Outside Activity Analysis Sheet

Proposed Outside Activity: Serve as Vice President for the American

Robyn Fenty Deputy Director, Public Affairs

Name of Employee: Position:

Society for Public Affairs Officers and speak at annual conference			
I. Ethics Rev	Request may be approved Request may be approved subject to conditions noted in Comments section below Request must be denied for reasons noted in Comments section below		
II. Comments			

III. Legal Analysis

Applicable Authority	Analysis, Key Questions, Additional Information
18 USC 203 Compensation for representational services before the US	
203 likely an issue	
CAUTION 203 is a risk	
203 not likely an issue	
18 USC 205 Representation on behalf of 3 rd party before US	
205 likely an issue	
CAUTION 205 is a risk	
205 not likely an issue	
18 USC 208 Conflicting Financial Interest	
208 likely an issue	
CAUTION 208 is a risk	
208 not likely an issue	

Applicable Authority	Analysis, Key Questions, Additional Information
18 USC 209 Supplementation of Salary	
209 likely an issue	
CAUTION 209 is a risk	
209 not likely an issue	
5 CFR 2635.201-205 Gifts from Outside Sources	
Gifts likely an issue	
Gifts are a risk	
Gifts not likely an issue	
5 CFR 2635.502 Impartiality	
.502 likely an issue	
CAUTION .502 is a risk	
.502 not likely an issue	

Applicable Authority	Analysis, Key Questions, Additional Information
5 CFR 2635.702-705 Misuse of Position	
.702 likely an issue	
CAUTION .702 is a risk	
.702 not likely an issue	
5 CFR 2635.802	
Conflicting Outside	STOP
Employment and Activities	If 208 and/or .502 analyses result in we then
Activities	.802 should be considered.
5 CFR 2635.805	
Service as an Expert Witness	Not applicable
5 CFR 2635.807	
Teaching, Speaking	
and Writing	
.807 likely an issue	
CAUTION .807 is a risk	
.807 not likely an issue	

Applicable Authority	Analysis, Key Questions, Additional Information
5 CFR 2635.808 Fundraising Activities	
.808 likely an issue	
CAUTION .808 is a risk	
.808 not likely an issue	