



# governmentattic.org

*"Rummaging in the government's attic"*

Description of document: Federal Trade Commission (FTC) publications The Ethicist, 2015-2017 and 2017 Ethics Calendar

Requested date: 21-January-2017

Released date: 08-March-2017

Posted date: 13-March-2017

Source of document: Freedom of Information Act Request  
Office of General Counsel  
Federal Trade Commission  
600 Pennsylvania Ave., NW  
Washington, D.C. 20580  
Fax: (202) 326-2477  
Email: [FOIA@FTC.GOV](mailto:FOIA@FTC.GOV)

The governmentattic.org web site ("the site") is noncommercial and free to the public. The site and materials made available on the site, such as this file, are for reference only. The governmentattic.org web site and its principals have made every effort to make this information as complete and as accurate as possible, however, there may be mistakes and omissions, both typographical and in content. The governmentattic.org web site and its principals shall have neither liability nor responsibility to any person or entity with respect to any loss or damage caused, or alleged to have been caused, directly or indirectly, by the information provided on the governmentattic.org web site or in this file. The public records published on the site were obtained from government agencies using proper legal channels. Each document is identified as to the source. Any concerns about the contents of the site should be directed to the agency originating the document in question. GovernmentAttic.org is not responsible for the contents of documents published on the website.



UNITED STATES OF AMERICA  
FEDERAL TRADE COMMISSION  
WASHINGTON, D.C. 20580

MAR 08 2017

Via email

Re: FOIA-2017-00416  
FTC Ethicist publication

This is in response to your request dated January 21, 2017, under the Freedom of Information Act seeking access to The Ethicist and Ethics calendar. In accordance with the FOIA and agency policy, we have searched our records as of January 23, 2017, the date we received your request in our FOIA office.

Some information is exempt from release under FOIA Exemption 6, 5 U.S.C. § 552(b)(6), because individuals' right to privacy outweighs the general public's interest in seeing personal identifying information. See *The Lakin Law Firm v. FTC*, 352 F.3d 1122 (7th Cir. 2003).

If you are not satisfied with this response to your request, you may appeal by writing to Freedom of Information Act Appeal, Office of the General Counsel, Federal Trade Commission, 600 Pennsylvania Avenue, N.W., Washington, D.C. 20580, within 90 days of the date of this letter. Please enclose a copy of your original request and a copy of this response.

You also may seek dispute resolution services from the FTC FOIA Public Liaison Richard Gold via telephone at 202-326-3355 or via e-mail at [rgold@ftc.gov](mailto:rgold@ftc.gov); or from the Office of Government Information Services via email at [ogis@nara.gov](mailto:ogis@nara.gov), via fax at 202-741-5769, or via mail at Office of Government Information Services (OGIS), National Archives and Records Administration, 8601 Adelphi Road, College Park, MD 20740.

If you have any questions about the way we handled your request or about the FOIA regulations or procedures, please contact Anna Murray at (202) 326-2820.

Sincerely,

Dione J. Stearns  
Assistant General Counsel

Att: 43 pages



Brought to you by The FTC Ethics Team

# The FTC Ethicist

VOLUME 1, ISSUE 4

FALL 2015



During the holiday season, questions often arise about the solicitation and acceptance of gifts. These rules can be tough to keep straight. We present you with a lilting poem to inspire seasonal cheer, and to help navigate various holiday scenarios. Fa la la!

## Holiday Poem

*The holiday season - a  
time for good cheer!  
For egg nog, for parties,  
for friends to be near.  
But I must be careful  
Lest I accept free  
A gift not permitted, no  
matter how wee.*

*Part two six three five of  
the 5 CFR  
Explains in detail the rele-  
vant bar.  
It defines the term gift.  
To mean all things worth  
money.  
That's NBA tickets or jars  
full of honey.*

*Some gifts may be taken  
but some are verboten.  
The source is the key - it's  
the rule that I'm quotin'.  
When from me or others  
The source seeks some act,  
I must find an exception  
or I could be sacked*

*Even others who give can  
cause problems for me.  
If my job prompts the giv-  
ing - my position, you see.  
But lucky for me,  
Some exceptions exist.  
They're in subpart B and  
should not be missed.*

*I can pay market value if  
the gift I do like,  
Or I can at my option say  
"go take a hike."  
I can always say no,  
But I need not decline.  
If worth twenty or less  
then the gift can be mine.*

*This exception has prompt-  
ed some very loud hollers.  
It says gifts are okay if  
worth twenty dollars.  
But surely the public  
Is certain to see,  
I could never be bought for  
a sandwich and tea.*

Continued on Page 2

## Gift Cards 101: What are you allowed to give?

As office holiday parties draw closer, you may be tempted to give a gift card during gift exchanges. However, not all gift cards are created equal, since some are equivalent to cash, and cash is never an acceptable gift in the federal workplace. Here's a breakdown of the types of gift cards you can and cannot swap during that game of White Elephant:

General-use prepaid cards may not be accepted under the \$20 de minimis exception, regardless of their value. These cards generally bear the logo of a payment network, such as Visa, MasterCard, or American Express, and are accepted by any merchant that accepts those credit or debit cards as payment.

Store gift cards may be accepted under the \$20 de minimis exception. A gift card to your favorite coffee chain or bookstore, for example, is okay.

A mall gift card or a gift card for an online marketplace is considered to be a store gift card and may be accepted pursuant to the de minimis exception.

Gift cards that are cobranded with the logo of a payment network and the logo of a merchant or affiliated group of merchants are general-use prepaid cards, not store gift cards.





Office of the General Counsel

#### FTC ETHICS TEAM

Christian S. White (x 2476)  
Lorielle L. Pankey (x3108)  
Cheryl Embree (x3077)  
Alice Bartek (x2191)  
Regina Duarte (x3547)

When in doubt, give  
Ethics a shout!

Because public service is a public trust, each U.S. Government employee has a responsibility to adhere to the various laws and ethics regulations that guide the performance of his or her official duties. Each employee must avoid, at all times, creating even an appearance of partiality or conflict of interest.

This newsletter has been developed as part of our ongoing effort to help FTC employees maintain these high standards of ethical behavior. It is NOT intended as a substitute for seeking one-on-one advice from an agency ethics official whenever you are uncertain about how to act properly in a given situation. Our names and phone numbers are listed here and we encourage you to contact us.

In this newsletter, you'll find relevant, timely advice on ethics issues, along with some reminders about upcoming deadlines and perhaps a fun fact or recipe every now and again. We encourage you to let us know what other information you would find helpful.

**Check us out on the intranet!**

[ftcintranet.ftc.gov/cfportal/ethics/](http://ftcintranet.ftc.gov/cfportal/ethics/)

Thank you for reading the FTC  
Ethicist!



### Holiday Poem Continued

*Restrictions apply so it does  
not suffice  
To pay twenty bucks for a  
gift twice the price.  
And in any one year  
I can't use it, of course,  
To go over the limit - fifty  
dollars per source.*

*For gifts that a friend or  
my sister might send,  
The rules recognize I don't  
want to offend.  
Regardless of value,  
It only must be  
That their motive to give  
wasn't business, but me.*

*The rule's much the same in  
the case of my spouse  
Who happens to work as she  
can't stand our house.  
Although her employer  
Is one of those sources,  
I can go to their fete and  
avoid more divorces.*

*In the case of most parties,  
the rule's not so clear  
As the agency must have an  
interest, I fear.  
If worth more than twenty  
And it's no friend true,  
Then I'd better seek guid-  
ance or I could be blue.*

*When foreign officials are  
giving the gift,  
The rules are less strict so I  
don't cause a rift.  
I can take it if  
Fair market value U.S.  
Is three hundred fifty dol-  
lars or less.*

*I can give to my boss to a  
limit of ten -  
A baseball, a cap, or a blue  
ballpoint pen.  
If not to my boss  
Or my chain of command,  
To a friend I can give more  
without being canned.*

*I always look forward to my  
office party.  
We're all in good moods and  
the food is so hearty.  
If no arm is twisted,  
Collecting is okay  
To make sure that everyone  
has a good day.*

*But finally, how would these  
rules affect me  
If I served the President as  
"appointee"?  
I know that appointees  
Must sign when they're hired  
A short ethics pledge (or they  
risk being fired.)*

*The same rules apply to a per-  
son who signed  
Except there's an extra gift  
rule that's enshrined:  
No gifts from a source  
Listed as "lobbyist" -  
Though no friend or kin is re-  
quired to be dissed.*

*So go forth with good  
cheer and know  
there's no reason  
To think that the gifts  
rules will ruin your  
season*





Brought to you by The FTC Ethics Team

# The FTC Ethicist

VOLUME 2,  
ISSUE 4  
FALL 2016



## Outside Activities: What You Need To Know

Fall weather is upon us! And with the Autumn festivities come such fun outside activities as pumpkin carving, apple picking, and leaf raking. These and other delightful outside activities are possibly on your weekend agendas, and while the Ethics Team hopes you enjoy the outdoors, we also hope you have disclosed certain outside activities to us that need prior approval.

A supplemental ethics regulation provides that all FTC employees must seek and receive prior written approval from your supervisor and from the Designated Agency Ethics Official before engaging in any outside employment, whether or not for pay. This regulation does not pertain to employment and activities that: 1) are unpaid; 2) do not involve rendering "professional services;" and 3) are performed to benefit certain types of nonprofit organizations.

Whether or not you receive compensation is straightforward. Less obvious is whether the services you provide are professional, which includes but is not limited to holding these titles within

an outside organization: officer, director, employee, agent, attorney, consultant, contractor, general partner, or trustee.

Even if you don't hold a formal position, if the work you are doing is parallel to your official position at the FTC, then it is considered a professional service. Examples include attorneys that are teaching, speaking, and writing on legal topics may need prior outside activity approval. Likewise, economists that are doing economic teaching, speaking, or writing need prior approval. Also, if you are an IT specialist, and you are fixing computers on the side, you will need an outside employment request.

Prior approval is not required, however, to participate in the activities of a

nonprofit charitable, religious, professional, social, fraternal, educational, recreational, public service, or civic organization, unless such activities

involve the provision of professional services or advice or are for compensation other than reimbursement of expenses.

By keeping your supervisor and the Ethics team informed of your outside activities, you will avoid conflicts at the FTC and ensure you don't run afoul of the law. For example, a criminal statute prohibits you from speaking to the United States with the intent to influence official action on behalf of others (one of many reasons to get tailored guidance from the Ethics Team about your personal endeavors). Leave the scary ethics analysis to the professionals, and call the Ethics team with any questions.

### DON'T BE SPOOKED!

You can easily remember whether or not you must submit an outside employment request by asking yourself three questions:

1. Am I paid?
2. Am I rendering a professional service?
3. Is the organization I serve a for-profit?

If you answered yes to any of these questions, you need an outside employment request, available here: <https://ftcintranet.ftc.gov/forms/gen-cnsi/ftc-474.pdf>

Reminders: The limited personal use policy does NOT apply to outside activities.

