



MANAGEMENT

1.2 Legal Authority

CODE OF PROFESSIONAL RESPONSIBILITY

- A. Purpose:** The integrity of the U.S. Marshals Service (USMS) is dependent upon the conduct of its individual employees. Each day the employees of the USMS demonstrate the highest standards of integrity, character, public trust and professional responsibility. The USMS seeks to maintain these standards as well as improve all aspects of professional responsibility among its employees. The attached Code of Professional Responsibility sets forth 38 standards of conduct for all employees.
- B. Authority:** The Director's authority to establish certain standards of conduct is set forth in [5 CFR 3801.106](#), Department of Justice Supplemental Standards of Ethical Conduct; [5 CFR 735](#), Employee Responsibilities and Standards of Conduct; and [28 CFR 45](#), Department of Justice Employee Responsibilities.
- C. Policy:** Each employee whose conduct on and off duty reflects upon the federal government is required to adhere to the Code of Professional Responsibility.
- D. Responsibilities**
- USMS Employees:** Employees are required to read the Code of Professional Responsibility each year and acknowledge this through the web-based acknowledgment form found in the Office of General Counsel ethics website. The form is on the ethics website welcome page, and employees indicate they have read the Code that is published on the USMS intranet, understand its contents, and agree to abide by its provisions. Employees should go to their immediate supervisors with any questions concerning interpretation or application of a standard.
 - Headquarters/Districts:** U.S. Marshals, Chief Deputy U.S. Marshals and Assistant Directors must make sure all employees under their supervision are able to access the Code from the USMS Intranet, giving them sufficient on-duty time to read and understand it. The Office of General Counsel will maintain in a database the electronic acknowledgments submitted by all USMS employees in January of each year to document that every employee has received, reviewed and understands the USMS Code.
- E. Code of Professional Responsibility**
- Courtesy:** Be courteous and demonstrate good manners toward the general public, members of Congress and employees. Maintain a respectful and helpful attitude in all endeavors.
 - Appearance:** Maintain a neat, clean and businesslike appearance and comply with USMS dress standards while on duty.
 - Fitness for Work:** Report to work physically fit and mentally alert. Employees who feel otherwise should notify the appropriate supervisor and request temporary relief from duty or seek instructions.
 - Adverse Circumstances:** Before an assignment report to the immediate supervisor any circumstances that may adversely affect performance.
 - Drug Use and Possession:** Except in an official capacity, neither possess nor use illegal drugs.

- Do not consume or possess alcoholic beverages while on duty. Do not report for duty in a condition that impairs the ability to perform as expected.
6. **Vehicles:** Do not operate a government vehicle in an improper manner or under the influence of intoxicants or drugs.
 7. **Weapons Display:** Operational employees must conceal all weapons from view when not in use, unless otherwise authorized by management. Weapons will not be inspected, cleaned, handled or exchanged in public areas or in the presence of jury members, prisoners, witnesses, protectees, family members or the general public.
 8. **Weapons Security:** When not carrying them, secure weapons in a safe place to prevent theft, tampering or misuse.
 9. **Gifts:** Do not accept or solicit gifts, favors or bribes in connection with official duties.
 10. **Discussion of Official DOJ or USMS Business:** Do not discuss DOJ or USMS internal matters, policies, grievances or personalities with family members. In addition, do not discuss the above or financial, personal or family matters with jury members, prisoners, witnesses, protectees, any known associates of the above, or the public.
 11. **Personal Relationships:** Do not entertain, socialize or enter into business arrangements with, give legal advice or grant special favors to, or accept gifts or payments from jury members, prisoners, defendants, witnesses, protectees or family members and known associates of the above.
 12. **Personal Guests:** Do not allow jury members, prisoners, witnesses, protectees or their family members and known associates into your living quarters (temporary or permanent).
 13. **Visiting Detail Sites:** Do not visit a detail assignment site during non-duty hours or allow family members and friends to visit a detail site or operational area. An exception may be granted by the appropriate management official for persons employed or contracted as matrons or guards.
 14. **Gambling:** Do not gamble or enter into games of chance with prisoners, witnesses, jurors or protectees or on government-owned or leased premises.
 15. **Relief from Duty Post:** Stay on duty until properly relieved and remain alert at all times while on duty.
 16. **News Releases and other Disclosures:** Do not disclose any official information except to USMS or other officials who need to know it, or issue any news or press release without the express permission of the appropriate management official. This does not prohibit protected whistle-blowing or union activities.
 17. **Discussion of Assignments:** Refrain from discussing duty assignments—particularly staffing, weapons, security precautions or procedures—except with those who have a need to know.
 18. **Investigation Conduct:** When assigned to conduct investigations or interviews, do so in an impartial and businesslike manner to ensure fairness, both to the individual being investigated and to the USMS.
 19. **Investigation Techniques:** When on an investigation, do not use techniques that violate the law, such as unauthorized intrusion onto private property, unnecessary destruction of property, and unauthorized listening and/or use of recording devices.
 20. **Compliance with Laws:** Comply with local, state and federal laws while performing official duties.
 21. **Recording Conversations:** Do not surreptitiously record conversations between USMS employees.

