

MEH

April 9, 1987

CONFIDENTIAL

[REDACTED]

RE: CASE NUMBER 87019.A

Dear [REDACTED]

The Board of Ethics has received a request for an advisory opinion to determine whether the ethics laws would bar [REDACTED] and an appropriate delegation of City officials from accepting [REDACTED] invitation to fly on its inaugural flight to [REDACTED] Korea.

It is the understanding of the Board that [REDACTED] is considering providing travel expenses, meals, and approximately three nights of lodging in a [REDACTED] hotel for various elected and appointed officials, as well as [REDACTED]. This invitation would be extended to City officials with the understanding that they would participate in various public ceremonies and events hosted by [REDACTED] and intended to promote trade and cultural relations between the cities. It is expected that public officials from [REDACTED] will also participate in these events.

Please note that the acceptance of this invitation is governed by Executive Order 86-1, not the recently enacted Ethics Ordinance. The ordinance does not take effect until July 1, 1987.

While the Order prohibits gifts in exchange for any favorable treatment regarding city business, Section 5 of the Executive Order prescribes several circumstances under which the acceptance of gifts may be deemed appropriate. Pertinent to this case is Section 5(c)(v) which provides that "any reasonable hosting, including travel expenses, entertainment, meals, or refreshments furnished in connection with public events, appearances or ceremonies reasonably related to official city business" may be deemed an appropriate gift. It is important to note that this section allows City officials to accept reasonable hosting only in connection with public events related to official business.



City of Chicago
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Executive Director

Robert C. Howard
Chair

Janet Malone Morrow
Vice-Chair

Sol Brandzel
Rev. Harry Gibson
Nola Hicks
Vennie Lyons
Beatrice Pizana

Suite 1320
205 West Randolph Street
Chicago, Illinois 60606
(312) 744-9662



[REDACTED]
Page 2
April 9, 1987

Please note that Section 5(d) of the Order also permits gifts to the City itself, subject to appropriate reporting.

It is the opinion of the Board that your proposed invitation to [REDACTED] will be permissible, if a sufficient nexus exists between official city business and a public event. We therefore suggest that [REDACTED] provide [REDACTED] with concrete opportunities to promote trade and cultural relations in [REDACTED]

Please be advised that your proposed invitations to appointed officials will be appropriate under the Executive Order only if the officials' city duties are related to the promotion of trade or business, or to assisting [REDACTED] in that respect. Also note that since the conduct of elected officials is not governed by the Executive Order, the Board is not authorized to advise you in regard to their participation in the proposed events in [REDACTED]

Finally, to ensure that the itinerary proposed by [REDACTED] does not violate the Executive Order, we suggest that you submit your final proposal to the Board prior to extending invitations to [REDACTED] or any appointed officials.

Very truly yours,

Robert C. Howard CB:

Robert C. Howard
Chairman

RCH/cb/0044