ETHICS ESSENTIALS

A Primer for New Judges on Conflicts, Outside Activities, and Other Potential Pitfalls



Committee on Codes of Conduct

Judicial Conference of the United States

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Introduction

Welcome to the federal judiciary! Whether you've served previously as a judge or are embarking on your initial appointment, you know how important it is to follow the rules of ethical conduct. The Judicial Conference Committee on Codes of Conduct prepared this introductory pamphlet to provide a brief overview of the rules of conduct applicable to federal judges. The pamphlet highlights essential standards of conduct, answers recurring questions, and provides examples of common situations new judges may encounter.

Respect for the judiciary depends upon public confidence in the integrity and independence of judges. Understanding and observing ethics standards is an important element in upholding the public's confidence and ensuring an independent and honorable judiciary.

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Principles of Ethical Conduct

CANON 1: A judge should uphold the integrity and independence of the judiciary.

CANON 2: A judge should avoid impropriety and the appearance of impropriety in all activities.

CANON 3: A judge should perform the duties of the office impartially and diligently.

CANON 4: A judge may engage in extra-judicial activities to improve the law, the legal system, and the administration of justice.

CANON 5: A judge should regulate extra-judicial activities to minimize the risk of conflict with judicial duties.

CANON 6: A judge should regularly file reports of compensation received for law-related and extra-judicial activities.

CANON 7: A judge should refrain from political activity.

Gift

Regulations: A judge shall not, except as specifically permitted,

solicit or accept a gift from any person seeking official action from or doing business with the court, or whose interests may be substantially affected by

the performance of official duties.

Outside Employment

Regulations: A judge shall not engage in certain forms of

compensated employment, including employment as a fiduciary, and may not accept compensation exceeding the annual earnings ceiling (15 percent of

basic pay for Executive Schedule level II).

Honoraria Regulations:

A judge may not accept payment for an appearance, speech, or article (including a series of related appearances, speeches or articles related to official duties), or where payment is made because of the

judge's official position.

These principles are derived from the *Code of Conduct for United States Judges* and the *Judicial Conference Regulations on Gifts* and on *Outside Earned Income, Honoraria, and Employment*, which are discussed on the following pages. Also discussed are published Advisory Opinions of particular relevance to new judges. For authoritative guidance, you should refer to the actual text of these documents, which appear in the *Guide to Judiciary Policies and Procedures*, Volume 2, and on the J-Net at http://jnet.ao.dcn/Guide/Volume_2.html. A violation of these rules could result in disciplinary action or, for certain offenses, civil and criminal sanctions under related statutes on conflict of interest.

Judges are subject to the Code of Conduct and ethics regulations when appointed and authorized to perform judicial functions. You should arrange your affairs to comply with the Code of Conduct "as soon as reasonably possible," but in any event no later than one year after appointment.

If you have questions after reviewing the information outlined in this pamphlet, guidance is available from the General Counsel's Office at the Administrative Office of the U.S. Courts, telephone 202-502-1100. You may seek a confidential advisory opinion from the Committee on Codes of Conduct, in care of the Administrative Office General Counsel's Office, One Columbus Circle, N.E., Washington, D.C. 20544.

Conflicts of Interest and Recusal

As a federal judge, you have the authority to resolve significant public and private disputes. Sometimes, though, a matter assigned to you may involve you or your family personally, or may affect individuals or organizations with which you have associations outside of your official duties. In these situations, if your impartiality might reasonably be questioned, you must disqualify or recuse yourself from the proceeding (the terms "disqualify" and "recuse" are commonly used interchangeably).

Grounds for Disqualification

Disqualification is required under Canon 3C(1)(a) to (e) in several situations:

- you have personal knowledge of disputed facts
- your law firm handled the same matter while you were there
- a close relative is a party or attorney
- you, your spouse, or your minor child owns a financial interest in a party
- as a government official, you served as a counsel in the case

If you fall into one of these categories, your disqualification is mandatory.

You should also disqualify under Canon 3C(1) if the circumstances would cause a reasonable person to question your impartiality.

Reference: Canon 3C(1) and 3C(1)(a) to (e). See also 28 U.S.C. § 455.

