



August 26, 2002

CONFIDENTIAL

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Executive Director

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Eileen T. Corcoran
Michael F. Quirk
Genita C. Robinson
Joseph E. Samson

Suite 500
740 North Sedgwick Street
Chicago, Illinois 60610
(312) 744-9660
(312) 744-2793 (FAX)
(312) 744-5996 (TTY)

<http://www.cityofchicago.org>

[REDACTED]
[REDACTED]
[REDACTED]
Chicago, IL 606[REDACTED]

Re: Case No. 02029.Q

Dear [REDACTED],

You are the [REDACTED] Chicago [REDACTED]'s [REDACTED].
On July 31, 2002, the [REDACTED], extended
an invitation to you, to attend the [REDACTED]. The [REDACTED] is
sponsored by the [REDACTED], and all your
expenses will be paid by that organization. You have asked staff whether you
may accept this offer.

According to the invitation letter, the [REDACTED]
[REDACTED] has developed an Invitation Program in order to facilitate the
attendance of up to forty U.S. [REDACTED] interested in [REDACTED]
[REDACTED] to the 20th edition of [REDACTED]. You will leave Chicago on
Monday, September 30 and return Saturday, October 5. The invitation consists
of payment of your one coach round-trip air travel, accommodations at a first
class hotel for the four nights of the fair, and registration and admission tickets
for all events and activities organized and related to the fair. Further,
according to the letter, you are advised that "guests should assume expenses
surpassing the established conditions..."

The [REDACTED] which is held annually in [REDACTED], is the world's largest [REDACTED]
[REDACTED], drawing representatives of over 800 [REDACTED] as
well as [REDACTED], [REDACTED] and [REDACTED], [REDACTED] and [REDACTED] from
all over the world. At the [REDACTED], you will have the opportunity to improve your
knowledge of and familiarity with the leading professionals - [REDACTED],
[REDACTED] - in the [REDACTED]
and [REDACTED] world, as well as sharing ideas and experiences
with fellow [REDACTED]. You have stated that your attendance at the [REDACTED] would
benefit the City and enhance your ability to perform your City duties, and that
your Commissioner would like you to attend.

Under Section 2-156-040(d) of the Ethics Ordinance, City employees are
permitted to accept hosting expenses, including travel and entertainment
expenses, if:

- (1) the expenses are not paid anonymously;
- (2) the expenses are not paid to influence the employee's official



- actions in his or her City job;
- (3) the expenses are reasonable;
 - (4) the expenses are furnished in connection with public events, appearances or ceremonies related to official City business; and
 - (5) the expenses are furnished by the sponsor of the public event.


Based on our review of the invitation materials you sent us on May 16, and on conversations with you, staff finds that all the conditions listed in §040 (d) of the Ordinance are met, and concludes that the Ordinance does not prohibit you from accepting the hosting expenses from the [REDACTED]

[REDACTED] Our conclusion is consistent with advice we have given to similarly situated employees in the past. (See Case No. 98035.Q, in which Board staff advised a City employee that he was not prohibited from accepting the payment of reasonable travel and hosting expenses to attend an industry-wide product marketing conference, from the conference sponsor.)

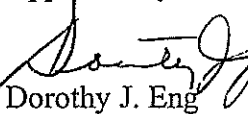
Staff's opinion is not necessarily dispositive of all issues relevant to this situation, but is based solely on the application of the City's Governmental Ethics Ordinance to the facts stated in this opinion. If the facts stated are incorrect or incomplete, please notify us immediately, as any change may alter our opinion. Other laws or rules also may apply to this situation. Be advised that City departments have the authority to adopt and enforce rules of conduct that may be more restrictive than the limitations imposed by the Ethics Ordinance.

We appreciate your inquiry and your concern to abide by the standards embodied in the Ethics Ordinance. If you have any further questions, please do not hesitate to contact us.

Very truly yours,


Jamie A. Schillinger
Research Analyst

Approved by:


Dorothy J. Eng
Executive Director