

met



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

To: [REDACTED]

From:   
Dorothy J. Eng  
Executive Director

Re: [REDACTED] Systems  
Case No. 91075.Q  
[REDACTED]  
Exposition  
Case No. 91076.Q

Date: August 7, 1991

I am writing in response to your request for an opinion on whether travel expenses offered to your Bureau could be accepted under the provisions of 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. After reviewing the materials you forwarded and past opinions of the Board, it is the staff's opinion that the Ordinance does not prohibit your Bureau from accepting the travel assistance you described.

According to the material we received on July 26, 1991, [REDACTED] Company has invited any four members of your Bureau to attend the [REDACTED] Exposition [REDACTED]

The information gained by your department employees from the exposition will assist the department in their decisions on [REDACTED] for the City. [REDACTED] Company will pay for travel, lodging, and meals for the City employees who attend.

In a separate invitation, [REDACTED] Systems invited any four members of your Bureau to attend a seminar in [REDACTED]. The seminar will cover issues of maintenance for the City's [REDACTED] and long term planning for the City's future needs. [REDACTED] Systems will



pay for airfare, lodging for two nights, and meals for the City employees who attend.

Under Section 2-156-040 (d), City officials are explicitly 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 official's 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."

The staff has discussed your request in relation to the above restrictions and it is our belief that, based on previous Board decisions, acceptance of the invitations you described is permitted.

We thank you again for bringing this matter to our attention and for your willingness to comply with the standards embodied in the ethics Ordinance. If you have any further questions, please do not hesitate to contact us.

cc: Kelly Welsh  
Corporation Counsel

rct/91075-76.Q