



August 10, 1987

City of Chicago
Harold Washington, Mayor

[REDACTED]

Board of Ethics
Harriet McCullough
Executive Director

Robert C. Howard
Chair

Case Number 87065.Q

Janet Malone Morrow
Vice-Chair

CONFIDENTIAL

Sol Brandzel
Rev. Harry Gibson
Nola Hicks
Vennie Lyons
Beatrice Pizana

Dear [REDACTED]

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

The purpose of this letter is to confirm the decision of the Board of Ethics regarding your request for an advisory opinion.

As you know, we have reviewed your request for an advisory opinion to determine whether the Governmental Ethics Ordinance (Chapter 26.2 of the Chicago Municipal Code) would prohibit you from accepting an invitation to attend a one-day [REDACTED] session in [REDACTED] California on [REDACTED]. You informed us that the purpose of this session was to learn about Corp.'s research and development efforts in the area of business applications and to share information with Corp. about the City's long term goals or needs regarding business applications. You also informed us that an additional technical session will be held in Chicago following the communication session.

It is the understanding of the Board of Ethics staff that: (a) Corporation offered to pay for travel and one day of your hotel expenses; (b) officials from other cities were invited to attend the session; (c) the meeting was conducted in California because this location will be the headquarters for Corporation's research and development, and the staff who works on the new system is located in California.

The acceptance of this invitation is governed by Section 26.2-4(c) 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



Page 2

[REDACTED]
August 10, 1987

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 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 concluded that your acceptance of Corp.'s invitation to pay for your expenses related to the [REDACTED] session was appropriate. This conclusion was based on the following facts: (1) the session was considered official City business, since your duties as a City employee includes the day-to-day management of the systems and procedures, disbursement, and [REDACTED] operations within the [REDACTED] Office; (2) the session was a public event in that officials from other states and cities were invited to attend this session; and (3) acceptance of travel and hotel expenses for one day constitutes reasonable hosting.

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

Sincerely,

Judith Scully
Judith Scully
Deputy Director

JS/jh-[REDACTED]