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September 15, 1998

CONFIDENTIAL

[REDACTED]

Re: Case No. 98044.Q [Travel]

Dear [REDACTED]:

You contacted our office on [REDACTED] because you were selected by your department, Dept. X, to attend a conference sponsored by C Systems, a division of Corporation C ("C"), and the company has asked for written confirmation that C's payment of costs for your attendance conforms with the requirements of Chicago's Governmental Ethics Ordinance.

C, a City contractor, is sponsoring a three-day workshop, the "[REDACTED] Conference," at the [REDACTED] Lodge in [REDACTED] for approximately 40-60 [REDACTED] representatives nationwide. You told us these representatives are members of the C Systems Advisory Council, [REDACTED] professionals recruited by C to provide feedback to the company on its current products and development ideas for new [REDACTED] systems, as well as general information about the directions of future [REDACTED] development. Council members, who serve without pay for two-year terms, furnish this information to C by answering email surveys and by attending an annual

C Systems conference, you said. The company had contacted L [REDACTED] First Deputy Commissioner of Dept. X, about a representative of Dept. X serving on this advisory council and attending the [REDACTED] Conference, for whom C would cover travel and hosting expenses.

L asked you to serve on the Council and attend the conference, and you accepted. C has offered to pay the cost of your lodging and meals at the conference, your round-trip travel expenses between Chicago and [REDACTED], [REDACTED] and to provide round-trip travel between [REDACTED] and [REDACTED] aboard a C corporate plane.

The purpose of the conference, you said, is to allow professionals from across the country, all members of the Advisory Council, to discuss their ideas, problems, needs, and visions for [REDACTED] technology and services over the next decade; and to enable C to get feedback from them on their future product needs in order to expand and improve the merchandise it offers. You forwarded to us a copy of the conference agenda, and emphasized that this meeting furnishes a unique opportunity for your department to communicate with other [REDACTED] representatives



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on your mutual concerns, to plan adequately for future [redacted] needs, and to communicate those needs to product designers.

You said that, according to the Deputy Commissioner of Administration and Finance for Dept. X, C has three current contracts with Dept. X, two relating to [redacted] security and one to an experimental [redacted] system. You said you have never dealt with this company and are not familiar with the products it offers. In your City position as [redacted] Chief, you supervise and evaluate departmental operations at various sites. You said you deal with City contractors only when a new [redacted] is opened in your district and only then, with materials [redacted] vendors, to make sure the facilities are set up properly and on time.

In a recent Board case, a City contractor offered to provide travel and related expenses for City employees to attend an educational seminar relating to the products and services the company offered, and the employees' department said that their attendance at the seminar would be helpful to the department and would assist it in fulfilling its City duties. Case No. 98039.Q. Staff advised that the Ethics Ordinance did not prohibit the contractor's payment of travel and related expenses, as long as they were reasonably related to the purposes of the event and served to benefit the City, rather than the employees personally; and the offer was not made in exchange for the willingness of the employees to influence City decisions about the company. *Id.* Based on this and prior cases, and the facts you have presented, the staff concludes that the Ethics Ordinance does not prohibit you or your department from accepting C's payment of the reasonable expenses of travel, lodging and meals for you to attend its [redacted] Conference on behalf of Dept. X.

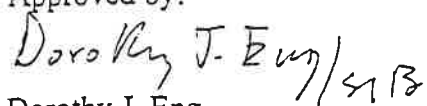
The staff's opinion in this case is based on the application of the City's Governmental Ethics Ordinance to the facts stated in this letter. If the facts as presented are inaccurate, please notify us, as a change in the facts may alter our opinion.

We appreciate your concern to abide by the standards of the Ethics Ordinance. If you have any further questions, please contact us.

Very truly yours,


Ellen M.W. Sewell
Legal Counsel

Approved by:


Dorothy J. Eng
Executive Director