



Title:
**TEAMING OPPORTUNITIES AND TEMPORARY
NAMING RIGHTS POLICY**

Subject:
GENERAL OPERATIONS

Page:
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Policy Number:
03.70.00

Category:
DISTRICTWIDE POLICY

Approval Date:
10/29/2020

Last Revised Date:

POLICY STATEMENT:

It is the policy of the Forest Preserve District of Cook County (the “District”) to actively pursue teaming opportunities, with the goal of helping to expand non-tax financial resources in support of the mission and priorities of the District. Sponsorship and temporary naming rights efforts can be led by a Board-approved third-party consultant or by District staff.

PURPOSE:

The purpose of this policy is to provide guidance to: (1) District employees authorized to work on teaming opportunities and other related activities and (2) third-party consultants hired by the District to facilitate such efforts.

AFFECTED AREAS:

The scope of this policy applies to all District employees.

This policy governs all teaming opportunities, and temporary name recognition activities.

This policy does not: **(1)** govern permanently named District properties, such as the names of specific preserves (*i.e. McCormick Woods, Dan Ryan Woods, etc.*), and/or nature centers (*i.e. Little Red School House*); **(2)** govern permanent naming opportunities as referenced in the District “Permanent Naming Policy”; or **(3)** address tax-deductible philanthropic gifts or donations by individuals or entities to the District or the Forest Preserve Foundation.

DEFINITIONS:

Donation: Gifts of money, goods, or services given to the District or Forest Preserve Foundation, by an individual or entity and the market-value of such gifts are tax-deductible under the then current Internal Revenue Code. Donations are outside of the scope of this policy.

Employee: Employee means an individual employed by the District.

Forest Preserve Foundation (the “Foundation”): A 501(c)3 non-profit charitable organization that supports the protection and restoration of native habitats within the District and works to connect all residents, especially youth, with this great natural resource.

Fundraising: The raising of revenue, or gifts-in-kind, to support the mission and/or priorities of the District.

Prohibited Source: Prohibited source includes any person or entity that:

1. Is seeking official action: **(a)** By the official or employee; or **(b)** In the case of an employee, by the employee or by the District, the official or the other employee directing the employee;

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2. Does business or seeks to do business: (a) With the official or employee; or (b) In the case of an employee, with the employee or with the District, the official or the other employee directing the employee;
3. Conducts activities regulated: (a) By the official or employee; or (b) In the case of an employee, by the employee or by the District, official or other employee directing the employee;
4. Has interests that may be substantially affected by the performance or non-performance of the official duties of the official or employee; or
5. Is a compensated lobbyist on District matters or is registered or required to be registered with the Secretary of State under the Lobbyist Registration Act, 25 ILCS 170/1, et. seq.

Recognition: The official act of acknowledgement of acceptance.

Sponsor: An entity that pays a cash or in-kind fee to be associated with a District project or program in exchange for an acknowledgement by the District (e.g. name or logo included on a brochure, sign, banner, or other display). Sponsors are seeking to gain exposure to consumers for sales and marketing benefits.

Sponsorship: Financial support from a corporation or business for a specific event, project or program, in exchange for certain benefits and/or value.

Sponsorship/Naming Rights Review Committee: At a minimum, the sponsorship/naming rights review committee shall consist of the Director of Communications, Grants Administrator and the Department Head (or designee) from the relevant Forest Preserves Department for the opportunity. The Committee will be convened by the Director of Permits, Rentals and Concessions when any sponsorship opportunity is presented. The Committee shall review and approve all proposed opportunities, including visual impact, to confirm that they are in compliance with this policy.

Teaming Opportunities: Teaming opportunities may include advertisements, programs, awards, promotions, sponsorship opportunities, and recognition proposals.

Amenity: Amenities include District support facilities and non-permanently named District property, including but not limited to, conference and meeting rooms, nature play areas, off-leash dog areas, pools, aquatic center(s), tennis court(s), campground buildings, aerial adventure course, etc.

Temporary Naming Opportunities: Temporary naming recognition opportunities are:

- 1) sponsorship and/or other fundraising related opportunities;
- 2) have a specific and defined term life not to exceed 10 years; and
- 3) naming opportunities that comply with the District “Temporary Naming Recognition Policy” and the District “Fundraising Policy”.