Do NOT reference your FTC title in connection with your personal activities unless the Ethics Team first tells you it is OK.





Office of the General Counsel

#### FTC ETHICS TEAM

Christian S. White (x 2476)

Lorielle L. Pankey (x3108)

Alice Bartek-Santiago (x2191)

Regina Duarte (x3547)

*When in doubt, give  
Ethics a shout!*

Because public service is a public trust, each U.S. Government employee has a responsibility to adhere to the various laws and ethics regulations that guide the performance of his or her official duties. Each employee must avoid, at all times, creating even an appearance of partiality or conflict of interest.

This newsletter has been developed as part of our ongoing effort to help FTC employees maintain these high standards of ethical behavior. It is NOT intended as a substitute for seeking one-on-one advice from an agency ethics official whenever you are uncertain about how to act properly in a given situation. Our names and phone numbers are listed here and we encourage you to contact us.

In this newsletter, you'll find relevant, timely advice on ethics issues, along with some reminders about upcoming deadlines and perhaps a fun fact or recipe every now and again. We encourage you to let us know what other information you would find helpful.

Thank you for reading the FTC Ethicist!

**Check us out on the intranet!**

[ftcintranet.ftc.gov/cfportal/ethics/](http://ftcintranet.ftc.gov/cfportal/ethics/)

## HALL OF SHAME

### Conflict of Interest Nets Employee \$900 Fine

When determining which company should receive a contract to produce a video on Y2K issues for the Department of Commerce, a producer/director in the Office of Public Affairs settled on a small production company that specialized in voiceover work. There was only one small problem—the company was owned by the employee and his wife. The Department of Commerce eventually paid the company over \$10,000 for their work, earning the employee and his wife a profit of over \$1000.

Unfortunately for the employee, his fifteen minutes of fame were cut short by a District Court Judge, who sentenced him to one year of probation, 100 hours of community service, and a \$900 fine. The employee was found guilty of violating 18 U.S.C. 208(a), which bars employees from participating personally and substantially in a matter in which they have a financial interest.

### Ethics K-9 Korner



**Get  
approval  
before  
doing outside  
work!**

Attention all dog lovers!

We continue to seek entries for the "Ethics K-9 Korner," which features an adorable pooch with an ethics tip.

This quarter's winner is Kori. His proud owner is (b)(6) in BC, Mergers II.

Is your dog cuter? Prove it! Send entries to:  
[abarteksantiago@ftc.gov](mailto:abarteksantiago@ftc.gov)

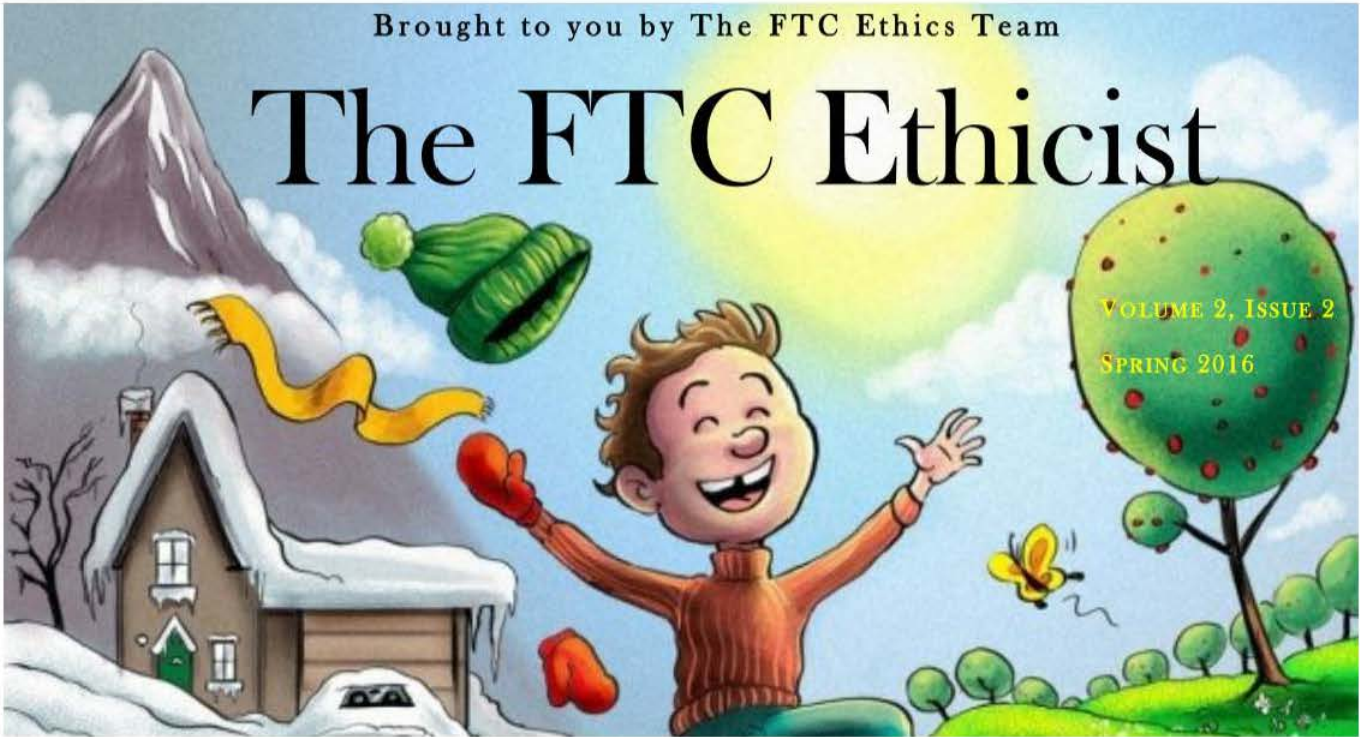
Enjoy our Ethics K-9 Korner? Be on the lookout for another fun Ethics K-9 learning tool coming soon!



Brought to you by The FTC Ethics Team

# The FTC Ethicist

VOLUME 2, ISSUE 2  
SPRING 2016



## DON'T MAKE IT PERSONAL

Thinking about writing your cellphone carrier to complain about your bill using FTC letterhead? Want to post a remark in an online comment box using your ftc.gov email address? Stop! Remember that you may not use your official title to coerce; to endorse any product, service or enterprise; or to give the appearance of governmental sanction. 5 C.F.R. § 2635.702 FTC letterhead must not be used for personal correspondence (except for certain recommendation letters). Think twice before referencing your FTC position in connection with a personal matter. There are also restrictions on using agency resources for personal matters. Read the FTC's [Limited Personal Use Policy](#).

You may use your FTC title in connection with a personal activity when:

- Providing a personal recommendation for someone you either worked with in Federal employment or whom you are recommending for Federal employment.
- Providing a biography in connection with a speaking or writing activity if your title is given no special prominence.
- Publishing an article in a scientific or professional journal if there is an appropriate disclaimer.

## New To The Commission? WELCOME!

If you are new to the FTC, the Ethics Team would like to welcome you on board! To get your journey at the agency started without a hitch, here is a checklist of important legal requirements. Have a question? [Contact us!](#)

- **Ethics Orientation:** You must attend initial ethics orientation when you arrive to the FTC.
- **GS-14 or 15:** You must submit a confidential financial disclosure form within 30 days.
- **Senior Staff:** You must submit a public financial disclosure form within 30 days.
- **Outside Employment:** You must obtain prior approval for most outside activities from your supervisor and the Ethics Team.
- **Gifts:** If someone offers you a gift due to your official position, contact the Ethics Team to determine if you may accept it.
- **Widely Attended Gathering:** If someone offers free attendance to an event, contact the Ethics Team to determine if you may accept the invitation.
- **Ethics Training:** GS-14 employees and above must receive annual federal ethics training. The Ethics Team will soon provide training to all employees.





## Office of the General Counsel

### FTC ETHICS TEAM

Christian S. White (x 2476)  
Lorielle L. Pankey (x3108)  
Cheryl Embree (x3077)  
Alice Bartek-Santiago (x2191)  
Regina Duarte (x3547)

*When in doubt, give  
Ethics a shout!*

Because public service is a public trust, each U.S. Government employee has a responsibility to adhere to the various laws and ethics regulations that guide the performance of his or her official duties. Each employee must avoid, at all times, creating even an appearance of partiality or conflict of interest.

This newsletter has been developed as part of our ongoing effort to help FTC employees maintain these high standards of ethical behavior. It is NOT intended as a substitute for seeking one-on-one advice from an agency ethics official whenever you are uncertain about how to act properly in a given situation. Our names and phone numbers are listed here and we encourage you to contact us.

In this newsletter, you'll find relevant, timely advice on ethics issues, along with some reminders about upcoming deadlines and perhaps a fun fact or recipe every now and again. We encourage you to let us know what other information you would find helpful.

Thank you for reading the  
FTC Ethicist!

**Check us out on the intranet!**

**[ftcintranet.ftc.gov/cfportal/ethics/](http://ftcintranet.ftc.gov/cfportal/ethics/)**

## HALL OF SHAME

### Secret Agent Man?

A former high-level official at the Environmental Protection Agency (EPA) stole nearly \$900,000 from the Government by pretending to be part of a detail to the Central Intelligence Agency (CIA) for nearly two decades. He duped a series of supervisors, including top officials, by disappearing from the office and explaining his absences by telling his bosses that he was doing top-secret work for the CIA and its "directorate of operations." No one at EPA ever checked to see if he worked for the CIA. In all, he was paid for 2.5 years of work that he did not perform and received about \$500,000 in "retention bonuses" that he did not deserve. In addition, he lied about contracting malaria, which cost the EPA \$8,000 over three years for a parking space reserved for the disabled. He was reimbursed for \$57,000 in fraudulent travel expenses, and he continued to draw a paycheck for 19 months after his retirement.

He has repaid the nearly \$900,000 to the EPA, but still owes \$507,000 in a money judgment. He was sentenced to 32 months in prison.

**Never solicit  
a gift from a  
co-worker or  
outside  
source!**

### Ethics K-9 Korner



Attention all dog lovers!

We are seeking entries for the new "Ethics K-9 Korner," which will feature an adorable pooch with an ethics tip. Think we're shamelessly wielding gratuitous cuteness to foster ethics awareness? You betcha!

This week's first sponsor is none other than (b)(6) (b)(6)'s 10-year young puppy, Emerson. What a sharp dresser he is – and so ethical, too!

Is your dog is cuter? Prove it! Send entries to:  
[cembree@ftc.gov](mailto:cembree@ftc.gov)



Brought to you by  
The FTC Ethics Team

Volume 1, Issue 3  
Summer 2015

# The FTC Ethicist

When in doubt, give ethics a shout!\*

*Summer is winding down, are you planning to leave the agency?* Please don't forget to make an appointment with one of us BEFORE your last day (to chat about rules that apply after you go and to sign your clearance form). Thanks!

