



# Outline

- Guidance/Resources for DOD/DON employees
- Employee Responsibilities
- Criminal Conflict of Interest laws
- Gift Rules
- Relations with Non-Federal Entities
- Contractors in the Workplace
- Confidential Financial Disclosure Reports (OGE Form 450s)



# Department of Defense Ethics Rules

Office of Legal and Technology Services  
Naval Medical Research Center

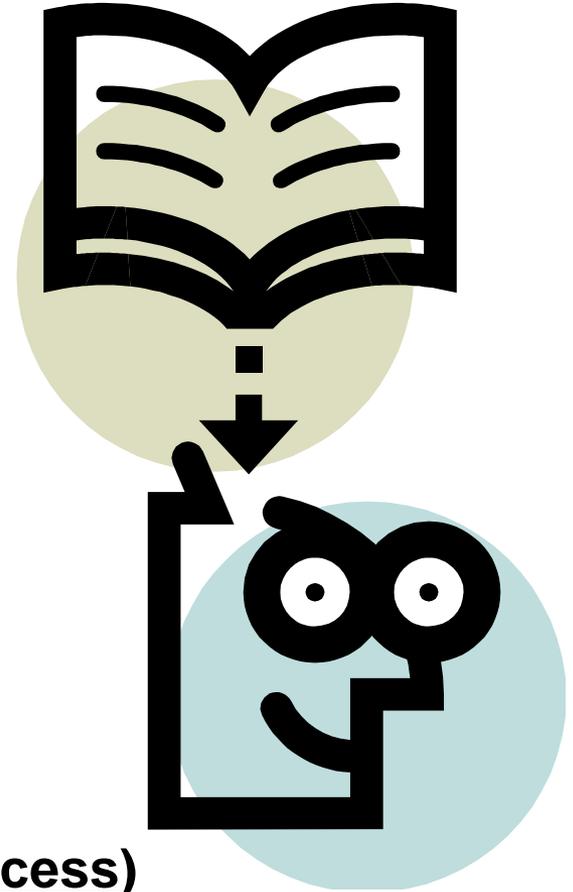
February 15, 2011





## Guidance for DOD/DON Personnel:

- 18 USC 201,205, 207-209;  
41 USC 423
- 5 CFR 2635, Standards of Ethical Conduct for Employees of the Executive Branch
- Specific guidance for DOD personnel may be found in DOD 5500.7-R, Joint Ethics Regulation, and at the DOD Standards of Conduct Office website:  
  
• <https://donogc.navy.mil/ethics> (requires CAC access)
- Specific questions, contact your Ethics Counselor





# GUIDANCE/RESOURCES

## Mandatory Training for All New Check-Ins

Education and Training - NMRC Intranet Home Page - Windows Internet Explorer

http://nmrcintranet/edtra/newcheckin.htm

File Edit View Favorites Tools Help

Education and Training - NMRC Intranet Home Page

### NMRC Intranet Home Page

Home > Education & Training > New Check-In Training

#### Mandatory Training for All New Check-Ins

- [CBRNE](#)
- [DOD Information Assurance Awareness](#)
- [Equal Employment Opportunity](#)
- [Ethics Training](#)
- [Safety Training](#)
- [Prevention of Sexual Harassment](#)  
Required for all new check-ins except for Henry Jackson Foundation contractors, who receive comparable training through Henry Jackson.
- [Quarterly Training](#)
- [Anti-terrorism Level-I](#)
- [Trafficking-In-Persons](#)
- [Personally Identifiable Information](#)

#### Optional Training

The date of 17 September has been designated as Constitution Day and Citizenship Day to commemorate the signing of the Constitution in Philadelphia on 17 September 1787. Specifically, Congressional Appropriations Bill H.R. 4818, P.L. 108-447, requires Federal agencies to provide new employees with educational and training materials on the U.S. Constitution as part of the new employee orientation materials; and provide all Federal agency employees educational and training materials on the Constitution on 17 September. Once you have completed the training, you do not need to print the completion certificate, or you may print it for your personal use.

