

MEH



April 7, 1987

City of Chicago
Harold Washington, Mayor

CONFIDENTIAL

Board of Ethics
Harriet McCullough
Executive Director

Robert C. Howard
Chair

Janet Malone Morrow
Vice-Chair

[REDACTED]

Sol Brandzel
Rev. Harry Gibson
Nola Hicks
Vennie Lyons
Beatrice Pizana

Suite 1320
205 West Randolph Street
Chicago, Illinois 60606
(312) 744-9660

Dear [REDACTED] CASE NUMBER 87021.A

You have requested that the Board of Ethics render an advisory opinion to determine whether the City of Chicago's ethics laws will prohibit you from accepting an invitation from [REDACTED] and [REDACTED] to attend the Tenth Pan American Games to be held in Indianapolis, Indiana. It is the understanding of the Board that if you accept the invitation to attend the games, [REDACTED] will be assuming the costs of two days and two nights' first class lodging, as well as meals.

This offer to pay your expenses is a "gift" as defined by section 26.2-1(k) of the newly enacted Ethics Ordinance. Although the Ethics Ordinance does not take effect until July 1, 1987, its provisions will govern this case since the Pan American Games do not convene until August.

Section 26.2-4 of the Ethics Ordinance governs the acceptance of gifts by city officials. Specifically, Section 26.2-4(c) prohibits city officials from accepting anything of value from persons who have an economic interest in a regulatory transaction involving the City. In so far as [REDACTED] maintains an account with the Department of Aviation, you will be prohibited from accepting this trip in accordance with Section 26.2-4(c). For your convenience, a copy of this section is attached.

Please note that Section 26.2-4(d) of the Ordinance prescribes several circumstances under which the acceptance of gifts will be deemed appropriate. Pertinent to this case is Section 26.2-4(d)(iv) which provides that "any reasonable hosting, including travel expenses, entertainment, meals or refreshments furnished in connection with public events, appearance or ceremonies reasonably related



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to official City business" will be deemed an appropriate gift. However, it is the opinion of the Board that your participation in [REDACTED] seminar to introduce and explore new communications technologies during the Pan American Games not constitute official City business.

Sincerely,

Robert C. Howard ^{js}

Robert C. Howard
Chairman

JS/cb/0035

cc: File