



TEXAS ETHICS COMMISSION



ETHICS ADVISORY OPINION NO. 619

March 11, 2025

ISSUE

Whether a judge may use political contributions to pay for reasonable travel expenses associated with attending a naval ceremony as an invited local dignitary. (AOR-719)

SUMMARY

Under the facts presented, a judge would not convert political contributions to personal use by using political contributions to pay or reasonable travel expenses to attend a naval ceremony as an invited local dignitary.

FACTS

The requestor is a state judge who is also the Regional Presiding Judge for a Judicial Region of Texas. The requestor has been invited to take part in a Federal Celebration of the Navy, specifically about showcasing a Naval Air Station located in one of the counties within her Judicial Region.

The showcase will take place on the USS George H.W. Bush aircraft carrier, which will be near Norfolk, Virginia. The invitation explains that the officials who are invited would need to travel to Norfolk, and the next day, the Navy would fly the invitees out to the USS George H.W. Bush aircraft carrier for the ceremony and celebration.

The requestor asks whether she may use campaign contributions to pay for reasonable travel expenses to Norfolk, Virginia to attend this ceremony.

ANALYSIS

A candidate or officeholder may not convert political contributions to "personal use." *Id.* § 253.035(a), (c). "Personal use" means "a use that primarily furthers individual or family purposes not connected with the performance of duties or activities as a candidate for or holder of a public office." *Id.* § 253.035(d).

Whether it is appropriate for a candidate or officeholder to spend political funds for travel depends on the purpose of the travel. It is appropriate for a candidate to spend political contributions to pay the travel expenses if the expenses are primarily connected to officeholder activities or duties. Conversely, the Election Code does not permit the use of political

contributions to pay for travel if the primary purpose of the trip is personal. Tex. Ethics Comm'n Op. No. 297 (1996).

Here, the facts indicate that the primary purpose of the travel is connected to requestor's officeholder duties or activities. The requestor was invited to attend the event as a local dignitary. The requestor is the Regional Presiding Judge for the Judicial Region that contains a naval airbase that will be showcased at the naval ceremony and celebration. We believe attending a ceremonial event hosted by a governmental entity under the facts presented is an officeholder activity. We are aware of no facts to suggest the travel would be for a personal or family purpose not connected with attending the governmental function. Therefore, under the facts presented, the requestor may use political contributions to pay for reasonable travel expenses to attend the event.