And Voila!

Here's Alice Bartek, your new deputy ethics official!



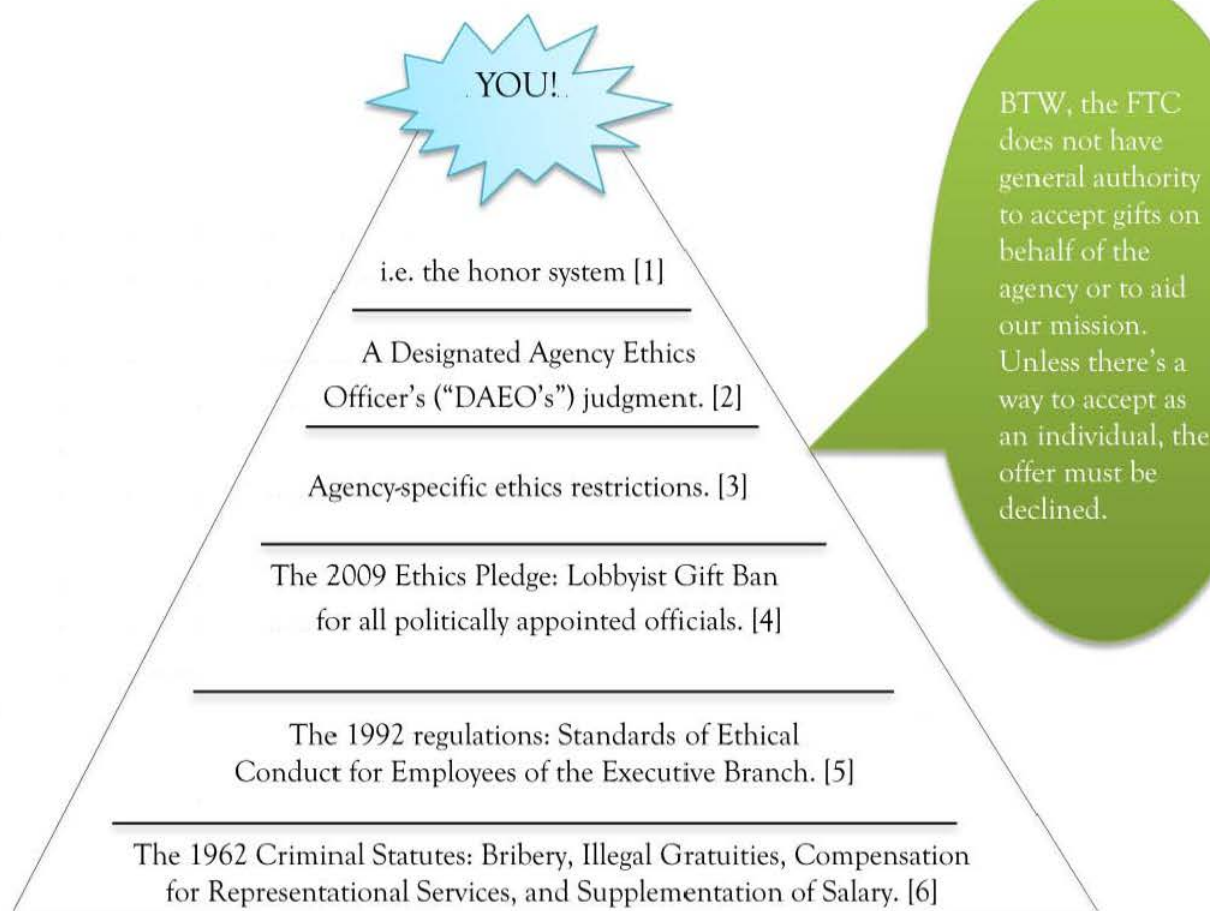
Don't I know her from somewhere? Yes! You may have met Alice in her former role as a FOIA attorney or maybe you've seen her fabulous acting skills in her testimonial video on the new FTC Careers Page, here: <https://www.ftc.gov/about-ftc/careers-ftc/testimonials>. We are thrilled to have Alice join the ethics team and we hope you ask her your most ponderous ethical queries: **abartek@ftc.gov** or **202-326-2191** or **HQ room 554**.

\*Or call us: Alice Bartek x2191, Regina Duarte x3547, Cheryl Embree x3077, Lorielle Pankey, ADAEO x3108, Chris White, DAEO x2476.

Nothing substitutes for personalized legal guidance—not this newsletter, not even our intranet page (found here btw: [ftcintranet.ftc.gov/cfportal/ethics/](http://ftcintranet.ftc.gov/cfportal/ethics/)).

## A snazzy gift pyramid, just for you:

This diagram explains the history and foundational concepts of our gift rules, as federal employees. The idea behind all of this, of course, is that the American people don't like thinking that their government officials can be bribed. Remember just by being employed by the FTC, you hold a public office and thus you hold the public's trust as well. Keep it strong!



[1] "[I]t is never inappropriate and frequently prudent for an employee to decline a gift..." 5 C.F.R. § 2635.204.

[2] Our Designated Agency Ethics Officials is Chris White, and he has been since the eighties!

[3] The FTC specific ethics rules are found at 5 C.F.R. § 7501.

[4] Exec. Order No. 13,490, 74 Fed. Reg. 4,673 (Jan. 21, 2009).

[5] 5 C.F.R. §§ 2635.201-205.

[6] 18 U.S.C. §§ 201, 203, 205, 209.

*\*Or call us: Alice Bartek x2191, Regina Duarte x3547, Cheryl Embree x3077, Lorielle Pankey, ADAEO x3108, Chris White, DAEO x2476*

*Nothing substitutes for personalized legal guidance—not this newsletter, not even our intranet page (found here btw: [ftcintranet.ftc.gov/cfportal/ethics/](http://ftcintranet.ftc.gov/cfportal/ethics/)).*



Brought to you by The FTC Ethics Team.

# The FTC Ethicist

VOLUME 1, ISSUE 2

SPRING 2015

Goodbye Friend!

**Kathleen Fulp**, formerly Kathleen Johnson, has taken a job with the General Counsel's ethics office at the TSA. We wish her the best! We will miss her dearly! Kathleen has been a steady light of wise ethics advice and general good cheer for nearly seven years here at the FTC. An open house to celebrate her time with us and to toast her sure-to-be-exciting future career is happening on **Thursday, April 30th, from 3-5pm** in OGC's conference room 588 (HQ). Join us!

## Don't Forget:

Public Financial Disclosure Reports are due on **Friday, May 15th, 2015** and **must be submitted online via INTEGRITY at [www.integrity.gov](http://www.integrity.gov)**. Questions? Extension needed? Let us know **before** the deadline!

## LinkedIn and the Rule Against Endorsements:

Thank you OED for the training opportunity- Alice Bartek and Cheryl Embree were thrilled to have the chance to chat about the ethics rules with such an engaged and kind audience on April 9th... In fact, the event supplied the content for a new column in our quarterly Ethicist, "Burning Questions and Bumbling Answers: When the Ethics Rules Don't Quite Match Reality"

Q: Can I "endorse" a former co-worker's page on LinkedIn, even if she now works as a federal contractor?

A: Yes, but use common sense to avoid appearance issues. For instance, please do not go

out of your way to emphasize the FTC in your endorsement. The goal here is to minimize your use of OFFICIAL title in your endorsements/ recommendations on your PERSONAL social media accounts, so that the public isn't confused into thinking you are speaking on behalf of the FTC or in your official FTC capacity. From a recent advisory by the Office of Government Ethics:

"OGE is aware that at least one social media service automatically adds a user's name, title, and employer to any recommendation that the user posts regarding a job seeker. In any such case where title and employer name are added

automatically, OGE does not consider a recommendation to constitute a misuse of position because the recommendation is readily understood by users of the social media service to be personal, rather than official, in nature. An employee should not, however, affirmatively choose to include a reference to the employee's title, position, or employer in a recommendation, except where 5 C.F.R. § 2635.702(b) expressly permits such references."

NOTE: Rule 702(b) generally allows you to give recommendations using your official title when you either worked with the person as part of your federal job or you are recommending the person for a federal position.

## Did you know?

Paying taxes is #12 of the 14 General Principles of Ethical Conduct:

"Employees shall satisfy in good faith their obligations as citizens, including all just financial obligations, especially those -- such as Federal, State, or local taxes -- that are imposed by law." So way to go!

(Curious about the other 13 principles? See 5 C.F.R. § 2635.101(b))



Office of the General Counsel

**FTC ETHICS TEAM**

Christian S. White (x 2476)  
Lorielle L. Pankey (x3108)  
Kathleen R. Fulp (x2869)  
Cheryl Embree (x3077)  
Regina Duarte (x3547)

*When in doubt, give  
Ethics a shout!*

Because public service is a public trust, each U.S. Government employee has a responsibility to adhere to the various laws and ethics regulations that guide the performance of his or her official duties. Each employee must avoid, at all times, creating even an appearance of partiality or conflict of interest.

This newsletter has been developed as part of our ongoing effort to help FTC employees maintain these high standards of ethical behavior. It is NOT intended as a substitute for seeking one-on-one advice from an agency ethics official whenever you are uncertain about how to act properly in a given situation. Our names and phone numbers are listed here and we encourage you to contact us.

In this newsletter, you'll find relevant, timely advice on ethics issues, along with some reminders about upcoming deadlines and perhaps a fun fact or recipe every now and again. We encourage you to let us know what other information you would find helpful.

Thank you for reading the FTC Ethicist!

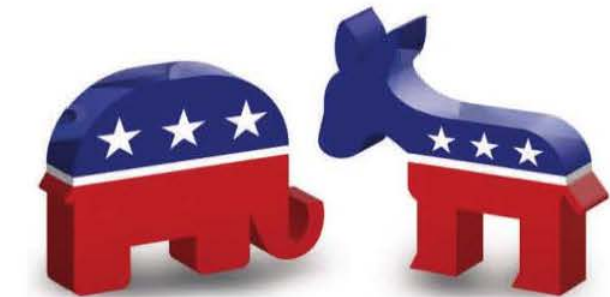
**Check us out on the intranet!**

[ftcintranet.ftc.gov/cfportal/ethics/](http://ftcintranet.ftc.gov/cfportal/ethics/)

## We're a long ways from Iowa, but...

The 2016 presidential race has officially begun! Now is the time to brush up on the key points of the Hatch Act:

- You may never fundraise for a partisan candidate— as a fed, you must not ask for, money, collect money, or invite your friends to fund-raising events
- You may never use federal time, space, and resources to support a partisan candidate....time to stop drinking from that donkey/elephant mug, take down the Hillary bobblehead from your office display, and, avoid pins/shirts/etc that support a candidate
- You are covered by the Hatch Act even in your social media use, even dur-



ing your personal time. For example, don't use Facebook to tell folks to donate to a candidate or to chat with a subordinate about the merits of a candidate in a way that the subordinate could feel is coercive.

