



**ANNE ARUNDEL COUNTY  
ETHICS COMMISSION**

February 18, 2008

*By Electronic Mail Only*

Re: AO-08-12

You inquired whether you may accept an invitation, extended to you and a guest, to attend a cocktail reception, dinner, and show being offered by the Medieval Times restaurant and theatre. The ethics commission advises that you may not accept this invitation.

Medieval Times is a private commercial entity with locations throughout the country. It offers dinner and an elaborate staged show. Tickets to the show are offered to the public, according to the website, [www.medievaltimes.com](http://www.medievaltimes.com), at about \$50 per adult, and \$38 per child.

If Medieval Times is a controlled donor, i.e. an entity that is described in §7-5-106(b) of the ethics law, this gift is prohibited unless it falls under any of the exceptions to the prohibition. Because it exceeds the “modest value” maximum of \$25 for meals<sup>1</sup> and beverages, and the nominal value of \$25 for other gifts, it does not fit within these exceptions. As a commercial enterprise, it does not fit in the “charitable, cultural, or political event” exception to the prohibition.

Even if Medieval Times is not a controlled donor, the gift probably is still prohibited under §7-5-107(a). This provision prohibits “private gain” that is offered to an employee because of the employee’s position. If the invitation was sent to you in your capacity as a member of the county council, it was extended to you because of your official position. A couple of indicia of an “official” invitation as opposed to a personal one would be that the invitation was also made to other elected officials or that it was addressed to you in your official capacity or sent to your county address. If the invitation was extended to you because you are a member of the county council, you may not accept the invitation.

Thank you for your inquiry.

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<sup>1</sup> The ethics commission has established a maximum of \$50 for meals and beverages offered to a county employee to attend an event where a spouse or partner would be expected to attend as well. That is not necessarily the case here; the invitation is extended to you and a “guest,” presumably that could include a child or anybody else.

The Anne Arundel County Ethics Commission

/s/

By: \_\_\_\_\_

Betsy K. Dawson, Executive Director