



SUMMARY OF  
ETHICS RULES FOR  
EMPLOYEES OF  
THE U.S. AND  
FOREIGN  
COMMERCIAL  
SERVICE  
OF THE  
INTERNATIONAL  
TRADE  
ADMINISTRATION

ETHICS LAW AND PROGRAMS  
DIVISION

OFFICE OF THE  
ASSISTANT GENERAL COUNSEL  
FOR ADMINISTRATION

UNITED STATES  
DEPARTMENT OF COMMERCE

202-482-5384

[ethicsdivision@doc.gov](mailto:ethicsdivision@doc.gov)

[www.commerce.gov/ethics](http://www.commerce.gov/ethics)

2012



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# PUBLIC SERVICE IS A PUBLIC TRUST

As an employee of the U.S. and Foreign Commercial Service of the International Trade Administration, you have been placed in a position of trust and are held to a high standard of ethical conduct. This handout contains a summary of the rules set forth in conflict of interest statutes, the *Standards of Ethical Conduct for Employees of the Executive Branch*, and other ethics laws. You should retain this handout for use as a reference source.

## Office of the Assistant General Counsel for Administration

To obtain legal advice regarding ethics issues, contact the:

- **Ethics Law and Programs Division at 202-482-5384 or [ethicsdivision@doc.gov](mailto:ethicsdivision@doc.gov) for advice regarding conflict of interest laws and rules of conduct.**

To obtain legal advice regarding other administrative law issues, call the following offices:

- **Employment and Labor Law Division at 202-482-5017 for advice regarding employment law and labor law issues**
- **General Law Division at 202-482-5391 for advice regarding appropriations laws, joint projects, preservation and release of documents, and general administrative law issues.**

*Designated Agency Ethics Official:*

- *Cameron F. Kerry – General Counsel*

*Alternate Designated Agency Ethics Official:*

- *Barbara S. Fredericks – Assistant General Counsel for Administration*

### **Office of Inspector**

**General** – The Ethics Law and Programs Division provides advice but does not investigate allegations of violations of law. To report fraud, waste, abuse, or other violations of law, or to request an investigation, call the Office of Inspector General Hotline at 800-424-5197 or 202-482-2495 or email [hotline@oig.doc.gov](mailto:hotline@oig.doc.gov).

*Prepared by the Ethics Law and Programs Division, Office of the Assistant General Counsel for Administration, United States Department of Commerce – January 19, 2012*

## **GENERAL ETHICAL PRINCIPLES**

1. *Public service is a public trust, requiring employees to place loyalty to the Constitution, the laws and ethical principles above private gain.*
2. *Employees shall not hold financial interests that conflict with the conscientious performance of duty.*
3. *Employees shall not engage in financial transactions using nonpublic Government information or allow the improper use of such information to further any private interest.*
4. *An employee shall not, except as permitted in ethics regulations, solicit or accept any gift or other item of monetary value from any person or entity seeking official action from, doing business with, or conducting activities regulated by the employee's agency, or whose interests may be substantially affected by the performance or non-performance of the employee's duties.*
5. *Employees shall put forth honest effort in the performance of their duties.*
6. *Employees shall not knowingly make unauthorized commitments or promises of any kind purporting to bind the Government.*
7. *Employees shall not use public office for private gain.*
8. *Employees shall act impartially and not give preferential treatment to any private organization or individual.*
9. *Employees shall protect and conserve Federal property and shall not use it for other than authorized activities.*
10. *Employees shall not engage in outside employment or activities, including seeking or negotiating for employment, that conflict with official Government duties and responsibilities.*
11. *Employees shall disclose waste, fraud, abuse, and corruption to appropriate authorities.*
12. *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.*
13. *Employees shall adhere to all laws and regulations that provide equal opportunity for all Americans regardless of race, color, religion, sex, national origin, age, or handicap.*
14. *Employees shall endeavor to avoid any actions creating the appearance that they are violating the law or the ethical standards set forth in ethics regulations. Whether particular situations create an appearance that the law or these standards have been violated shall be determined from the perspective of a reasonable person with knowledge of the relevant facts.*

## FINANCIAL CONFLICTS OF INTEREST

**Financial Conflicts of Interest.** You cannot, as part of your U.S. Commercial Service duties, participate in any matter that will affect your personal financial interests, unless an exemption applies (see below) or you have received a conflict of interest waiver. Furthermore, the financial interests of some persons are considered so intertwined with your own that you are also barred from participating in matters affecting their financial interests. These include the financial interests of your spouse, minor children, household members, general partners, and non-Federal employers; persons with whom you are seeking employment; and organizations in which you serve as an officer or director.