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PROCEDURE/PROCESS:

1) TEAMING OPPORTUNITIES:

a. **Basic Principles:** The following basic principles form the basis for the Teaming Opportunities:

1. Advertising, sponsorship opportunities, programs, awards, promotions, and recognition proposals (collectively, “Teaming Opportunities”) may be accepted from any individual or entity deemed appropriate by the District. The District reserves the right to accept or reject proposed Teaming Opportunities for any legitimate business reason.
2. Under no circumstances should either temporary or permanent recognition be affixed to cultural or natural resources of the site or located where they would intrude on the historic or natural character of the area.
3. Teaming Opportunities must not in any way suggest the endorsement of the District.
4. The District shall not accept sponsorships or other Teaming Opportunities associated with, or related to, tobacco brands, firearms/fireworks, pornography, sweepstakes, gambling, politics, or religion.
5. Teaming proposals associated with makers, sellers, or distributors of alcoholic beverages will be limited to programs targeted to adults and will be evaluated on a case-by-case basis.
6. Other prohibited content includes:
 - Content or material that conflicts with the interests or mission of the District.
 - Content or material that is likely to lower the value or popular appeal of the relevant asset.
 - Content or material that contravenes restrictions established by the relevant governmental authority or authorities through ordinance, resolution, executive order, or, when relevant, court rule.
 - Within the standards of United States, Illinois, and County law, content that (i) promotes, is associated with, or entails weapons, nudity, violence, sexual relations or sexually related matters; or (ii) is inappropriate for or harmful to children.
7. The use of corporate names or logos in connection with Teaming Opportunities may be permitted, with advance written approval of the District, on brochures, select signage, temporary signs, audiovisual materials, give-away items, newsletters, other printed materials, and apparel designed for a specific event or program. Logos and names of sponsors will not be allowed on official District uniforms.
8. Teaming Opportunities involving the expenditure of funds in excess of \$150,000 or three (3) years as specified within the District’s Code of Ordinances be approved by the Forest Preserves District of Cook County Board of Commissioners in advance.
9. Teaming Opportunities must be approved by the Sponsorship/Naming Rights Review Committee.

b. **Ethical Considerations:** Teaming opportunities and temporary naming rights can provide great benefits to the District, but may come with unintended consequences that require prudence in their acceptance. The District name, image, history and mission generate significant good will and have a

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value requiring vigilant protection. Association through questionable relationships with products (tobacco and firearms) or practices are to be avoided.

The District relationship with sponsors should be transparent and understandable to the public. All records related to teaming opportunities or temporary naming rights deals may be subject to disclosure under the Freedom of Information Act. Any contractual agreement should contain the ability for the District to exit the contractual relationship with or without cause.

In addition to the guidelines outlined above, the District will not accept a sponsorship or enter into a naming rights agreement with persons or entities:

- Who are opposing parties, involved with the District in pending litigation;
- When the conditions placed on a donation are inconsistent with the authorized purposes, policies, and planning documents of District, an individual preserve or program;
- When the donation is inconsistent with or otherwise seeks to circumvent laws, regulations or policies; or

A determination of whether or not a potential sponsor falls into any of these categories may require consultation with the Legal Department prior to entering into an agreement. In the consultation process, consideration must be given as to how the solicitation, acceptance and recognition of the teaming opportunity will reflect on any partner and the preserve/program it supports as well as on the District.

- c. **Sponsorships:** The District may solicit private entities to act as sponsors of various events, facilities or programs as long as the District does not select sponsors in a discriminatory or otherwise illegal manner. The character and mission of a donor organization should not conflict with the public service and resource protection mission of the District. Regardless of the form of Teaming Opportunity accepted or the form of recognition chosen, all relationships and related recognition must be consistent with any existing contractual obligation of the District (including restrictions contained in the deeds or bequest agreements for any relevant real or personal property) and compliant with all applicable federal, state, and local laws and/or regulations.
- d. **Website:** The District should include information on how to become a sponsor or enter into a temporary naming rights deal on its website.
- e. **Forms of Recognition:** Forms of recognition should be clearly outlined in the contract between the sponsor and the District. The extent of the sponsor exposure should be determined based on the value of the gift.
 1. **Temporary Signs:** Temporary signs (such as those used to acknowledge donors during construction activities or restoration of a structure or site, or to recognize a sponsor's financial support during a contract period) should be informational and of appropriate design and scale. The signs should be sturdy, constructed of high-quality materials, consistent with the design of District signs, professionally done and in keeping with District design standards. The donor's name and corporate logo may be used if they are subordinate to the sign's message. Sponsors wishing to post temporary signs may do so for the duration of their event and at their own expense. The District must approve any and all signs that are to be posted on its property. Temporary recognition signs may be left in place only for the contract period, or in the case of

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“construction” signs, for no more than six months beyond completion of the actual work on the project.

