

July 10, 1998
Re: IO-98-96

You asked whether you and the members of your cabinet could accept invitations to this year's annual crab feast, held by a local business person. Your cabinet consists of about 25 county officials. You estimated that the value of the gift to each guest is about \$25 but that this event is by invitation only; there are no tickets to be purchased.

The host is a member of the board of directors of the Anne Arundel Economic Development Corporation. The AAEDC is an entity doing business with, and subject to regulation by the county. Therefore, the host is a donor whose gifts are subject to the restrictions imposed by §3-106 of the ethics law. A spokesperson from the AAEDC said that the crab feast may actually be given by the member's grandfather and has been an annual event for many years. For this inquiry, the ethics commission assumes that in either case, the host is a "controlled donor."

The ethics commission concludes that this gift may be accepted pursuant to §3-106(c)(4), permitting gifts of "occasional meals and beverages of modest value." This conclusion presumes that the donor is not currently lobbying for pending legislation, negotiating a contract with the county, or for any other reason, attempting to influence any imminent executive action.

Since you estimate the value of the gift to meet the minimum reporting requirements under §4-104, you should report this gift on your Financial Disclosure Statement for 1998.

Sincerely,

Betsy K. Dawson
Executive Director