- State and local races are covered too! Please seek advice from us or from the Office of Special Counsel if you are planning to volun-

teer for a campaign or run for office, etc.

- Voting is always okay (you know, when the time eventually comes).

These are just highlights. Keep in mind that some of the Hatch Act rules vary by the type of government job you hold, so please contact an ethics official with questions.



Brought to you by The FTC Ethics Team

# The FTC Ethicist

VOLUME 2, ISSUE 1

SUMMER 2016

## The Hatch Act: Special Edition:

"Generally, federal employees can avoid violating the Hatch Act if they :

- (1)do not engage in political activity while on duty or in the workplace;
  - (2)do not engage in political activity in an official capacity at any time; and
  - (3)do not solicit or receive political contribution at any time"
- the Office of Special Counsel, in a 11/12/15 memo.

### **Sen. Carl Hatch:**

Represented New Mexico from 1933-1948, Sen. Hatch is best remembered (by whom? by you!) for the Hatch Act of 1939 and 1940, which served to prevent federal employees from engaging in political activity.

Widespread allegations that local Democratic Party politicians used employees of the Works Progress Administration (WPA) during the congressional elections of 1938 provided the immediate impetus for the Hatch Act's passage. (Sen. Hatch would never have fathomed social media, but the law evolves regardless, see to the left. )

## The Hatch Act: 2016 Social Media Guidance:

OSC issued guidance earlier this year to account for new trends, especially on Twitter and Facebook. You are allowed to express support for candidates through social media, so long as you don't do so during FTC billed time. Here are the top three points:

1. Federal employees may display campaign logos or candidate photographs as their cover or header photo situated at the top of their social media profiles on their personal Facebook or Twitter accounts.

2. Federal employees may display campaign logos or candidate photographs as their profile pictures on their personal Facebook or Twitter accounts. However, because a profile picture accompanies most actions on social media, employees would not be permitted, while on duty or in the workplace, to post, "share," "tweet," or "retweet" any items on Facebook or Twitter, since each such action would show their support for a partisan group or candidate in a partisan race,

even if the content of the action is not about those entities.

3. "Further restricted employees"(i.e. career SESers and ALJ's)—just like all federal employees—may "like" a social media post from a partisan group or candidate in a partisan race and may comment on such an entity's social media pages when not at work.

**Note:** No federal employee may "like" a post soliciting for partisan political contributions at any time.







Office of the General Counsel

#### FTC ETHICS TEAM

Christian S. White (x 2476)

Lorielle L. Pankey (x3108)

Alice Bartek-Santiago (x2191)

Regina Duarte (x3547)

*When in doubt, give  
Ethics a shout!*

## Goodbye Friend!

Cheryl Embree has taken an ethics job with the USDA.  
We wish her the best!

Because public service is a public trust, each U.S. Government employee has a responsibility to adhere to the various laws and ethics regulations that guide the performance of his or her official duties. Each employee must avoid, at all times, creating even an appearance of partiality or conflict of interest.

This newsletter has been developed as part of our ongoing effort to help FTC employees maintain these high standards of ethical behavior. It is NOT intended as a substitute for seeking one-on-one advice from an agency ethics official whenever you are uncertain about how to act properly in a given situation. Our names and phone numbers are listed here and we encourage you to contact us.

In this newsletter, you'll find relevant, timely advice on ethics issues, along with some reminders about upcoming deadlines and perhaps a fun fact or recipe every now and again. We encourage you to let us know what other information you would find helpful.

Thank you for reading the FTC Ethicist!

**Check us out on the intranet!**

[ftcintranet.ftc.gov/cfportal/ethics/](http://ftcintranet.ftc.gov/cfportal/ethics/)

**HALL OF  
SHAME**

In 2014, an FEC employee resigned after OSC found he had posted dozens of political tweets while on duty, including tweets soliciting funds for Obama's reelection campaign. He also had participated in a Huffington Post live broadcast using an FEC webcam, where he criticized the Republican Party and Mitt Romney.

**Never tweet for a partisan  
candidate while on FTC  
duty!**

## Ethics K-9 Korner



Attention all dog lovers!

We are seeking entries for the new "Ethics K-9 Korner," which will feature an adorable pooch with an ethics tip.

This quarter's winner is a seven-year old Yorkie named Dallas. His proud owner is (b)(6) in BCP.

Is your dog cuter? Prove it! Fill out [this form](#) and send photos to:

[abarteksantiago@ftc.gov](mailto:abarteksantiago@ftc.gov)



*Brought to you by The FTC Ethics Team*

# The FTC Ethicist

VOLUME 1, ISSUE 1

WINTER 2015

## What's The (Particular) Matter?

Over the years you've heard us advise about ethical conflicts that arise when you participate in, supervise or learn confidential information about a particular matter. But what does the term "particular matter" mean at the FTC? Is it limited to law enforcement investigations?

We're glad you asked.

In general, "particular matters" include matters that involve deliberation, decision, or action focused upon the interests of specific persons, or a discrete and identifiable class of persons. In other words, any official action or activity – no matter how big or small – that focuses on a person's or group's interests is likely a particular matter. So our law enforcement investigations, rulemaking and policy matters, contract reviews and

determinations, workshops (matters that focus on a class or group are "particular matters of general applicability") are all particular matters. Even projects so new or amorphous in nature that they have not yet received a matter number could be particular matters.

So why does this matter to you (pun intended, unfortunately)? The criminal financial conflict of interest rule, 18 U.S.C. §208, bars you from working on matters like these if you have a disqualifying financial interest. Other regulatory and criminal conflict rules also limit your ability to work on certain particular



matters that impact the FTC or the Federal Government. Simply put, we want to remind you to reach out to an Ethics Official for conflicts advice even if the matter you'd like to work on is not a specific party, or long-term, established project. No matter the matter, we can help (puns intended – again).

### Don't Forget:

- Confidential Financial Disclosure Reports are due to your reviewing official on **February 17, 2015**. Questions? Extension needed? Let us know **before** the deadline!
- All Public Financial Disclosure reports, including periodic transaction reports, must now be filed **electronically** on the **Integrity** system. Contact the Ethics Team with questions.

## 2015 Gift and Travel Reimbursement Reporting Thresholds

The new aggregation threshold for the reporting of gifts and reimbursements received from any one source on financial disclosure reports is "more than \$375"; items worth "\$150 or less" do not need to be counted

towards that overall threshold. Note also that the General Services Administration has increased the "minimal value" for purposes of the Foreign Gifts and Decorations Act to "\$375 or less" for the three-year period

2014-2016. Further, the Office of Government Ethics has raised from \$350 to \$375 the widely attended gathering gift exception ceiling for nonsponsor gifts of free attendance. Contact an ethics official for guidance.



Office of the General Counsel

#### FTC ETHICS TEAM

Christian S. White (x 2476)  
Lorielle L. Pankey (x3108)  
Kathleen R. Fulp (x2869)  
Cheryl Embree (x3077)  
Regina Duarte (x3547)

*When in doubt, give  
Ethics a shout!*

Because public service is a public trust, each U.S. Government employee has a responsibility to adhere to the various laws and ethics regulations that guide the performance of his or her official duties. Each employee must avoid, at all times, creating even an appearance of partiality or conflict of interest.

This newsletter has been developed as part of our ongoing effort to help FTC employees maintain these high standards of ethical behavior. It is NOT intended as a substitute for seeking one-on-one advice from an agency ethics official whenever you are uncertain about how to act properly in a given situation. Our names and phone numbers are listed here and we encourage you to contact us.

In this newsletter, you'll find relevant, timely advice on ethics issues, along with some reminders about upcoming deadlines and perhaps a fun fact or recipe every now and again. We encourage you to let us know what other information you would find helpful.

Thank you for reading the FTC Ethicist!

**Check us out on the intranet!**

[ftcintranet.ftc.gov/cfportal/ethics/](http://ftcintranet.ftc.gov/cfportal/ethics/)

## Knowing What Matters

We get it. Guidance on the ethics rules is great but it's much more useful when applied to actual facts. The following fact scenarios further illustrate how a potential conflict might stem from a particular matter:

- You are planning a workshop about mobile phone apps and you want to ask your spouse's employer, Apps, Inc., to participate in the workshop.
- You are planning an event for your favorite charity (in your personal capacity) and you decide to ask an FTC Commissioner to speak at the event (note, the "particular matter" in this example is the act of asking the Commissioner for her participation).
- You are an attorney asked to provide your thoughts on a not-yet-opened potential study of certain practices in the telecommunications industry and your minor child holds stock in a telecommunications company.
- You are a paralegal doing a substantive portion of the review for a rulemaking focused on pharmaceutical companies and your spouse is an employee with an equity stake in XYZ Pharmaceutical Company.
- You are an economist participating in the FTC's Food Marketing Study and you are seeking employment with one of the companies participating in the study.

All of the above examples involve particular matters and the persons in each of the fact scenarios should not proceed without first obtaining guidance from an ethics official.





# The FTC Ethicist

Happy New Year! As we say goodbye to 2015, let's look forward to making 2016 our best year yet. To get started on the right foot, make sure to brush up on the latest and greatest in federal ethics news. Read on, you go-getter!

## CONSUMER OWNERSHIP:

When must you recuse based on what you own?

Federal employees must constantly be on the lookout to avoid circumstances creating a potential ethics problem. This involves recusing yourself from matters where you have a financial interest, such as stock or sector mutual fund ownership. 18 USC 208; 5 CFR 2640.

However, what happens when an FTC employee owns a product which might be subject to redress or replacement depending on the success of an FTC investigation? Just because you own a toaster which is under investigation as a faulty product, should you recuse yourself from a matter? What about a car? Keep in

any FTC matter that directly affects "your" financial interests (the interests of certain others are considered your interests). You must not work on such matters without first obtaining a waiver from a criminal statute (the FTC's Ethics Team is unable to independently waive criminal statutes but we think the toaster owner would have a better chance than the owner of an affected car). The Ethics Team will also consider whether a reasonable person with knowledge of the relevant facts would be likely to question the employee's impartiality in the matter. 5 C.F.R. § 2635.502(c).



mind you must not work on

Relevant circumstances include the effect that resolving the matter would have on the financial interests of the person involved, the nature and importance of the employee's role in the matter, and the difficulty of reassigning the matter to another employee.

If you think you have a conflict due to consumer ownership—**BEFORE WORKING ON THE MATTER**—it is important to share all pertinent details about the type of product you own, and what the potential redress might be, so we can make a case-by-case determination.

## Don't Forget:

### FILING A FINANCIAL DISCLOSURE REPORT?

If you are a GS-14 or GS-15, you must file an annual OGE Form 450, Confidential Financial Disclosure report, by **FEBRUARY 16, 2016**. If you need an extension, contact us before the deadline!