2. **Interpretive Programs:** When a sponsor’s donation directly funds an interpretive program, it is appropriate to mention the donor’s contribution(s) at the beginning or end of the program. It may also be appropriate to mention corporate support when the funding is directly related to what is being interpreted, such as a natural restoration.
3. **Use of Corporate Logos:** Logos and names of sponsors will not be allowed on official uniforms, but may be allowed on apparel designed for a specific event if their financial contribution is directly supporting the event. Logos and names will be permitted on brochures, give-away items relating to the event, banners, and select signage.
4. **Product Sampling and Display Opportunities:** Sponsors may be allowed to erect temporary courtesy tents, booths, and tables at designated District locations and during special events as part of a sponsorship agreement for an agreed-upon period of time.
5. **Special/Program Event Recognition:** Special events are a recognized fundraising activity for many organizations and a popular source of recreation for a large portion of the population.
 - Corporate names must not be used in any way that would imply or otherwise suggest the District endorsement of a corporate product or company, or be construed as a commercial solicitation or advertising.
 - The emphasis should be on acknowledging the sponsor(s) versus on-site advertising.
 - On-site notices, such as banners, may be appropriate to the character and scale of the event and may be displayed for a period of time in advance of the event if the Office of the General Superintendent wishes to encourage public attendance.
 - When appropriate, higher-profile recognition can occur through media events, press announcements, photo opportunities, ground breakings, ribbon cuttings, meal functions or special recognition events.
- f. **Conflict:** Any policy or ordinance conflict that might arise should be resolved by the Legal Department and Office of the General Superintendent.

2) **TEMPORARY NAMING RECOGNITION OPPORTUNITIES:**

- a. **Policy Statement:** The District of Cook County (the “District”) offers temporary naming recognition opportunities for select District properties. This policy is designed as an ongoing strategy of the District to increase non-tax revenue in support of the District mission and plans.
- b. **Purpose:** The intent of this policy is to set forth criteria and parameters to guide temporary naming recognition opportunities for amenities within District properties. This policy provides the District the authority to consider and approve the naming of District amenities after an organization, business or individual that has provided a financial contribution to the District which will be used to support the District capital projects, plans, and/or restorations and programming efforts.

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- c. **General Policy:** In all cases, the District will ensure that temporary naming recognition opportunities will not be in conflict with or run counter to the District mission and goals.
- d. **Categories of Names That Should Be Avoided:** Proposed names should not include any of the following:
 - Offensive or insensitive names;
 - A name after an individual that has been found corrupt, and/or guilty of a felony crime;
 - A name that promotes or advertises tobacco brands, firearms/fireworks, pornography, sweepstakes, gambling, political messages, or religion;
 - Promote the use of alcohol or legal and illegal drugs;
 - Discriminate on the basis of race, color, religion, sex, age, national origin, disability, marital status, sexual orientation, gender identity, military status or any other legally protected status; and/or
 - Endorse products or services or promote practices that do not comply with District policies, procedures, or code; or applicable County, State or federal regulations, ordinances, codes, or statutes.
- e. **Approval of Temporary Naming Recognition Opportunities:** All District entities eligible for temporary naming rights shall be determined and approved by the District.
- f. **Naming Rules:** At the facility/preserve level, the temporary name must follow the approved District name, for example, Busse Woods, sponsored by ABC would be acceptable. ABC Busse Woods would not. For features within the facility or preserve, the sponsor name may precede the feature name, for example, ABC Boathouse at Busse Woods or Busse Woods Boathouse sponsored by ABC would both be acceptable. SEE APPENDIX B: Naming Rights Guidelines
- g. **Signage Rules:** Temporary naming must not in any way suggest the endorsement of the District. The use of corporate names or logos in connection with temporary naming may be permitted on temporary signs designed for a specific event or program. If a temporary naming opportunity includes signage, a detailed proposal of the signage, including design, layout, verbiage and cost will need to be provided, in writing, for review and approval by the District. The District can specify sign size, sign, type, and font of any naming temporary naming recognition rights signage or displays. The District reserves the right to terminate any temporary naming right agreement not in accordance with this policy.
- h. **Restrictions:** Under no circumstances should either temporary or permanent recognition: (a) be affixed to cultural or natural resources (other than dirt or grass) of the site or located where they would intrude on the historic or natural character of the area; (b) suggest in any way the endorsement of the District.
- i. **Pricing Methodology:** The Sponsorship consultant shall recommend pricing in the catalog of District temporary naming recognition opportunities. Pricing considerations should be developed by: (1) assessing the asset value of the District amenity and contemplating a number of factors including the market value; (2) the cost of construction or improvement to the amenity; (3) the amenities use and visibility; and (4) the location and draw of the amenity.
- j. **Temporary Naming Length:** In no instance shall any naming rights opportunity exceed ten years.
- k. **Sole Power:** The District maintains the exclusive right to name and/or rename any District property at its own sole discretion, and to reject any proposed name change or request at its sole discretion.

