

18 U.S.C. 207 Post Employment Analysis Worksheet

Employee Name: Ken Dickens/Supervisory Counsel

18 U.S.C. 207(a)(1) and (a)(2)									
	Yes X	No No restrictions apply							
1. Did employee's duties involve any specific party matters? <i>(If yes, list them below.)</i>	X	No No restrictions apply							
2. List of specific party matters. <i>For each indicate whether the employee either participated personally and substantially in the matter, or (if a supervisor or manager) had the matter pending under his/her official responsibility during the last year of service.</i>	Personal and substantial participation (a)(1)	Pending under official responsibility <i>(during last year)</i> (a)(2)							
Wellness Pharmaceutical Compliance Investigation	Possibly If Ken directly and actively supervised his staff (a)(1) trumps (a)(2)	Possibly If was pending during last year before termination AND Not subject to (a)(1)							
3. Identify employee's post government employment <i>(if known).</i>									
Wellness Pharmaceutical									
Post employment matters-- <i>For any matters identified indicate whether they are the same particular matters as any listed above. If the same, decide whether any proposed activities would involve a prohibited communication/appearance.</i>	Communication Appearance with Intent to Influence	To or Before U.S.	On Behalf of 3rd Party						
<table style="width: 100%; border: none;"> <tr> <td style="width: 35%;"></td> <td style="text-align: center; font-size: small;">Same particular matter Yes No</td> </tr> <tr> <td>1. Coordinate company's regulatory program (will involve submissions to governmental regulators).</td> <td style="text-align: center;">Not for regulations</td> </tr> <tr> <td>2. Point person for all communications regarding compliance with regulatory requirements.</td> <td style="text-align: center;">Possibly</td> </tr> </table>		Same particular matter Yes No	1. Coordinate company's regulatory program (will involve submissions to governmental regulators).	Not for regulations	2. Point person for all communications regarding compliance with regulatory requirements.	Possibly	Unless communication is somehow related to the same investigation, regulations not subject to (a)(1) or (a)(2) bars Only those in connection with same investigation subject to (a)(1) or (a)(2) bars	Any Dep't or agency including FDA/HHS/DOJ & Fed Court, etc.	Any comms as employee of Wellness
	Same particular matter Yes No								
1. Coordinate company's regulatory program (will involve submissions to governmental regulators).	Not for regulations								
2. Point person for all communications regarding compliance with regulatory requirements.	Possibly								
4. Is there an exception? (list activity)	5 CFR 2641.301								