



ETHICS PRESENTATION

Briefing by
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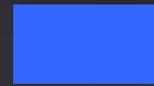
Gifts



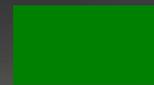
Government Resources



Outside Activities



Financial Interests



Personal Relationships



Post-employment



GIFTS

You may not accept personal gifts from anyone with matters before Commerce, with some exceptions: < US\$20; a widely-attended gathering (if approved); from a foreign government, or a meal overseas.

You may not offer a gift to a supervisor or accept a gift from a subordinate (unless \$10 or less or a major event).

With approval you may accept gifts to the Government, including travel gifts.

 **William, a US&FCS employee and skilled orator, delivers a speech as part of his Commercial Service duties at a luncheon during an American Chamber of Commerce meeting in Mexico City.**



 William, a US&FCS employee and skilled orator, delivers a speech as part of his commercial service duties at a luncheon during an American Chamber of Commerce meeting in Mexico City.

If the Chamber offers him a \$50 pen and a \$100 honorarium for his speech, may he accept them?



 William, a US&FCS employee and skilled orator, delivers a speech as part of his Commercial Service duties at a luncheon during an American Chamber of Commerce meeting in Mexico City.

May William accept an invitation to an AmCham reception for 60 U.S. company executives the night before the meeting?



 William, a US&FCS employee and skilled orator, delivers a speech as part of his Commercial Service duties at a luncheon during an American Chamber of Commerce meeting in Mexico City.

May William accept an invitation to play golf with a few Mexican and U.S. business persons after his speech ?



 **William, a US&FCS employee and skilled orator, delivers a speech as part of his Commercial Service duties at a luncheon during the American Chamber of Commerce meeting in Mexico City.**

May William buy a gold bracelet for his boss, Elizabeth, a DAS visiting from HQ? (It's her first visit and she loves gold.)



 **William, a US&FCS employee and skilled orator, delivers a speech as part of his Commercial Service duties at a luncheon during the American Chamber of Commerce meeting in Mexico City.**

William takes a day of annual leave to see the city. May he use the discounted U.S. Government hotel rate for her extra night?



 William, a US&FCS employee and skilled orator, delivers a speech as part of his Commercial Service duties at a luncheon during the American Chamber of Commerce meeting in Mexico City.

May William ask the Chamber to underwrite his expenses for an export promotion tour of U.S. cities?



 **William, a US&FCS employee and skilled orator, delivers a speech as part of his Commercial Service duties at a luncheon during the American Chamber of Commerce meeting in Mexico City!**

May William sign a letter asking Chamber members to contribute to the Embassy's 4th of July celebration?



GOVERNMENT RESOURCES

Use Government resources only for authorized purposes.

You may access e-mail or the Internet for personal uses except NOT for:

-  **viewing sexually explicit material;**
-  **political activities;**
-  **business or profit-making purposes;**
-  **uses that result in additional costs; or**
-  **other uses barred by law or policy or that would discredit the Department.**

§ Kate, who handles advocacy for her CS Office, is in Singapore to assist Apple sell iPhones® to the local government. She brought her Government laptop and knows she is allowed to use it to access the Internet for personal purposes.



§ Kate, who handles advocacy for her CS Office, is in Singapore to assist Apple sell iPhones[®] to the local government. She brought her Government laptop and knows she is allowed to use it to access the Internet for personal purposes.

That night, she conducts business on her Avon[®] website and views Spring-Break-Uncensored.com (a hobby). Is this ok?



§ Kate, who handles advocacy for her CS Office, is in Singapore to assist Apple sell iPhones® to the local government. She brought her Government laptop and knows she is allowed to use it to access the Internet for personal purposes.

May Kate buy souvenirs with her Government credit card, if she spends less than her *per diem* and pays the bill early?



§ Kate, who handles advocacy for her CS Office, is in Singapore to assist Apple sell iPhones® to the local government. She brought her Government laptop and knows she is allowed to use it to access the Internet for personal purposes.

After she learns the local government will be buying iPhones may Kate call her broker to buy AT&T stock before it is made public?



§ Kate, who handles advocacy for her CS Office, is in Singapore to assist Apple sell iPhones® to the local government. She brought her Government laptop and knows she is allowed to use it to access the Internet for personal purposes.

She writes a letter to Apple complaining about her faulty personal iPhone she wants replaced; may she refer to her job title?



§ Kate, who handles advocacy for her CS Office, is in Singapore to assist Apple sell iPhones® to the local government. She brought her Government laptop and knows she is allowed to use it to access the Internet for personal purposes!

Kate starts a personal blog about international customs; may she use her official title to emphasize her expertise?





OUTSIDE ACTIVITIES



You may not engage in an outside activity that is barred by law, requires disqualification from important duties, or creates an appearance of misuse of your position.

Non-U.S. citizens (LES) may have outside employment if it does not conflict with ITA duties.

You may not contact a U.S. Government agency or court for others in your personal capacity.

 Harry, an ITA employee working in Santiago, is a world-renowned expert on free trade. Before joining ITA, he authored a book titled “Free Trade: Actions the U.S. Should Take to Compete on the World Market.”



