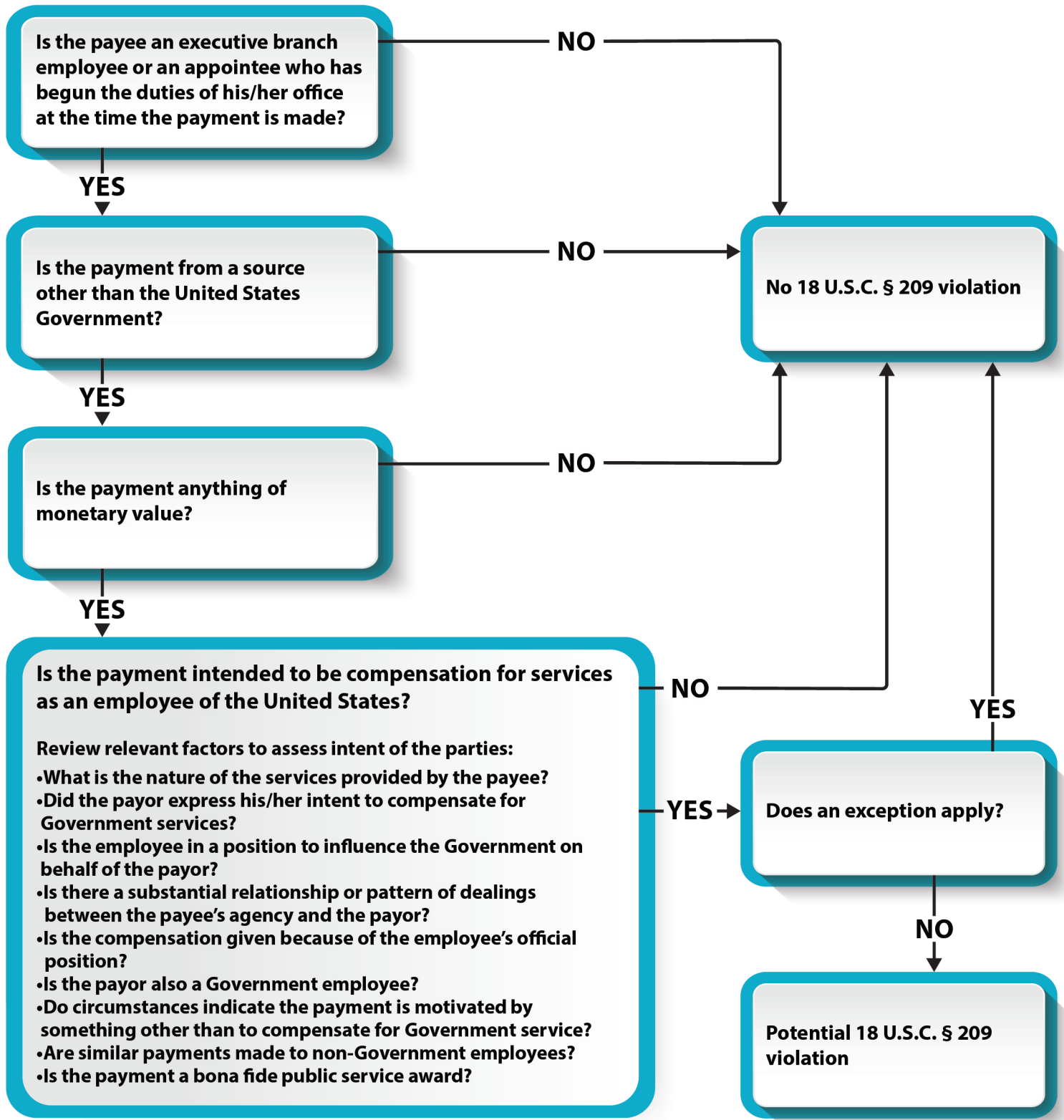


DOES 18 U.S.C. § 209 PROHIBIT RECEIPT OF THIS PAYMENT?



WILL RECEIPT OF THIS PAYMENT REQUIRE RECUSAL UNDER 5 C.F.R. § 2635.503?

Does the payment constitute a “covered payment”?

Is it any item with a value in excess of \$10,000, which is paid by a former employer:

- **On the basis of a determination made after it became known to the former employer that the individual was being considered for or had accepted a Government position; and**
- **Other than pursuant to a “qualifying program” (a compensation, partnership or benefits program that is contained in written form and does not treat persons entering Government more favorably, or an unwritten program where there is a history of similar payments made to those not entering Government service).**

NO

No recusal necessary

YES

Employee is disqualified from participating in any particular matter in which the former employer is a party or represents a party for two years from the date the payment is received.