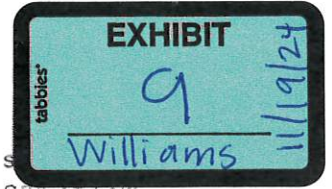




James H. Burns  
Partner  
T: (803) 255-9586  
james.burns@nelsonmullins.com

NELSON MULLINS RILEY & SEAMAN  
ATTORNEYS AND COUNSELORS AT LAW  
1320 Main Street  
17th Floor  
Columbia, SC 29201  
T: (803) 799-2000 F: (803) 256-7500  
nelsonmullins.com



November 15, 2024

**Via Electronic Mail**

Justin T. Williams  
122 Emerald Court Road  
Columbia, SC 29209

RE: Opinion Letter on Definition of Political Gathering

Dear Justin:

You have asked me to provide you with an opinion regarding the application of the definition of “political gathering” pursuant to the South Carolina Code of Judicial Conduct (“Judicial Code”), as well as the applicability of the South Carolina Ethics, Government Accountability, and Campaign Reform Act of 1991, S.C. Code Ann. § 8-13-100 et seq., as amended (“Ethics Act”) and advisory opinions from the State Regulation of Public Utilities Review Committee (“PURC”). More specifically, you are the Vice-Chair of the Public Service Commission, a quasi-judicial role, and you have submitted an application with the Judicial Merit Selection Commission to run for a judicial seat.

This opinion letter is based on facts provided to me by you, and this letter does not have the effect of an official advisory opinion provided by either the South Carolina State Ethics Commission (“SEC”), the PURC, or the Office of the South Carolina Attorney General.

You provided me with the following facts. In August 2024, you applied to the Judicial Merit Selection Commission for consideration as a candidate for the judiciary, namely as a circuit court judge. As part of your application, you signed an Acknowledgement of Application Form stating that you “understand that as a judicial candidate [you are] bound by the Judicial Canons.” The Judicial Canons, or Judicial Code, are promulgated in South Carolina Appellate Court Rules, Rule 501, Rules Governing the Judiciary, Employees of the Judicial Branch and Other Assisting the Judiciary. On September 7, 2024, you, along with your spouse and child, attended a public event/public forum sponsored by the Alpha Kappa Alpha Sorority, Inc. titled Soaring to the Polls Public Forum: Engage, Educate & Empower; Your Future, Your Choice: Vote! that included a panel discussion about community issues, families, and children. Importantly, this event was held at a public school, Columbia High School. See Alpha Kappa Alpha Sorority, Inc. Event Flyer

Justin Williams  
November 15, 2024  
Page 2

attached as Exhibit 1. You attended this event in your personal capacity as a member of the community. You did not lend your official title as a member of the Public Service Commission or any title you may have as a candidate for the judiciary. You did not speak at the event, and you did not have any official role at the event. You did not coordinate the event schedule or disseminate any information discussed at the event. Once again, you only attended the event with your wife and young son.

As a commissioner on the Public Service Commission, you are bound by the requirements in S.C. Code Ann. § 58-3-30 regarding conduct and ethics. S.C. Code Ann. § 58-3-30 states:

(A) The commissioners shall take the oath of office provided by the Constitution and the oaths prescribed by law for state officers.

(B) The commissioners and commission employees are bound by the Code of Judicial Conduct, as contained in Rule 501 of the South Carolina Appellate Court Rules, except as provided in Section 58-3-260, and the State Ethics Commission must enforce and administer those rules pursuant to Section 8-13-320. In addition, commissioners and commission employees must comply with the applicable requirements of Chapter 13 of Title 8.

(C) Each year, the commissioners and their employees must attend a workshop of at least six contact hours concerning ethics and the Administrative Procedures Act. This workshop must be developed with input from the review committee.

S.C. Code Ann. § 58-3-30. Accordingly, you are bound by the Judicial Code in your capacity as a member of the Public Service Commission, and in light of your affirmed candidacy for a circuit court judicial seat, this also binds you to the canons in the Judicial Code.