[Constitution Day](#)

Departments

- [Career Counseling](#)
- [Education & Training](#)
- [Help Desk](#)

Services

- [CO's Policy Statements](#)
- [Command Climate Survey](#)
- [Contact Information](#)
- [Directives](#)
- [DoD Decals](#)
- [E-Forms](#)
- [Forest Glen BB](#)
- [Gorgas Memorial Library](#)
- [Handbooks](#)
- [HIPAA](#)
- [HWC](#)
- [Links](#)
- [MAVS](#)
- [MWR](#)

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# GUIDANCE/RESOURCES

## Ethics Training

Education and Training - NMRC Intranet Home Page - Windows Internet Explorer

http://nmrcintranet/edtra/ethics.htm

File Edit View Favorites Tools Help

Education and Training - NMRC Intranet Home Page



# NMRC Intranet Home Page



Home > Education & Training > Ethics Training

### Ethics Training

Annual requirement for all Military and NSPS employees. If you have any questions concerning the training, contact HM2 Reginald Bienaime, x3035, [reginald.bienaime@med.navy.mil](mailto:reginald.bienaime@med.navy.mil) or LTJG Anthony Eisenhardt, x 9514, [anthony.eisenhardt@med.navy.mil](mailto:anthony.eisenhardt@med.navy.mil).

#### Instructions for Accessing Training

- Log in to [http://www.dod.mil/dodgdc/defense\\_ethics/](http://www.dod.mil/dodgdc/defense_ethics/), then click on *Current Training Module* on the left side of the page and you will be directed to the training.
- Use the next button at the top right of the page to navigate the course.
- At the end of the course, follow the directions on the left side of the page to fill out and print your certificate.
- Give a copy of the certificate to your Directorate Training Officer.

Departments

- Career Counseling
- Education & Training
- Help Desk
- Materials Management
- Safety
- Security
- Travel

Services

- CO's Policy Statements
- Command Climate Survey
- Contact Information
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# Directorate Training Officers

Education and Training - NMRC Intranet Home Page - Windows Internet Explorer

http://nmrcintranet/edtra/edtra.htm

File Edit View Favorites Tools Help

Education and Training - NMRC Intranet Home Page

Home - Education & Training

## Education and Training

- 2010 Clinical Investigations Lecture Series
- Equal Employment Opportunity Training
- General Military Training
- New Check-in Training
- Quarterly Training
- Additional Training
- E-Forms
- Links

Departments

- Career Counseling
- Education & Training
- Help Desk
- Materials Management
- Safety
- Security
- Travel

Services

- CO's Policy Statements
- Command Climate Survey
- Contact Information
- Directives
- DoD Decals
- E-Forms
- Electronic Service Record
- Forest Glen BB
- Gorgas Memorial Library
- Handbooks
- HIPAA
- HWC
- Links
- MAVS
- MVIR
- NMLC Counsel
- Plan of the Week
- Research Collaboration Tool
- Security Badges
- Strategic Plan

Webmaster

Home

NMRC Internet Site

Directorate Training Officers

Megan Phillips	HQ and DFA
Charles Kaiser	DFR
Barsie Jordan	IDD
Timothy Velasco	BDRD
Pam Poite	CCC
Jon Fletcher	RSD
Hugo Araujo	BMR
Sheila Jones	Materials Management

Training POCS

LCDR Kochel	Command Education and Training Officer
HM2 Bienaime	Information Assurance Training
	CBRNE Training
	Trafficking In Persons
	Ethics
	GMT
HM1 Gigremosa	Enlisted Leadership
	Enlisted Advancement
LT Defang	CMEQ (Sexual Harassment Training)/Navy Rights and Responsibilities
LT McCoy	Anti-Terrorism Training/Counter-intelligence Training
CDR Gormley	HIPAA Training
Eric Campbell	Government Travel Card Training
Teri Brantley	Human Subjects Research Training (CITI)
LCDR Barnett	Safety Training

For more information, please contact contact LTJG Anthony Eisenhardt, x 9514, [anthony.eisenhardt@med.navy.mil](mailto:anthony.eisenhardt@med.navy.mil) or HM2 Reginald Bienaime, x3035, [reginald.bienaime@med.navy.mil](mailto:reginald.bienaime@med.navy.mil)

