



GUIDELINES FOR POLITICAL APPOINTEES ENGAGING IN MEETINGS AND GIVING SPEECHES AT EVENTS HOSTED BY FORMER CLIENTS, EMPLOYERS, AND ORGANIZATIONS

Under ethics regulations and the Ethics Pledge, political appointees are generally barred for two years from participating in a matter in which a former client, or former employer, or organization for which formerly served as an officer or board member (hereinafter “former employer”), is a party or represents a party.

Meetings that Are Allowed – Notwithstanding this restriction, an employee can:

- give a speech at an event hosted by a former employer, provided that:
 - the event is not for financial gain (admission fees are only charged to recoup costs),
 - the event is not a fund-raiser,
 - the event is not a business development activity, and
 - this is not a repeat venue for the employee when other comparable forums are available;
- participate in meetings with a former employer, provided that:
 - the meeting is open to all interested parties and
 - the meeting is only to discuss policy issues; and
- set up meetings with a former employer, if:
 - the meeting is only to discuss policy issues, not issues in which the former employer is a party or represents a party.

Examples

- A political appointee who recently resigned from an officer position with a trade association can speak in an official capacity at an event held by the organization that will be widely-attended by industry leaders.
- A political appointee can attend a meeting held with all interested key players in an industry, including a former client, to discuss possible industry-wide regulations.

Preferential Treatment – It is important to avoid any appearance of preferential treatment for a company or organization with which an employee was formerly affiliated. Before approving participation in an event, management officials should also consider the totality of the circumstances to avoid any perception of preferential treatment, such as the number of times the official has participated in an official capacity in events concerning the company or organization and whether there is participation in such events for similarly-situated entities.