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3) **TEMPORARY NAMING RIGHTS GUIDELINES:**

- a. All naming rights opportunities must have a defined term life not to exceed 10 years.
- b. **At the facility/preserve level**, the Forest Preserve name must always come first:
 - Little Red Schoolhouse Nature Center sponsored/presented/brought to you by ABC.
 - Dan Ryan Woods sponsored by ABC
 - The Tinley Creek Trail sponsored by ABC
 - Whelan Pool sponsored by ABC
 - Camp Sullivan sponsored by ABC
- c. **Within the facility/preserve**, the Sponsor name can go first or second (*sponsorship value will vary*):
 - ABC Nature Play Area at the Dan Ryan Woods OR Nature Play Area at the Dan Ryan Woods sponsored/presented/brought to you by....
 - ABC Boathouse at Busse Woods
 - ABC Pool at the Cermak Woods Aquatic Center
 - ABC Classroom at the Little Red Schoolhouse Nature Center
 - ABC Off Leash Dog Area at Beck Lake
 - ABC Pavilion at that Thatcher Woods
- d. **Sponsor name can precede event titles:**
 - ABC Maple Syrup Festival at River Trail Nature Center
 - ABC Presents Stars, Stories and Smores

RESPONSIBILITY:

Permits, Rentals and Concessions Department: The Permits, Rentals and Concessions Department shall: (1) be the primary point of contact for the third-party sponsorship consultant; and, (2) facilitate the Sponsorship/Naming Rights Review Committees to evaluate specific sponsorship or naming rights opportunities.

District Employees: District employees are required to comply with this policy, and other related District policies and procedures.

User Departments: District User Departments shall comply with this policy, and other related District policies and procedures. Departments impacted by potential sponsorship opportunities shall be included in the committee to review and approve said opportunities.

Finance & Administration Department: The Finance & Administration Department will: (1) Reconcile gifts, and work to ensure that all charitable gifts (i.e. planned gifts, individual donations, etc.) are directed to the appropriate fund/bank account; and, (2) Ensure that Forest Preserve user departments comply with gift restrictions.

Legal Department: The Legal Department will provide legal counsel to the Development Committee.

Office of the General Superintendent: The Office of the General Superintendent will: (1) select District employees to participate in fundraising activities on behalf of and in support of the mission and priorities of the District; and (2) Establish and communicate District policies. (3) the Director of Communications and Grant Administrator shall participate on the committee for all sponsorship or naming rights requests, and

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evaluate the visual impact of proposed recognition. The Communications Division will also be responsible for ensuring fulfillment with visibility on marketing material such as brochures and the website, etc.

Board of Commissioners: The Board of Commissioners retains the responsibility of selecting permanent names for all District buildings and other District property. The Board must also approve all teaming opportunities in excess of the length of time and dollar amount specified in the Code of Ordinances. The General Superintendent will put forward recommended names for a District building or other District property to the Board of Commissioners for approval.

TRAINING REQUIREMENTS:

- 1) All relevant/impacted District employees shall be trained on this policy shall be trained on this policy.

COMMUNICATION PLAN:

- 1) This policy should be distributed to all relevant/impacted District employees.
- 2) This policy should be added to the District shared drive, intranet, and website.
- 3) Department Heads should work to ensure that relevant staff are knowledgeable about this policy.