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# CRIMINAL CONFLICT OF INTEREST LAWS:

- Bribery and Graft (18 USC 201);
- Outside Representation or Compensation in Matters Involving Government (18 USC 205);
- Post-Government Employment Restrictions (18 USC 207);
- Procurement Integrity Act (41 USC 423);
- Conflicting Financial Interests (18 USC 208)
- Improper Supplementation of Salary (18 USC 209)



# **Bribery and Graft (18 USC 201):**

You may not seek or accept anything of value, other than your government pay, for being influenced in our official duties.



## **Outside Representation or Compensation in Matters Involving Government (18 USC 205):**

- You generally may not represent anyone other than the government to a federal agency or court on a particular matter involving the government.
- You generally may not share in any compensation resulting from such a representation.



# Post-Government Employment Restrictions (18 USC 207):

- You may not do government work that affects someone with whom you are seeking employment;
- If you engage in non-federal employment while you are on terminal leave or otherwise still in government service, you may not:
  - Represent anybody outside the government to the government, with or without compensation, or
  - Share in compensation for any services performed by anyone to represent someone outside the government to the government.



# Post-Government Employment Restrictions (cont) (18 USC 207):

## All Officers and Employees:

- **Lifetime Ban** – Personal and Substantial Participation
- **Two-Year Ban** – Official Responsibility



# Post-Government Employment Restrictions (cont) (18 USC 207):

## Procurement Integrity:

- No compensation for one year if:
  - You held a certain position
  - Involved in a \$10 Million Matter
- **Ethics Advisory Letter**



# Conflicting Financial Interests (18 USC 208):

- You may **NOT** officially participate in a particular matter that could affect:
  - Your financial interests; or
  - Those of your spouse, minor children, general partner or organization with which you are negotiating or have an arrangement for future or current employment.



# SALARY SUPPLEMENTATION (18 USC 209)

- **A government employee may not** receive any salary supplementation as compensation for his services as an employee of the executive branch of the United States Government, of any independent agency of the United States, or of the District of Columbia, from any source other than the Government of the United States



# Procurement Integrity Act (41 USC 423)

- Participants in acquisition over SA must report employment contacts in writing to supervisor and ethics official.
- Agency official must promptly reject employment or disqualify himself from procurement.



# EXAMPLES:

## Hiring Scientists with Pre-existing IP:

**Scenario 1:** Scientist has rights to existing IP through ownership of a company. The scientist wants to work in his official govt. capacity on the pre-existing technology either through a Govt. CRADA or licensing arrangements.



# OUTCOMES:

Scientist assigns pre-existing IP to USG and we manage the IP as usual.

The scientist receives royalties under our royalty distribution policies; or

The Govt. should NOT enter into the transaction.



# GIFT RULES (5 USC 7353):

## Gifts from Outside Sources:

- An employee shall not solicit or accept any gift or other item of monetary value:
  - From a prohibited source; or
  - Given because of the employee's official position.



# Prohibited Sources:

Any person:

- Seeking official action from, doing business with, or conducting activities regulated by, the individual's employing agency; or
- Whose interests may be substantially affected by the performance or non-performance of the individual's official duties.



# NOT "GIFTS":

- Modest items of food and refreshments;
- Greeting cards and items with little intrinsic value, such as plaques, certificates and trophies;
- Loans from financial institutions;
- Opportunities and benefits available to the public or a class of employees;
- Rewards and prizes to competitors;
- Pensions and other benefits from a former employer;
- Anything paid for by the Government or by the employee;
- Gifts accepted under specific statute.



# Gift Exceptions:

- Gifts of up to \$20, up to \$50 per year from the same source;
- Discounts and similar benefits;
- Gifts based on personal relationships;
- Gifts based on outside employment;
- Awards and honorary degrees;
- Social invitations from other than prohibited sources;
- Speaking engagements and widely attended gatherings.



