

Gifts

CONFIDENTIAL

February 3, 2003

[John Smith]
{Title}, Department of [R]

Chicago, IL 606xx

Re: Case No. 03009.Q

Dear [Mr. Smith]:

On January 31, 2003, you asked whether the City's Governmental Ethics Ordinance prohibits either the [I] Corporation, a City vendor, from offering, to the City's [H] and [M] project teams (comprising about 7 City employees, including you), or these team members from accepting, dinner at a local restaurant to celebrate the implementation of these two projects. Both projects involve programs created by [I] under City contracts still active, and project team members are able to make decisions or take actions affecting [I's] contract and ongoing City business. This letter confirms our conversation of January 31, 2003, in which we advised you of Board staff's conclusion that, because each team member is in a position to affect [I's] City business, pursuant to §§ 2-156-040 (b) and (c) of the Ordinance, so long as: 1) the value of the dinner to each City employee comes to less than \$50; and 2) the dinner offer is not made or accepted based on any mutual understanding that team members' official actions, decisions or judgments concerning [I's] City business would be affected by the offer, then the Ordinance neither prohibits [I] from making this offer, nor team members from accepting it.

Our conclusion regarding this offer is based solely on the application of the City's Governmental Ethics Ordinance to the facts presented; other laws, rules, regulations or policies may apply to the situation. If any of the facts stated in this letter are inaccurate or incomplete, please inform us immediately, as any change could alter our conclusion. We appreciate your concern to abide by the standards contained in the Ordinance. Please contact us with any further questions.

Yours very truly,

Steven I. Berlin,
Deputy Director

Approved:

Dorothy J. Eng,
Executive Director