22. **Identification:** Only use DOJ identification for official U.S. government purposes.
23. **Statements of Fact:** Do not knowingly give false or misleading statements or conceal material facts in connection with employment, promotion, travel voucher, any record, investigation or other proper proceeding.
24. **Discrimination:** Do not discriminate against or sexually harass an employee or job applicant or engage in any prohibited personnel activities.
25. **Personal Obligations:** Ensure that just financial obligations are met. A just financial obligation is one acknowledged by you to be valid or reduced to judgment by the court.
26. **Personal Activities:** Refrain from any activity that would adversely affect the reputation of the DOJ.
27. **Personal and Business Associations:** Avoid personal and business associations with convicted felons, persons connected with criminal felons or those connected with criminal activities. This does not apply to immediate family members.
28. **Conduct:** Avoid any criminal, infamous, dishonest, immoral, or notoriously disgraceful conduct, including use of intoxicants and illicit drugs.
29. **High Standards:** Demonstrate the highest standards of personal and moral conduct expected of law enforcement officers and other government employees.
30. **Assignments:** Always perform assignments according to prescribed regulations to the best of one's ability and follow safe and secure work procedures.
31. **Reporting Civil Rights Violations:** Report to appropriate management officials violations of constitutional and statutory rights--such as prisoner abuse, unnecessary use of force, unlawful intimidation, and discrimination on the basis of race, sex, religion or national origin--in the provision of law enforcement services.
32. **False Statements:** Do not knowingly make false statements about fellow employees or officials or speak with reckless disregard of the truth.
33. **Carrying Out Orders:** Do not unnecessarily delay or refuse to carry out a proper order of a supervisor or other official overseeing your work.
34. **Government Property:** Do not possess or otherwise take government property, and make every effort to secure and use it responsibly.
35. **Marshals Sales:** Do not bid on or purchase in any manner, directly or through an agent, any items being offered at a USMS sale.
36. **Reporting Violations:** Report violations of prescribed regulations, statutes or laws to appropriate management officials.
37. **Personal Relationships with Subordinates:** You may not, through the official chain of command or by actual practice, supervise a person with whom you are having an intimate personal relationship or immediate family members of that person. Further, you may not make, influence, or have input into decisions about the pay, promotions, work assignments, or any other conditions of employment of that person or his or her immediate family members.
38. **Supervision of Relatives:** You may not, through the official chain of command or by actual practice, supervise a relative as defined by 5 USC 3110. Further, you may not make, influence, or have input into decisions about a relative's employment, pay, promotions, work assignments, or any other conditions of employment.