One recurring form of conflict occurs when a judge (or the judge's spouse or minor child) has a financial interest in a party, which results in mandatory disqualification. Not all investments are considered financial interests under the conflicts provisions.

Financial interests: financial interests that result in mandatory disqualification include —

- ownership of a family business
- shares of stock in a public company (even one share is disqualifying)
- shares of stock in the parent company of a party
- property held by a trust in which you are a trustee or vested beneficiary
- service as an officer, director, or active participant in the affairs of a party

Investments that are not considered financial interests: investments that do not result in mandatory disqualification include —

- mutual funds
- corporate or municipal bonds
- insurance policies
- ordinary bank accounts and loans

Reference: Advisory Opinion Nos. 20, 57, and 101.



Query: Judge M is handling a class action lawsuit in which the plaintiff class consists of all Bank Four credit card holders. At a restaurant yesterday Judge M noticed that his sister uses a Bank Four credit card. Must he give up the case?

Answer: Yes, as long as his sister is a member of the class. But if she opts out, she is not a party, and Judge M is no longer disqualified and may continue to preside.



Query: What if Judge M's sister opts out, but he then learns that his cousin is a partner in the law firm representing the defendant?

Answer: Disqualification is mandatory when a sibling or other near relative (within the third degree of kinship) is a partner in a firm appearing before the judge, but not for a cousin. Judge M should recuse only if the circumstances would cause a reasonable person to question his impartiality, for example because of a particularly close personal or business relationship with his cousin.

Keeping track of conflicts can present big challenges. You are required to keep informed about your personal and financial interests so you can disqualify when necessary. This means you SHOULD NOT place your assets in a blind trust, since you would not know what you own. Also, you SHOULD NOT let a broker make trades for you without prior approval or immediate notice. You are also required to make a reasonable effort to keep informed about financial interests of your spouse and minor resident child.

Reference: Canon 3C(2).

Conflicts Screening

The following checklists can help you create a conflicts list for monitoring purposes (See appendix):

- ◆ Checklist for Financial Conflicts (Form AO-300)
- ◆ Checklist for Other Conflicts (Form AO-301)
- ◆ Conflicts List (Form AO-302)

You can include on your conflicts list your financial investments and the names of relatives whose appearance in a case triggers recusal. Conflicts screening software is available in most courts to alert you when an entry on your conflicts list matches a party or attorney on your docket. Although this screening is not foolproof, it can aid greatly in identifying potential conflicts.



Query: Judge D's husband is in an investment club in which members purchase stock that is jointly owned by all members. Does Judge D need to ask about club investments?

Answer: Yes, Judge D is obliged to make a reasonable effort to keep informed about her husband's financial interests, which include investments owned jointly with others.



Query: The investment club owns stock in several insurance companies. A party in a products liability case before Judge D is being defended under an indemnity insurance policy. Is the judge required to find out who the insurance company is and to recuse if her husband owns stock?

Answer: No, a judge with insurance holdings has no duty to inquire whether an insurance company indemnifies a party. If her husband owns stock in a company Judge D knows is indemnifying a party, recusal is still not required, unless she knows his stock interest could be substantially affected by the proceeding.

What should you do when you discover a financial or other conflict of interest in a case already assigned to you? Here are some options:

Divestiture: you may sell or give away financial interests that create a conflict. As long as the divested interest was not one that could be substantially affected by the outcome, you may continue to handle the case. (If you divest financial interests before a case or conflict arises, you need not consider whether the interests could have been substantially affected.)

Remittal: if you are willing to participate, you may ask the parties to waive (or remit) your disqualification. But note that remittal is not available when you are disqualified due to a financial interest or for any of the mandatory grounds described in Canon 3C(1)(a) to (e). The remittal procedures are spelled out in Canon 3D (e.g., allow the parties to confer outside your presence). A sample form is also provided.

Reference: Canons 3C(4) and 3D; Advisory Opinion No. 69.



Query: Judge T just inherited GM stock from a relative. The judge is presiding in a case in which GM is a defendant; what should he do?