You have asked me to opine on whether your attendance at the Alpha Kappa Alpha Sorority, Inc. event is considered attendance at a political gathering. In my opinion, this event was not a political gathering, and your attendance at the same does not violate the Judicial Code or the Ethics Act.

Canon 5 of the South Carolina Appellate Court Rules, Rule 501 is intended to prohibit a judge or judicial candidate from inappropriate political activity. Canon 5(A)(1)(d) states that "a judge or a candidate for election or appointment to judicial office shall not: . . . (d) attend political gatherings; . . . ." While the Judicial Code does not define the term "political gathering," political organization is defined as "a political party or other group, the principal purpose of which is to further the election or appointment of candidates to political office." See Rule 501, SCACR. Accordingly, it is important to look at the characteristics of the organization, the Alpha Kappa Alpha Sorority, Inc. that sponsored

Justin Williams  
November 15, 2024  
Page 3

the September 7 event. The mission of the Alpha Kappa Alpha Sorority, Inc. is "to cultivate and encourage high scholastic and ethical standards, to promote unity and friendship among college women, to study and help alleviate problems concerning girls and women in order to improve their social stature, to maintain a progressive interest in college life, and to be of 'Service to All Mankind.'" See <https://aka1908.com/>. The Alpha Kappa Alpha Sorority, Inc. disseminates very specific guidelines to its members regarding political activities and the prohibition of the Alpha Kappa Alpha Sorority, Inc. not officially sponsoring or engaging in the same. See Alpha Kappa Alpha Sorority, Incorporated Political Activity Guidelines attached as Exhibit 2.

To be sure, when you consider the attendees—families—and the subject matter—community issues impacting families—along with the guidelines of the organization sponsoring the event—taken together this event is simply not a political gathering. Couple these facts with your actions at the event: you attended with your wife and son, you did not speak at the event, you did not coordinate the event, and you did not lend your official title to the event, and the conclusion is the same—the event you attended is not considered a political gathering.

There are instances when events that one might not consider a political gathering is in fact deemed a political gathering. PURC issued a follow up to an Advisory Opinion dated February 27, 2006, that addresses whether attendance by commissioners or commissioner candidates at legislative caucus meetings is permissible. See State Reg. of Pub. Utilities Rev. Comm. Discussion of Advisory Opinion dtd Feb. 27, 2006 attached as Exhibit 3. The Review Committee established an official position that, "in the context of the screening process for Public Service Commission elections, the Review Committee considers legislative caucus meetings to be political gatherings under Cannon 5 of the Code of Judicial Conduct." *Id.* Legislative caucus meetings are sponsored by either the Democrat or Republican parties, respectively. This is distinctly different than the event you attended on September 7.

Based on the facts you provided me related to the September 7 event, your knowledge and understanding of the Judicial Code's prohibition for you to attend political gatherings, and the relevant jurisprudence, the logistical conclusion is that you in fact did not attend a political gathering on September 7.

If the facts and/or circumstances change or additional information is provided, please let me know so I can provide any additional analysis. Please let me know if you have any questions.

