

EMWS



CONFIDENTIAL

[REDACTED]

[REDACTED]

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Re: Case No. 97009.Q

Dear Alderman [REDACTED]

On [REDACTED], 1997 you asked the Board of Ethics for a letter addressing whether the City's Campaign Financing Ordinance ("the Ordinance") prohibits Mr. and Mrs. "Z" from making several political contributions. The first contribution, for \$ [REDACTED], is dated [REDACTED], 1997; the second, dated [REDACTED], 1997, is for \$ [REDACTED]; both are made payable to the "Committee for [REDACTED]." The third, for \$ [REDACTED], payable to "[REDACTED] For Congress," also is dated [REDACTED] 1997. The contributions are drawn on two checking accounts of Mr. and Mrs. Z. From the facts presented, staff concludes that nothing in the Ordinance prohibits the Zs from making these contributions.

As you know, §2-164-040 (a) of the Ordinance restricts the amount of contributions a person who has "done business" with the City within the preceding four reporting years (July 1 to June 30) and that a person who is "seeking to do business" with the City may make to an elected official of City government during any reporting year of his term, or to any official or employee of the City who is seeking election to any other office. (Terms in quotation marks are defined in §2-156-010 (h) and (x) of the City's Governmental Ethics Ordinance.)

Our review of City records indicates that the Zs have not done business with the City during the preceding four reporting years. A [REDACTED] letter you received from Mr. Z (a copy of which you sent us), states "I am not doing business with the City of Chicago presently and I have not done business with the City of Chicago for the last 25 years to the best of my knowledge ... [and] I have no intentions of doing business with the City in the next three years."

Based on these facts, staff concludes that the Zs are not subject to the restrictions that limit the amount of contributions a person may make to candidates and City elected officials, and that nothing in the Ordinance prohibits them from making these contributions.



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This conclusion is based solely on the application of the City's Campaign Financing Ordinance to the facts presented in this letter. If any of the facts are incorrect or incomplete, please notify us, as a change in the facts may alter our conclusion. Please note that other laws, rules, or regulations may apply to this situation. To help ascertain whether these contributions (especially the \$ contribution to "[REDACTED] for Congress") are in compliance with Federal law, we suggest you contact Lawrence Noble in the General Counsel's Office of the Federal Election Commission, at 800-424-9530.

We appreciate your request for guidance on this matter and your concern to abide by the standards embodied in the City's Campaign Financing Ordinance. If we can be of further assistance, please advise.

With best wishes for your continued success in public service,

Yours very truly,

Dorothy J. Eng

Dorothy J. Eng
Executive Director