### FOR REVIEWING OFFICIALS:

After reviewing our tips for reviewing officials located on the intranet—<https://ftcintranet.ftc.gov/cfportal/ethics/uploads/2016%20memo%20to%20450%20reviewing%20officials.pdf>, remember to sign off as the "Final Reviewing Official."





Office of the General Counsel

#### FTC ETHICS TEAM

Chris White (x 2476)  
Lorielle Pankey (x3108)  
Cheryl Embree (x3077)  
Alice Bartek (x2191)  
Regina Duarte (x3547)

Because public service is a public trust, each U.S. Government employee has a responsibility to adhere to the various laws and ethics regulations that guide the performance of his or her official duties. Each employee must avoid, at all times, creating even an appearance of partiality or conflict of interest.

This newsletter has been developed as part of our ongoing effort to help FTC employees maintain these high standards of ethical behavior. It is NOT intended as a substitute for seeking one-on-one advice from an agency ethics official whenever you are uncertain about how to act properly in a given situation. Our names and phone numbers are listed here and we encourage you to contact us.

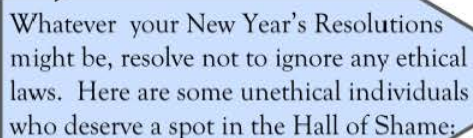
In this newsletter, you'll find relevant, timely advice on ethics issues, along with some reminders about upcoming deadlines and perhaps a fun fact or recipe every now and again. We encourage you to let us know what other information you would find helpful.

*When in doubt, give  
Ethics a shout!*

Thank you for reading the FTC Ethicist!



**HALL OF  
SHAME**



Whatever your New Year's Resolutions might be, resolve not to ignore any ethical laws. Here are some unethical individuals who deserve a spot in the Hall of Shame:

#### **A Gold-Plated Retirement**

A General commanding U.S. forces in South Korea improperly accepted over \$5,000 in gifts and cash, including gold-plated pens, from a South Korean benefactor. The General claimed that the gifts were accepted because the South Korean was a longtime and personal friend, despite the fact that the South Korean did not speak English and they were forced to communicate through hand signals and gestures. The General repaid the South Korean in full and was allowed to retire at a lower grade.

**Check us out on the intranet!**

[ftcintranet.ftc.gov/cfportal/ethics/](http://ftcintranet.ftc.gov/cfportal/ethics/)

#### **"What do you mean, this isn't my property?!"**

One entrepreneurial Federal employee backed his panel van up to the office door one night and stole all the computer equipment. He wasn't too hard to catch: he tried to sell everything at a yard sale the next day—with barcodes and "Property of US Government" stickers still prominently displayed.

#### **Political Activities:**

##### **A Humorous – But True – Story**

An election was coming up and one enterprising young Federal employee called his ethics officer to inquire whether it was permitted, under the Hatch Act Amendments, to stuff ballot boxes! The employee, when told not to wear a Bush campaign button, responded, "But I'm not. This is a button from his dad's campaign!"







Brought to you by  
The FTC Ethics Team

VOLUME 3, ISSUE 1  
WINTER 2017

Another year, another set of resolutions you intend to keep. Although your good intentions may be difficult to adhere to, one easy thing should be maintaining compliance with ethics requirements, both new and old. Find lots of helpful tips ahead!

## “I GOT A GIFT. NOW WHAT?”

New items to consider based on changes to gifts rules

The U.S. Office of Government Ethics (“OGE”) has amended the rules that govern gifts from outside sources. Here are some highlights:

### I. Declining Otherwise Permissible Gifts

In evaluating the appropriateness of accepting an offered gift, there is now a values-based standard that employees should consider when deciding whether to accept or decline offered gifts. Specifically, “employees should consider declining otherwise permissible gifts if they believe that a reasonable person with knowledge of the relevant facts would question the employee’s integrity or impartiality as a result of accepting the gift.”

### II. WAG Change

OGE has also amended the “Widely Attended Gatherings” (“WAG”) exception to expand the requirement for written authorizations. Under the new rules, every authorization to attend a WAG must be in writing.

### III. Books

There is a limited exception for gifts of informational materials, such as books, so long as the market value of the educational item does not exceed \$100. This exception recognizes that gifts of informational materials foster information sharing, benefit the agency and the Government, and accommodate the right of citizens to petition their Government.

### IV. Disposing of Prohibited Gifts

OGE also has added a new disposition authority in recognition that it can sometimes be difficult, cost-prohibitive, and time-consuming to return a gift. For tangible items valued at less than \$100, employees will be able to dispose of prohibited gifts by destroying them. Destruction can be accomplished by permanently discarding the item in the trash. Employees are encouraged to document the destruction (e.g., by sending an email to an agency ethics official).



## Welcome to Craig!

The Ethics Team welcomes a new deputy ethics official, Craig Bannon. Craig is a dedicated public servant, joining us from the Defense Logistics Agency. We are excited to have him on the team. Please feel free to direct questions to Craig at (202) 326-2067 or [cbannon@ftc.gov](mailto:cbannon@ftc.gov)

## Don't Forget

Confidential Financial Disclosure Reports are due to your reviewing official on February 15, 2017  
Questions?  
Extension needed? Let us know before the deadline!





Office of the General Counsel

#### FTC ETHICS TEAM

Chris White (x 2476)

Lorielle Pankey (x3108)

Alice Bartek-Santiago (x2191)

Craig Bannon (x2067)

Regina Duarte (x3547)

*When in doubt, give  
Ethics a shout!*

Because public service is a public trust, each U.S. Government employee has a responsibility to adhere to the various laws and ethics regulations that guide the performance of his or her official duties. Each employee must avoid, at all times, creating even an appearance of partiality or conflict of interest.

This newsletter has been developed to help FTC employees maintain these high standards of ethical behavior. It is NOT intended as a substitute for seeking one-on-one advice from an agency ethics official whenever you are uncertain about how to act properly in a given situation. Our names and phone numbers are listed here so you can contact us.

In this newsletter, you'll find relevant, timely advice on ethics issues, along with some reminders about upcoming deadlines and perhaps a fun fact or recipe every now and again. We encourage you to let us know what other information you would find helpful.

Thank you for reading the FTC Ethicist!

## HALL OF SHAME

Whatever your New Year's Resolutions, resolve not to ignore any federal ethics laws. Here is an unethical individual who deserves a spot in the Hall of Shame:

### Army Employee Sentenced for Conflicts of Interest

A civilian employee of the U.S. Army pleaded guilty to violation of the conflicts of interest statute (18 U.S.C. 208) in Federal Court and was sentenced to one year probation and a \$1,000 fine. The employee had participated in the awarding and administration of contracts involving a company in which the employee owned stock, thereby participating personally and substantially as a Government employee in matters that affected his financial interests. The employee, who filed financial disclosure statements (OGE Form 450), had also failed to disclose his financial interest in the company.



**Check us out on the intranet!**

[ftcintranet.ftc.gov/cfportal/ethics/](http://ftcintranet.ftc.gov/cfportal/ethics/)

### Ethics K-9 Korner

Own company stock?  
Check with Ethics  
before working on  
any FTC matters  
involving that  
company!



Attention All Dog Lovers!

We still want entries for the "Ethics K-9 Korner," which features an adorable pooch with an ethics tip.

This quarter's winner is Lucy. Her proud owner is (b)(6) in BC Operations.

Is your dog cuter? Prove it! Send entries to:  
[abarteksantiago@ftc.gov](mailto:abarteksantiago@ftc.gov)



# January 2017

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday																																																																																				
1 <i>New Year's Day</i>	2 <i>New Year's Day (observed)</i>	3	4	5	6	7																																																																																				
8	9	10	11	12	13	14																																																																																				
15	16 <i>Martin Luther King Jr. Day</i>	17	18	19	20	21																																																																																				
22	23	24	25	26	27	28																																																																																				
29	30	31			<div>December</div> <table> <tr><td>Su</td><td>M</td><td>Tu</td><td>W</td><td>Th</td><td>Fri</td><td>Sa</td></tr> <tr><td></td><td></td><td></td><td>1</td><td>2</td><td>3</td><td></td></tr> <tr><td>4</td><td>5</td><td>6</td><td>7</td><td>8</td><td>9</td><td>10</td></tr> <tr><td>11</td><td>12</td><td>13</td><td>14</td><td>15</td><td>16</td><td>17</td></tr> <tr><td>18</td><td>19</td><td>20</td><td>21</td><td>22</td><td>23</td><td>24</td></tr> <tr><td>25</td><td>26</td><td>27</td><td>28</td><td>29</td><td>30</td><td>31</td></tr> </table> <div>February</div> <table> <tr><td>Su</td><td>M</td><td>Tu</td><td>W</td><td>Th</td><td>Fri</td><td>Sa</td></tr> <tr><td></td><td></td><td></td><td>1</td><td>2</td><td>3</td><td>4</td></tr> <tr><td>5</td><td>6</td><td>7</td><td>8</td><td>9</td><td>10</td><td>11</td></tr> <tr><td>12</td><td>13</td><td>14</td><td>15</td><td>16</td><td>17</td><td>18</td></tr> <tr><td>19</td><td>20</td><td>21</td><td>22</td><td>23</td><td>24</td><td>25</td></tr> <tr><td>26</td><td>27</td><td>28</td><td></td><td></td><td></td><td></td></tr> </table>		Su	M	Tu	W	Th	Fri	Sa				1	2	3		4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	Su	M	Tu	W	Th	Fri	Sa				1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28				
Su	M	Tu	W	Th	Fri	Sa																																																																																				
			1	2	3																																																																																					
4	5	6	7	8	9	10																																																																																				
11	12	13	14	15	16	17																																																																																				
18	19	20	21	22	23	24																																																																																				
25	26	27	28	29	30	31																																																																																				
Su	M	Tu	W	Th	Fri	Sa																																																																																				
			1	2	3	4																																																																																				
5	6	7	8	9	10	11																																																																																				
12	13	14	15	16	17	18																																																																																				
19	20	21	22	23	24	25																																																																																				
26	27	28																																																																																								

Slow Down & "Paws": Think about Federal Ethics [BEFORE](#) You Act!