Answer: If Judge T is willing to divest the stock, he may continue to preside. Otherwise, disqualification is mandatory. Judge T should not ask the parties to waive (or remit) the disqualification, because the remittal provision does not extend to financial interests.

Gifts From Outside Sources

It is not unusual for friends, relatives, and other associates to offer gifts to judges. Often this happens when a judge is appointed and sworn in, but it occurs at other times too. As a general rule, judges may not accept gifts from an "interested person," that is, someone seeking official action from or doing business with the court, or whose interests may be substantially affected by the performance of official duties. There are some exceptions.

Items that are not gifts: certain modest items are not considered gifts and therefore may be accepted from anyone; these include —

- personal social hospitality
- greeting cards, plaques and certificates for presentation

- commercial discounts (unrelated to judicial status)
- rewards and prizes in public contests
- anything for which market value is paid

Gifts that may be accepted: certain gifts are considered appropriate whether or not the donor is an "interested person;" these include —

- gifts incident to a public testimonial (and commensurate with the occasion)
- books and resources for official use
- invitations to law-related functions and educational activities
- gifts from relatives and friends
- employment-related benefits

Reference: Gift Regulations §§ 3, 5.

Note: Recusal considerations arising from gifts are governed by Canon 3.



Query: Judge V will be sworn in shortly as a district judge. The bar association has offered to host a reception, with the food and drinks to be donated by a law firm. Is this OK?

Answer: Yes, the judge may accept a bar association reception. But donations from individual lawyers or law firms can raise concerns. If this is Judge V's former firm she may accept the donation, but not if she has no pre-existing or longstanding relationship with the firm. Advisory Opinion No. 98 spells out in more detail what gifts new judges may accept in connection with their investitures.

Although Judge V may accept many gifts, she should not ask for them. Also, under no circumstances should she accept a gift in return for performing an official act or in violation of any statute or regulation.

Some Investiture Gifts that May Be Accepted

- a judicial robe, given by former law partners
- a gavel from a former client
- a gift of a chair from friends and colleagues

Gifts above a certain value must be reported on your annual financial disclosure report.

Reference: Gift Regulations; Advisory Opinion No. 98.

Judges sometimes receive invitations to attend outside functions, which can include payment of an attendance fee, travel, meals, and other incidental expenses. If the donor is not an "interested person," or if the event is law-related or educational, you may be able to accept the invitation. You should consult the Gift Regulations for specific guidance.



Query: State University invited Judge B to a weekend seminar in Florida on Law and Literature. May he accept?

Answer: Probably so. Judges may go to law-related and educational events and accept reimbursement of expenses to attend. A seminar sponsored by a university is generally considered appropriate, though concerns can arise if the sponsor (or a major contributor of funding) is a party or is involved in litigation likely to come before the judge and the seminar relates to the subject matter of the litigation. Advisory Opinion No. 67 describes a number of factors judges should consider before accepting an invitation to an expense-paid seminar.

If Judge B attends a seminar and the sponsor (or a major contributor) later has a case before him, he should consider whether recusal would be appropriate.

When Invited to a Seminar — Factors to Consider

- the identity of the seminar sponsor
- the nature and source of seminar funding
- whether a sponsor or major contributor is in litigation before the judge (or likely to be)
- the subject matter of the seminar
- the nature of expenses paid or reimbursed
- whether seminar and funding sources are publicly disclosed

Reference: Gift Regulations § 5(b)(3); Advisory Opinion No. 67.

Use of Official Position

Your appointment as a judge places you in a powerful federal office. Canon 2B advises you not to lend the prestige of your office to advance the private interests of others. You should use your judicial position and authority only for official business, and not to endorse or support activities of private or commercial organizations.

Use and Misuse of Judicial Office — Areas of Concern

- letters of recommendation
- commercial endorsements
- sharing confidential information
- using government property for personal purposes
- granting access or preferential treatment to special, private groups
- nepotism or favoritism in hiring

Reference: Canons 2, 3B(4).



Query: An attorney with whom Judge F served on a bar committee asked the judge to recommend her for a job with the U.S. Attorney's office. Should he agree?