# Gifts of Travel Benefits (31 USC 1353):

- When an employee is in a travel status, and when there is no conflict of interest, an agency may accept on behalf of the Government:
  - Travel and other actual expenses;
  - Lodging, meals and free attendance
- Must have concurrence from your Chain of Command/Ethics Counselor



# GIFTS BETWEEN EMPLOYEES:

## GENERAL RULES:

- You may not give to, or make a donation toward a gift for a superior or official supervisor;
- You may not solicit a contribution from another employee for a gift to either a superior or official supervisor;
- An employee may not accept a gift from an employee who receives less pay unless the donor and recipient have a personal relationship that would justify the gift and are not in a superior-subordinate relationship.



# EXCEPTIONS:

- Gifts valued at \$10 or less, on an occasional basis;
- Gifts given on traditional gift-giving occasions;
- Occasional food or refreshments within the office;
- Hospitality at residence (within limits);
- Hostess gifts;
- Cash gifts are **NOT** permitted



# Fundraising

**General Rule:** You may not solicit or otherwise support fundraising in the Federal workplace.





## RELATIONS WITH NON-FEDERAL ENTITIES

- A federal employee is prohibited from directly or indirectly soliciting gifts from a prohibited source.
- Agency Designees may permit their DoD employees to attend meetings, conferences, seminars, or similar events sponsored by non-Federal entities in their official DoD capacities at Federal Government expense if there is a legitimate Federal Government purpose.
- Fundraising and Other Activities. DoD employees may voluntarily participate in activities of non-Federal entities as individuals in their personal capacities, provided they act exclusively outside the scope of their official positions.



## RELATIONS WITH NON-FEDERAL ENTITIES

- DoD employees may not use or allow the use of their official titles, positions or organization names in connection with activities performed in their personal capacities.
- DoD employees may become members and may participate in the management of non-Federal entities as individuals in a personal capacity provided they act exclusively outside the scope of their official position.
- DoD employees are generally prohibited from engaging in any official activities in which a non-Federal entity is a party or has a financial interest if the DoD employee is an active participant in the non-Federal entity or has been an officer in the non-Federal entity within the last year.



# RELATIONS WITH NON-FEDERAL ENTITIES

- A DoD employee, shall obtain written approval before engaging in a business activity or compensated outside employment with a prohibited source.
- Disclaimer for Speeches and Writings Devoted to Agency Matters.



## TEACHING, SPEAKING, AND WRITING

- **Rule:** You may accept payment for teaching, speaking, or writing that is unrelated to your official duties and that was not prepared on official time.
- If your employment by DoD is identified, you must make a disclaimer.



# Teaching, Speaking and Writing (cont)

**Security Clearance:** A lecture, speech or writing that pertains to Military matters, national security issues, or subjects of significant concern to DoD shall be reviewed for clearance by the appropriate authorities.

**Honoraria:** Compensation for a lecture, speech or writing may be restricted by the honoraria prohibition:



# Political Activities:

**Rule:** Most Federal civilian employees may actively participate in political campaigns and other partisan activities. However, they may not engage in such activities on duty, or in any Federal workplace, vehicle, or while in uniform.

**If you plan to engage in any partisan political activity,  
you should  
consult your ethics counselor.**



## USE OF NON-PUBLIC INFORMATION

- Use of inside information is a crime under 18 USC 1905 (Trade Secrets Act).
- Example: Dr. Kildaire, NMRC PI of the CTCRADA, tells his wife that the Clinical Trial of Acme Pharmaceutical's designer drug invented by Ben Casey appears to be unsafe.

Mrs. Kildaire tells her brother Nicholas Ponzi to sell all his Acme stock and to take immediate short positions.

Result: Criminal violation and likely jail time.



# Contractors in the Workplace

— Normally, Government personnel do not exercise any of the following functions over contractor employees:

- Supervise or direct.
- Approve leave or other absences.
- Train or approve training. (Normally a contractor is expected to provide a trained workforce that is responsive to and meets the contract obligations.)
- Conduct performance appraisals or other evaluations.
- Provide or approve awards and recognition.
- Tell or suggest to a contractor whom to hire.

