

July 18, 2000

Re: IO-00-113

You inquired whether you may participate in the county employee's golf tournament and whether you may "solicit or play with lobbyists or subordinates". The answer is "yes".

The brochure advertising the golf tournament, which you provided, lists a cost of \$60 to cover the greens fees, food, golf cart, and prizes. If you are paying to participate in this event, you are not accepting a gift, but are giving value for value received. If you invite lobbyists or subordinates to join you, at their own expense, you are not soliciting a gift. And since there is apparently no charitable donation involved in the cost, there is no issue that the prestige of your office or position is being used for the benefit of yourself or others.

Thank you for your inquiry. Best of luck to your foursome.

Sincerely,

Betsy K. Dawson
Executive Director