



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

January 21, 1988

[REDACTED]

CONFIDENTIAL

Case Number 88006.A

Dear [REDACTED]

The Board of Ethics has reviewed your request for an advisory opinion to determine whether the Ethics Ordinance would allow you to accept a nomination to become treasurer of the [REDACTED] a non-profit agency which receives Community Development Block Grant (CDBG) funds. As we understand the situation, if you accept the nomination and are elected treasurer of the agency [REDACTED], you will not receive any compensation for your services as treasurer. You have indicated that the CDBG funds which the agency [REDACTED] receives are administered by the City; and that your official job responsibilities do not include or in any way relate to the administration or distribution of CDBG funds.

To determine whether you may accept the nomination the Board has reviewed the conflict of interest provision (Section 26.2-8) and the interest in City business provision (Section 26.2-11) of the Ethics Ordinance.

Section 26.2-8(a) states that:

"no official or employee shall make or participate in the making of any governmental decision with respect to any matter in which he has any economic interest distinguishable from that of the general public."

Under this section, it would be permissible for you to accept the nomination since (1) you are not in the position to make or participate in making a governmental decision with regard to the CDBG funds received by the Agency [REDACTED], and (2) you



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[REDACTED]
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have no economic interest in the agency [REDACTED] because you service as treasurer would not be compensated.

Section 26.2-11 of the Ordinance states that:

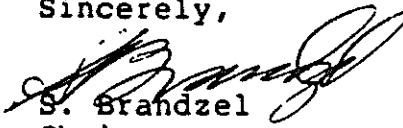
"No elected official or employee shall have a financial interest in his own name or in the name of any other person in any contract or business of the City...whenever the expense...is paid with funds belonging to or administered by the City...." (emphasis added)

A financial interest is any interest which either (1) entitles its owner to more than \$2,500 per year; or (2) has a present value of \$5,000 or more; or (3) represents more than 10% of a corporation or any other legal entity. Since you will not receive compensation or any other personal economic benefit from your involvement with the agency - [REDACTED] you will not maintain a direct financial interest in the CDBG funds which the agency [REDACTED] receives from the City.

The Board therefore concludes that your acceptance of the nomination to become treasurer of the agency - [REDACTED] would not constitute a violation of the Ethics Ordinance.

We very much appreciate your inquiry. If you have any further questions concerning this matter please do not hesitate to contact us at 744-9660.

Sincerely,


S. Brandzel
Chairman

[REDACTED]