Very truly yours,

*/s James H. Burns*  
James H. Burns

Enclosures

---

---

## **EXHIBIT 1**

---

Alpha Kappa Alpha Sorority, Incorporated®

GAMMA NU OMEGA | UPSILON OMEGA OMEGA | OMEGA GAMMA OMEGA

# SOARING TO THE POLLS PUBLIC FORUM



# ENGAGE, EDUCATE, & EMPOWER

## YOUR FUTURE, YOUR CHOICE: VOTE!

PANEL  
DISCUSSION

VOTER  
REGISTRATION

DOOR  
PRIZES

COLUMBIA HIGH SCHOOL  
AUDITORIUM  
1701 WESTCHESTER DR.  
COLUMBIA, SC 29210

SEPTEMBER 7  
11AM - 1PM

THIS EVENT IS OPEN TO THE PUBLIC

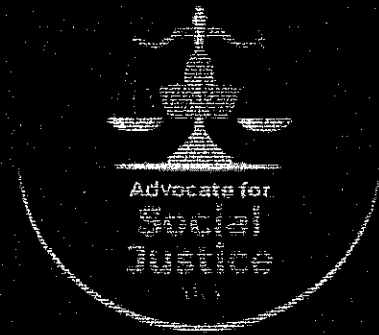


# Alpha Kappa Alpha Sorority, Incorporated®

GAMMA NU OMEGA | UPSILON OMEGA OMEGA | OMEGA GAMMA OMEGA

Moderator and Special Guest

Engage, Educate, and  
Empower



## Soaring to the Polls Public Forum

Saturday, September 7, 2024  
11:00am - 1:00pm

Columbia High School Auditorium  
701 West Chester Drive  
Columbia, SC 29210

**\*\*Live DJ and door prizes! \*\***  
All generations welcome!



Cynthia Hardy



Bakari Sellers

### Panelists



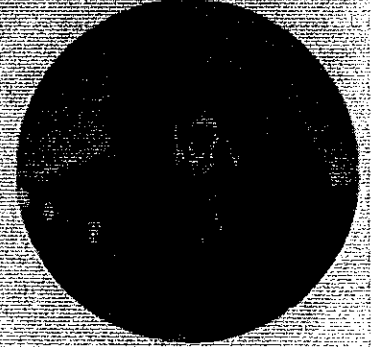
Dr. Wes Bellamy



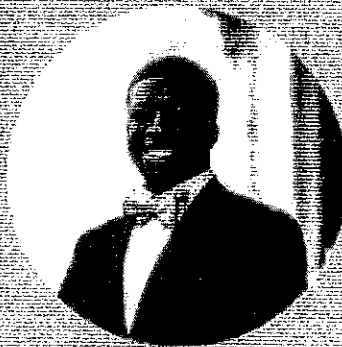
Rep. Annie McDaniel



Antjuan Seawright



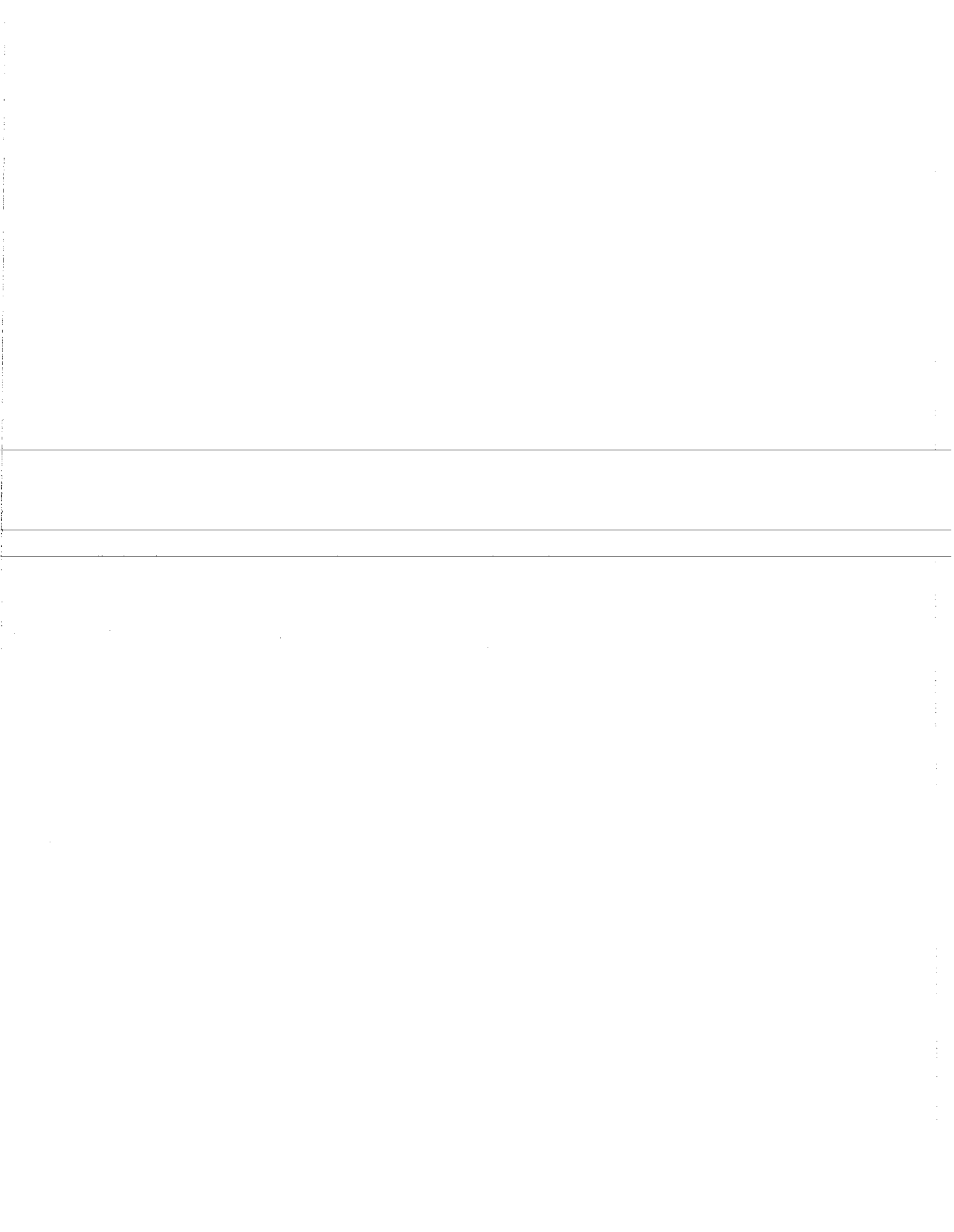
Jessica Bright



Tyler Gadson



Shelley Williams



---

---

## **EXHIBIT 2**

---



**ALPHA KAPPA ALPHA SORORITY, INCORPORATED**  
**POLITICAL ACTIVITY GUIDELINES**

1. The Supreme Basileus or her designee is the only spokesperson for Alpha Kappa Alpha Sorority, Incorporated®.
2. Members are not authorized to endorse a political candidate or make political contributions on behalf of Alpha Kappa Alpha Sorority, Incorporated®.
