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CONFIDENTIAL

August 10, 1994

Re: Case No. 94026.Q
Campaign Finance

Dear

This letter will confirm our conversation of last week. You explained that, in September, Alderman X wishes to host a political fundraiser in the neighborhood. You asked our office whether the Ethics or Campaign Finance Ordinances impose any limitations on the Alderman inviting registered lobbyists to this fundraiser. Invited lobbyists would, you said, be among other invited guests, pay their own way, and be registered as lobbyists with the City; the donation would be \$100.

After considering the issue, staff concludes that nothing in either Ordinance specifically prohibits these invitations. However, as selling tickets to a political fundraiser constitutes seeking a political contribution to a campaign (see Case No. 88080.A, enclosed), and thus political fundraising is involved, there are several sections of the Ordinances to which special attention should be paid. These include, but are not limited to:

The Campaign Financing Ordinance:

§2-164-020, "Gifts and Favors to Candidates";

§2-164-030, "Anonymous and Pseudonymous Contributions";

The Ethics Ordinance:

§§2-156-040(a) and (b), "Offering, Receiving and Soliciting Gifts or Favors";

§2-156-050, "Solicitation or Receipt of Money for Advice or Assistance."

The relevant provisions of the Campaign Financing Ordinance are outlined in the enclosed brochure, the "Campaign Financing Ordinance: A Guide For Candidates To Elected Office Of City Government."



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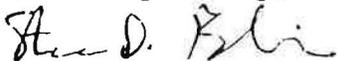
The enclosed opinion, Case No. 88080.A, addresses related questions, and also refers to two of the relevant provisions of the Ethics Ordinance. Please note that the section numbers you will see cited in this opinion were changed in 1990: §26.2-5 became §2-156-050, and §26.2-4(b) became §2-156-040(b).

To help assure that an elected official's political fundraising is properly within the law, all of the provisions discussed in this letter must be adhered to.

Our conclusion to your question is based on the facts stated in this letter. If the facts presented are incorrect or incomplete, please notify us immediately, as a change in the facts may alter our conclusion. Please note that we have not addressed laws or regulations, other than the City's Ethics and Campaign Finance Ordinances, that might apply to your question. For your convenience, we also enclose copies of both of these Ordinances.

We appreciate your calling us about this matter, and your willingness to abide by the standards of the Ethics and Campaign Finance Ordinances. Please do not hesitate to call if you have any further or specific questions.

Yours very truly,



Steven I. Berlin
Deputy Director

approved:



Dorothy J. Eng
Executive Director

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