

MEH

May 16, 1991

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

[REDACTED]

City of Chicago
Richard M. Daley, Mayor

Board of Ethics

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Executive Director

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Catherine M. Ryan

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

Re: Case No. 91054.Q

Dear [REDACTED]:

On May 8, 1991, we received your letter requesting an opinion regarding your plans to participate in the inaugural flight of [REDACTED] Airlines' service from Chicago to [REDACTED] City, as a guest of the airline. We are writing to confirm that your acceptance of the offer that was described to us is in compliance with the Governmental Ethics Ordinance.

We appreciate your bringing this matter to the Board's attention and your willingness to follow the ethical standards embodied in the Ordinance. In this letter, we present the provisions of the Ordinance relevant to your situation, and our analysis of the facts according to those provisions.

According to the information you provided, the inaugural flight between Chicago's O'Hare International Airport and [REDACTED] Airport in [REDACTED] City will take place [REDACTED].

To commemorate the expansion of its service, [REDACTED] Airlines has invited you, along with other public officials, to be their guest on this flight. The airline also has offered to pay your hotel expenses during the trip, which will span four or five days. While in [REDACTED] City, you plan to attend the official functions sponsored by the airline where you will be meeting with business, civic and governmental leaders for the purpose of developing trade and cultural relations between these two cities.

Under § 2-156-040(d) of the Governmental Ethics Ordinance, City officials are explicitly permitted



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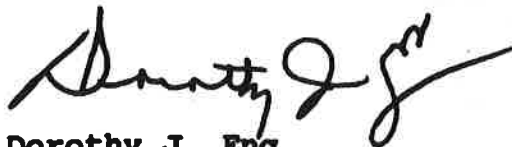
to accept hosting expenses, including travel and entertainment costs, if:

- (1) the expenses are not paid anonymously;
- (2) the expenses are not paid to influence the official's decisions or 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 such public event."

As this travel package has been described to us, the expenses are to be paid by the sponsor of the event, [REDACTED] Airlines, with no attempt to influence your actions in City government. The expenses are reasonable in the sense that they do not exceed what is necessary to achieve the stated purpose of the trip, i.e., to promote economic and cultural relations between Chicago and City. In addition, the costs are being furnished in connection with civic functions in which you have been invited to participate in your capacity as an official representative of the City of Chicago. Therefore, based on previous Board decisions, the staff believes that your acceptance of the invitation from [REDACTED] Airlines is in compliance with the Ethics Ordinance.

Thank you again for bringing this matter to our attention. If you have any further questions regarding this matter or any of the provisions of the Ordinance, please do not hesitate to contact us. Enjoy your trip.

Sincerely,



Dorothy J. Eng
Executive Director

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