



a financial interest in his own name or in the name of any other person in any contract, work or business of the City or in the sale of any article, whenever the expense, price or consideration of the contract, work, business or sale is paid with funds belonging to or administered by the City, or is authorized by ordinance...

The relevant Ordinance provision is §2-156-110. It states, in pertinent part, that no City employee shall have:

After reviewing the facts and documents you provided, staff communicated its conclusion to you on (date) [redacted]. Our conclusion is that the proposed contract violates the interest in City Business provision of the Ordinance, §2-156-110, and therefore should not be awarded to the intended party. As you requested on [redacted], this letter will confirm staff's conclusions, reasoning, and recommendations.

On (date) [redacted] you contacted the Board and asked whether the City's Governmental Ethics Ordinance prohibits or limits Company I [redacted] from receiving a one-time non-competitive City contract in the amount of \$8,600. [redacted] is, you believe, wholly owned by Mr. X [redacted], an employee of the City of Chicago Dept. A [redacted]. Under the proposed contract, Co. I would train certain Dept. B [redacted] employees in various aspects of [redacted] security. As described in the documents you provided, training would begin [redacted], and continue until [redacted].

Dear Mr. Z [redacted]:

Re: Case No. 96013.0
Financial Interest in City Business

[Large redacted block of text]

C O N F I D E N T I A L



Room 303
320 North Clark Street
Chicago, Illinois 60610
(312) 744-9660
(312) 744-2793 (FAX)
(312) 744-5996 (TT/TDD)

City of Chicago
Richard M. Daley, Mayor
Board of Ethics
Dorothy J. Eng
Executive Director
Angela L. James
Vice Chair
Darryl L. DePrest
Emily Nicklin
Fr. Martin E. O'Donovan



7/10/95

"Financial interest" is defined in relevant part in section 2-156-010(1) of the Ethics Ordinance as:

- (ii) any interest with a cost or present value of \$5,000 or more ...

Under §2-156-110, a city employee, such as Mr. X, may have an interest in a city contract or city work or business as long as the interest does not constitute a financial interest. Case no. 91087.A, p.2. As stated above, the Ordinance defines financial interest, in relevant part, as any interest with a cost or present value of \$5,000 or more. The terms of the proposed contract with Co. 11 Mr. X clearly exceed \$5,000, the allowable amount under the Ordinance. Awarding this contract to Co. 11 would constitute a violation that would subject this employee to employment sanctions, including discharge. Therefore, we recommend that the contract not be awarded to Co. 11 and that Mr. X be advised accordingly.

Please note that our conclusion is based solely on the application of the City's Ethics Ordinance to the facts stated in this letter. If the facts are incomplete or incorrect, please notify us, as a change in the facts may alter our conclusion. Please note also that a City department may adopt and impose rules stricter than those contained in the Ethics Ordinance.

We appreciate your calling us about this matter, and your concern to abide by the standards of the Governmental Ethics Ordinance. Please do not hesitate to contact us if you or your department have any further questions or need further guidance.

At your request, we are sending a copy of this letter to Mr. Y [redacted] : Dept. B [redacted] (Title) [redacted]

Yours very truly,
 Steven I. Berlin
 Deputy Director

Approved:

[Signature]
 Dorothy J. Eng
 Executive Director

cc: [redacted] s1b/95013.0L