**Exemptions.** Exemptions permit you to participate in matters affecting a financial interest if the financial interest is a:

- holding in a U.S.-registered diversified mutual fund;
- holding in a U.S.-registered industry sector-specific mutual fund or geographic sector-specific mutual fund valued at US\$50,000 or less (if total interests in all funds in that sector total US\$50,000 or less);
- stock or bond holding (traded on a U.S. exchange) of US\$15,000 or less in a U.S. company if the company is a party in a specific-party matter; or
- stock or bond holding (traded on a U.S. exchange) of US\$25,000 or less in a U.S. company with regard to a broad policy matter (if total holdings in the industry or group affected by the matter are US\$50,000 or less).

**Waivers.** If you serve overseas, you may obtain a waiver for interests that meet certain criteria, such as stock valued at US\$50,000 or less. Contact the Ethics Law and Programs Division at 202-482-5384 to obtain such a waiver.

**Employees Overseas.** If you are a U.S. citizen serving overseas (and were not hired locally), you and your family are restricted from investing in: stocks or bonds of a company headquartered or that conducts substantial business in your country of assignment; mutual funds that concentrate investments in your assigned country; and real estate in your assigned country (other than a personal residence or retirement property purchased, if approved by the Chief of Mission).

## MISUSE OF UNITED STATES GOVERNMENT RESOURCES

**Use of U.S. Government Resources.** You can use U.S. Government resources only for authorized Government activities. Such resources include Government equipment, supplies, services, and the time of Government personnel. You cannot use information you receive in the course of your employment for personal purposes, unless the information is also available to the public. However, you can use frequent flier miles you earned from Government travel for personal purposes, including personal travel or upgrades for official travel.

**Rule on the Use of the Internet and Email.** You can use access to email and to the Internet for personal activities if such use does not interfere with the business of your office and is not prohibited by your agency, *provided that* you do not use access for:

- the pursuit of private commercial business activities or profit-making ventures;
- partisan political activities;
- prohibited lobbying activities;
- uses that result in additional charges to the Government;
- engaging in prohibited discriminatory conduct;
- obtaining or viewing sexually explicit material;
- any activity that would bring discredit to the U.S. Government; or
- any violation of a statute or regulation.

If you serve in the United States, you may use office printers for personal Internet and email uses, provided it does not consume excessive resources.

**Employees Overseas.** If you serve overseas, you should follow the rules set by the Chief of Mission regarding the use of Government services, equipment, and supplies, which may be more restrictive than the rules applicable to employees serving in offices in the United States.

**Use of U.S. Government Position.** You cannot use your U.S. Government authority, including business contacts obtained through employment, for personal activities. In addition, you cannot use your Government title in connection with a non-Government activity, except as part of general biographical data or when writing for a scientific or technical publication (if you include a disclaimer). If you are a political appointee, you are required by an Ethics Pledge you signed to make hiring and employment decisions based on the candidate's qualifications, competence, and experience.

## GIFTS, BRIBES, AND SALARY SUPPLEMENTATION

**Bribes and Salary Supplementation.** As a U.S. Government employee, you cannot ask for or receive anything of value for taking action or failing to take action and cannot be paid for performing your duties from anyone other than the U.S. Government.

**Personal Gifts.** Generally, you cannot accept a gift or invitation that is offered because of your position with the U.S. Government or that is from someone that has (or is seeking) a contract, grant, or other business with the Department of Commerce; is regulated by Commerce; or has interests that may be affected by performance of your Commercial Service duties. Gifts to your spouse or minor children are considered gifts to you in most circumstances. However, *exceptions* allow you to accept:

- items of little intrinsic value (cards, plaques, trophies);
- gifts of US\$20 or less (other than cash) (up to US\$50 per year from the same donor);\*
- gifts from relatives or friends (if based on your personal relationship);
- invitations to widely-attended events (if from the host (generally) and if your supervisor approves your attendance as being in ITA's interest and as outweighing any appearance concern);\*<sup>†</sup>
- business meals overseas, if a foreign citizen or representative of a foreign entity is present (up to the *per diem* for the city);\*
- discounts available to a broad range of persons;
- awards and honorary degrees (in specified circumstances);\*
- meals, lodging, transportation, and other benefits based on an outside business or employment relationship;\* and
- gifts from a foreign government of US\$350 or less; gifts of over US\$350 may be accepted, but become property of the United States Government.