REFERENCES:

Forest Preserve District of Cook County

Advertisements (FPDCC Code Section [3-3-8](#))

Forest Preserve District of Cook County

Code of Ethical Conduct (FPDCC Code Section [1-13: 1-6](#))

Forest Preserve District of Cook County

Permanent Naming Policy

POLICY LEAD:

Anthony D. Tindall
Policy & Sustainability Manager

APPROVAL:

Arnold Randall
General Superintendent

POLICY HISTORY:

Approved: 10/29/2020

Revised:

Revised:

Revised:

If you have questions, comments, or suggestions concerning District policies, please contact:

Forest Preserve District of Cook County
Office of the General Superintendent
69 W. Washington St., Suite 2040, Chicago, IL 60602
Email: FPD.Policy@cookcountyil.gov



APPENDIX A:
Cook County Board of Ethics Memo



TONI PRECKWINKLE

PRESIDENT
Cook County Board
of Commissioners

RICHARD R. BOYKIN
1st District

ROBERT STEELE
2nd District

JERRY BUTLER
3rd District

STANLEY MOORE
4th District

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14th District

TIMOTHY O. SCHNEIDER
15th District

JEFFREY R. TOBOLSKI
16th District

ELIZABETH ANN DOODY GORMAN
17th District

COOK COUNTY BOARD OF ETHICS

RANJIT HAKIM
EXECUTIVE DIRECTOR

69 W. Washington St. Suite 3040 • Chicago, Illinois 60602 • (312) 603- 4304 • F (312) 603-9988
cookcounty.ethics@cookcountyil.gov

February 6, 2015

VIA EMAIL

Lisa Lee
Deputy Chief Attorney
Forest Preserve of Cook County
69 W. Washington St., Suite 2010
lisa.lee@cookcountyil.gov

Ms. Lee:

You recently contacted the Cook County Board of Ethics ("Board") to inquire as to whether the Forest Preserves District ("District") could request and accept certain donations in connection with a planned expansion of its camping programs. Board precedent establishes that none of the scenarios you presented would be *per se* violations of the District's Ethics Ordinance. The Ethics Ordinance places extensive restrictions on the ability of District officials and employees to solicit gifts and free services from District vendors, potential District vendors, regulated entities, lobbyists and other prohibited sources. This gift ban, however, does not apply where a donation is made for the use of the District's patrons and not individual District officials and employees. The Board further explains its reasoning below and suggests additional controls to reduce even the appearance of impropriety.

Background

The District currently grants certain camping gear retailers permits authorizing the retailers to hold camping classes on District property for District patrons. The retailers then remit a percentage of the fees collected from enrollees in these classes to the District. The District intends to expand its camping program in 2015 and will likely issue a request for proposal (or permit applications) seeking additional vendors to provide more camping classes under a similar financial arrangement at other District locations.

With respect to existing and new camping classes, the District would like existing permittees and new vendors to reserve free or reduced fee class slots for District patrons who might not otherwise be able to afford to participate. In addition, as part of its plan to expand camping opportunities, the District would like to build up a "gear library" of free or reduced cost camping gear from which District patrons could borrow as needed. One potential source of donated camping gear is existing permittees and other camping gear retailers. The concern is that existing permittees may feel coerced into donating gear for District patrons and other camping gear retailers may believe that donations will give them an advantage in responding to the District's forthcoming request for new class providers.

Issues Presented

1. Does the District's Ethics Ordinance prohibit the District from accepting product donations (e.g., mosquito repellent) for use by District patrons from entities that are not doing business with the District?

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To illustrate, in 2003, the Cook County Department of Public Health ("CCDPH") was preparing to launch a public-health campaign, called "Fight the Bite," to combat the spread of West Nile Disease by mosquitos. Part of this campaign involved the distribution of DEET to the public. Three companies – two with no relation to the County whatsoever and one that was already doing business with the County – volunteered to donate insect repellant to CCDPH for its campaign. The Board opined that donations from all three companies were permissible. Advisory Opinion, No. 03 A 0004, *4 (Sept. 17, 2003).

The Board reasoned that donations from the two companies with no relationship to the County were permissible because they were not prohibited sources for purposes of the gift ban. *Id.* With regard to the donated insect repellant from the third company that was already doing business with the County, the Board opined that:

[a]lthough from a prohibited source, these products are not a gift to a County employee. Rather, these products are effectively a donation to the public which will be distributed by the CCDPH. The primary purpose of the gift ban is to prohibit *individual* County employees and officials from receiving or soliciting gifts that might improperly influence them in the execution of their official duties. . . . The Cook County Department of Public Health should be able to accept the donations of insect repellant containing DEET to distribute at their community events and share with the Cook County Forest Preserve District and other community partners.

