



May 19, 1992

City of Chicago
Richard M. Daley, Mayor

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

Board of Ethics

Dorothy J. Eng
Executive Director

Catherine M. Ryan
Chair

Angeles L. Eames
Vice Chair

Darryl L. DePriest
Fr. Martin E. O'Donovan
Marlene O. Rankin

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

[REDACTED]

Re: Case No. 92018.Q
Travel

Dear [REDACTED]:

On May 12, 1992, we received your letter and accompanying materials asking if the Governmental Ethics Ordinance prohibits you from accepting travel and hosting expenses while serving as a member of a delegation traveling to [REDACTED] Country A [REDACTED] this fall. The delegation sponsor, [REDACTED], would pay your expenses for the trip. The staff is of the opinion that nothing in the Ordinance prohibits you from accepting this position and the travel expenses provided with it. We set forth our analysis below.

The letter and attachments we received from you show that the [REDACTED] delegation that you will be a part of [REDACTED] will be in Country A [REDACTED] from [REDACTED] through [REDACTED] 1992. The purpose of the trip is to exchange information with the host cities and countries on technical issues of infrastructure development, concentrating on [REDACTED].

We spoke with [REDACTED], your assistant, who stated the sponsor [REDACTED] has no transactions with the City that you are in a position to affect. We confirmed, with the resources that we have available, that it does not have contracts with the City. In addition, [REDACTED] she [REDACTED] provided us with materials that show that [REDACTED] it [REDACTED] is an organization that administers international professional programs. Sponsor [REDACTED] is administered by [REDACTED], which encourages communication among the world's citizens.



Case No. 92017.Q
May 13, 1992
Page 2

Under the facts presented, we reviewed the two subsections of the Ordinance that apply to your circumstances. They are paragraphs (b) and (c) of section 12-156-040, which state:

(b) No person shall give or offer to give to any official, employee, or City contractor, or the spouse or minor child of either of them, and none of them shall accept, anything of value, including, but not limited to, a gift, favor or promise of future employment, based upon any mutual understanding, either explicit or implicit, that the votes, official actions, decisions or judgements of any official, employee or City contractor, concerning the business of the City would be influenced thereby. It shall be presumed that a non-monetary gift having a value of less than \$50 does not involve such an understanding.

(c) No person who has an economic interest in a specific City business, service or regulatory transaction shall give, directly or indirectly, to any City official or employee whose decision or action may substantially affect such transaction, or to the spouse or minor child of such official or employee, and none of them shall accept, any gift of (i) cash or its equivalent regardless of value, or (ii) an item or service other than an occasional one of nominal value (less than \$50) provided, however, nothing herein shall be construed to prohibit such person from accepting gifts from relatives.

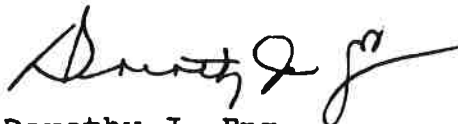
The facts presented show that you are not in a position in your City job to vote or make any official actions, decisions, or judgements regarding ^{sponsor} because it has no interest in any specific business of the City. Therefore, the Ethics Ordinance does not prohibit you from accepting the travel and hosting expenses for your role as ^{member} of this ~~delegation~~ delegation.

Our opinion in this case is based on the application of the City's Governmental Ethics Ordinance to the facts stated in this letter. If the facts presented are incorrect or incomplete, please notify us immediately, as any change in the facts may alter our opinion. We appreciate the information you provided to us and your willingness to comply with the ethical standards embodied in the Governmental

Case No. 92018.Q
May 13, 1992
Page 3

Ethics Ordinance. If you have any further questions, please do not hesitate to contact us.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Dorothy J. Eng".

Dorothy J. Eng
Executive Director

cc: Kelly Welsh, Corporation Counsel

mk:92018.L