

MEH



City of Chicago  
Harold Washington, Mayor

August 7, 1987

Board of Ethics  
Harriet McCullough  
Executive Director

[REDACTED]

Robert C. Howard  
Chair

Case Number 87051.A

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

Pursuant to our telephone conversation, I am writing you this letter to confirm the decision of the Board regarding your request for an advisory opinion. As you know, we have reviewed your request for an advisory opinion to determine whether Executive Order 86-1 (the Executive Order on ethics) would have prohibited you from accepting an invitation to attend an Airport Conference in [REDACTED] held [REDACTED] 1987. You informed the Board that the airport conference attracts major airport financiers; and generally the people who work on such financings in the major airport centers are invited.

It is also the understanding of the Board of Ethics staff that: (1) the conference was sponsored by [REDACTED] (2) [REDACTED] was an [REDACTED] underwriter for a number of special facility airport bond financings in Chicago and at one time they served [REDACTED] on City of Chicago airport financings; (3) [REDACTED] is not presently involved in financing the Chicago airport project; and (4) you would stay four days and three nights at the conference with all expenses (with the exception of airfare) paid by [REDACTED]

The acceptance of this invitation is governed by Section 5 of the Executive Order (attached). Although this section prohibits any entity that has an economic interest in a specific City business from giving any gift to a City official or employee whose decisions or actions may substantially affect that entity's interest, it also prescribes circumstances under which the acceptance of gifts will be



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deemed appropriate. Pertinent to this case is Section 5(c)(v) which allows an employee to accept an invitation which involves reasonable hosting, furnished in connection with a public event reasonably related to official City business.

After reviewing the facts of this case at its July 22, 1987 Board meeting, the Board confirmed the staff's conclusion that your acceptance of the invitation to attend the Airport Conference was permitted under the Executive Order. The conclusion was based on the following facts: (1) the conference was considered official City business, since one of your duties is to work on airport financing; (2) the conference was a public event in that other major airport financiers were invited to attend this conference; and (3) acceptance of lodging for the duration of the conference 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]