good afternoon and welcome back to the national government ethics virtual summit I'm Patrick Shepherd and I'm Ryan

0:34

Siegrist and we're going to be covering the second part of our four-part gifts online presentation that's right we'll

0:41

be continuing our orientation to the regulation we understand a few folks had some difficulty with the earlier

0:46

broadcast we had a little bit of difficult routing the broadcast so if you missed that that's now available on

0:52

the homepage of the youtube channel so that's youtube.com slash OGE institute

0:57

no space so if you missed that you can go back and take a look during these

1:02

four sessions Ryan we are going to be discussing the gift exceptions which are the exceptions to the general

1:08

prohibition that's right and and this is intended to be more of an orientation to

1:13

the regulation more so than a practical application of it yeah so in the spirit of our new ethics official track what

1:20

we're doing here is providing an orientation making sure that everyone is aware of the exceptions that are available and again these are exceptions

1:27

right these are other exclusions from the definition though we may talk about those tomorrow right and we get there

1:33

after we talked about the general prohibition and I guess we can take a little bit of time and reprise our

1:38

conversation about the advice and counsel process in general as well as the gifts micro process for those of you

1:43

who missed it and then we'll get into the three exceptions that we're going to discuss today which include gifts based

1:49

on outside business and employment activities I gifts associated with political activities and the final one

1:56

which is social invitations oft forgot the very gospel you know social

2:02

invitations so those are the three that we're going to be covering this afternoon and then tomorrow back for

2:07

widely attended gatherings which is what we're going to cover solely in the morning that is all that we're going to talk

2:13

the morning and then in the afternoon tomorrow we'll have some miscellaneous provisions sort of a a poo pourri of

2:21

gift related ideas that uh that will complete our orientation to the rec a

2:27

cornucopia if you will cornica of the election ease yes that that we often

2:34

don't see but it's still very important to know that they're there should something ever come up yeah and I think

2:39

this is going to be a great resource for folks in the future so if you have new as official starting in the near future

2:44

or in the distant future this set of presentations can serve as a good starting point for those who are new to

2:51

advise and counsel on gifts issues so should we for those of us who are joining us for the first time today

2:56

let's go ahead and reprise our discussion briefly about the advice and counsel process in the gifts micro

3:02

process excellence so again we have our advice and counseling spheroid yes so we

3:09

have it take is not a linear process it is not a numbered process because it's often the case it's almost universally

3:16

the case we talk to employees that we don't just go in a row we don't start

3:21

with a perfect fact pattern and then do a perfect analysis and they create an opinion right you can't approach advice

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and counseling is a teleological affair now so we're gonna have some back and forth and in fact one of the gifts of

3:32

experience is the ability to better spot issues and better see the facts that you

3:38

don't have that you need in order to thoroughly respond to an employee's inquiry right and as you become as you

3:44

become more seasoned not only spotting the issues but also ways of getting getting the facts because often times

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you will get the facts and you will apply the rules the facts and then the employee will come back and say oh wait

3:56

I forgot about this that's right that changes everything and you have to spin the wheel again exactly where you send

4:01

off the opinion and you email back 30 seconds later oh and i forgot to say that perhaps it was important well of

4:07

course it was important right it usually is but with experience you'll be able to see those issues coming and maybe take

4:13

care of them a little more not efficiently and we are going to be pointing out some traps for the unwary

4:18

as we go through our presentation today morrow so that you know there are some

4:24

areas where you know they're there are some some traps that are hidden within the exceptions and we can point those

4:29

out to you so that you know what to ask and you see the issues coming better than you would otherwise we'll also

4:35

share with you some frequently asked questions that we get with these some some classic misconceptions if you will

4:41

about some of these things those are numerous maybe someday we should do a show just about classic misconceptions

4:47

with the ethics rules I think that's a great idea all right should we talk about the microprocessor yeah let's go ahead and go down to that all right so

4:53

that was the advice and counsel spheroid which is a process in the sense that it

4:58

has parts that we need to be aware of and apply you know in in a useful way so

5:04

that we can mature completeness of our advice but we have what we call the gifts micro process we call it a

