

**CONFIDENTIAL**

October 16, 2012

[REDACTED]

Re: Case No. 12064.Q

Dear Ms. [REDACTED]

This afternoon, and previously on October 4, [REDACTED] Alderman [REDACTED] asked my office whether, under the City of Chicago's Governmental Ethics Ordinance, s/he may accept travel expenses for a mission to Israel from and sponsored by the American Israel Educational Foundation (AIEF), a unit of the American Israel Public Affairs Committee (AIPAC). S/he would depart Chicago on November 26, 2012, and return December 4. According to the information you provided, other participants on the trip will include other elected officials and civic, political and religious leaders who seek to gain an in-depth understanding of modern Israel. Alderman [REDACTED] does not know of any matters that AIPAC or AIEF may have before the City or the City Council.

On these facts, I conclude that nothing in the Ordinance prohibits Alderman [REDACTED] from accepting these expenses and participating in the mission. However, if s/he is offered any honoraria (on top of reasonable travel expenses), then she would be prohibited from accepting them. Moreover, under the revised Governmental Ethics Ordinance, set to take effect on November 1, 2012, Alderman [REDACTED] is required to report the trip (the who/what/where/when/why—an email suffices) to my office within 10 days of her return. S/he is not required to report this travel on his/her 2013 Statement of Financial Interests (to be filed with our office), because, under Board case law, reasonable educational or other business travel expenses are not considered gifts.

This conclusion is consistent with prior Board cases, including those involving aldermen who accepted expenses for similar AIPAC/AIEF missions to Israel. See Case Nos. 07053.Q; 07020.Q. It is also based solely on the application of the City's Governmental Ethics Ordinance to the facts summarized in this letter. If these facts are incorrect or incomplete, please notify our office immediately, as any change may alter our conclusions.

My agency sincerely appreciates the opportunity to advise you and the alderman, and your and his/her concern to abide by the standards embodied in the City's Governmental Ethics Ordinance. If you have any questions, please contact me.

Yours very truly,

Steven I. Berlin,  
Executive Director

cc: Alderman [REDACTED]