3. Members are permitted to engage in political activity in their **individual** capacities and must make their individual participation clear and unambiguous.
4. Members cannot wear paraphernalia while working on political campaigns or distributing political buttons, flyers, or other campaign literature.
5. Members are authorized to wear paraphernalia at non-partisan, political activities such as a voter registration drive or get out the vote (GOTV) efforts.
6. ~~Members cannot wear paraphernalia, display hand gestures and symbols, or issue the “Skee-Wee”® call at political events.~~
7. Pink and Green are universal colors and can be worn while participating in political activities as long as the symbols and sorority name are not printed, referenced or displayed in any way.
8. Vendors are not authorized to sell merchandise on social media platforms and members should refrain from purchasing paraphernalia through social media.
9. Vendors selling unauthorized AKA-branded paraphernalia and merchandise should be reported to the Corporate Office immediately for further action using the **Vendor Infraction Form**.
10. Members must exercise good judgment when posting and commenting on social media and may only speak in their **individual** capacities. Avoid negative commentary and unproductive chats. Stick to the facts.
11. Members are not authorized to speak with media outlets on behalf of Alpha Kappa Alpha. Media inquiries should be referred to [exec@akaa1908.com](mailto:exec@akaa1908.com).
12. Members should contact their Regional Director with any questions.