Id. (emphasis supplied).

Similarly, here, the District is not prohibited from accepting the donation of goods and services (e.g., camping gear, free or reduced cost classes, mosquito repellent) for use by members of the public both from entities that currently do no business with the District as well as from entities that do (or may seek to do) business with the District. But while it is legal to accept these donations, the availability of these goods and services for District patrons, nonetheless, raises three potential ethical dilemmas. Fortunately, each, in the view of the Board, is solvable with adequate controls.

First, when off-duty and enjoying the District's property like any other member of the public, District officials and employees may express an interest in using a donated good or service that the District makes generally available for its patrons. Allowing them to do so is risky, however, because it may appear that District officials and employees are coopting camping gear, free or reduced cost camping classes or mosquito repellent from the public and circumventing the gift ban. As a result, the District should consider establishing a policy regarding officials' and employees' access to these donated goods and services for the sake of avoiding the appearance of impropriety. For example, the District might adopt a bright line rule that its officials and employees cannot use the gear library or would have to pay a rental fee for doing so. With respect to the classes, District officials or employees might only be eligible for the full cost camping classes, leaving the free or reduced cost slots available for other patrons. In the alternative, the District could adopt a more narrowly tailored policy to preserve priority

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access for District patrons, such as only allowing officials and employees to take advantage of the gear library or camping classes when no other member of the public had requested to use these goods or services.

Second, when the District approaches current permittees, potential vendors and even unrelated camping gear retailers for donations to the gear library, they may feel either that a refusal to donate will jeopardize current District business or that willingness to give will be an advantage in future business dealings. The District can address both concerns by clearly disclaiming that a donor's decision to give or not to give will have any impact on current or future District business. To extent that solicitations are made in writing, this disclaimer should also be made in writing.

Third, when the District solicits new vendors to provide camping classes, it is likely that some of the entities that respond to the request for proposal or apply for a permit will be entities that were canvassed for camping gear donations. The District's goal should be to make good on the disclaimer outlined above by insulating any member of the bid/permit evaluation committee from knowing which potential vendors contributed to the gear library (or made other voluntary donations for the benefit of District patrons) and which did not. Doing so will ensure that a potential vendor's willingness to make donations of goods and services for the benefit of District patrons does not unduly influence an unrelated procurement process.³

You also inquired as to whether the District could ask District vendors to opt-in to receiving information from the Forest Preserve Foundation ("Foundation"), a 501(c)(3) organization which raises funds to support the protection and restoration of native habitats within the District. Again, this conduct would likely not violate any specific provision of the District's Ethics Ordinance, but the optics are worse than the scenarios presented above. This is because the District is effectively involved in cash fundraising for itself and that fundraising is targeting only at District vendors.⁴

The District may be able to alleviate some of the potentially coercive effect of a request to opt-in to solicitations from the Foundation by a disclaimer that the decision to opt-in or not will not impact current or future District business, however, there may be a better solution. Because the Foundation is a separate, nongovernmental entity, it can FOIA a list of the District's vendors and contact them with a request to opt-in to receive further information itself. The Foundation's employees (so long as they are not also District officials and employees) are not bound by the District's Ethics Ordinance. Moreover, the Foundation's mailing list is likely a

³ To the extent that the District wants new providers of camping classes on District property to reserve free or reduced cost slots for District patrons, the Board recommends the inclusion of that requirement in the request for proposals or request for permit applications so that vendors can include this service in pricing the responsive bids or applications. The inclusion of a requirement to provide free or reduced cost classes to a category of District patrons in the procurement process upfront eliminates the concern that a vendor will later feel coerced into providing the donated services after it has already established a business relationship that it wants to continue with the District.

⁴ In the scenarios above, donated goods and services were primarily being made available to District patrons and the efforts to build a gear library or receive other donated products for use by District patrons were directed at both current vendors and retailers with no business relationship with the District.

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mix of District vendors and non-vendors so its total fundraising effort is not solely directed at entities doing business with the District.

Please note that the determinations and recommendations herein are based solely on the application of the Ethics Ordinance to the general questions posed. Other laws or rules may also govern, and this opinion is not binding with respect to their application.

I trust this advisory opinion addresses your concerns, but please do not hesitate to contact our office if you have additional questions or require additional information. Thank you for your inquiry and I commend you for seeking to uphold the guiding principles of the Ethics Ordinance.

Sincerely,



Ranjit Hakim
Executive Director