GIFTS

A. Gifts

1. **Purpose:** This policy directive provides policy and procedures for United States Marshals Service (USMS) employees who receive gifts valued between \$20 and \$150. This directive does not cover gifts from a foreign government or employee awards. Gifts received from foreign donors/governments are covered by 5 USC 7342, and must be reported by recipients on the web-based report form found at the "Foreign Gifts" webpage of the USMS Ethics website.
2. **Authority:** DOJ Order 2400.2: *Solicitation and Acceptance of Gifts*; delegation of gift-acceptance authority from the Director, USMS, to General Counsel.
3. **Policy:** Employees may accept gifts worth up to \$20 in accordance with 5 CFR 2635.204
4. **Procedures**
 - a. An employee must obtain approval from General Counsel before accepting a gift from a nonfederal source valued between \$20 and \$150.
 - b. Gifts exceeding \$150 require approval from the assistant attorney general for administration and should be sent to the General Counsel.
 - c. In considering whether to approve a request to keep a gift that is to be accepted on behalf of the USMS, the General Counsel will apply the following criteria:
 - (1) Gifts solicited by employees will not be accepted.
 - (2) Gifts of services will not be accepted.
 - (3) Employees may not give gifts to the USMS or the DOJ without approval from the assistant attorney general for administration (see DOJ Order No. 2400.2).
 - (4) The donor must present proof of ownership of a gift.
 - (5) Acceptance and use of gifts must be compatible with the agency mission.
 - (6) Gifts from prohibited sources will be closely scrutinized.
 - d. All potential gifts of land, buildings, vehicles, cash or artwork to the USMS, regardless of value, must be reported to the Ethics Officer in the Office of General Counsel via a written request. The request may be e-mailed, faxed (202-307-9456) or mailed. The Director will be consulted, as appropriate.
 - e. The General Counsel will assess a gift at its fair market value, not the value declared by the donor, unless a receipt accompanies the item.
 - f. The General Counsel will also consider the following in determining whether a gift should be accepted:
 - (1) Any conditions a donor imposes
 - (2) Additional costs (e.g., appraisals, transportation, repair or maintenance) of accepting a gift
 - g. The donor must complete a Gift Donation Form before delivering the item. If the gift is presented without any prior indication of the donation, the employee must fill out a Gift Acceptance Form.
5. **Responsibilities**
 - a. **Assistant Attorney General for Administration:** approves gifts of more than \$150 as well as those from USMS employees to the USMS or the DOJ.

- b. **General Counsel:** processes and approves gifts valued between \$20 and \$150; and processes requests for gifts exceeding \$150 and those from USMS employees to the USMS or the DOJ for consideration by the assistant attorney general for administration.
- c. **Employees:** submit gift-acceptance requests to the Ethics Officer in the Office of General Counsel.

OUTSIDE EMPLOYMENT

- A. **Purpose:** This policy directive establishes policies and procedures for United States Marshals Service (USMS) employees concerning outside employment (see definitions).
- B. **Proponent:** Office of General Counsel, 202-307-9054, Fax 202-307-9456
- C. **Authority:** 18 USC 203, 205, 208 & 209; 5 CFR 2635; 5 CFR 2636, Subpart C; 5 CFR 3801.106; DOJ Order 1200.1; *Supplemental Standards of Conduct for Justice Department Employees* and 48 CFR 3.601.
- D. **Policy**
 - 1. It is the policy of the USMS that employees may not engage in outside employment, including self-employment that creates or appears to create a conflict of interest with their official responsibilities. USMS employees who consult with the United States Marshals Service Ethics Officer or Deputy Designated Agency Ethics Official (DDAEO) before engaging in outside employment activities are not subject to discipline if the following conditions are met: employees disclose all relevant facts, the advice given allows the employee to take outside employment, employees act upon the advice given, and employees receive written opinions.
 - a. This directive does not affect or supersede the general ethics principles and standards of conduct. All outside employment must be evaluated (by the Ethics Officer) for possible conflicts of interest and management or policy implications, if any. Supervisors and employees alike should consider requesting the Ethics Officer's advice even if prior approval is not necessary to afford them a measure of protection from those who would question the appropriateness of their outside activities.
 - b. A distinction must be made between ethics approval and approval from appropriate management officials. The role of the Ethics Officer is to review proposed outside activities in light of the Standards of Conduct, agency policies, and federal laws and regulations. This analysis does not involve a review of an office's staffing needs, the way an employee's time is spent, or a determination of whether the employment is compatible with (or interferes with) the discharge of the duties and responsibilities of the employee's government position. This determination is the responsibility of an office's management. Employees should obtain management's approval for outside employment and then seek ethics advice from the Ethics Officer, as appropriate.
 - 2. **Principles Applicable to All Employees:** The following principles are applicable to all employees:
 - a. Employees may not contract with the federal government. If an employee has or starts a business, the business may not attempt to obtain contracts from or sell to an agency of the federal government.
 - b. Employees may not, with or without compensation, represent anyone other than the United States in a matter in which the United States is a party or has an interest. For instance, a USMS employee cannot offer to represent a neighbor with the Social Security Administration in a dispute about benefits. In addition, no employee may accept additional compensation to perform his or her federal duties. Representing another federal employee in disciplinary proceedings or acting as part of a cooperative, voluntary, professional, or similar non-profit organization, if a majority of the members are

employees of the United States, are exceptions to this principle.

