

2015 Board Opinions

Advisory Opinion No.	Date Issued	Brief Description	Key Words
			Citations
<u>2015-001</u> Non-public Advisory Opinion	07/29/15	<p>Advised City official regarding application of City ethics laws to the official's proposed sending of solicitation letters to various local businesses requesting that contributions be made to a non-profit entity to support an annual community event hosted by the official and the official's office. Although the solicited contributions would support an event hosted by the City official and the official's office, the official would not be soliciting a gift as defined by the City Ethics Code because the official would not realize a personal financial benefit from the event or from the contributions to the non-profit to support the event. Although the City gift and conflict of interest restrictions do not prohibit sending the letters, an appearance of impropriety exists with respect to certain proposed recipients. To avoid this appearance of impropriety, the Board recommends that the City official not solicit businesses that: a) are currently seeking official action from the City official or his or her City office; b) have sought official action from the City official or his or her City office in the last year; or c) are businesses that the City official has reason to believe will seek official action from the City official or his or her City office in the foreseeable future. The Board further recommends the proposed solicitation letters should omit any language characterizing the contributions as being for or benefiting the City official.</p>	<p>GIFT; SOLICITATION LETTER; APPEARANCE OF IMPROPRIETY; OFFICIAL ACTION; NON-PROFIT; CHARITY; CONFLICT OF INTEREST; CONTRIBUTION; COMMUNITY EVENT; RESTRICTED SOURCE; FUNDRAISING; DONATION; FINANCIAL BENEFIT; NON-MINISTERIAL; MITIGATE APPEARANCE OF IMPROPRIETY; COERCIVE</p> <p>Code Chapter 17-1400; Code §§ 20-601(9, 10)&(17), 20-604(4)(b), 20-607; Charter §10-105; General Counsel Opinion 2012-505 (<i>superseded</i>)</p>