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May he teach, for compensation, an on-line course on global markets offered by the New York University?



🗣️ Harry, an ITA employee working in Santiago, is a world-renowned expert on free trade. Before joining ITA, he authored a book titled “Free Trade: Actions the U.S. Should Take to Compete on the World Market.”

If he does teach at NYU, may he work on an MOU between ITA and the university to co-host a trade conference?



🗣️ Harry, an ITA employee working in Santiago, is a world-renowned expert on free trade. Before joining ITA, he authored a book titled “Free Trade: Actions the U.S. Should Take to Compete on the World Market.”

May he serve as a board member of the local American Chamber of Commerce on behalf of ITA?



🗣️ Harry, an ITA employee working in Santiago, is a world-renowned expert on free trade. Before joining ITA, he authored a book titled “Free Trade: Actions the U.S. Should Take to Compete on the World Market!”

May he use his ITA title with his name on the cover of the soon-to-be-published 2nd edition of his book (with a disclaimer)?



FINANCIAL CONFLICTS OF INTEREST

You may not work as a U.S. Government official on a matter affecting your personal financial interests, except:

- * an interest covered by a waiver;**
- * US\$15,000 or less in a U.S. publicly-traded stock or bond; or a**
- * U.S. diversified mutual fund.**

You may not invest in your country of assignment (except a residence).

 Pippa, a Trade Specialist working in Toronto, has been asked to develop a “Gold Key Program” for Coca-Cola (a major sponsor of 4th of July Events). Pippa owns \$75,000 of stock in the company. Unfortunately, that’s her only asset.



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May Pippa develop Coke’s Gold Key Program? (It will probably be reviewed and edited by several supervisors.)



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May Pippa comment on proposed legislation standardizing carbonation levels of beverages exported from the U.S.?



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Pippa plans to invest in the NAFTA/CAFTA/SAFTA Fund, which has holdings throughout the region. May she?





CONFLICTS OF INTEREST BASED ON PERSONAL RELATIONSHIPS



You may not work as a Government official on a matter if one of the parties is someone with whom you have a close personal or business relationship (a “covered relationship”).

Exceptions are sometimes allowed based on agency needs.

Charles recently worked at George Washington University but was then hired to work in the Commercial Service office in Belize City. One of his hobbies is scuba diving and he is an active member of the International Divers Education Association (IDEA).



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May Charles, as part of his ITA duties, set up a joint conference with GW?



Charles was recently hired from George Washington University to work in the Commercial Service office in Belize City. One of his hobbies is scuba diving and he is an active member of the International Diving Educators Association (IDEA).

Charles's sister, Anne, who works for Intel, comes to the office seeking advocacy help; may Charles provide it?



Charles was recently hired from George Washington University to work in the Commercial Service office in Belize City. One of his hobbies is scuba diving and he is an active member of the International Diving Educators Association (IDEA).

IDEA asks Charles to set up a meeting with the U.S. Ambassador regarding local dive taxes. Can he help set up the meeting?

Charles was recently hired from George Washington University to work in the Commercial Service office in Belize City. One of his hobbies is scuba diving and he is an active member of the International Diving Educators Association (IDEA).

Camilla (his boss) assigns him to review proposed U.S. regs, that IDEA opposes, concerning international fishing. May he?



Charles was recently hired from George Washington University to work in the Commercial Service office in Belize City. One of his hobbies is scuba diving and he is an active member of the International Diving Educators Association (IDEA)!

Charles is assigned to review a contract bid for translation services submitted by his best friend, Andrew. May Charles do this?



⚔ POST-EMPLOYMENT ⚔

You may not work as a Government official on a matter affecting a prospective employer.

After leaving Federal service, you will be subject to some restrictions on contacting the Government on behalf of others and on using nonpublic information.

¶ Phillip, an employee in ITA, is considering leaving Federal service. He instructs his headhunter to send his resume to the Textile Manufacturer's Association (TMA). He is scheduled to give the keynote address at TMA's annual meeting in July.



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Was Phillip wrong to instruct her headhunter to send her resume to TMA?

¶ Phillip, an employee in ITA, is considering leaving Federal service. He instructs his headhunter to send his resume to the Textile Manufacturer's Association (TMA). He is scheduled to give the keynote address at TMA's annual meeting in July.

A month has gone by and Phillip has not heard from TMA. He goes ahead and delivers the speech. Any problem?



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After 13 months at TMA, may Phillip call the Advocacy Center to ask about the status of a Gold Key he worked on while at ITA?



¶ Phillip, an employee in ITA, is considering leaving Federal service. He instructs his headhunter to send his resume to the Textile Manufacturer's Association (TMA). He is scheduled to give the keynote address at TMA's annual meeting in July.

On behalf of TMA, may Phillip submit comments on proposed changes to the CS fee schedule, a project he headed at ITA?





**For further guidance on the
ethics rules, please contact:**

**Ethics Law and Programs
Division**

202-482-5384

ethicsdivision@doc.gov