- c. Employees may not engage in compensated or uncompensated outside activities that involve any criminal or *habeas corpus* matters, be it federal, state, or local. For instance, an employee may not participate in activities that may involve the criminal court system at any level of government except as a member of a jury or called as a witness.
- d. No employee may engage in compensated or uncompensated outside activities that involve litigation, investigations, grants, and other matters in which the Department of Justice (and any of its components) is or represents a party, witness, litigant, investigator, or grant-maker.
- e. No employee may use non-public information in financial transactions to further his/her own private interest or that of another.
- f. An employee may not use his or her official title or position for private gain.
- g. Any outside activity, with or without compensation, **requires** the prior approval of the Ethics Officer if it involves some subject matter, policy, or program within the employee's area of responsibility. This includes teaching that relates to the employee's duties, or any other outside employment that is somehow connected to the employee's duties or the office's responsibilities. For instance, an employee with ADP responsibilities would have to receive a prior approval from the Ethics Officer before accepting outside employment involving computer assistance or advice.
- h. Any outside employment that may raise issues of conflict of interest or appearances of impropriety requires consultation with the Ethics Officer.
- i. An employee who is on sick leave or on excused absence may not engage in outside employment during the duration of this leave period.
- j. No USMS employee may engage in the following types of outside employment (compensated or uncompensated):
 - bill collector or collection agent;
 - reposessor of automobiles or any other kind of merchandise;
 - bouncer in an establishment where alcoholic beverages are served or sold;
 - guard, watchman, special policeman, investigator, or security officer;
 - any employment that requires service of process;
 - any employment that requires or encourages access to police information; and
 - any employment that requires the use of law enforcement powers.

3. **Policy Applicable to Non-GS 1811 Employees** (see definitions)

a. **Teaching, Speaking, and Writing**

- (1) Generally, employees who are not Criminal Investigators (GS-1811) receiving law enforcement availability pay may receive compensation for speaking, teaching, and writing **unless** these activities relate to their official duties. If these activities relate to their official duties, employees may not be compensated except for reimbursement of reasonable expenses (e.g., transportation and lodging).
- (2) If the teaching relates to an employee's official duties, the employee may accept

compensation only under the following conditions:

- (a) The course requires multiple presentations and is offered as part of a regularly established curriculum of an institute of higher education (i.e., university or college) or of a secondary or elementary school.
 - (b) The course is part of a program sponsored and funded by federal, state, or local government, but is not offered by an entity described above.
 - (c) Employees in non-career positions above the GS-15 level, i.e., non-career SES, must have advance written authorization from the USMS Ethics Officer before accepting compensation for teaching.
- b. **Outside Practice of Law:** Attorneys who work for the USMS in the GS-905 series who want to engage in compensated or uncompensated outside practice of law must obtain the prior approval of the Ethics Officer/DDAEO.
4. **Policy Applicable to GS-1811 Criminal Investigators Receiving Law Enforcement Availability Pay (LEAP)**
- a. **No Outside Earned Compensation:** Employees in the GS-1811 series may not engage in any compensated outside employment. This restriction is a condition of employment with the USMS if the employee receives LEAP.
 - (1) **Expenses vs. Compensation:** GS-1811 employees may accept reimbursement of expenses but not compensation for their time, efforts, or services. Reimbursement of reasonable expenses may include transportation, lodging, *per diem*, and other expenses associated with participation in non-federal activities. If it is clear that reimbursement of expenses seems excessive (i.e., appears to be compensation for services disguised as reimbursement of expenses), employees have an independent affirmative obligation to inquire further and consult with the Ethics Officer.
 - (2) **Earned vs. Non-earned Compensation:** Compensation or income that is passive, such as investment income, royalties, and rents, is permissible. As long as the compensation is not offered in return for an employee's time, efforts, or services, it will generally be considered non-earned income.
 - (3) **Exceptions:** Employees may receive compensation for National Guard duty and Reserve duty.
 - (4) **Uncompensated Outside Employment:** Employees in the GS-1811 series are advised to consult with the Ethics Officer in addition to obtaining management approval if they want to engage in uncompensated outside employment.
5. **Policy Applicable to SES and PAS Employees**
- a. Presidential appointees to full-time non-career positions, such as U. S. Marshals and other non-career SES employees, may not receive **any** outside earned income for outside employment.
 - b. Non-career SES employees who are **not** appointed by the President are limited to earning up to 15 percent of the annual rate of basic pay for Level II of the Executive Schedule (under 5 USC 5313), as in effect at the beginning of the calendar year, if engaged in outside employment, in such calendar year. Further, such employees may not be compensated for serving as a member of a board or engaging in activities that involve a fiduciary relationship with or employment by a firm that provides such services. Additionally, they may not allow their names to be used by such an entity.
 - c. Career SES employees are subject to the same restrictions as non-GS-1811 employees,

