

November 10, 2004  
Re: IO-04-99

You inquired whether you may accept an invitation from the National Aquarium in Baltimore to attend a lecture and an “exclusive donor reception” after the lecture. The answer is that you may accept this invitation, and you and your spouse may attend both the lecture and the reception.

The Aquarium receives an annual grant from the county, and may therefore be a controlled donor. You are a county employee who works on the grant application process, even though you are not involved in the decision to award the grant. The host of the reception has indicated that the cost per person for the reception is under \$20, which falls within the exception for “occasional meals and beverages of modest value” under §5-106(c)(2)(i). The invitation is for “two adults”, which indicates that you are expected to bring a guest. For an event where a companion is expected, a permitted gift of a meal and beverages of modest value would fall within the \$50 range.

Thank you for your inquiry.

Sincerely,

Betsy K. Dawson  
Executive Director