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[REDACTED]

EMUS
gifts
sales promos

Re: Magic Kingdom Club; Case No. 97060.Q

On [REDACTED], you asked whether, under the Ethics Ordinance, your department can continue its membership in Walt Disney's Magic Kingdom Club, and whether participating departmental employees can receive new [REDACTED] Club identification cards. You said that, as was true in [REDACTED] when you first inquired about restrictions in the Ordinance pertinent to the department's membership as a Club chapter, neither the Club nor any Disney entity currently have contracts or business pending or ongoing with your department. The Board of Ethics advised you then of the limitations of § 2-156-040 of the Ordinance and of the sales promotion exception described in Case No. 93015.A (a copy of which was enclosed). We assigned Case No. 95037.Q to that inquiry. Your concern now is whether recent amendments to the Ordinance affect the department's continued membership in the Club.

Neither section 2-156-040 of the Ordinance nor the sales promotion exception described in Case No. 93015.A were changed or affected by recent amendments to the Municipal Code. Thus, to the extent that, as you said, the terms of the department's membership as a Club chapter and the other conditions described in this letter and in Case No. 95037.Q remain the same, the department may, under the Ethics Ordinance, continue to participate as a chapter in Walt Disney's Magic Kingdom Club, as the offer is still an acceptable sales promotion.

We appreciate your inquiry and your department's concern to abide by the standards of the Ethics Ordinance. Please advise if you have any questions.

Yours very truly,

Steven I. Berlin
Deputy Director

approved:

Dorothy J. Eng
Executive Director

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