5:10

microprocessor both because it's a fairly short process and also because it exists within that process for general

5:16

advice and counsel and it also if you're doing it also is a subprocess and many

5:21

other kinds of analyses you might do like outside activities for example that's right so this is a constituent

5:26

process that applies only to subpart B yeah here's from outside sources regulation and it consists basically of

5:33

three points and the first part is is it a gift which seems like a sensible place to begin right so the first thing we

5:39

have to determine a do we have a gift and we have a definition at with it within our regulations and this is a

5:46

call again for those of you who have do not have your regulate regulations handy

5:52

you should get them right now we're looking at some part b of 5 CFR 26-35

5:57

and here we're at 26-35 2 or 3 v's where we find our definition of a gift and we

6:03

have a general definition which is inclusive of virtually every object on the planet right and then we have some

6:08

common sense exclusions from the definition mm-hmm and those exclusions are things that are not ifs for purposes of the rule right in as we mentioned

6:15

earlier this morning we're not when we say the word gift we're only talking about gifts for purposes of the rules so

6:22

there is a there it is not the what we

6:27

would normally think of as a gift it is within the bounds of the regulation that we're talking that's right and there's

6:33

those exclusions are things that are gifts so we don't have to determine whether or not they're prohibited which is the

6:38

second prong of our analysis which is going is the gift of prohibited gift and the gift can be prohibited for two

6:44

reasons well one of them is uh if it's from a prohibited source right and if I

6:50

remember right you can tell me if I'm wrong Patrick of prohibited source is a sort of generally to sort of match everything together a little bit as

6:56

someone who has business before seeks business uh before the agency or has is

7:03

seeking to to get some sort of official action from the agency that's right so

7:08

yeah so someone who's seeking business with the agency someone who's doing business with the agencies was regulated by the agencies once business before the

7:15

agency and we also have those I'll what we call quote unquote bad prohibited sources right those are the ones where

7:21

an employee employees personal actions meaning that that person themselves can

7:27

do something that could affect the interests of their their government position can write that the performance or nonperformance of their government

7:33

job could affect the interests of the organization or person right we call those a battery source but for purpose

7:39

of the general prohibition they're just prohibited sources and you're a gift to be prohibited it only needs to satisfy

7:44

one of those criteria right right well we also will we also forgot to mention

7:50

the second horn o which is which is gifts given because of an employee's official position that's right so either

7:55

gifts from bourbon sources regardless of the motivation right ah are prohibited

8:01

mhm as well as gifts from any person regardless of their relationship to the agency if it's given because of their

8:07

official position and the question I'd like to ask there is you know but for your federal job with this gift be on

8:14

offer right if the answer that question is it would not I think we're fair to

8:19

say at least provisionally that that probably meets the probation so let's say we have something that is a gift it

8:25

meets the definition oh hi it is being offered either from a prohibited source or because of an official position or

8:32

both oftentimes it's both but we think that I it might be useful to accept that gift anyway that's where we come to our

8:39

exceptions right and the three we're going to talk about today are the three that we're going to talk about today our

8:44

gifts given because of outside business or employment relationships very common comes up all the time very important to

8:50

know about we are also going to talk about political gifts pursuant to hatch

8:55

act activities okay so gifts permitted associated with activities permitted by the patch act right and also we're going

9:02

to talk about social invitations which is a oft overlooked but very useful

9:08

exemption very useful and this is going to be one place where want to be very careful about which prohibition were applying right okay fantastic should we

9:15

get into it uh yeah uh real quick before we before we move on the within the

9:22

materials for this which are posted on the watch now Paige I know Gigi's website we do have the materials for all

9:29

of our virtual sessions up which includes this reference guide for analyzing gifts it's very useful it's

9:35

got that gifts micro process on it and it's also got some advice and counsel

9:40

tips yeah nuts a great job job II do not encourage you to use that in conjunction with your regulations when advising