unless the Director promulgates policies that alter this provision.

E. Procedures: The following procedures must be followed for requesting and granting approval for USMS employees to engage in outside employment including self-employment.

1. **Requesting Authorization:** Employees must submit a completed *Request for Approval of Outside Employment or Activities* to their immediate supervisor before engaging in outside employment or self-employment if it involves some subject matter, policy, or program within the employee's area of responsibility. The supervisor, in turn, will submit the request to the Ethics Officer.
2. **Granting Authorization:** Supervisors receiving *Request for Approval of Outside Employment or Activities* must:
 - a. Submit the completed *Request for Approval of Outside Employment or Activities* to the U.S. Marshal or Assistant Director to whom they report, along with their recommendation to either approve or deny the request and their justification for such.
 - b. Obtain the recommendation of the U.S. Marshal or Assistant Director, along with their decision to approve or deny the request.
 - c. Make two copies of the signed request, keep one copy in office files, submit the other to the Ethics Officer for prior approval. Once the Ethics Officer returns the request form with an approval, forward that copy to the Personnel Staffing Specialist, Human Resources Division, who services employee's District or Division, for inclusion in the employee's Official Personnel File (OPF). If the request is denied, there is no need for inclusion in the OPF.

F. Responsibilities

1. **Employees:** Employees submitting a *Request for Approval of Outside Employment or Activities* are responsible for:
 - a. Refusing compensation for public speaking or writing relating to their official duties, including but not limited to: matters to which they are presently assigned or have been assigned in the last year; any ongoing or announced policy, program, or operation of the USMS; or in the case of a non-career employee, any subject matter that pertains to the programs and operations of the USMS.
 - b. Following appropriate grievance procedures including those described in the *Alternative Dispute Resolution* directive, as applicable, if they disagree with a denial.
 - c. Allowing supervisors and/or the Ethics Officer 10 working days to consider the request for outside employment before an approval is needed.
2. **Supervisors:** In addition to the procedures outlined above, supervisors receiving a *Request for Approval of Outside Employment or Activities* are responsible for:
 - a. Determining whether or not to recommend authorization with consideration being give to the following factors:
 - (1) performance ratings
 - (2) effectiveness in accomplishing work assignments
 - (3) use of sick leave
 - (4) punctuality
 - b. Reviewing approved outside employment or activities on an annual basis in conjunction with employees' annual performance ratings or upon career promotions.

- c. Canceling a previously approved request (in consultation with the Ethics Officer) when the outside employment causes a conflict of interest or adversely affects the employee's performance.
 - d. Consulting with the Ethics Officer about an employee's request when management requests such consultation.
3. **Ethics Officer/DDAEO:** Must provide formal and informal written opinions if requested and as required by regulations, and provide advice on ethics matters.

