



JHM

December 12, 2001

City of Chicago  
Richard M. Daley, Mayor

**Board of Ethics**

Dorothy J. Eng  
Executive Director

Darryl L. DePriest  
Chair

Angeles L. Eames  
Vice Chair

Eileen T. Corcoran  
Michael F. Quirk  
Joseph E. Samson

Suite 500  
740 North Sedgwick Street  
Chicago, Illinois 60610  
(312) 744-9660  
(312) 744-2793 (FAX)  
(312) 744-5996 (TTY)

<http://www.cityofchicago.org>

**CONFIDENTIAL**

**VIA FAX AND FIRST CLASS MAIL**

[ ]  
[ ]  
[ ]  
[ ]

**Re: Case No. 01052.Q  
Luncheons and Memorial Scholarship Award**

Dear [Mary]:

In a telephone conversation with Board staff on December 3, 2001, you requested guidance from the Board of Ethics concerning two luncheons hosted by [ ] the Organization [ ]—one for [Department] employees and another for [ Department ] volunteers—and a \$500 memorial scholarship award given annually to a [ Branch ] employee by [the Organization]. The [Branch] is a [branch of the Department].

In Board staff's conversation with you on December 3<sup>rd</sup>, you stated that [the Organization] traditionally hosts two catered luncheons: one, usually held in the summer, for approximately 100 [Branch] volunteers and one, usually held around the winter holidays, for approximately 60 [ Branch ] employees. In the past, both luncheons have been held at the [Branch] during works hours. You said that you did not know the exact value of the luncheons but estimated the cost, in both instances, to be well under \$50 per guest.

You also stated that, approximately two years ago, [the Organization] instituted a memorial award in honor of a late [Branch] employee. The award, which traditionally has included a check for \$500, is conferred annually on a [Branch] employee, selected by his/her peers, and is presented at the [ Branch ] during [office] hours at an [Organization] public function.

Finally, you stated that, to your knowledge, [the Organization] has no economic interest in any City business, service or regulatory transaction.



[Mary]  
Case No. 01052.Q  
December 12, 2001  
Page 2

JHM

Based on the information you provided, it is Board staff's opinion that nothing in the City's Governmental Ethics Ordinance prohibits [the Organization] from sponsoring the luncheons or the memorial scholarship award, as described. Further, nothing in the Ordinance prohibits either [Department] employees or volunteers from accepting the lunch, or [Department] employees from accepting the memorial award. We do note, however, that under Section 2-156-450 of the Ordinance, [the Department] has the authority to adopt and enforce rules of conduct, as a matter of policy, that are more restrictive than any limitations imposed by the Ethics Ordinance.

Staff's opinion is not necessarily dispositive of all issues relevant to this situation, but it is based solely on the application of the City's Governmental Ethics Ordinance to the facts stated in this letter. If the facts stated are incorrect or incomplete, please notify the Board immediately, as any change may alter our determination. Other laws, rules or policies may also apply to this situation.

We appreciate your sensitivity to the standards embodied in the Ethics Ordinance and your willingness to comply with them. If you have any further questions, please do not hesitate to contact us.

Very truly yours,

[signature]

Mary Rose D. Silva  
Attorney/Investigator

Approved:

[signature]

---

Dorothy J. Eng  
Executive Director