Answer: No. Judges may be asked by acquaintances to provide letters of recommendation in connection with employment, college admission, or other pursuits, but letters from judges can be

perceived as asserting pressure by reason of judicial office. Writing recommendations is discouraged, except when the judge has longstanding and special knowledge (e.g., for law clerks), and not when the judge is in no better position than others to evaluate the candidate. To avoid concerns, it is preferable to be listed as a reference and respond to inquiries.

Reference: Advisory Opinion No. 73.



Query: Judge P received a law firm's invitation to an informal lunch to speak to new associates in the litigation section. What should she do?

Answer: Judge P should not attend "brown bag" and other informal lunches at law firm offices, as this may lend the prestige of judicial office or convey the impression the firm is in a special position to influence her. However, Judge P may attend informal gatherings at the courthouse for new attorneys, as long as the judge makes known a willingness to accommodate other interested groups.

Outside Activities

Your life before judicial appointment was filled with a wide variety of personal and professional activities. You may continue to participate in these activities, as long as they don't interfere with judicial duties, cast doubt on your impartiality, or detract from your office.

Law-related activities permitted: judges are permitted (and encouraged) to participate in law-related activities such as speaking, writing, teaching, and bar association projects.

Other activities permitted: judges are permitted to speak, write, and teach on non-legal subjects and to engage in artistic, athletic, social, recreational, avocational, educational, religious, charitable, fraternal, and civic activities.

Restricted or Prohibited Activities

Special restrictions apply to some activities, while others are entirely prohibited; you should check before doing any of the following:

- accepting compensation for an appearance, speech or article (this may be a prohibited honorarium)
- teaching for compensation (requires prior approval)
- running, advising, or being employed by a business (other than a family business)
- serving as a trustee or other fiduciary (other than for family members)
- acting as an arbitrator or mediator
- practicing law
- accepting certain government appointments
- being a member of an organization that practices invidious discrimination
- personally participating in fund-raising (see discussion below)

Reference: Canons 4, 5; Advisory Opinion Nos. 86, 87, 96.



Query: Before her appointment, Judge H was a member of a nonprofit group that represents poor immigrants in deportation proceedings. Judge H will no longer serve as a volunteer lawyer, but may she continue to be a member or serve on the board?

Answer: No. Although participating in charitable, civic, and other organizations is generally permitted, Judge H should not continue membership in a legal aid group that regularly engages in litigation. Participating in organizations that take stands on controversial matters of public policy or where the association calls into question the judge's impartiality is also inappropriate.

Reference: Advisory Opinion No. 82.



Query: The Washington County bar association offered \$200 to Judge S to write an article "from the bench" for its monthly journal; may he accept?

Answer: Yes and no. Judge S may author and publish law-related articles. Of course, certain subject matters are off limits, such as commenting about specific matters pending in his court. Judge S may also accept reimbursement of the expenses he incurs. But judges are not permitted to accept compensation for writing an article.

Reference: Advisory Opinion Nos. 55 and 87.

Government resources are provided to help you perform your official functions and should be used for that purpose, not for private, outside activities. But you may use the library, your chambers, and computer resources in ways that don't result in additional costs to the government. And you may use staff for outside activities in two situations:

For law-related outside activities: you may not use staff to any substantial degree, but limited cite-checking, editing, or discrete research assignments are permitted, so long as your activity is not compensated.

For non-law-related activities: only de minimis use of staff is permitted, such as answering telephone calls and scheduling.

Reference: Canons 4D and 5H; Advisory Opinion Nos. 79 and 80.

Fund-Raising Activities

Although you may properly do many things for outside groups, one thing you may not do is assist personally in their fund-raising. You should not solicit funds — even for a worthy cause and even from family members or close friends.



Query: Before his appointment, Judge R volunteered at a community homeless shelter that has now bestowed on him an award to be given at the annual dinner, where he will be expected to speak. May he accept?

Answer: Maybe, but first Judge R needs to ask if this is a fund-raising dinner, in which case he may not be a speaker, guest of honor, or featured on the program. If it is not a fund-raiser, he may accept the honor and speak at the dinner. If it is a fund-raiser, Judge R should not accept the award or speak, but he may attend the dinner or make a contribution to the organization.



