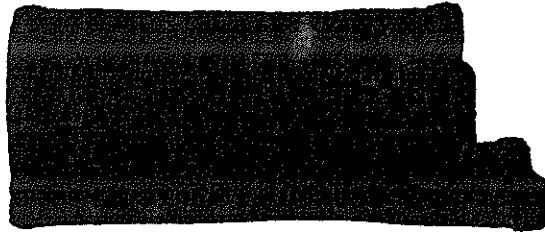


MEH

August 27, 1987



Case Number 87043.A

CONFIDENTIAL

Dear [redacted]

The Board of Ethics has reviewed your request for an advisory opinion to determine whether your outside employment presents a conflict of interest in violation of the provisions of the Ethics Ordinance.

In your letter of June 8th, you stated that for the past several years you have done bookkeeping and taxes for private clients on your own time, keeping these activities entirely separate from your employment with the Department of Revenue. Under the circumstances you described, the Board concludes that your outside employment does not violate the Ethics Ordinance. However, you have also stated that the [redacted] informed you that in his opinion, your outside employment constituted a conflict of interest. We must therefore advise you that the Ordinance expressly permits City agencies to adopt rules of conduct that are more restrictive than the provisions of the Ordinance (See Section 26.2-44; attached).

There are three provisions of the Ethics Ordinance potentially applicable to your situation. The provisions are as follows:

- (1) Section 26.2-5 states that a City employee must not accept anything of value in return for advice or assistance on matters concerning the operation or business of the City.
- (2) Section 26.2-7 prohibits any City employee from disclosing confidential or non-public information gained as a result of employment with the City.



City of Chicago
Harold Washington, Mayor

Board of Ethics
Harriet McCullough
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) 744-9660

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██████████
August 27, 1987

- (3) Section 26.2-9(a) states that a City employee may not represent any person other than the City in any formal or informal proceeding before any City agency in which the agency's action is of a non-ministerial nature.

Assuming that the work that you perform on behalf of your clients does not require you to represent them in front of any City agencies or advise them on matters pertaining to City business, your outside employment will not violate the provisions of the Ethics Ordinance.

Again, we must point out that the provisions contained in the Ethics Ordinance express the minimum standard necessary to prevent conflict of interests between an employee's City responsibilities and his outside employment. Departments ██████████ are therefore free to adopt more restrictive rules than those contained in the Ordinance.

If you have any questions regarding this matter, please contact the Board of Ethics at 744-9660.

Sincerely,

Sol Brandzel

Sol Brandzel
Chairman

MA/jh ██████████