\* *These exceptions do not necessarily apply for gifts and invitations to political appointees; see the sidebar for guidance on such gifts and invitations.*

<sup>†</sup> *See the box on the next page for more information regarding invitations to widely-attended gatherings.*

### **Gifts and Invitations to Political Appointees.**

If you are a political appointee, you cannot accept gifts or invitations from a registered lobbyist or lobbying organization *unless*:

- the gift or invitation is based on a personal relationship or
- the gift is from a lobbying organization that is a 501(c)(3) organization or a media company (and the invitation was not extended by a person who is a lobbyist).

**Invitations to “widely-attended gatherings” (WAGs).** A WAG is an event with a large and diverse number of people from outside the U.S. Government. You can attend a WAG if it is not primarily entertainment and your supervisor approves your attendance as being in your agency’s interest (but if the invitation is not from the host of the event, you can accept only if the value is \$350 or less and more than 100 persons will be attending).

If an item cannot be accepted as a personal gift, but refusal would cause offense, you should consider accepting it as a gift to ITA, if it would further an agency mission and not create an appearance problem. (See guidance on gifts to the U.S. Government below.)

**Gifts between Employees.** In general, you cannot offer a gift to a supervisor or accept a gift from a subordinate. However, *exceptions* permit you to offer or accept:

- a gift for a special occasion (such as a child’s birth, a retirement, or a wedding);
- items of US\$10 or less, given occasionally;
- food shared in the office; and
- personal hospitality at one’s home or a gift to a host or hostess.

**Gifts to the U.S. Government.** U.S. Government agencies can accept (but not solicit) travel payments for employees to attend meetings and similar functions. The U.S. Department of Commerce can also accept other types of gifts to support agency activities, if acceptance would not create an appearance of impropriety. Honoraria cannot be accepted and, except in rare cases, gifts from ITA grantees and contractors and persons with interests in controversial matters before ITA cannot be accepted. You can ask for funds and in-kind donations to support an agency mission (except that you cannot solicit for the travel of a Federal employee) as part of a solicitation program that is non-preferential (such as to or through a broad-based group) and that does not give donors substantive benefits, such as the right to meet with senior U.S. officials or to speak or distribute materials at ITA events. These same rules apply to solicitations by someone co-hosting an event with ITA. A gift of more than US\$35,000 in value must be approved by the Secretary of Commerce. It is best to contact an ethics official for advice before soliciting any funds or other support on behalf of the U.S. Government.

**Gifts from a Foreign Government.** You can accept a gift from a foreign government if it cannot be graciously declined. “Foreign government” for these purposes includes international organizations composed of national governments, such as the United Nations. If a gift from a foreign government is valued at US\$335 or less, you may retain it as a personal gift for personal use. If it is valued at more than US\$335, you may accept it as a gift to the Department, even if it does not support an agency activity.

**Forms Relating to Gifts.** Forms for reporting gifts to the agency or from a foreign government and for obtaining a supervisor’s approval for an invitation are available at: [www.commerce.gov/ethics](http://www.commerce.gov/ethics).

## APPEARANCES OF BIAS (CONFLICTS BASED ON PERSONAL RELATIONSHIPS)

### **Appearances of Impropriety concerning Matters Affecting Relatives and Associates.**

Unless you receive specific authorization, you cannot participate in a matter as a Commercial Service employee if one of the parties to the matter is (or is represented by) a person with whom you have close family or business ties (a “covered relationship”) and if your participation would create an appearance of loss of impartiality. Persons with whom you are considered to have a “covered relationship” include:

- persons with whom you have or are seeking a business or financial relationship (other than a routine consumer transaction);
- members of your household;
- close relatives;
- employers and clients of your parents, dependent children, and spouse (and their prospective employers and clients);
- former employers and clients, for a one-year period (or a two-year period if you received an extraordinary severance payment from the former employer before entering U.S. Government service or if you are a political appointee); and
- organizations in which you are an active participant (other than political organizations).

In addition, if you are a political appointee and served as a registered lobbyist at any point in the two-year period before your appointment, for two years you cannot work as a Federal employee on any matter on which you provided lobbying services or on any matter within the specific issue area on which you lobbied.

**Appearances of Bias Caused by Persons other than “Covered Relationships.”** Note that if you are assigned to a task that does not involve someone with whom you have a “covered relationship” but which still may raise a question regarding favoritism, such as a matter involving a close personal friend, you should discuss the concern with your supervisor, who can make the decision on whether to reassign the matter to someone else based on management concerns, even though there is no legal problem.

