

MEH

**CONFIDENTIAL**

July 25, 1989

[REDACTED]



City of Chicago  
Richard M. Daley, Mayor

Board of Ethics  
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Executive Director

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Chair

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Vice Chair

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Marlene O. Rankin

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

Re: [REDACTED]  
Case No. 89112.A

Dear Individual B

Individual A, Commissioner of a Department of the City of Chicago, requested the Board of Ethics to render an advisory opinion regarding your acceptance of reimbursement of travel expenses under the following circumstances: Recently you traveled to another city to take part in a round table held by a company dealing w/ the city, a City contractor (Individual A stated that the company has sold two systems to the City in the past). According to Individual A, you were one of five experts invited to the event, the purpose of which was to develop a system for the City of Chicago in which the City might be interested. You took administrative leave to go to the round table and paid your own expenses at that time (\$225.11 for room and transportation). Now that company has offered to reimburse those expenses.

The Ethics Ordinance (Chapter 26.2 of the Municipal Code of Chicago) allows City employees and officials to accept hosting and travel expenses, if certain conditions are met: The expenses must be reasonable (not excessive), the event must be both "public" and related to official City business and, finally, the expenses must be paid by the sponsor of the event. Section 26.2-4(d) of the Ordinance states:

Except as prohibited in subsections (a) and (b) [referring to anonymous gifts and gifts given in exchange for political favors], nothing in this Section 26.2-4 shall prohibit any person from giving or receiving... (iv) reasonable hosting, including travel and expenses, entertainment, meals or refreshments furnished in connection with public events, appearances or ceremonies related to official City



business, if furnished by the sponsor of such public event.

In order to make a determination regarding your acceptance of the reimbursement, the Board requested further details concerning whether the event was "public." The Board also requested you to confirm the facts provided by *individual A* and summarized above. In a telephone conversation with our staff on July 7, 1989, you confirmed the accuracy of the preceding account and stated that in addition to yourself, officials from Illinois  
South Carolina

Wisconsin and  
the City of Indianapolis were in attendance at the round table.

**CONCLUSION:** On the basis of the information you have provided, the Board has determined that all the requisites of Section 26.2-4(d) have been satisfied: (1) Your travel expenses are reasonable--less than \$250 for a trip to *that city*; and (2) The event was public, i.e., attended not only by Chicago City officials and the host contractor, but by representatives of several other interested governmental bodies; (3) The event was related to official City business, i.e., the purpose of the event was to help develop *to help with city problems* in which the City might be interested; and (4) Your travel expenses will be paid by the host of the event, *a company dealing w/ the City.* Therefore, the Board concludes that, so long as you are not reimbursed by the City or any other source for the trip, you may accept reimbursement from *this company* for travel expenses incurred in connection with *this* round table.

Should you have any further questions, please contact the Board at 744-9660.

Sincerely,

  
S. Brandzel  
Chairman