



May 24, 1989

City of Chicago  
Richard M. Daley, Mayor

Board of Ethics  
Harriet McCullough  
Executive Director

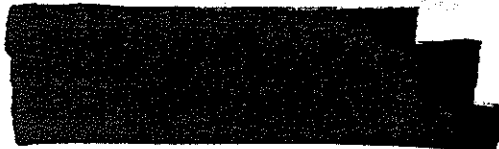
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Chair

Mary Milano  
Vice Chair

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Dear [Redacted]

This letter is to inform you that the Board of Ethics has reviewed your response to our staff's questions regarding the trip you took to *another state* earlier this year.

As you were informed in our staff's earlier letter, the Chicago Governmental Ethics Ordinance restricts the acceptance of gifts and other benefits by City employees and officials. These restrictions are set forth in Section 26.2-4 and were summarized in our staff letter to you dated April 5, 1989 (attached).

Under Section 26.2-4(d) of the Ethics Ordinance, City employees and officials may accept travel and hosting expenses, but only when all of the following conditions are met: (1) the expenses are furnished in connection with a public event or ceremony; (2) this public event is related to official City business; (3) the expenses furnished do not exceed what is reasonably necessary to enable the recipient to carry out his official obligations with respect to such events; (4) the person furnishing the expenses is the sponsor of the event; (5) the donor is not anonymous; and (6) there is no understanding, either explicit or implicit, that the benefits being furnished will influence the recipient's governmental decisions.

Based on your characterization of the circumstances surrounding your trip to *another state* the Board finds no clear indication that your actions violated the Governmental Ethics Ordinance. However, we wish to emphasize that your participation as a City employee in trips or seminars hosted by persons who have a potential interest in your actions as a City employee, or in the actions of other City agencies may give an




appearance of impropriety. For example, in the present case, we are aware that *the company paying for the trip* has received City contracts in the past. Your acceptance of travel benefits from this former contractor might create the impression that *this company* will receive favorable treatment by your agency or another City agency in return for its hospitality, even if no actual intention to improperly influence City actions is involved.

However, since the specific circumstances under which an employee might accept travel will differ from case to case, you should not assume that our opinion in the present case can automatically be applied to future travel situations. Therefore, we recommend that in the event of future opportunities for free travel you seek an advisory opinion from the Board prior to accepting such benefits. This measure will help to assure that your actions do not violate or appear to violate the provisions of the Ethics Ordinance.

We appreciate your attention to this matter. If you should have further questions regarding travel or some other issue related to the Ethics Ordinance, please do not hesitate to contact our office at 744-9660.

Sincerely,

  
S. Brandzel  
Chair

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