

91037.Q

March 8, 1991

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

[REDACTED]

City of Chicago
Richard M. Daley, Mayor

Board of Ethics

Dorothy J. Eng
Executive Director

Albert F. Hofeld
Chair

Angela L. Eames
Vice Chair

Margaret Carter
Darryl L. DePriest
Fr. Martin E. O'Donovan
Marlene O. Rankin
Catherine M. Ryan

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

**Re: Purchase of Political Advertising
on Cable Television**

Dear [REDACTED]

This letter is being sent as a follow-up to our telephone conversation of February 28, 1991, concerning the purchase of political advertising by candidates [REDACTED]

It is my understanding that [COMPANY A] a company that does business with the City, has offered for sale the advertising package described in the attached letter dated February 22, 1991, which you forwarded to us. You wanted to know if [COMPANY A]'s offer for sale, or the purchase of this package by a candidate, including incumbents running for re-election, is permissible under the provisions of the City's Governmental Ethics and Campaign Financing Ordinances.

I have spoken with representatives of [COMPANY A] who have assured me that this offer does not include any free advertising time and that the amount charged for political advertising time is at the rate dictated by the Federal Communications Commission ("F.C.C.") regulations governing political cablecasts.

Based on these representations, [COMPANY A]'s offer of February 22, 1991, as described in the attached letter, would not fall within the parameters of either ordinance over which the Board has jurisdiction. Therefore, neither the offer to sell nor the purchase of this advertising package by candidates would constitute a violation of the City's Governmental Ethics or Campaign Financing Ordinances.



91037.Q

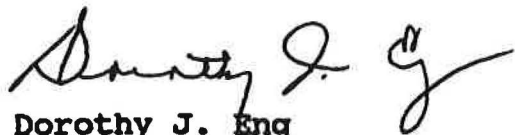
91037. Q

[REDACTED]

March 8, 1991
Page 2

If we can be of any further assistance to you, please do not
hesitate to call.

Very truly yours,



Dorothy J. Eng
Executive Director

enclosure

A: [REDACTED]