# February 2017

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday																																																																																																																														
			1	2 <i>Groundhog Day</i>	3	4																																																																																																																														
5	6	7	8	9	10	11																																																																																																																														
12	13	14 <i>Valentine's Day</i>	15	16	17	18																																																																																																																														
19	20 <i>Presidents' Day</i>	21	22	23	24	25																																																																																																																														
26	27	28			<div>January</div> <table> <tr><td>Su</td><td>M</td><td>Tu</td><td>W</td><td>Th</td><td>Fri</td><td>Sa</td></tr> <tr><td>1</td><td>2</td><td>3</td><td>4</td><td>5</td><td>6</td><td>7</td></tr> <tr><td>8</td><td>9</td><td>10</td><td>11</td><td>12</td><td>13</td><td>14</td></tr> <tr><td>15</td><td>16</td><td>17</td><td>18</td><td>19</td><td>20</td><td>21</td></tr> <tr><td>22</td><td>23</td><td>24</td><td>25</td><td>26</td><td>27</td><td>28</td></tr> <tr><td>29</td><td>30</td><td>31</td><td></td><td></td><td></td><td></td></tr> </table> <div>March</div> <table> <tr><td>Su</td><td>M</td><td>Tu</td><td>W</td><td>Th</td><td>Fri</td><td>Sa</td></tr> <tr><td></td><td></td><td></td><td></td><td>1</td><td>2</td><td>3</td></tr> <tr><td></td><td></td><td></td><td></td><td>4</td><td>5</td><td>6</td></tr> <tr><td></td><td></td><td></td><td></td><td>7</td><td>8</td><td>9</td></tr> <tr><td></td><td></td><td></td><td></td><td>10</td><td>11</td><td>12</td></tr> <tr><td></td><td></td><td></td><td></td><td>13</td><td>14</td><td>15</td></tr> <tr><td></td><td></td><td></td><td></td><td>16</td><td>17</td><td>18</td></tr> <tr><td></td><td></td><td></td><td></td><td>19</td><td>20</td><td>21</td></tr> <tr><td></td><td></td><td></td><td></td><td>22</td><td>23</td><td>24</td></tr> <tr><td></td><td></td><td></td><td></td><td>25</td><td>26</td><td>27</td></tr> <tr><td></td><td></td><td></td><td></td><td>28</td><td>29</td><td>30</td></tr> <tr><td></td><td></td><td></td><td></td><td>31</td><td></td><td></td></tr> </table>		Su	M	Tu	W	Th	Fri	Sa	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31					Su	M	Tu	W	Th	Fri	Sa					1	2	3					4	5	6					7	8	9					10	11	12					13	14	15					16	17	18					19	20	21					22	23	24					25	26	27					28	29	30					31		
Su	M	Tu	W	Th	Fri	Sa																																																																																																																														
1	2	3	4	5	6	7																																																																																																																														
8	9	10	11	12	13	14																																																																																																																														
15	16	17	18	19	20	21																																																																																																																														
22	23	24	25	26	27	28																																																																																																																														
29	30	31																																																																																																																																		
Su	M	Tu	W	Th	Fri	Sa																																																																																																																														
				1	2	3																																																																																																																														
				4	5	6																																																																																																																														
				7	8	9																																																																																																																														
				10	11	12																																																																																																																														
				13	14	15																																																																																																																														
				16	17	18																																																																																																																														
				19	20	21																																																																																																																														
				22	23	24																																																																																																																														
				25	26	27																																																																																																																														
				28	29	30																																																																																																																														
				31																																																																																																																																

Slow Down & "Paws": Think about Federal Ethics **BEFORE** You Act!



# March 2017

Sun	Mon	Tue	Wed	Thu	Fri	Sat																																																																																											
<div>February</div> <table> <tr><td>Su</td><td>M</td><td>Tu</td><td>W</td><td>Th</td><td>Fri</td><td>Sa</td></tr> <tr><td></td><td></td><td></td><td>1</td><td>2</td><td>3</td><td>4</td></tr> <tr><td>5</td><td>6</td><td>7</td><td>8</td><td>9</td><td>10</td><td>11</td></tr> <tr><td>12</td><td>13</td><td>14</td><td>15</td><td>16</td><td>17</td><td>18</td></tr> <tr><td>19</td><td>20</td><td>21</td><td>22</td><td>23</td><td>24</td><td>25</td></tr> <tr><td>26</td><td>27</td><td>28</td><td></td><td></td><td></td><td></td></tr> </table>	Su	M	Tu	W	Th	Fri	Sa				1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28					<div>April</div> <table> <tr><td>Su</td><td>M</td><td>Tu</td><td>W</td><td>Th</td><td>Fri</td><td>Sa</td></tr> <tr><td></td><td></td><td></td><td></td><td></td><td></td><td>1</td></tr> <tr><td>2</td><td>3</td><td>4</td><td>5</td><td>6</td><td>7</td><td>8</td></tr> <tr><td>9</td><td>10</td><td>11</td><td>12</td><td>13</td><td>14</td><td>15</td></tr> <tr><td>16</td><td>17</td><td>18</td><td>19</td><td>20</td><td>21</td><td>22</td></tr> <tr><td>23</td><td>24</td><td>25</td><td>26</td><td>27</td><td>28</td><td>29</td></tr> <tr><td>30</td><td></td><td></td><td></td><td></td><td></td><td></td></tr> </table>	Su	M	Tu	W	Th	Fri	Sa							1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30								1	2	3	4
Su	M	Tu	W	Th	Fri	Sa																																																																																											
			1	2	3	4																																																																																											
5	6	7	8	9	10	11																																																																																											
12	13	14	15	16	17	18																																																																																											
19	20	21	22	23	24	25																																																																																											
26	27	28																																																																																															
Su	M	Tu	W	Th	Fri	Sa																																																																																											
						1																																																																																											
2	3	4	5	6	7	8																																																																																											
9	10	11	12	13	14	15																																																																																											
16	17	18	19	20	21	22																																																																																											
23	24	25	26	27	28	29																																																																																											
30																																																																																																	
5	6	7	8	9	10	11																																																																																											
12 <i>Daylight Saving Time Starts</i>	13	14	15	16	17	18																																																																																											
19	20 <i>Spring Begins</i>	21	22	23	24	25																																																																																											
26	27	28	29	30	31																																																																																												

Slow Down & "Paws":

Think about Federal Ethics **BEFORE** You Act!





Slow Down & “Paws”: Think about Federal Ethics **BEFORE** You Act!



# May 2017

Sun	Mon	Tue	Wed	Thu	Fri	Sat																																																																																											
	1	2	3	4	5	6																																																																																											
7	8	9	10	11	12	13																																																																																											
14 <i>Mother's Day</i>	15	16	17	18	19	20																																																																																											
21	22	23	24	25	26	27																																																																																											
28	29 <i>Memorial Day</i>	30	31		<div> <div>April</div> <table> <tr><td>Su</td><td>M</td><td>Tu</td><td>W</td><td>Th</td><td>Fri</td><td>Sa</td></tr> <tr><td></td><td></td><td></td><td></td><td></td><td>1</td><td></td></tr> <tr><td>2</td><td>3</td><td>4</td><td>5</td><td>6</td><td>7</td><td>8</td></tr> <tr><td>9</td><td>10</td><td>11</td><td>12</td><td>13</td><td>14</td><td>15</td></tr> <tr><td>16</td><td>17</td><td>18</td><td>19</td><td>20</td><td>21</td><td>22</td></tr> <tr><td>23</td><td>24</td><td>25</td><td>26</td><td>27</td><td>28</td><td>29</td></tr> <tr><td>30</td><td></td><td></td><td></td><td></td><td></td><td></td></tr> </table> </div> <div> <div>June</div> <table> <tr><td>Su</td><td>M</td><td>Tu</td><td>W</td><td>Th</td><td>Fri</td><td>Sa</td></tr> <tr><td></td><td></td><td></td><td></td><td></td><td>1</td><td>2</td></tr> <tr><td>3</td><td>4</td><td>5</td><td>6</td><td>7</td><td>8</td><td>9</td></tr> <tr><td>10</td><td>11</td><td>12</td><td>13</td><td>14</td><td>15</td><td>16</td></tr> <tr><td>17</td><td>18</td><td>19</td><td>20</td><td>21</td><td>22</td><td>23</td></tr> <tr><td>24</td><td>25</td><td>26</td><td>27</td><td>28</td><td>29</td><td>30</td></tr> </table> </div>		Su	M	Tu	W	Th	Fri	Sa						1		2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30							Su	M	Tu	W	Th	Fri	Sa						1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30
Su	M	Tu	W	Th	Fri	Sa																																																																																											
					1																																																																																												
2	3	4	5	6	7	8																																																																																											
9	10	11	12	13	14	15																																																																																											
16	17	18	19	20	21	22																																																																																											
23	24	25	26	27	28	29																																																																																											
30																																																																																																	
Su	M	Tu	W	Th	Fri	Sa																																																																																											
					1	2																																																																																											
3	4	5	6	7	8	9																																																																																											
10	11	12	13	14	15	16																																																																																											
17	18	19	20	21	22	23																																																																																											
24	25	26	27	28	29	30																																																																																											

Slow Down & "Paws": Think about Federal Ethics BEFORE You Act!





# June 2017

Sun	Mon	Tue	Wed	Thu	Fri	Sat
<b>May</b> Su: 1 2 3 4 5 6 M: 7 8 9 10 11 12 13 Tu: 14 15 16 17 18 19 20 We: 21 22 23 24 25 26 27 Th: 28 29 30 31	<b>July</b> Su: 1 2 3 4 5 6 7 8 M: 9 10 11 12 13 14 15 Tu: 16 17 18 19 20 21 22 We: 23 24 25 26 27 28 29 Th: 30 31			1	2	3
4	5	6	7	8	9	10
11	12	13	14	15	16	17
18	19	20	21	22	23	24
<i>Father's Day</i>			<i>Summer Begins</i>			
25	26	27	28	29	30	

Slow Down & "Paws": Think about Federal Ethics **BEFORE** You Act!



# July 2017

Sun	Mon	Tue	Wed	Thu	Fri	Sat																																																																																				
<div> <div>June</div> <table> <tr><td>Su</td><td>M</td><td>Tu</td><td>W</td><td>Th</td><td>Fri</td><td>Sa</td></tr> <tr><td></td><td></td><td></td><td>1</td><td>2</td><td>3</td><td></td></tr> <tr><td>4</td><td>5</td><td>6</td><td>7</td><td>8</td><td>9</td><td>10</td></tr> <tr><td>11</td><td>12</td><td>13</td><td>14</td><td>15</td><td>16</td><td>17</td></tr> <tr><td>18</td><td>19</td><td>20</td><td>21</td><td>22</td><td>23</td><td>24</td></tr> <tr><td>25</td><td>26</td><td>27</td><td>28</td><td>29</td><td>30</td><td></td></tr> </table> </div>	Su	M	Tu	W	Th	Fri	Sa				1	2	3		4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30		<div> <div>August</div> <table> <tr><td>Su</td><td>M</td><td>Tu</td><td>W</td><td>Th</td><td>Fri</td><td>Sa</td></tr> <tr><td></td><td></td><td></td><td>1</td><td>2</td><td>3</td><td>4</td></tr> <tr><td>5</td><td>6</td><td>7</td><td>8</td><td>9</td><td>10</td><td>11</td></tr> <tr><td>12</td><td>13</td><td>14</td><td>15</td><td>16</td><td>17</td><td>18</td></tr> <tr><td>19</td><td>20</td><td>21</td><td>22</td><td>23</td><td>24</td><td>25</td></tr> <tr><td>26</td><td>27</td><td>28</td><td>29</td><td>30</td><td>31</td><td></td></tr> </table> </div>	Su	M	Tu	W	Th	Fri	Sa				1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31						1
Su	M	Tu	W	Th	Fri	Sa																																																																																				
			1	2	3																																																																																					
4	5	6	7	8	9	10																																																																																				
11	12	13	14	15	16	17																																																																																				
18	19	20	21	22	23	24																																																																																				
25	26	27	28	29	30																																																																																					
Su	M	Tu	W	Th	Fri	Sa																																																																																				
			1	2	3	4																																																																																				
5	6	7	8	9	10	11																																																																																				
12	13	14	15	16	17	18																																																																																				
19	20	21	22	23	24	25																																																																																				
26	27	28	29	30	31																																																																																					
2	3	4 <i>Independence Day</i>	5	6	7	8																																																																																				
9	10	11	12	13	14	15																																																																																				
16	17	18	19	20	21	22																																																																																				
23	24	25	26	27	28	29																																																																																				
30	31																																																																																									

Slow Down & "Paws":

Think about Federal Ethics **BEFORE** You Act!