**Exception to the General Rule.** If ITA’s need for your participation in a matter outweighs appearance concerns, special authorization for you to participate in a matter may be available. Contact the Ethics Law and Programs Division at 202-482-5384 or [ethcsdivision@doc.gov](mailto:ethcsdivision@doc.gov) for further guidance if you think such authorization is appropriate.



## EMPLOYMENT OUTSIDE THE U.S. GOVERNMENT AND OUTSIDE ACTIVITIES

**Non-Government Employment.** You cannot engage in outside employment or other personal activity that conflicts with your Commercial Service position, including employment that requires disqualification from important Government duties or an activity that creates an appearance of using your public office for private gain. You must disqualify yourself from participating in a matter as a Commercial Service employee if it will affect the financial interests of an outside employer or if an organization in which you are an active participant is a party or is representing a party in the matter.

**Teaching, Speaking, and Writing.** You cannot receive payments (other than for travel) for writing, speaking, or teaching about programs and operations of the Department (unless as part of a course that is in the regular curriculum of an accredited school). A writing about agency programs or operations that are related to your duties must be given to your supervisor for prior review. If you are a political appointee in the SES, you must receive prior approval before teaching for compensation.

**Special Rules for U.S.-Citizen Employees Overseas.**

If you are a *U.S. citizen employee* working overseas (and not locally-hired), you cannot, in your country of assignment:

- work for compensation or
- transact or have an interest in any business; and your spouse or a family member cannot:
- engage in outside employment or an activity that:
  - would violate any law of the country;
  - would require a waiver of diplomatic immunity deemed unacceptably broad by the Chief of Mission; or
- could otherwise damage the interests of the United States, as determined by the Chief of Mission of that country.

Furthermore, if you are a *U.S. citizen employee* working overseas, you, your spouse, and family cannot, in your country of assignment:

- speculate in currency exchange;
- engage in transactions at exchange rates differing from local legally-available rates, unless authorized in advance by the Chief of Mission;

**Permitted Overseas Employment.** Even if you are a U.S. citizen employee, you or a family member can accept employment that takes place solely within the U.S. embassy and you can receive compensation for teaching if it is for an extension program of an accredited U.S. degree-granting institution or a private foreign university that is not state-supported.

- engage in sales to unauthorized persons of currency acquired at preferential rates through diplomatic or other restricted arrangements;
- engage in transactions using a diplomatic pouch or official mail, if not approved;
- transfer blocked funds in violation of U.S. foreign funds and asset controls;
- engage in independent and unsanctioned private transactions that involve you as an individual in violation of applicable foreign currency control regulations; or
- act as an intermediary in the transfer of private funds from persons in one country to persons in another country (including the U.S.), except as authorized as part of your official duties.

**Special Rules for Locally Engaged Staff Overseas.**

If you are *locally engaged staff overseas* (employees who are not U.S. citizens or are U.S. citizens who were hired overseas), you must receive approval from the Chief of Mission before accepting any outside employment. Approval will be granted unless the activity would violate any law of the country or could damage the interests of the United States.

**Sale of Personal Property.** If you are a U.S. citizen, you and your spouse and family members cannot sell or dispose of personal property that was imported into or purchased from a foreign country if it was exempt by virtue of your U.S. Government position from import limitations, customs duties, or taxes that would otherwise apply, unless authorized by the Chief of Mission and applicable regulations.

**Service with Non-U.S. Government Entities in an Official Capacity.** Please note that although there is statutory authority for Department of State officials to serve as representatives of the U.S. Government on the boards of some educational institutions, there is no similar authority for Department of Commerce officials. Please contact an ethics official before serving in an official position on a board or as an officer of a non-U.S. Government organization.

**Service with Private Organizations.** You must receive approval from both the Chief of Mission and the Assistant General Counsel for Administration for you or your spouse or a family member to serve in a private capacity overseas as an officer, director, or trustee of a private organization. You also should seek guidance from the Ethics Law and Programs Division regarding serving in an official capacity with an outside organization; official service as a board member or officer is barred in most cases. Fund-raising for a private organization in an official capacity is permitted in some circumstances, with the approval of the Chief of Mission, if it will advance U.S. foreign policy interests. You should seek further advice before engaging in such fund-raising.

**Working for a Foreign Government.** If you are a U.S. citizen, you cannot work for, or receive payments from, a foreign government, unless authorized by statute.

