

City of Chicago  
Richard M. Daley, Mayor



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

February 6, 1991

C O N F I D E N T I A L

Re: Case No. 90070.0

Dear

Under the Governmental Ethics Ordinance, Section 2-156-110 (prior code § 26-2-11), financial interest in city business, city employees are prohibited from gaining a "financial interest" defined as more than \$2,500 per year or a lump-sum payment of \$5,000 or more--in city business whenever that payment is derived from city funds. During our review of statements filed with the Board of Ethics, we noted that you participate in a city program and an EMPLOYEE for A CITY DEPARTMENT. This raised the issue of whether the interest you derive from participating in the program is considered "interest in city business" for the purposes of the Ethics Ordinance.

In researching the issue, we learned that your income as a participant in the program is derived from the monthly retainers that AN OUTSIDE ORGANIZATION pays you and from another non-city source and not from "funds belonging to or administered by the city" (as defined in § 2-156-110). This confirmed our belief that your concurrent service was appropriate under the Ordinance.

Let me assure you that this issue was raised by a member of the staff of our office during a routine review of financial interests statements.

If you have any questions or comments, please feel free to contact us.

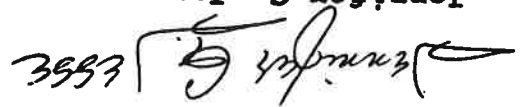


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Jennifer G. Jesse  
Research Analyst



Sincerely,

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