•



# Contractors in the Workplace

– Contractor employees may not exercise any of the following functions:



- Supervise Government personnel.
- Supervise employees of other contractors.
- Administer or supervise Government procurement activities.
- Perform inherently governmental functions.



# Contractors in the Workplace

- An inherently governmental function is a function that is so intimately related to the public interest as to mandate performance by Government employees. These functions include those activities that require the exercise of discretion in applying government authority, (FAR 7.5)
- **Example: Directors, Dept and Deputy Dept Hds**



# Contractors in the Workplace

- What is not Inherently Governmental:
- **Summary:** Contractor services that are preparatory in nature that allows Government personnel the ability to exercise the policy and discretionary judgment they must exercise. There is a large list of services that are NOT inherently governmental.
- **CAUTION:** Government personnel must exercise appropriate review to be certain that the Contractor services are not merely rubber stamped by the Government employee.



# CONTRACTORS IN THE WORKPLACE

- Gift Rules: Personal transportation provided by a contractor employee is a gift that should be analyzed under the gift rules. When the gift exceptions do not apply, personnel may pay fair market value for the personal transportation.



## CONTRACTORS IN THE WORKPLACE (CONFUSION OF IDENTITY)

- Due to the different roles, responsibilities, authority, and restrictions, it is necessary that the identities of Federal personnel and contractor personnel be apparent. FAR 37.114(c)

Examples: Email titles, unique ID badges



# OGE 450's

- **Who must file and OGE 450:**
- **CO/XO/OIC's**
- **Procurement Officials with procurements above the simplified acquisition threshold**
- **CO's discretion for influential individuals in procurements.**
- .
- **When must an OGE 450 be filed?**
  - **NEW ENTRANTS:** w/l 30 days of reporting
  
  - **ANNUAL FILERS:** February 15.
  
  - **What is the reporting period?**
  
  - **NEW ENTRANTS:** Report the required information for the 12 months preceding the filing of the form.
  
  - **ANNUAL FILERS:** Report the required information for the preceding calendar year (January 01-December 31)



# HOW TO FILL OUT THE OGE 450:

OGE Form 450, 5 CFR Part 2634, Subpart I  
 U.S. Office of Government Ethics (June 2008)  
 (Replaces January 2007 edition)

Form Approved  
 OMB No. 3209-0006

Date Received by Agency

Page Number

## CONFIDENTIAL FINANCIAL DISCLOSURE REPORT Executive Branch

Employee's Name (Print last, first, middle initial)		E-mail Address
Position/Title		Grade
Agency		Branch/Unit and Address
Work Phone	Reporting Status New Entrant <input type="checkbox"/> Annual <input type="checkbox"/>	If New Entrant, Date of Appointment to Position (mm/dd/yy)
Check box if Special Government Employee (SGE) <input type="checkbox"/>	An SGE is an executive branch officer or employee who is retained, designated, appointed, or employed to perform temporary duties either on a full-time or intermittent basis, with or without compensation, for a period not to exceed 130 days during any consecutive 365-day period.	
If an SGE, Mailing Address (Number, Street, City, State, ZIP Code)		

Step 1: Read the instructions for Parts I through V on the following pages.

Step 2: For each statement below, check Yes or No to describe your situation.

I. I have reportable assets or sources of income for myself, my spouse, or my dependent children.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
II. I have reportable liabilities (debts) for myself, my spouse, or my dependent children.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
III. I have reportable outside positions for myself.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
IV. I have reportable agreements or arrangements for myself.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
NOTE: Statement V is for <u>annual</u> filers only. It does not apply to new entrants and SGEs.		
V. I have reportable gifts or travel reimbursements for myself, my spouse, or my dependent children.	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Step 3: If you selected Yes for any statement, you must describe the reportable interests that you have in the corresponding Part (I, II, III, IV, or V) of the form.

Step 4: Sign and date the form.

Step 5: Submit the completed form to your ethics office.

I certify that the statements I have made on this form and all attached statements are true, complete, and correct to the best of my knowledge.