## CONTACTING THE UNITED STATES GOVERNMENT

**Basic Restrictions on Contacting the U.S. Government on Behalf of Others.** Generally, you cannot serve as an agent or attorney or, if paid, otherwise represent anyone before a United States Government agency or court. For purposes of this restriction, representation includes any contact, whether by telephone, by email, in writing, or in person, that is made with the purpose of influencing U.S. Government action. Requests for publicly-available information are not barred, nor are factual responses to Government requests for information.

**Receiving Compensation based on the Representational Activities of Others.** In addition to being personally barred from representing others before the United States Government, you are also barred from receiving any payment that is based on representational activities of others before a Federal agency or Federal court during a period in which you serve or served as a Federal employee.

**Exceptions to the Rule on Contacting the U.S. Government.** You can represent:

- other U.S. Government employees in some personnel disputes if you do not receive compensation;
  - your parents, spouse, or children, or an estate or trust, but only if you receive approval beforehand, which can be obtained by contacting an ethics official; and
  - if you are not paid, professional, recreational, and similar groups before the U.S. Government if the majority of the organization's members are Federal employees or their spouses or dependents, and if the matter does not involve claims against the U.S. Government, proceedings in which the organization is a party, or Government financial benefits to the organization.
- Contact the Ethics Law and Programs Division at 202-482-5834 for advice or if you need to obtain prior approval.

**Serving on Boards of Federal Child Centers and Fitness and Health Organizations.** Although you can serve on boards for organizations composed primarily of Federal employees and can discuss most organization issues with Department officials, you must be careful not to discuss issues concerning financial payments from the Department to the organization with Department officials. All such discussions should be conducted by someone who is not a Federal employee.

## POLITICAL ACTIVITIES

**General Restrictions concerning Engaging in U.S. Political Activities.** If you are a U.S. citizen, you can actively engage in political activities relating to a United States election campaign (when not on duty, not on Government premises, and not representing the United States Government), but you cannot:

- engage in political activities while on U.S. Government premises;
- engage in political activities while on official duty;
- engage in political activities when representing the United States Government;
- use the authority of your U.S. Government position for political purposes;
- use U.S. Government resources for political purposes, such as by sending a political email from your office computer;
- accept or receive a political contribution;
- personally ask for or accept political contributions (except for an employee union in some cases);
- host a political fund-raiser;
- ask for or accept volunteer services from a subordinate; or
- run as a candidate in a partisan election (except in certain designated areas).

**Permissible Activities.** Unless you are a career member of the SES, you can:

- assist a U.S. election campaign, such as by seeking for votes (but not funds), stuffing envelopes, and organizing campaign events and
- serve as an officer in a U.S. political organization.

**Special Rules for Career SES Members.** If you are a career member of the Senior Executive Service, you cannot actively engage in partisan campaign activities or serve as an officer of a political organization, even during non-duty hours. (These restrictions do not apply to Senior Foreign Service members.) During non-duty hours you can actively participate in nonpartisan elections and non-candidate campaigns, such as for referenda. Regarding partisan campaigns, you can vote, make contributions, and sign nominating petitions.

**Activities Overseas.** If you are a U.S. citizen employee overseas, you cannot actively participate in a foreign electoral campaign; however, you can participate in U.S. campaign activities within the restrictions identified. If you are not a U.S. citizen, you may actively participate in political activities of your country of citizenship when off duty and when off U.S. Government premises. It is particularly important for U.S. Government employees to not participate in any political activities when on duty as a U.S. Government official or when otherwise representing the United States.

## SEEKING EMPLOYMENT AND RESTRICTIONS AFTER LEAVING U.S. GOVERNMENT EMPLOYMENT

**Seeking Employment.** Once you begin to seek employment outside the U.S. Government, you cannot work at ITA on any matter (including a policy matter) in which a prospective employer has a financial interest until employment discussions end (or until two months have passed since you submitted a résumé with no response). If you are working on a procurement of over US\$100,000, you must notify your supervisor and an ethics official, in writing, of contacts with or from a competing contractor.

