



CONFLICT OF INTEREST GUIDANCE FOR FIRSTNET BOARD MEMBERS

Board members of the First Responder Network Authority (FirstNet) are barred by a criminal conflict of interest statute from participating in any way as a Federal employee in any matter that will have a direct and predictable effect on the financial interests of:

- the member,
- the spouse of the member,
- a minor child of the member,
- a general partner of the member,
- a non-Federal employer of the member,
- anyone with whom the member is seeking employment or has an arrangement regarding future employment, or
- an organization in which the member serves as an officer, director, trustee, or other fiduciary

unless participation is legally permitted, such as through a regulatory exemption (for example, an interest in a broadly-diversified U.S.-registered mutual fund or an interest in a security traded on a U.S. exchange that is of minimal value).

In addition, ethics regulations bar a member, as a Federal employee, from participating in a matter involving specific parties if:

- the matter will affect the financial interests of someone in the member's household or
- one of the parties to the matter is, or is represented by,
 - someone with whom the member has or is seeking a business or financial relationship (other than a routine consumer transaction);
 - someone with whom the spouse, parent, or dependent child of the member is serving or seeking to serve as an officer, director, trustee, general partner, agent, attorney, consultant, contractor, or employee;
 - any person or entity for whom the member has within the last year served as an officer, director, trustee, general partner, agent, attorney, consultant, contractor, or employee; or
 - an organization in which the member is an active participant

unless participation has been specifically authorized under applicable ethics regulations.

Further information or advice regarding these rules can be provided by attorneys in the Ethics Law and Programs Division of the Office of the Assistant General Counsel for Administration, at ethicsdivision@doc.gov or 202-482-5384.

*Prepared by the Ethics Law and Programs Division, Office of the General Counsel,
United States Department of Commerce – 202-482-5384 – ethicsdivision@doc.gov –
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