Signature of Employee	Date (mm/dd/yy)
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### FOR REVIEWERS' USE ONLY:

On the basis of information contained in this report, I conclude that the filer is in compliance with applicable laws and regulations, except as noted in the "comments" box below.	
Signature and Title of Supervisor/Other Intermediate Reviewer (if required by the agency)	Date (mm/dd/yy)
E-mail Address	Phone Number
Signature and Title of Agency's Final Reviewing Official	Date (mm/dd/yy)
Comments of Reviewing Officials	
(Check box if continued on additional page <input type="checkbox"/> )	

filer

supervisor

Ethics counselor



# HOW TO FILL OUT THE OGE 450 (Cont):

OGE Form 450, 5 CFR Part 2634, Subpart I  
 U.S. Office of Government Ethics (June 2008)  
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Employee's Name (Print last, first, middle initial)	Page Number
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## Part I: Assets and Income

<p><b>Report for Yourself, Spouse, and Dependent Child:</b></p> <ul style="list-style-type: none"> <li>Assets held for investment with a value greater than \$1,000 at the end of the reporting period OR assets held for investment which produced more than \$200 in income during the reporting period, including but not limited to:           <ul style="list-style-type: none"> <li>Assets such as stocks, bonds, annuities, trust holdings, partnership interests, life insurance, investment real estate, or a privately-held trade or business</li> <li>Sector mutual funds: those funds invested in a particular industry, business, or location such as ABC Electronics Fund or XYZ Canada Fund (report the full name of the fund, not just the general family fund name)</li> <li>Holdings of retirement plans, such as 401(k)s or IRAs (list each holding except diversified mutual funds)</li> <li>Holdings of investment life insurance</li> <li>Holdings of variable annuities</li> <li>Defined benefit pension plans provided by a former employer (include the name of the employer)</li> </ul> </li> </ul>	<p><b>Do Not Report:</b></p> <ul style="list-style-type: none"> <li>Federal Government retirement benefits</li> <li>Thrift Savings Plan</li> <li>Certificates of deposit, savings or checking accounts</li> <li>Term life insurance</li> <li>Money market mutual funds and money market accounts</li> <li>Your personal residence, unless you rent it out</li> <li>Diversified mutual funds, such as ABC Equity Value Fund or XYZ Large Capital Fund</li> <li>U.S. Government Treasury bonds, bills, notes, and savings bonds</li> <li>Money owed to you, your spouse, or dependent child by a spouse, parent, sibling, or child</li> </ul>
<p><b>Also Report:</b></p> <ul style="list-style-type: none"> <li><u>For yourself:</u> (1) all sources of salary, fees, commissions, and other earned income greater than \$200, (2) honoraria greater than \$200, and (3) other non-investment income such as scholarships, prizes, and gambling income greater than \$200</li> <li><u>For your spouse:</u> (1) all sources of salary, fees, commissions, and other earned income greater than \$1,000, and (2) honoraria greater than \$200</li> </ul>	<p><b>Do Not Report:</b></p> <ul style="list-style-type: none"> <li>Dependent child's earned income</li> <li>Veterans' benefits</li> <li>Federal Government salary</li> <li>Social Security benefits</li> </ul>

### Important Definitions

<b>Diversified Mutual Fund</b> – A mutual fund that does not have a stated policy of concentrating its investments in one industry, business, or single country other than the United States.
<b>Sector Mutual Fund</b> – A mutual fund that concentrates its investments in an industry, business, single country other than the United States, or bonds of a single state within the United States.
<b>Dependent Child</b> – A son, daughter, stepson or stepdaughter who is either unmarried and under age 21 and living in the filer's house, or considered dependent under the U.S. tax code.