Query: A neighborhood civic association asked Judge R to invite his neighbors to join the organization, which has a \$15 membership fee. Is this appropriate?

Answer: Yes, judges may ask friends and neighbors to join an organization, so long as the membership solicitation is not coercive and is not essentially a fund-raising mechanism.

Reference: Canons 4C and 5B(2), and accompanying Commentary.

Political Activities

It may seem peculiar that someone nominated, confirmed, and appointed through a political process must, upon assuming office, avoid politics. But when you put on your robes, you are expected to put aside both partisan and non-partisan political activities.

Things you can do:

- register and vote in elections
- express your views privately
- attend ceremonial and government functions (e.g., inaugurations)

Things you cannot do:

- hold office in any political party or organization
- publicly endorse or oppose a candidate for political office
- campaign for a political party or candidate
- make or solicit political contributions
- attend political gatherings
- run as a candidate for office



Query: Judge C knows she can no longer participate in political activities, but her husband wants to manage a friend's campaign for state office. What should she do?

Answer: Judge C should take appropriate steps to disassociate herself from her husband's political activities. For example, if he contributes money to a candidate, it should come from a separate account that does not bear the judge's name. Also, the judge should not attend any political functions, whether or not her husband is involved in them.

Reference: Canon 7; Advisory Opinion No. 53.



Query: What about Judge C's law clerks? May they help a friend who is running for office in a different state?

Answer: No. Law clerks and other chambers staff are subject to similar restraints. Judge C should not allow them to participate in partisan or nonpartisan political activity, whether it's in the same city or across the country.

Reference: Code of Conduct for Judicial Employees, Canon 5; Advisory Opinion No. 92.

Former Employment

Like most federal judges, you probably practiced law before your appointment, whether for a law firm, a corporation, or a government agency. You need not sever all financial and personal relationships arising out of your former legal employment, but you should arrange your affairs to address continuing financial entanglements and to ensure that you recuse in appropriate situations.

Financial Arrangements with a Former Firm

You may:

- agree on a payment reflecting your interest in the firm
- accept the fair value of fees for work you did
- receive payments from the firm over time

But you may not:

- share in firm profits earned after your departure
- participate in any matter handled by the firm while receiving payments

Reference: Advisory Opinion No. 24.



Query: Judge Q received a financial payout from his former firm for three years, during which time he disqualified from all firm matters. May he now preside in a case handled by one of his former partners?

Answer: Yes, unless his partner handled the case when Judge Q was at the firm. Disqualification is mandatory if an attorney with whom the judge previously practiced law handled the matter during their association. If the case arose after Judge Q's departure from the firm, he may preside, assuming there is no other reason to question his impartiality. To avoid impartiality concerns, judges should disqualify from matters handled by a former firm for a reasonable period (generally, at least two years).

Reference: Canon 3C(1)(b).



Query: When she was state Attorney General, Judge W defended numerous employment discrimination claims against the state. May she preside in an employment discrimination case that was handled by an assistant?

Answer: No. A judge who formerly served as a government attorney should recuse from all cases under her supervision or litigated in her name, notwithstanding her lack of personal involvement. But if Judge W's office did not handle the matter while she was Attorney General, she is not disqualified. The fact that she handled similar cases is not disqualifying, because legal arguments made on behalf of clients do not call into question a judge's impartiality when presiding over a later, different case, even if it involves related legal issues.

Reference: Canon 3C(1)(e).

Conclusion

As a judge you will, inevitably, be the subject of public attention. Your personal conduct as well as your judicial actions will be closely scrutinized. We hope this introductory pamphlet will help you in upholding — on and off the bench — the high ethical standards of the federal judiciary.