Developed by the International Connection Committee and  
the International Risk Management Task Force

---

---

**EXHIBIT 3**

## ***State Regulation of Public Utilities Review Committee***

*Sen. Thomas C. Alexander, Chairman*  
*Rep. William E. Sandifer, III, Vice Chairman*  
*Elizabeth H. Atwater, Esquire*  
*Erik H. Ebersole*  
*Rep. P. Michael Forrester*  
*Sen. C. Bradley Hutto*  
*Rep. Harry L. Ott, Jr.*  
*Sen. Luke A. Rankin, Sr.*  
*John Steven Simmons, Esquire*  
*Helen T. Zeigler, Esquire*



*Heather Anderson*  
*Committee Counsel*  
*Andy Fiffick*  
*Committee Counsel*

*Post Office Box 142*  
*Columbia, South Carolina 29202*  
*(803) 212-6208*

---

**SUBJECTS: 1) ATTENDANCE BY CANDIDATES FOR THE PUBLIC SERVICE COMMISSION AT LEGISLATIVE RECEPTIONS**

**2) ATTENDANCE BY CANDIDATES FOR THE PUBLIC SERVICE COMMISSION AT LEGISLATIVE CAUCUS MEETINGS**

DISCUSSION OF SUBJECT 1: In an Advisory Opinion dated February 27, 2006 (attached as Exhibit A), the State Regulation of Public Utilities Review Committee ("Review Committee") addressed the issue of attendance by candidates for the Public Service Commission at legislative receptions. In that opinion, the Review Committee established the position that in the context of the screening process for Public Service Commission elections, candidates seeking election to the Public Service Commission should not attend legislative receptions sponsored by (1) a lobbyist's principal, (2) an entity regulated by the Public Service Commission, or (3) a party appearing before the Public Service Commission. It has come to the attention of the Review Committee that there are legislative receptions that, while not in one of these three categories, are receptions that should nonetheless be avoided by candidates for the Public Service Commission, including incumbent and non-incumbent candidates, for the same reasons articulated in the Review Committee's February 27, 2006 opinion. As such, the Review Committee hereby establishes an official position that, in the context of the screening process for Public Service Commission elections, all candidates for the Public Service Commission, not just candidates who are incumbent commissioners, should also not attend any reception:

(1) that is extended to the House or Senate Invitations Committee pursuant to House Rule 4.13 or Senate Rule 48; (2) that notice of which is published in the Calendar of the House or Senate; or (3) that notice of which is posted on the webpage of the House or Senate Invitations Committee. Failure to follow these three additional guidelines as set forth in this opinion on or after January 15, 2013 may be considered by the Review Committee as a factor in its screening process.

DISCUSSION OF SUBJECT 2: In an Advisory Opinion dated February 27, 2006 (Exhibit A), the State Regulation of Public Utilities Review Committee ("Review Committee") addressed the issue of attendance by candidates for the Public Service Commission at legislative receptions. While the February 27, 2006 opinion delineates the Review Committee's position that commissioners and commission candidates are prohibited from political gatherings under Cannon 5 of the Code of Judicial Conduct, it has come to the attention of the Review Committee that, inasmuch as the February 27, 2006 opinion does not directly address the attendance by candidates for the Public Service Commission at legislative caucus meetings, clarification is necessary. Therefore, the Review Committee hereby establishes an official position that, in the context of the screening process for Public Service Commission elections, the Review Committee considers legislative caucus meetings to be political gatherings under Cannon 5 of the Code of Judicial Conduct. As such, candidates for the Public Service Commission, including incumbent and non-incumbent candidates, should not attend legislative caucus meetings. Legislative caucus meetings would not include meetings based on geographically based groups organized by congressional district or county. Failure to follow the guidelines as set forth in this opinion after January 15, 2013 may be considered by the Review Committee as a factor in its screening process.

---

**THIS OPINION IS ADVISORY IN NATURE ONLY. THE STATE ETHICS COMMISSION IS RESPONSIBLE FOR ENFORCING VIOLATIONS BY INCUMBENT COMMISSIONERS OF THE STATE ETHICS ACT AND THE CODE OF JUDICIAL CONDUCT. THE REVIEW COMMITTEE MAY CONSIDER VIOLATIONS WHEN IT CONSIDERS A CANDIDATE'S QUALIFICATIONS.**

*Candidates may contact Review Committee counsel, Heather Anderson at (803) 212-6208 or Andy Fiffick (803) 734-3015 for questions or clarification regarding this advisory opinion.*