**Reportable Information** – Go to the last page to see examples of how to report assets and income.

Specific stock, bond, sector mutual fund, type/location of real estate, etc. (Indicate the full name of each specific asset or investment. You may add the ticker symbol to the full name.) Name of Employer or Business; Source of Fees, Commissions, or Honoraria (Include brief description.) You may distinguish any entry for a family member by preceding it with S for spouse, DC for dependent child, or J for jointly held.	No longer held
1	<input type="checkbox"/>
2	<input type="checkbox"/>
3	<input type="checkbox"/>
4	<input type="checkbox"/>
5	<input type="checkbox"/>



# HOW TO FILL OUT THE OGE 450 (Cont):

OGE Form 450, 5 CFR Part 2634, Subpart I  
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Employee's Name (Print last, first, middle initial)	Page Number
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## Part II: Liabilities

<b>Report for Yourself, Spouse, and Dependent Child:</b> <ul style="list-style-type: none"> <li>• A liability over \$10,000 owed at any time during the reporting period, other than a loan from a financial institution or business entity granted on terms made available to the general public</li> <li>• A loan over \$10,000 from an individual, such as a friend or a business associate</li> </ul>	<b>Do Not Report:</b> <ul style="list-style-type: none"> <li>• Any liability, such as a mortgage, a student loan, or a credit card account, from a financial institution or business entity granted on terms made available to the general public</li> <li>• Loans secured by automobiles, household furniture, or appliances, unless the loan exceeds the purchase price of the item it secures</li> <li>• Liabilities that you owe to your spouse or to the parent, sibling, or child of you, your spouse, or your dependent child</li> </ul>
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**Reportable Information** – Go to the last page to see examples of how to report liabilities.

Name of creditor (include city and state where creditor is located)	Type of liability (personal loan, margin account, etc.)
1	
2	

## Part III: Outside Positions

<b>Report for Yourself:</b> <ul style="list-style-type: none"> <li>• All positions outside the U.S. Government held at any time during the reporting period, whether or not you were compensated and whether or not you currently hold that position. Positions include an officer, director, employee, trustee, general partner, proprietor, representative, executor, or consultant of any of the following:           <ul style="list-style-type: none"> <li>- Corporation, partnership, trust, or other business entity</li> <li>- Non-profit or volunteer organization</li> <li>- Educational institution</li> </ul> </li> </ul>	<b>Do Not Report:</b> <ul style="list-style-type: none"> <li>• Any position with a           <ul style="list-style-type: none"> <li>- Religious entity</li> <li>- Social entity</li> <li>- Fraternal entity</li> <li>- Political entity</li> </ul> </li> <li>• Any position held by your spouse or dependent child</li> <li>• Any position that you hold as part of your official duties</li> </ul>
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**Reportable Information** – Go to the last page to see examples of how to report outside positions.

Organization (include city and state where organization is located)	Type of organization	Position	No longer held
1			<input type="checkbox"/>
2			<input type="checkbox"/>
3			<input type="checkbox"/>
4			<input type="checkbox"/>
5			<input type="checkbox"/>
6			<input type="checkbox"/>



# HOW TO FILL OUT THE OGE 450 (Cont):

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Employee's Name (Print last, first, middle initial)	Page Number
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## Part IV: Agreements or Arrangements

<b>Report Your Agreements or Arrangements for:</b> <ul style="list-style-type: none"> <li>Continuing participation in an employee pension or benefit plan maintained by a former employer</li> <li>A leave of absence</li> <li>Future employment, including date you accepted employment offer</li> <li>Continuation of payment by a former employer (including severance payments)</li> </ul>	<b>Do Not Report:</b> <ul style="list-style-type: none"> <li>Any agreement or arrangement related to your employment by the Federal Government</li> <li>Spouse's and dependent child's agreements or arrangements</li> </ul>
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**Reportable Information** – Go to the last page to see examples of how to report agreements and arrangements.

Entity with which you have an agreement or arrangement (include city and state where entity is located)	Terms of Agreement or Arrangement
1	
2	
3	
4	

## Part V: Gifts and Travel Reimbursements

Fill out this part only if you are filing an Annual Report. If you are a new entrant or an SGE, skip this part.

