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Room 303
320 North Clark Street
Chicago, Illinois 60610
(312) 744-9660

To: [REDACTED]

From: *Dorothy J. Eng*
Dorothy J. Eng
Executive Director

Re: [REDACTED] Trip
Case No. 91058.Q

Date: 29 May, 1991

On May 29, 1991 we received your phone call requesting a determination as to whether, under the provisions of the Governmental Ethics Ordinance, you could accept an invitation to join a Chicago delegation to Japan. After reviewing the facts as presented to us we find no problems with your accepting the invitation. We appreciate your bringing this matter to the Board's attention and your willingness to follow the ethical standards embodied in the Ordinance. In this memorandum we present the provisions of the Ordinance relevant to this case, and our analysis of the facts according to those provisions.

The information the Board has received concerning the trip in question is as follows. You and several other City officials have been asked to join a Chicago delegation to Japan sponsored and funded by the [REDACTED] Foundation. The Foundation is a non-profit group which seeks the exchange of information between the two countries in the area of management techniques. [REDACTED] T [REDACTED] is organizing this delegation which is to include five government representatives and the leader from the sponsoring organization. The overall focus of the exchange is [REDACTED] and your delegation will be focussing particularly on [REDACTED]. The organization facilitating the organization of the Chicago delegation is [REDACTED].



[REDACTED] T [REDACTED].
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 invitation 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. Enjoy your trip.

cc: Kelly Welsh
Corporation Counsel

DJE/rct