

7MEW



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Suite 530
205 West Randolph Street
Chicago, Illinois 60606
(312) 744-9660

[REDACTED]

Re: [REDACTED]
Case 90046.Q

Dear [REDACTED]:

The Board of Ethics has received your query concerning an invitation you have received from (CORPORATION X, [REDACTED]). In a letter dated [REDACTED], CORPORATION X's [REDACTED] vice-president and general manager, INDIVIDUAL R, asked you to attend a meeting his company was holding in Las Vegas, Nevada on or around [REDACTED].

At the meeting, INDIVIDUAL R will first make a brief presentation of new technologies [REDACTED] to the "focus group" in which you have been asked to participate. Then the meeting will be turned over to professional "facilitator," who will then lead the session. In a telephone conversation with the staff on [REDACTED], INDIVIDUAL R stated that CORPORATION X [REDACTED] was employing this method to get the unbiased opinions of utilities managers regarding new [REDACTED] technologies, what features they deem important, what would make CORPORATION X's [REDACTED] product more marketable, etc. The session will be taped by the firm managing the focus group, which will then enter its findings into a final report for CORPORATION X [REDACTED] with no attribution to any of the focus group participants. The tape will then be destroyed.

The meeting will take about 4 hours. INDIVIDUAL R said he expects to get the participants in and out of Las Vegas on the same day. CORPORATION X [REDACTED] will cover the travel expenses of the participants, a hotel room if that is necessary, and food. In a telephone conversation with our staff on [REDACTED], you stated that, if you attend, you will fly in and out on the same day. [REDACTED]



[REDACTED]

Analysis: The Ethics Ordinance (Chapter 26.2 of the Municipal Code of Chicago) places certain restrictions on the acceptance of gifts by City employees and officials, including gifts of travel and hosting. Under Section 26.2-4(d) of the Ordinance, City personnel are permitted to accept such gifts if:

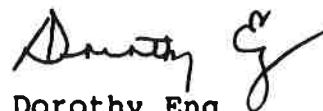
- (1) the donor of the travel and hosting expenses is not anonymous;
- (2) the gift of travel and hosting expenses does not involve a mutual understanding, either explicit or implicit, that the governmental actions of the City employee or official will be influenced thereby;
- (3) the expenses are "reasonable";
- (4) the expenses are "furnished in connection with public events, appearances or ceremonies related to official City business"; and
- (5) the expenses are "furnished by the sponsor of such public event."

On the basis of the foregoing facts, the requirements of Section 26.2-4(d) have been satisfied: (i) The donor of the travel and hosting expenses is known, CORPORATION X [REDACTED]; (ii) there is no evidence of the existence of a mutual understanding as referred to in (2), above; (iii) the expenses are reasonable; (iv) the meeting involves representatives of several INTERESTED PARTIES and is related to City business; and (v) the expenses are furnished by the sponsor of the event, CORPORATION X [REDACTED]. Therefore, under the Ethics Ordinance it is proper for you to accept CORPORATION X's [REDACTED] invitation.

This response is based upon the facts which are outlined in this letter. If they are incorrect, please advise, as any change might alter this decision.

Thank you for your inquiry; it was a pleasure being of assistance. Should you have any further questions, please contact either Mort Ames or myself at the Board of Ethics (744-9660).

Sincerely,



Dorothy Eng
Deputy Director

CC: [REDACTED]