# August 2017

Sun	Mon	Tue	Wed	Thu	Fri	Sat
<b>July</b> Su M Tu W Th Fri Sa 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31	<b>September</b> Su M Tu W Th Fri Sa 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30	1	2	3	4	5
6	7	8	9	10	11	12
13	14	15	16	17	18	19
20	21	22	23	24	25	26
27	28	29	30	31		

Slow Down & "Paws": Think about Federal Ethics **BEFORE** You Act!



# September 2017

Sun	Mon	Tue	Wed	Thu	Fri	Sat																																																																																				
<b>August</b> <table> <tr><td>Su</td><td>M</td><td>Tu</td><td>W</td><td>Th</td><td>Fri</td><td>Sa</td></tr> <tr><td></td><td>1</td><td>2</td><td>3</td><td>4</td><td>5</td><td></td></tr> <tr><td>6</td><td>7</td><td>8</td><td>9</td><td>10</td><td>11</td><td>12</td></tr> <tr><td>13</td><td>14</td><td>15</td><td>16</td><td>17</td><td>18</td><td>19</td></tr> <tr><td>20</td><td>21</td><td>22</td><td>23</td><td>24</td><td>25</td><td>26</td></tr> <tr><td>27</td><td>28</td><td>29</td><td>30</td><td>31</td><td></td><td></td></tr> </table>	Su	M	Tu	W	Th	Fri	Sa		1	2	3	4	5		6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31			<b>October</b> <table> <tr><td>Su</td><td>M</td><td>Tu</td><td>W</td><td>Th</td><td>Fri</td><td>Sa</td></tr> <tr><td></td><td>1</td><td>2</td><td>3</td><td>4</td><td>5</td><td>6</td></tr> <tr><td>7</td><td>8</td><td>9</td><td>10</td><td>11</td><td>12</td><td>13</td></tr> <tr><td>14</td><td>15</td><td>16</td><td>17</td><td>18</td><td>19</td><td>20</td></tr> <tr><td>21</td><td>22</td><td>23</td><td>24</td><td>25</td><td>26</td><td>27</td></tr> <tr><td>28</td><td>29</td><td>30</td><td>31</td><td></td><td></td><td></td></tr> </table>	Su	M	Tu	W	Th	Fri	Sa		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31							1	2
Su	M	Tu	W	Th	Fri	Sa																																																																																				
	1	2	3	4	5																																																																																					
6	7	8	9	10	11	12																																																																																				
13	14	15	16	17	18	19																																																																																				
20	21	22	23	24	25	26																																																																																				
27	28	29	30	31																																																																																						
Su	M	Tu	W	Th	Fri	Sa																																																																																				
	1	2	3	4	5	6																																																																																				
7	8	9	10	11	12	13																																																																																				
14	15	16	17	18	19	20																																																																																				
21	22	23	24	25	26	27																																																																																				
28	29	30	31																																																																																							
3	4 <i>Labor Day</i>	5	6	7	8	9																																																																																				
10 <i>Grandparents' Day</i>	11	12	13	14	15	16																																																																																				
17	18	19	20	21 <i>Autumn Begins</i>	22	23																																																																																				
24	25	26	27	28	29	30																																																																																				

Slow Down & "Paws": Think about Federal Ethics **BEFORE** You Act!





# October 2017

Sun	Mon	Tue	Wed	Thu	Fri	Sat																																																																						
1	2	3	4	5	6	7																																																																						
8	9 <i>Columbus Day</i>	10	11	12	13	14																																																																						
15	16	17	18	19	20	21																																																																						
22	23	24	25	26	27	28																																																																						
29	30	31 <i>Halloween</i>			<div> <div>September</div> <table> <tr><td>Su</td><td>1</td><td>2</td><td>3</td><td>4</td><td>5</td><td>6</td></tr> <tr><td>7</td><td>8</td><td>9</td><td>10</td><td>11</td><td>12</td><td>13</td></tr> <tr><td>14</td><td>15</td><td>16</td><td>17</td><td>18</td><td>19</td><td>20</td></tr> <tr><td>21</td><td>22</td><td>23</td><td>24</td><td>25</td><td>26</td><td>27</td></tr> <tr><td>28</td><td>29</td><td>30</td><td></td><td></td><td></td><td></td></tr> </table> </div> <div> <div>November</div> <table> <tr><td>Su</td><td>1</td><td>2</td><td>3</td><td>4</td><td>5</td><td>6</td></tr> <tr><td>7</td><td>8</td><td>9</td><td>10</td><td>11</td><td>12</td><td>13</td></tr> <tr><td>14</td><td>15</td><td>16</td><td>17</td><td>18</td><td>19</td><td>20</td></tr> <tr><td>21</td><td>22</td><td>23</td><td>24</td><td>25</td><td>26</td><td>27</td></tr> <tr><td>28</td><td>29</td><td>30</td><td></td><td></td><td></td><td></td></tr> </table> </div>		Su	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30					Su	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30				
Su	1	2	3	4	5	6																																																																						
7	8	9	10	11	12	13																																																																						
14	15	16	17	18	19	20																																																																						
21	22	23	24	25	26	27																																																																						
28	29	30																																																																										
Su	1	2	3	4	5	6																																																																						
7	8	9	10	11	12	13																																																																						
14	15	16	17	18	19	20																																																																						
21	22	23	24	25	26	27																																																																						
28	29	30																																																																										

Slow Down & "Paws":

Think about Federal Ethics **BEFORE** You Act!



# November 2017

Sun	Mon	Tue	Wed	Thu	Fri	Sat																																																																																											
<div>October</div> <table> <tr><td>Su</td><td>Mo</td><td>Tu</td><td>We</td><td>Th</td><td>Fri</td><td>Sa</td></tr> <tr><td>1</td><td>2</td><td>3</td><td>4</td><td>5</td><td>6</td><td>7</td></tr> <tr><td>8</td><td>9</td><td>10</td><td>11</td><td>12</td><td>13</td><td>14</td></tr> <tr><td>15</td><td>16</td><td>17</td><td>18</td><td>19</td><td>20</td><td>21</td></tr> <tr><td>22</td><td>23</td><td>24</td><td>25</td><td>26</td><td>27</td><td>28</td></tr> <tr><td>29</td><td>30</td><td>31</td><td></td><td></td><td></td><td></td></tr> </table>	Su	Mo	Tu	We	Th	Fri	Sa	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31					<div>December</div> <table> <tr><td>Su</td><td>Mo</td><td>Tu</td><td>We</td><td>Th</td><td>Fri</td><td>Sa</td></tr> <tr><td></td><td></td><td></td><td></td><td></td><td></td><td>1</td></tr> <tr><td></td><td>2</td><td>3</td><td>4</td><td>5</td><td>6</td><td>7</td></tr> <tr><td></td><td>8</td><td>9</td><td>10</td><td>11</td><td>12</td><td>13</td></tr> <tr><td></td><td>14</td><td>15</td><td>16</td><td>17</td><td>18</td><td>19</td></tr> <tr><td></td><td>20</td><td>21</td><td>22</td><td>23</td><td>24</td><td>25</td></tr> <tr><td></td><td>26</td><td>27</td><td>28</td><td>29</td><td>30</td><td>31</td></tr> </table>	Su	Mo	Tu	We	Th	Fri	Sa							1		2	3	4	5	6	7		8	9	10	11	12	13		14	15	16	17	18	19		20	21	22	23	24	25		26	27	28	29	30	31		1	2	3	4
Su	Mo	Tu	We	Th	Fri	Sa																																																																																											
1	2	3	4	5	6	7																																																																																											
8	9	10	11	12	13	14																																																																																											
15	16	17	18	19	20	21																																																																																											
22	23	24	25	26	27	28																																																																																											
29	30	31																																																																																															
Su	Mo	Tu	We	Th	Fri	Sa																																																																																											
						1																																																																																											
	2	3	4	5	6	7																																																																																											
	8	9	10	11	12	13																																																																																											
	14	15	16	17	18	19																																																																																											
	20	21	22	23	24	25																																																																																											
	26	27	28	29	30	31																																																																																											
5 <i>Daylight Saving Time Ends</i>	6	7 <i>Election Day</i>	8	9	10 <i>Veterans Day (observed)</i>	11 <i>Veterans Day</i>																																																																																											
12	13	14	15	16	17	18																																																																																											
19	20	21	22	23 <i>Thanksgiving Day</i>	24	25																																																																																											
26	27	28	29	30																																																																																													

Slow Down & "Paws"; Think about Federal Ethics **BEFORE** You Act!