G. Definitions

1. **DAEO, DEO, DDAEO, and Alternate DDAEO:** The Department of Justice's Designated Agency Ethics Official (DAEO) is the Assistant Attorney General for Administration. There is also the Departmental Ethics Office (DEO) from which agency ethics officials may receive policies and advice. The USMS ethics official is the Deputy Designated Agency Ethics Official (DDAEO) who is the General Counsel. The Alternate DDAEO is the Ethics Officer who is responsible for the day-to-day advice and management of the ethics program.
2. **Outside Employment:** Any non-federal activity performed for a source (including self-employment) other than the USMS or another federal government agency involving an employee's efforts, services, or time for compensation.
3. **GS-1811 and Non-GS-1811 Employees:** Criminal investigators in the GS-1811 series receiving LEAP are GS-1811 employees; all others, including but not limited to, those in the career and non-career SES, Presidentially-appointed employees, GS-082, 1802, 1810, 301, 341, and 1102 series, etc. are non-GS-1811 employees.
4. **Outside Earned Income:** Outside employment for which an employee receives compensation in the form of wages, salaries, honoraria, commissions, professional fees, and any other form of compensation for services, efforts, or time, other than the employee's federal salary.
5. **Conflict of Interest:** Activities that are not compatible or interfere with the full, proper, and impartial discharge of the duties and responsibilities of the employee's government position present employees with a conflict of interest. Generally, conflicts will be of a financial nature (an employee's own disqualifying financial interests or financial interests that are imputed to the employee), but sometimes they involve issues of employees' impartiality (personal and business relationships). Waivers of the conflict of interest permitting the employee to remain involved in an agency matter despite the conflict may be approved by the Ethics Officer and DDAEO upon request.
6. **Appearance of Conflict/Impropriety:** Activities that do not present employees with actual, direct conflicts of interest may still raise issues of an appearance of a conflict of interest or impropriety. The efficiency of the service requires that employees not create situations calling into question their own integrity and impartiality, or the agency's integrity and impartiality. Waivers of disqualification for an appearance of a **financial** conflict of interest may be approved by the Ethics Officer and DDAEO upon a showing that the appearance raised by the employee's activity is not so substantial as to be deemed likely to affect the integrity of the employee's services. Waivers of disqualification for an appearance of **partiality** may be approved by the Ethics Officer/DDAEO upon a showing that the appearance is outweighed, in light of all relevant circumstances, by the agency's interest in continued employee participation in the matter, and a determination is made that a reasonable person would not question the integrity of the agency's programs/operations.
7. **Non-public Information:** Information that employees gain by reason of federal employment and that they know, or reasonably should know, has not been made available to the general public. For instance, information: 1) exempt from disclosure under the Freedom of Information and the Privacy Act, or otherwise protected by statute, Executive Order or regulation; 2) designated as confidential by an agency; or 3) has not actually been disseminated to the general public and is not authorized to be made available to the public on request.

8. **Representational Services:** Employees who represent another person or entity by making an appearance or by other communication in an effort to attempt to influence the federal government concerning a particular matter. An appearance occurs when the employee is physically present before the United States, i.e., a federal court or agency. A communication occurs when the employee contacts (by any means including telephone, fax, electronic mail message) or corresponds with an agent of the United States.

**APPROVAL REQUIREMENTS FOR COMPENSATED
OUTSIDE EMPLOYMENT**

TYPE OF EMPLOYMENT ¹	APPROVAL NEEDED	APPROVING OFFICIAL
Related to duties	Yes	U. S. Marshal (USM) or Assistant Director (AD), and Ethics Officer (EO)
Unrelated to duties	Yes	USM or AD
Creates conflict of interest or appearance of a conflict of interest	Yes	EO
Practice of Law	Yes	EO and Deputy Attorney General
National Guard or Reserve duty	No	
Self-employment • Related to duties • Unrelated to duties	Yes Yes	USM or AD and EO USM or AD
Teaching • Related to duties • Unrelated to duties	Yes Yes	USM or AD and EO USM or AD
Speaking/Writing • Related to duties • Unrelated to duties	Yes No	USM or AD and EO

REQUEST FOR APPROVAL OF OUTSIDE EMPLOYMENT

Date

MEMORANDUM

TO:

FROM:

SUBJECT: Request for Approval of Outside Employment/Activity that Involves Some Subject Matter, Policy, or Program within My USMS Area of Responsibility

Name of proposed employer or activity group:

Type of employment/activity: _____

Days and hours to be spent working/performing activity: _____

Annuity only - expected salary: _____

I understand that if the requested outside employment/activity interferes with the performance of the duties of my USMS position, the needs of the Service will take precedence over those of my outside activities.

Employee's Signature

Approved: _____

Disapproved: _____

Approving Official Signature

Copy: HRD (OPF)

Note: Minor change - Section D under Outside employment reordered in outline.. Per email dated 1/8/09 from the Office of General Counsel. Archived Policy: [archive/1-2ethics 010809.htm](#)

Minor change - Code of Professional Responsibility, D(2), added Associate Directors. Per email dated 10/1/08 from the Office of General Counsel. Archived Policy: [archive/1-2ethics 121708.htm](#)