**Restrictions after Leaving U.S. Government Service.** After you leave the United States Government service, you cannot:

- contact a U.S. Government agency or court on behalf of someone else concerning a specific-party matter on which you worked;
- for two years, contact a U.S. Government agency or court on behalf of someone else concerning a specific-party matter on which a subordinate of yours worked or which was otherwise under your responsibility during your last year of service with ITA;
- for one year if you are a career senior employee\* or two years if you are a political senior appointee,\* contact on behalf of someone else ITA (or the Commerce Department if you are a Presidential appointee);
- for one year, if you are a senior employee,\* advise (or represent before the U.S. Government) a non-U.S. government or political party;
- disclose or use protected nonpublic Federal information, such as treaty negotiation information, private personnel information, trade secrets or proprietary business information, and national security information;
- for one year, accept compensation from the contractor of a \$10,000,000 or more procurement, if you served as a procurement official or program manager; or
- if you are a political appointee, for the remainder of the U.S. President's Administration, lobby any political appointee in the Executive Branch.

\* In 2012, a "senior employee" is an employee whose base pay is \$155,400.

**Exceptions and Special Post-Employment Rules.** Exceptions to these rules apply concerning providing testimony or representing state and local U.S. governments, international organizations, and educational and medical institutions, in some cases. Additional restrictions apply to employees who received buyouts.

**Additional Information Available.** Advice and more information is available from the Ethics Law and Programs Division at 202-482-5384 or [www.commerce.gov/ethics](http://www.commerce.gov/ethics).

## FINANCIAL DISCLOSURE

**Basic Guidelines.** Presidential Appointees, members of the Senior Executive Service, members of the Senior Foreign Service, employees in non-career policy-making positions, procurement officials, and other employees whose performance of Federal duties could have a significant impact on the interests of members of the public are required to file financial disclosure reports. These are collected upon entry into a position for which such reports are required and annually thereafter (in February or May, depending on the employee's position).

If you are designated as required to file such a report, please keep in mind that the information you disclose is used to provide advice to you to help ensure that you do not inadvertently engage in prohibited activities. To provide this advice (and to certify that the report includes all necessary information), it is important that the information you provide be as complete as possible. Specifically, please be sure to include:

- the full name of any mutual fund (not just the generic name of the company managing the fund);
- specific holdings in any IRA, 401(k) account, trust, or investment account (other than broadly-diversified mutual funds, if you file a confidential report (OGE Form 450));
- short description of the activities or industry sector of any privately-held company or limited partnership; and
- assets and sources of income of your spouse (and dependent children).

If you have a question, or need assistance in filling out your report, contact the Ethics Law and Programs Division at 202-482-5384.

**For more information about any of these rules and guidance on their application to a specific situation, contact the Ethics Law and Programs Division at 202-482-5384 or [ethicsdivision@doc.gov](mailto:ethicsdivision@doc.gov).**

## CITATIONS TO APPLICABLE LAW

### **Misuse of Government Position and Resources**

18 United States Code (U.S.C.) § 641  
5 Code of Federal Regulations (C.F.R.) §§ 2635.701–2635.705  
Department of Commerce Internet Use Policy

### **Appearances of Bias based on Outside Relationships**

5 C.F.R. §§ 2635.501-2635.503  
Ethics Pledge, Executive Order No. 13490, 74 Fed. Reg. 4673 (1/21/2009)

### **Gifts, Bribes, and Salary Supplementation**

5 U.S.C. §§ 7342, 7351, and 7353; 15 U.S.C. § 1522; 18 U.S.C. §§ 201 and 209  
5 C.F.R. §§ 2635.201–2635.205, 2635.301–2635-304  
41 C.F.R. Part 304-1  
Ethics Pledge, Executive Order No. 13490, 74 Fed. Reg. 4673 (1/21/2009)

### **Non-Federal Employment and Outside Activities**

5 U.S.C. §§ 7321–7326; 18 U.S.C. § 208  
5 C.F.R. §§ 734.201–734.702, 2635.801–2635.809  
3 Foreign Affairs Manual (FAM) Part 4120

### **Contacting the Government**

18 U.S.C. §§ 203, 205

### **Political Activities**

5 U.S.C. §§ 7321–7326  
5 C.F.R. §§ 734.201–734.702, 734.201–734.702

### **Financial Conflicts of Interest**

18 U.S.C. § 208; 35 U.S.C. § 4  
5 C.F.R. §§ 2635.401–2635.403, 2635.502, 2640.201–2640.202  
3 FAM Part 4120

### **Seeking Employment and Post-Employment Activities**

18 U.S.C. §§ 207 and 208; 41 U.S.C. § 423  
5 C.F.R. Parts 2635, 2637, and 2641; 15 C.F.R. §§ 15.11–15.18  
Ethics Pledge, Executive Order No. 13490, 74 Fed. Reg. 4673 (1/21/2009)