



2015 ETHICS TRAINING FACT PATTERN COMMERCIAL LAW DEVELOPMENT PROGRAM

Khloe is a Commercial Service Officer who has been sent to the 2015 Consumer Electronics Expo in Las Vegas. The trade show sponsor, the National Electronics Organization (NEO), has provided her first-class airfare and a room at the posh Aria hotel. Actually, her office director, Brody, insisted the company pay.

Shortly after arriving in Las Vegas, Khloe heads to a big reception hosted by NEO, where she runs into a new ITA Assistant Secretary, Kris. They mingle with company officials attending to learn about the hot topics in the industry. Although the reception is pretty lavish—an open bar and plenty of high-end hors d'oeuvres—it is no substitute for dinner, so Khloe heads off to a dinner to which she was invited by Macrosoft—a company that has just released a new tablet that it is heavily promoting at the Expo.

The next day, Khloe meets Kris for a giant all-you-can-eat champagne buffet brunch. Learning that it was Kris's birthday, Khloe picks up the tab (she's a naturally generous person and figured it couldn't hurt to get in good with the new boss; besides, she figures that with all the free meals she'll be getting over the weekend she will get plenty of *per diem* money she won't be spending).

At the trade show later that day Khloe goes to a demonstration of a new product—Goggle Glasses. Goggle plans to put the product on sale in the U.S. within the next month and export them by the end of the year (as soon as the export licenses are approved). Khloe is thrilled when she, like everyone present, gets a free sample of the Goggle Glasses. Other freebies she got on the trip included: a fruit basket in her hotel room that the Las Vegas Chamber of Commerce provided to all Expo attendees, a \$300 Samsung smart phone from the Korean Ministry of Telecommunications, a \$200 tablet from Dill Computers, and a \$25 “We Heart ITA” baseball cap from the AmCham in Singapore (in anticipation of her attendance at a big trade show there later in the year).

At the end of the day Khloe meets Brandon, vice president of PH—a big computer company—at the hotel bar (he picks up the tab). After Brandon learns more about Khloe's job at ITA, he mentions that his niece, Kourtney, is interested in working at the U.S. Embassy in Tokyo and asks if she can help Kourtney out; Khloe agrees to do the favor because he's been so nice to her.

The next day, on her own time on leave, she gives a lecture on the use of trade sanctions for political purposes at the College of Southern Nevada Las Vegas, for which she receives a \$5,000 honorarium. The students are impressed to be taught by a Government trade expert. On the flight back, Khloe is pleased with the trip's success.

Has Khloe violated any ethics rules? What has she done wrong?

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