

June 21, 1988

City of Chicago
Gene Sawyer, Acting Mayor

[Redacted]

Board of Ethics
Marriet McCullough
Executive Director

Re: [Redacted] Agency
Case No. 88079.A

Brandzel
Chair

Dear [Redacted]

Mary Milano
Vice Chair
W. Don Benedict
Margaret Carter
Angela Eames
W. A. Patterson Jackson
Arlene Rankin
Suite 1320
5 West Randolph Street
Chicago, Illinois 60606
(312) 744-9660

The Board of Ethics has received a request from the Department [Redacted] for an advisory opinion to determine whether you have an impermissible financial interest in City contracts held by the [Redacted] Agency, Inc., your family's business. This question arose due to the potential conflict between your connection with [Redacted] (you are the unpaid treasurer of that company) and your employment by the City of Chicago [Redacted]

The Ethics Ordinance (Chapter 26.2 of the Municipal Code) prohibits City employees from having a financial interest in any City business. Section 26.2-11 of the Ordinance states:

No elected official or employee shall have a financial interest in his own name or in the name of any other person in any contract, work or business of the City....

At our request, you submitted your personal income tax return for 1987 and agency [Redacted] tax return for that same year. These returns indicate that 1) you receive no compensation from [Redacted] Agency and 2) you do not hold any shares or maintain any other ownership interest in the company. Additionally, you have provided the Board of Ethics with a signed statement declaring: 1) that you receive no compensation or other financial benefits, either directly or indirectly, from agency: [Redacted] 2) that you maintain no ownership interest in agency [Redacted] and 3) that you are not entitled to receive any financial benefits from agency [Redacted] in the future. On the basis of this information, the Board of Ethics concludes that, for purposes of the Ethics Ordinance, you have no financial interest in City contracts obtained by agency [Redacted]. Therefore, the Ethics Ordinance will

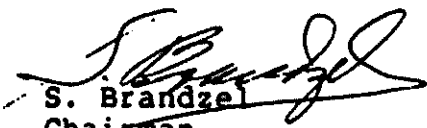


not prohibit the [redacted] Agency, Inc. from obtaining contracts with the City of Chicago.

However, due to your position as an officer of agency [redacted] with authority to make policy decisions for that business, the Board cautions you to be alert to Sections 26.2-3 (Improper Influence) and 26.2-8 (Conflicts of Interest) of the Ethics Ordinance. These provisions prohibit you from taking part in or attempting in any way to influence any City decision concerning agency [redacted]. Additionally, the Board directs your attention to Section 26.2-7 of the Ordinance, which prohibits employees of the City from using or disclosing confidential information gained in the course of or by reason of his or her employment. In closing, the Board reminds you that you should take all necessary steps to avoid even the appearance of impropriety with respect to the provisions cited above.

Should you have any questions, please contact the Board of Ethics at 744-9660.

Sincerely,


S. Brandzel
Chairman

cc: [redacted]
[redacted]
[redacted]
[redacted]