**EXHIBIT A**

***State Regulation of Public Utilities Review Committee***

*Sen. Thomas L. Moore, Chairman*  
*Rep. Harry F. Cato, Vice Chairman*  
*Sen. Thomas C. Alexander*  
*Elizabeth H. Atwater, Esquire*  
*Erin B. Crawford, Esquire*  
*Rep. Harry L. Ott, Jr.*  
*Sen. Luke A. Rankin, Sr.*  
*Rep. William E. Sandifer, III*  
*John Steven Simmons, Esquire*  
*Helen T. Zeigler, Esquire*



*Post Office Box 142*  
*Columbia, South Carolina 29202*  
*(803) 212-6625*

*Nancy V. Coombs*  
*Chief Counsel*  
*Jennifer L. Parrish*  
*Committee Counsel*  
*Debra D. Hammond*  
*Committee Staff*

February 27, 2006

---

**SUBJECT: ATTENDANCE BY CANDIDATES FOR THE PUBLIC SERVICE COMMISSION AT LEGISLATIVE RECEPTIONS**

---

**SUMMARY:** Candidates seeking election to the Public Service Commission should not attend legislative receptions sponsored by (1) a lobbyist's principal, (2) an entity regulated by the Public Service Commission, or (3) a party appearing before the Public Service Commission.

**QUESTION:** The Review Committee has been asked whether a candidate for the Public Service Commission may attend legislative receptions.

**DISCUSSION:** Members of the Public Service Commission (the commission) are subject not only to statutory constraints on their conduct and activities but also to constraints arising out of the Code of Judicial Conduct, Rule 501, SCACR. With respect to statutory constraints, a public official of a state agency, board, or commission must not accept lodging, transportation, entertainment, food, meals, beverages, or an invitation to a function paid for by a lobbyist's principal, unless the entire board or commission of which the public official is a member is invited. S.C. Code Ann. §2-17-90(A)(2). If a candidate is currently serving as a commissioner, he is prohibited by statute from attending a function unless the entire commission is invited. The Review Committee has been made aware that candidates for offices elected by the General Assembly sometimes attend receptions sponsored by lobbyists' principals even though they are not invited to the functions. If the entire commission is not invited, a commissioner must not attend a legislative reception sponsored by a lobbyist's principal.

Pursuant to §8-13-705, a person must not give, offer, or promise anything of value to a commissioner with the intent to influence the discharge of the commissioner's official responsibilities, and a commissioner must not receive anything of value in return for fulfilling his official responsibilities or duties. A reasonable person could deduce that the impartiality of a commissioner may be influenced by the hospitality shown by the host; therefore, a commissioner

should not attend receptions sponsored by an entity regulated by the commission or by a party appearing before the commission.

Additionally, pursuant to §8-13-935, candidates seeking election to the Public Service Commission are prohibited from directly or indirectly contacting a member of the General Assembly regarding screening until the qualifications for all candidates have been determined by the Review Committee and a report on the qualifications has been formally released. Candidates have ample opportunities to contact members of the General Assembly at the appropriate time without attending legislative receptions.

Pursuant to §58-3-30(B), members of the Public Service Commission are bound by the Code of Judicial Conduct. Canon 1 of the Code of Judicial Conduct requires commissioners to participate in establishing, maintaining, and enforcing high standards of conduct, and to personally observe those standards. Canon 2 of the Code of Judicial Conduct requires commissioners to act at all times in a manner that promotes public confidence in the integrity and impartiality of the commission, and avoid impropriety and the appearance of impropriety. "The test for appearance of impropriety is whether the conduct would create in reasonable minds a perception that the [commissioner's] ability to carry out [quasi-judicial] responsibilities with integrity, impartiality and competence is impaired." Canon 2, Commentary. Commissioners are subject to strict statutory prohibitions against ex parte communication. S.C. Code Ann. §58-3-260. Not only must commissioners refrain from improper ex parte communication, they also must avoid the appearance of engaging in improper ex parte communication. The opportunity exists for commissioners to engage in ex parte communications at legislative receptions sponsored by a lobbyist's principal, an entity regulated by the commission, or a party appearing before the commission; therefore, the attendance of a commissioner at a legislative reception could create the appearance of impropriety.

