

December 10, 1996

**Advisory Opinion 1996 - No. 13  
Inaugural Dinner Event**

The Board has received a request for an advisory opinion from Ron Rowe, President of the Inaugural Ball Committee, who has waived confidentiality.

**QUESTION**

Would it be a violation of the ethics laws if the Inaugural Dinner event to be held in January, 1997, has corporate sponsorship, under the following conditions?

The Inaugural Committee has traditionally held an honored guest dinner for state elected officials as part of the festivities for the Governor's Inaugural Ball. The invitees are designated by the committee by virtue of the office they hold. The elected officials invited are the Supreme Court Justices, legislative leaders and state-wide elected officials.

In the past, Sea-First Bank, or one of its predecessors, has been the corporate underwriter for the cost of the dinner. No gifts are provided to the invitees beyond the food and beverages for the dinner. Sea-First provides its corporate contribution directly to the Inaugural Committee, a group of local citizens in the Olympia area. The invitations to the dinner come from the Committee, and the bank has no role in deciding who will be invited.

**OPINION**

The answer is no, such an event would not be a violation of the State Ethics Act.

**ANALYSIS**

A. The Board has first assumed that the event in question is a separate, limited attendance restaurant-style dinner, rather than the reception-style food service provided in conjunction with the Inaugural Ball. If that is the case, the event falls within the exemption provided by RCW 42.52.150(2)(g) for "admission to, and the cost of food and beverages consumed at, events sponsored by or in conjunction with a civic, charitable, governmental, or community organization."

The Inaugural Ball has a long history in Washington State as one of the expected and customary functions associated with the inauguration of a governor and other state officials. The honored guest dinner has also been a part of the evening's events for many years. The organizing committee is a nonprofit entity created strictly for the purpose of organizing the inaugural festivities. Such an activity clearly fits the concept of an event sponsored by a civic or community organization.

The Board has previously held that complimentary admission to a civic or community event may not be permissible if the invitation comes from a third-party lobbyist or lobbyist-employer because it could be a violation of the reasonable expectation" standard in RCW 42.52.140 (**Advisory Opinion 1996 - No. 10**). In this case a lobbying entity is providing the funding for the dinner, but the civic/community organization is the source of the invitation and determines who will attend.

B. If, on the other hand, it is assumed that the event in question is not a separate dinner, but is part of the buffet-style reception which is provided with the Inaugural Ball, then the event would fall within the exemption stated in RCW 42.52.150(2)(f): "food and beverages consumed at hosted receptions where attendance is related to the state officer's or state employee's official duties."