<b>Report for Yourself, Spouse, and Dependent Child:</b> <ul style="list-style-type: none"> <li>Travel-related reimbursements (items such as lodging, transportation, and food) totaling more than \$335* from any one source during the reporting period; include where you traveled, the purpose, and date(s) of the trip</li> <li>Any other gifts totaling more than \$335* from any one source during the reporting period</li> </ul> <p>*If you received more than one gift from one source:</p> <ol style="list-style-type: none"> <li>Determine the value of each item you received from that source</li> <li>Ignore each item valued at \$134 or less</li> <li>Add the value of those items valued at more than \$134; if the total is more than \$335, then you must list those items on this form</li> </ol>	<b>Do Not Report:</b> <ul style="list-style-type: none"> <li>Anything received from relatives, the U.S. Government, D.C., state, or local governments</li> <li>Bequests and other forms of inheritance</li> <li>Gifts and travel reimbursements given to your agency in connection with your official travel</li> <li>Gifts of hospitality (food, lodging, entertainment) at the donor's residence or personal premises</li> <li>Anything received by your spouse or dependent child totally independent of their relationship to you</li> </ul>
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**Reportable Information** – Go to the last page to see examples of how to report gifts and travel reimbursements.

Source	Description
1	
2	
3	



# HOW TO FILL OUT THE OGE 450 (Cont):

OGE Form 450, 5 CFR Part 2634, Subpart I  
U.S. Office of Government Ethics (June 2008)  
(Replaces January 2007 edition)

Form Approved  
OMB No. 3209-0006

## EXAMPLES

### Part I: Assets and Income

Specific stock, bond, sector mutual fund, type/location of real estate, etc. (Indicate the full name of each specific asset or investment. You may add the ticker symbol to the full name.) Name of Employer or Business; Source of Fees, Commissions, or Honoraria (Include brief description.) You may distinguish any entry for a family member by preceding it with S for spouse, DC for dependent child, or J for jointly held.	No longer held
XYZ Japan Fund (Example of sector mutual fund)	<input type="checkbox"/>
OGE Energy (Example of stock that produced more than \$200 in capital gains)	<input checked="" type="checkbox"/>
(S) OGC Communications (Example of stock held in a 401(k) plan)	<input type="checkbox"/>
ABC Healthcare Fund (Example of sector fund held in a variable annuity)	<input type="checkbox"/>
Rental Condo, Anchorage, AK (Example of investment real estate)	<input type="checkbox"/>
Bryggadune University – former employer	<input checked="" type="checkbox"/>
(S) Express Medical Clinic – employer	<input type="checkbox"/>
Association of Accountants – honoraria	<input type="checkbox"/>

### Part II: Liabilities

Name of creditor (city and state)	Type of liability (personal loan, margin account, etc.)
John Jones (Denver, CO)	Personal loan from a friend
ANW Investment Company (San Francisco, CA)	Margin account

### Part III: Outside Positions

Organization (city and state)	Type of organization	Position	No longer held
Bryggadune University (Memphis, TN)	Educational institution	Professor	<input checked="" type="checkbox"/>
ISK Family Trust (Boynton Beach, FL)	Family Trust	Trustee	<input type="checkbox"/>
Scenic Rivers Association (Nashville, TN)	Non-profit environmental organization	Member, Board of Directors	<input checked="" type="checkbox"/>

### Part IV: Agreements or Arrangements

Entity with which you have an agreement or arrangement (include city and state where entity is located)	Terms of Agreement or Arrangement
Dee, Jones & Smith (San Diego, CA)	Will receive pension benefits (defined benefit plan) (Example of continuing participation in an employee pension or benefit plan by a former employer)
Hartford & Brown (San Diego, CA)	Employment agreement with Hartford & Brown. Starting work as attorney in July 2009. Entered into agreement in October 2008. (Example of agreement for future employment)

### Part V: Gifts and Travel Reimbursements

Source	Description
Dee, Jones & Smith	Leather briefcase (Example of a gift totaling more than \$335 from one source)
CGH Culinary Institute	Airline ticket, hotel room, and meals incident to culinary seminar in Tokyo, Japan from May 1-5, 2008 (Example of travel reimbursement)



# Conclusion

- **No matter what the ethics issue may be, if you're not sure what to do, check with your ethics counselor in advance.**
- **NMRC Ethics Counselor,**