

EMUS



CONFIDENTIAL

June 22, 1994

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Room 303  
320 North Clark Street  
Chicago, Illinois 60610  
(312) 744-9660  
(312) 744-2793 (FAX)  
(312) 744-5996 (TDD)

Re: Inviting City Employees to Golf Tournaments  
Case No. 94018.Q

Dear \_\_\_\_\_ :

On \_\_\_\_\_ you called us and asked whether Chicago's Governmental Ethics Ordinance prohibits your company from inviting certain or selected employees from the City's Department \_\_\_\_\_ to play in invitational golf tournaments and paying for their greens fees and meals. You explained to us that your company has a contract with the City to provide services for Area A. You said that a City employee, an \_\_\_\_\_ employee in the Department \_\_\_\_\_, in his City position supervises operations for Area A, and your company has daily interactions with him. Your company wishes to invite him to play in the \_\_\_\_\_ Invitational Golf Tournament, and pay for his greens fees and meals, which you estimate to be worth about \$90. The tournament is to be held on \_\_\_\_\_. You believe that other City employees attending would do so as guests of other private companies with City contracts.

Section 2-156-040(c) of the Governmental Ethics Ordinance (prior code §26.2-4(c)), entitled "Offering, Receiving and Soliciting Gifts or Favors," prohibits any person who has an economic interest in a specific business, service or regulatory transaction with the City from giving, and any employee or official from receiving, any item or service, other than an occasional one of nominal (less than \$50) value, if the official or employee is in a position to substantially affect this transaction.

From the facts you present, your company is clearly subject to this prohibition, because: 1) your company, as a City contractor, has an economic interest in its specific City contract with the Department \_\_\_\_\_; 2) the City employee your company intends to invite to the \_\_\_\_\_ golf



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tournament (and possibly to its own invitational tournament later in the summer) is in a position to make decisions or take actions that may substantially affect your company's City business; and 3) the value of the gift is worth about \$90.

With reference to other golf tournaments planned this summer, staff advises you that this prohibition applies for any employee in a position to substantially affect your company's City business.

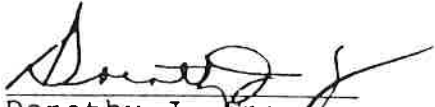
As we discussed earlier this week, I enclose a copy of the current version of the Ethics Ordinance for your review. We appreciate your inquiry and your willingness to comply with the ethical standards embodied in the Ordinance. If you have any further questions about this matter or any related issue, please do not hesitate to contact us.

Yours very truly,



Steven I. Berlin  
Deputy Director

approved:



Dorothy J. Eng  
Executive Director

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