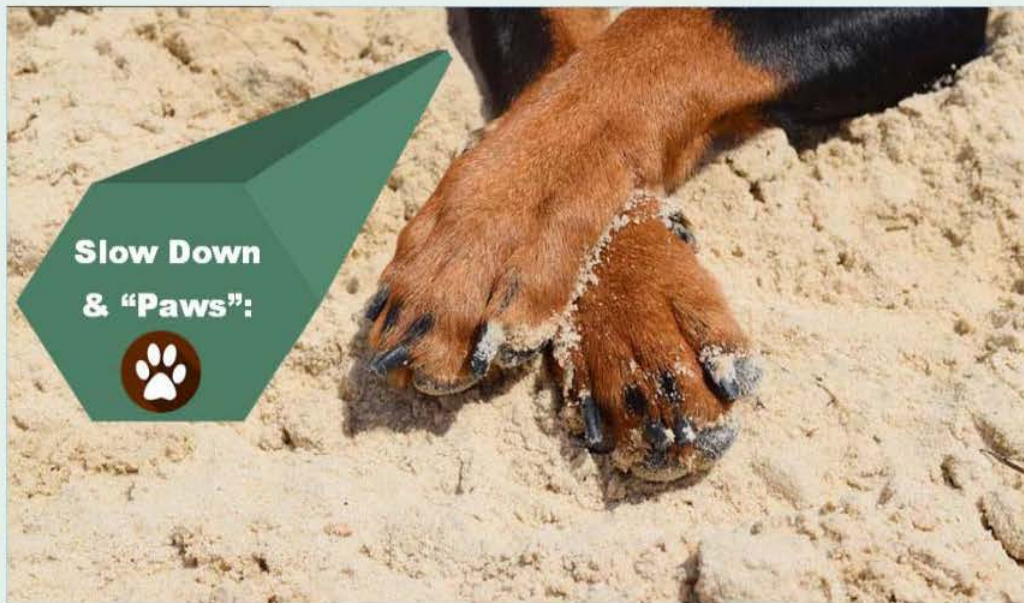


# December 2017

Sun	Mon	Tue	Wed	Thu	Fri	Sat																																																																						
					1	2																																																																						
3	4	5	6	7	8	9																																																																						
10	11	12	13	14	15	16																																																																						
17	18	19	20	21 <i>Winter Begins</i>	22	23																																																																						
24	25 <i>Christmas Day</i>	26	27	28	29	30																																																																						
31 <i>New Year's Eve</i>					<div> <div>November</div> <table> <tr><td>Su</td><td>1</td><td>2</td><td>3</td><td>4</td><td>5</td><td>6</td></tr> <tr><td>7</td><td>8</td><td>9</td><td>10</td><td>11</td><td>12</td><td>13</td></tr> <tr><td>14</td><td>15</td><td>16</td><td>17</td><td>18</td><td>19</td><td>20</td></tr> <tr><td>21</td><td>22</td><td>23</td><td>24</td><td>25</td><td>26</td><td>27</td></tr> <tr><td>28</td><td>29</td><td>30</td><td></td><td></td><td></td><td></td></tr> </table> </div> <div> <div>January</div> <table> <tr><td>Su</td><td>1</td><td>2</td><td>3</td><td>4</td><td>5</td><td>6</td></tr> <tr><td>7</td><td>8</td><td>9</td><td>10</td><td>11</td><td>12</td><td>13</td></tr> <tr><td>14</td><td>15</td><td>16</td><td>17</td><td>18</td><td>19</td><td>20</td></tr> <tr><td>21</td><td>22</td><td>23</td><td>24</td><td>25</td><td>26</td><td>27</td></tr> <tr><td>28</td><td>29</td><td>30</td><td>31</td><td></td><td></td><td></td></tr> </table> </div>		Su	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30					Su	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31			
Su	1	2	3	4	5	6																																																																						
7	8	9	10	11	12	13																																																																						
14	15	16	17	18	19	20																																																																						
21	22	23	24	25	26	27																																																																						
28	29	30																																																																										
Su	1	2	3	4	5	6																																																																						
7	8	9	10	11	12	13																																																																						
14	15	16	17	18	19	20																																																																						
21	22	23	24	25	26	27																																																																						
28	29	30	31																																																																									

Slow Down & "Paws":

Think about Federal Ethics BEFORE You Act!



**Slow Down  
& "Paws":**



**Think about Federal Ethics BEFORE You Act!**



**2017 ETHICS CALENDAR**



**Stand Tall  
&  
Serve with Integrity!**

---

**INTEGRITY**

---

**Stay Current on  
“Your”  
Investments.**



**Don't Work on FTC  
Matters Affecting  
“You.”**

---

**AVOID CONFLICTS**

---

The interests of certain others are considered your interests:

- Your Spouse
- Your Minor Child
- Your General (Business) Partner
- Those You Serve As an Officer, Trustee, Director or Employee
- Anyone with Whom You Are Negotiating or Have an Arrangement for Future (Non-Federal) Employment

# Financial Conflicts

Tucker, submitted by (b)(6) Information & Legal Support Division, Office of the General Counsel)

## The Leash Only Becomes Visible After You Take a Step Back.

Do you have personal or business ties to parties involved in your FTC work? The press of business may keep your focus on the ground. Be mindful of the public's viewpoint.

### CONSIDER YOUR AFFILIATIONS

- Persons Living With You
- Your Recent & Future Employers
- Persons Served By Your Spouse, Parent, or Dependent Child
- Your Relatives, Business Partners & Any Outside Groups You Serve



# Covered Relationships

Kori, submitted by (b)(6) (Mergers II Division, Bureau of Competition)



### DON'T GET YOUR HATS CONFUSED:

Last year, a HUD officer violated the Hatch Act when he said he was "taking off [his] HUD hat for a second," and discussed his political views during a tv interview in his official capacity.



If you are in your official capacity and wearing your official hat, you must follow all Hatch Act restrictions.

### OTHER PROHIBITIONS

- Soliciting donations
- Fundraising for a partisan candidate
- Running for office
- Endorsing a candidate with your official title

# Hatch Act

Emerson, submitted by (b)(6)

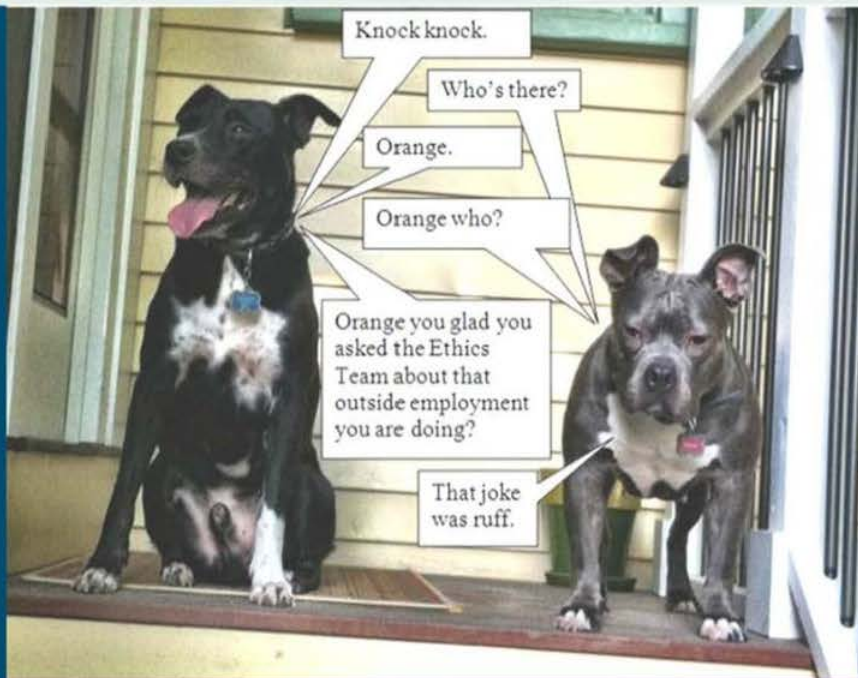
(Ethics Office, Office of the General Counsel)

Just because it's  
April, don't be a  
Fool.

You must seek and receive **prior written approval** from your supervisor and the Ethics Team **before** engaging in any outside employment.

#### APPROVAL NEEDED IF:

- The activity is compensated;
- You are rendering a "professional service", or;
- The employment benefits a for-profit organization



# Outside Employment

Romeo and Bella, submitted by (b)(6) Office of the Director, Bureau of Consumer Protection )

## SOCIAL MEDIA REMINDER:

Keep in mind that federal ethics rules apply to your virtual/online activities. Generally, you may refer to your official title/position in your profile/bio section. Be careful about referencing your title/position in your actual postings.



STOP IN THE  
NAME OF THE  
PAW!



# Misuse of Position

Left—Hazel, submitted by (b)(6) Contractor, Office of the Chief Information Officer)  
Right—Sampson, submitted by (b)(6) Ethics Office, Office of the General Counsel)



**CHEW ON THIS:**

**The FTC may only accept travel reimbursement from 501(c)(3) entities, foreign governments, and foreign nonprofits for non-federal source travel.**



# NFS Travel

Zoey, submitted by (b)(6) Contractor, Office of the Executive Director)

## CAN'T SAY NO? WE UNDERSTAND.

You probably want to give these two whatever they want (Tao is asking for bacon). If a recruiter calls, remember you must not work on FTC matters affecting the financial interests of anyone with whom you are seeking employment.

## SOME FOLKS ARE HARD TO TURN DOWN

"Seeking" begins once you express an interest, regardless of who initiates the communication.

"Seeking" generally continues until someone rejects the possibility of employment—deferring the discussion until later will not end the "seeking" relationship.



# Seeking Employment

Center: **Tao**, submitted by (b)(6) (Policy and Coordination Division, Bureau of Competition)  
Right: **Dallas**, submitted by (b)(6) (Investigation Technology & Analysis Division, Bureau of Consumer Protection)

### We're Here to Help!

If you part ways with the FTC, don't try to navigate post-employment constraints on your own. Contact the FTC's Ethics Team for guidance! Criminal statutory restrictions, FTC-specific regulatory constraints and other ethics rules may limit the work you are able to perform.



# Post-Employment

Left & Center: **Tucker & Winnie**, submitted by **(b)(6)** (Information & Legal Support Division, Office of the General Counsel)  
Right: **Cassius Clay**, submitted by **(b)(6)** (Information & Legal Support Division, Office of the General Counsel)



**Do: Throw me the ball when I ask.**

**Don't: Solicit charitable donations at work.**

## FUNDRAISING

- Apart from the OGC and FTC Childcare Center, you may not fundraise for charity during work hours or on Federal property.
- You may not solicit any person or entity that currently is an interested party in a Commission matter, proceeding, contract, or decision.



# Charitable Fundraising

Brody, submitted by (b)(6) (Division of Financial Practices, Bureau of Consumer Protection)

WANNA BE THE  
BEST?

Make sure there  
is no misuse of  
resources in  
your office.

DON'T ABUSE  
THESE:

- Time
- Equipment
- Staff
- Office supplies
- Travel Card



# Misuse of Resources

Griffey, submitted by (b)(6) (Northwest Region)

## Want to give a gift to your boss?

Generally, you should never give gifts up the chain of command. However, there are two exceptions:

- ♦ You may give your supervisor a gift, other than cash, with a market value of \$10 or less on an occasional basis. This includes occasions such as birthdays, Bosses' Day, or other annually occurring holidays.
- ♦ On special, infrequent occasions of personal significance, such as illness, a marriage, or the birth/adoption of a child, and on occasions that terminate the superior-subordinate relationship, you may give gifts to an official superior. Although there is no monetary limit, the gift must be of the type and value appropriate to the occasion.



## NOTE ABOUT GROUP GIFTS:

- ♦ Employees may solicit and make voluntary contributions of nominal amounts for an office gift. It is critical, however, that no one is pressured or coerced into contributing.

# Gifts from Federal Employees



## DON'T ACCEPT GIFTS FROM PROHIBITED SOURCES

The term "prohibited source" includes anyone seeking business with or official action by an employee's agency and anyone substantially affected by the performance of the employee's duties.



# Gifts From Outside Sources

Pluto, submitted by (b)(6) Employment & Labor Law, Office of the General Counsel)