Checklist for Financial Conflicts

This checklist should assist judges in developing a list of all interests that may give rise to a financial conflict of interest. Judges should list each company or organization in which they or the relatives described below have a financial interest or connection. Do not list the amount of any financial interest or identify to whom the interest belongs. These conflicts of interest may not be waived.

| Do | es the judge: | | | List name of company or organization | |
|--|---|------|---------|--------------------------------------|--|
| 1. | personally own stock, shares, or some other financial interest in a company? | NO 🗖 | YES ☐ ⇒ | | |
| 2. | have an equitable interest (e.g., as a vested beneficiary) in an estate or trust that has a financial interest in a company? | NO 🗖 | YES ☐ ⇒ | | |
| 3. | serve as an officer, director, advisor, trustee, or active participant in the affairs of an organization? | NO 🗖 | YES ☐ Þ | | |
| 4. | serve as a fiduciary of an estate or trust that has a financial interest in a company? | NO 🗖 | YES ☐ ⇒ | | |
| Do | es the judge's spouse: | | | | |
| 1. | personally own stock, shares, or some other financial interest in a company? | NO □ | YES ☐ ⇒ | | |
| 2. | have an equitable interest (e.g., as a vested beneficiary) in an estate or trust that has a financial interest in a company? | NO 🗖 | YES ☐ ⇒ | | |
| 3. | serve as an officer, director, advisor, trustee, or active participant in the affairs of an organization? | NO 🗖 | YES ☐ ⇔ | | |
| Does the judge's resident minor child: | | | | | |
| 1. | personally own stock, shares, or some other financial interest in a company? | NO 🗖 | YES ☐ ⇒ | | |
| 2. | have an equitable interest (e.g., as a vested beneficiary) in an estate or trust that has a financial interest in a company? | NO 🗖 | YES ☐ ⇒ | | |
| 3. | serve as an officer, director, advisor, trustee, or active participant in the affairs of an organization? | NO 🗖 | YES ☐ Þ | | |
| the rel | Does the judge's third degree relative, ¹ the judge's spouse's third degree relative, or the spouse of any of these relatives: | | | | |
| 1. | serve as an officer, director, or trustee of an organization? | NO 🗖 | YES ☐ ⇒ | | |

¹Parent, child, grandparent, grandchild, great grandparent, great grandchild, sister, brother, aunt, uncle, niece, and nephew.

Checklist for Other Conflicts

This checklist should assist judges in developing a list of certain matters that may give rise to a conflict of interest other than a financial conflict. This checklist does not include all matters that may require recusal but only those that can reasonably be identified in advance and recorded on a list to compare to the court's docket. Judges should include on their lists matters arising from their own activities, the activities of relatives, or the activities of certain attorneys. These conflicts of interest may not be waived. A judge may not preside over the cases described below.

Is the judge, the judge's spouse, the judge's third degree relative, ¹ the judge's spouse's third degree relative, or the spouse of any of these relatives:

| 1. | a party in a case? | NO 🗖 | YES ☐ ⇒ | | | |
|--|--|------|---------|--|--|--|
| 2. | likely to be a material witness in a case (to the judge's knowledge)? | NO 🗖 | YES ☐ ⇒ | | | |
| 3. | an attorney who is likely to come before the court? | NO 🗆 | YES ☐ ⇒ | | | |
| 4. | an equity partner in a law firm to come before the court? | NO 🗆 | YES ☐ ⇒ | | | |
| Did | Did the judge: | | | | | |
| 1. | serve as an attorney in a matter? | NO 🗖 | YES ☐ ⇒ | | | |
| 2. | participate in government employment as counsel, advisor, or material witness concerning a matter? | NO 🗖 | YES ☐ ➡ | | | |
| Did an attorney with whom the judge practiced law: | | | | | | |
| 1. | serve as an attorney in a matter during his or her association with the judge? | NO 🗖 | YES ☐ ⇒ | | | |
| 2. | serve as a material witness in a matter during his or her association with the judge? | NO 🗖 | YES ☐ ⇒ | | | |

List Cases

¹Parent, child, grandparent, grandchild, great grandparent, great grandchild, sister, brother, aunt, uncle, niece, and nephew.

Conflicts List

List here all companies or organizations in which the judge or relative has a financial interest (from the Checklist for Financial Conflicts, form AO-300):

| · |
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| |
| all matters in which the judge has a disqualifying nonfinancial interest (from the Checklist for Other , form A0-301): |
| , |
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| - |
| all attorneys and/or law firms related to the judge (from the Checklist for Other Conflicts, form or whose appearance in a matter will otherwise cause the judge to recuse: |
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