion. If the facts stated are incorrect or incomplete, please notify the Board immediately, as any change may alter our determination. Other laws or rules also may apply to this situation. Be advised that City departments have the authority to adopt and enforce rules of conduct that may be more restrictive than the limitations imposed by the Ethics Ordinance.

We appreciate your department's sensitivity to the standards embodied in the Ethics Ordinance and eagerness to comply with them. If you have any further questions, please do not hesitate to contact us.

Very truly yours,

[Signature]

Michael Haggerty
Deputy Director

Approved by:

[Signature]

Dorothy J. Eng
Executive Director