Canon 4D(5)(h) prohibits judges from accepting gifts from lawyers or their firms if they have come or are likely to come before the judge, or from their clients when the clients' interests have come or are likely to come before the judge. This canon, in addition to §8-13-705, prohibits commissioners from accepting gifts from lawyers who appear before the commission and from utilities regulated by the PSC. This would include legislative receptions. Canon 5 prohibits commissioners and commission candidates from attending political gatherings.

Statutory law does not address whether a candidate who is not currently serving on a state board or commission may attend a legislative reception. To ensure that all candidates are afforded equal treatment, the Review Committee is of the opinion that all candidates for the Public Service Commission, not just candidates who are incumbent commissioners, should not attend receptions sponsored by a lobbyist's principal, an entity regulated by the commission, or a party appearing before the commission. Attendance by a candidate for the Public Service Commission at a legislative reception sponsored by a lobbyist's principal, an entity regulated by the commission, or a party appearing before the commission may be considered by the Review Committee as a disqualifying factor.

**CONCLUSION:** Candidates seeking election to the Public Service Commission should not attend legislative receptions sponsored by (1) a lobbyist's principal, (2) an entity regulated by the

Public Service Commission, or (3) a party or person appearing before the Public Service Commission.

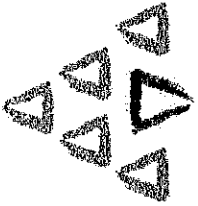
**THIS OPINION IS ADVISORY IN NATURE ONLY. THE STATE ETHICS COMMISSION IS RESPONSIBLE FOR ENFORCING VIOLATIONS BY INCUMBENT COMMISSIONERS OF THE STATE ETHICS ACT AND THE CODE OF JUDICIAL CONDUCT. THE REVIEW COMMITTEE MAY CONSIDER VIOLATIONS WHEN IT CONSIDERS A CANDIDATE'S QUALIFICATIONS.**

---

---

---





**Ballard & Watson**  
Attorneys at Law  
PERSISTENT. UNWAVERING.

Desa Ballard  
Harvey M Watson III  
Haley Hubbard

226 State Street West Columbia, SC 29169  
ph 803.796.9299 | fx 803.796.1066 | desaballard.com

November 15, 2024

Via Email Only (jtw225@gmail.com)

Justin T. Williams, Esquire  
101 Executive Center Drive  
Columbia, South Carolina 29210

Re: Opinion regarding Canon 5A of the Code of Judicial Conduct and the definition of "political gathering"

Dear Justin:

You requested an opinion on whether a community event hosted and sponsored by a collegiate sorority organization can be properly categorized as a "political gathering" under Canon 5A of the Code of Judicial Conduct.

By way of background, you currently serve as Commissioner and Vice Chairman of the Public Service Commission of South Carolina ("PSC"), and you are a candidate for election or appointment to judicial office. Pursuant to S.C. Code Ann. §58-3-30(B), members of the PSC are bound by the Code of Judicial Conduct. Additionally, the Code of Judicial Conduct governs the conduct of candidates for judicial office. Canon 5A(1)(d) prohibits a judge or judicial candidate from "attend[ing] political gatherings."

It is my understanding that you attended an event on or about September 7, 2024, entitled "Engage, Educate, and Empower: Soaring to the Polls Public Forum." This event was hosted by Alpha Kappa Alpha Sorority, Incorporated. Through the JMSC screening process, it has been posited to you that the above-referenced event may be a political gathering, which Canon 5A(1)(d) prohibits you from attending as a member of the PSC and a candidate for judicial office. Based on my understanding of the facts and my review of the Code of Judicial Conduct and relevant Opinions issued from the Advisory Committee on Standard of Judicial Conduct, it is my opinion that the community event hosted by Alpha Kappa Alpha is not a "political gathering" as prohibited by Canon 5A of the Code of Judicial Conduct ("CJC").

