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[REDACTED]

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

MT
travel

[REDACTED]

RE: Case No. 97027.Q

Dear Mr. [REDACTED]

You called the Board of Ethics for guidance on how the Governmental Ethics Ordinance applies to an offer that a member of your department received from [REDACTED] K, Inc. [REDACTED], a company that manufactures components of the [REDACTED] equipment the City uses.

The City has no contracts with K. But the City does currently purchase [REDACTED] equipment from [REDACTED] W, Inc., and K supplies parts used in the equipment W [REDACTED] sells to the City. K has developed a new prototype product, [REDACTED] and the City of Chicago is part of a state-wide study of this equipment, sponsored by the Illinois [REDACTED] Commission. The State of Illinois is covering the cost of supplying the prototype to several cities across the state.

K has planned a four-day [REDACTED] Product Training seminar [REDACTED] at its corporate headquarters in [REDACTED] to teach those who will be using the new product about its installation and maintenance. It has invited representatives from several cities in Illinois and from cities in other states, all of which are testing this equipment. K has offered to cover travel and hosting expenses for one representative from each city participating in the study, as well as for other customers of W [REDACTED] who are considering purchase of the equipment. In Chicago, the offer was extended to [REDACTED], Assistant [REDACTED] in charge of the [REDACTED] Section of the Department of [REDACTED].

NEIGHBORHOODS



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It is staff's conclusion, based on these facts and previous cases and Board decisions, that the Ethics Ordinance does not prohibit [redacted] from accepting K's offer to pay travel and hosting costs to attend the seminar.

Our conclusion is based on the application of the City's Ethics Ordinance to the facts summarized in this letter. If the facts as presented are inaccurate, please notify us, as any change may alter our conclusion. Please be advised that other laws or rules may apply to this situation.

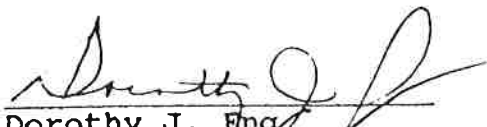
We appreciate your department's concern to abide by the standards embodied in the Ethics Ordinance. If you have any further questions, please contact us.

Very truly yours,



Steven I. Berlin
Deputy Director

Approved:


Dorothy J. Eng
Executive Director