Upon reviewing the CJC, there is no definition provided for "political gathering," however "political organization" is defined, and I believe that it is most helpful in determining what events constitute a "political gathering." The CJC defines a political organization as a "political party or other group, *the principal purpose of which is to further the election or appointment of candidates to political office.*" (Emphasis added). Since the definition of a political organization appears to turn on

its principal purpose to further the election or appointment of candidates to political office, the first step in determining whether or not the sorority event is a “political gathering” is to determine the principal purpose of the event. From my review of the sorority event flyer and subsequent news articles describing the event, it appears that the principal purpose of the event was to educate the community about the importance of voting in not only the presidential elections, but it statewide and local elections. Eligible attendees were also provided with the ability to register to vote. This was a non-partisan event open to all members of the community, which was held at a local high school auditorium. No candidate for political office was featured or appeared on any advertising materials for the event, and no candidates for political office were endorsed by Alpha Kappa Alpha Sorority.

Past Opinions issued by the Advisory Committee on Standards of Judicial Conduct (“Committee”) also provide guidance on whether attending similar events is permissible under the CJC. Most recently, in Opinion No. 02-2023, the Committee received an inquiry as to whether a part-time magistrate judge could use his title on a program for a community event hosted by a fraternity. This event was described as a fraternity event, hosted by the judge, in which various community issues would be addressed by a panel of speakers. The Committee did not even address whether the judge could attend the event and only concluded that the inquiring judge could not use his title on the program for the event. Similarly, the event at issue in the instant analysis was hosted by a sorority organization in a similar format to the event in Opinion No. 02-2023. While there was no judge hosting the event, a panel of speakers discussed issues related to voting and the impact and importance of voting.

Additionally, in Opinion No. 11-2010, the Committee found that it was appropriate for a family court judge to give a speech at an event sponsored by the League of Women Voters. The inquiring judge sought guidance because while the League of Women Voters is a non-partisan organization, it is closely tied to the political process and the topic of the speech is a controversial political issue. The Committee determined that the inquiring judge was permitted to speak at the event pursuant to Canon 4B. However, the Committee also referred to Canon 5A(1) and cautioned that if the speech involved requests for the judge’s opinion on the qualifications of judicial candidates, then the judge should not attend or speak at the event. As previously mentioned, the event hosted by Alpha Kappa Alpha Sorority was a non-partisan community event. Furthermore, Alpha Kappa Alpha is an intercollegiate sorority which is also a 501(c)(7) non-profit organization that is prohibited from endorsing candidates for political office. Similar to the analysis in Opinion No. 11-2010, if the event involved the endorsement of a political candidate or discussion of the qualification of various judicial candidates, then it would constitute a “political gathering” from which you would be prohibited from attending as a member of the PSC and as a candidate for judicial office.

Again, it is my opinion, based on the CJC and the Opinions of the Advisory Committee on Standards of Judicial Conduct, that the community event hosted by Alpha Kappa Alpha Sorority, Incorporated on September 7, 2024, was not a “political gathering” from which you are prohibited from attending pursuant to Canon 5A(1)(d). If the event promoted or endorsed a specific candidate, or the sorority hosting the event was affiliated with a specific political organization or party, then I

Mr. Justin Williams, Esquire  
In re: Opinion Letter  
November 15, 2024

Page 3 of 3

think it would be fairly characterized as a political event. However, a non-partisan event targeted at educating members of the community about the importance of voting and registering eligible voters is not a political gathering, and it is my opinion that attending such an event is permissible under Commentary to Canon 4A. (“Complete separation of a judge from extra-judicial activities is neither possible nor wise; a judge should not become isolated from the community in which the judge lives.”)

Thank you for allowing me to assist you with this matter. If you have any questions or wish to discuss the opinion further, please feel free to call or email me.

With warm personal regards, I am,

Sincerely yours,

*Haley A. Hubbard*

---

Haley Hubbard  
haley@desaballard.com

---

---