9:45

employees mm-hmm all right okay so we're going to talk about gifts based on outside business or employment

9:51

relationships I think I'm gonna go ahead and find that one first so we're at 26-35 204 e if I remember correctly oh

9:59

you do remember correctly alright and this is another exception that's composed of exceptions mm-hmm so these

10:06

not singular in its scope right it's got its got multiple parts yeah and I think you know with this and why the attendee

10:12

gatherings and a number of others that's something to be very careful about even

10:18

awards Monterey degrees is a two-part exception not so you know when we're thinking about these things remember that their constituent parts to sign

10:25

these all right so um an employee can accept meals lodging transportation

10:30

other benefits okay so k that's what we're talking about meals lodging transportation other benefits which are explicitly included in our general

10:37

definition of gift mm-hmm but we're limited then two meals lodging transportation and other benefits

10:42

resulting from the business or employment activities of the employees apps okay but we have a caveat here

10:50

going around yeah we do it says when it is clear that such benefits have not been offered or enhanced yes because of

10:57

the employees official position alright so if I'm employees spouse has an outside business relationship

11:04

like a job mm-hmm and they're being offered things uh you know as a result

11:09

of that employment relationship or other business relationship and those benefits are being certain that this to the spouse was a government employee also

11:15

it's permissible for the employee to accept those benefits provided they're not all further enhanced because of the

11:21

official position so what if we what if we tell a story real quick about this let's see how see if a story would be

11:27

helpful here so let's say that let's say that I have let's say that I have a spouse who works for a defense

11:32

contractor okay and they're doing a big company annual gala okay and she is

11:39

obviously invited because she's an employee at the defense contractor right and she's allowed to bring her spouse or

11:45

other guess one with her okay and she very nice to chose me okay am I allowed

11:50

to am I allowed to accept that gift I i think that's that's the sort of benefit

11:55

that we're looking at when we talk about e1 is where we're looking to benefits offered in conjunction with outside

12:01

employment so or outside employment he's an outside business relationship right this is a gift being extended to the

12:07

spouse as well as to you the employee I guess the only question we have for the

12:13

thing we have to find out is whether or not that benefit is being offered or enhanced because of your official position so I guess what I want to know

12:19

is whether or not other guests or spouses are going to be in attendance and whether you're getting any special

12:26

benefit because you're an employee of our agency so let's say for example that you know they the invitations been

12:33

extended to me and we find out a little bit later on that they found out that I'm a federal employee and they love

12:39

federal employees and they're going to you know put me put me on the special table with the open bar I think you know

12:47

that might be a case where we have a nun enhancement to the benefit because of your official position and we wouldn't

12:52

want to use e 1 in that case however if I you were getting the same deal everyone else was getting you know your

12:58

5 drink tickets and a seat at a table and the meal entertainment I think would

13:03

be just fine there so I think that'll be the operative question whether or not you are getting a special benefit because you are a federal employee or

13:10

because of your official position okay that seems pretty straightforward and I think you'll take it to common sense exception yeah that allows people to

13:17

participate in in customary events mm-hmm well customary events or that you

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know events you know honoring the achievements of your spouse you know

13:29

another employment related situations right events entertainment travel

13:34

etcetera suit mm-hmm go on a business trip with your spouse if it's expected that spouses will attend right those kinds of things so we have a second part

13:42

to this though yes and a third one I know look at the second one first yeah I think this one's the easier one okay so

13:49

this one this one is a resulting from his outside business or employment activities when it is clear again that

13:55

such benefits have not been offered or enhanced because of his his official status so this is the employee him or

14:01

herself right and they're outside business relationships so let me see if I can give us an example that will help

14:07

okay so say you have a outside business

14:14

what kind of outside business would you like to have right let's say that lets say the is is part of my outside

14:19

business i'm an employee of I let's say

14:25

that I moonlight is a is a long contractor or something like that okay so so Ryan has an outside business in

14:31

the contracting and lawn care industry mm-hmm um and let's say your clients or

14:37

people you serve in invite you to their Christmas party because you know you're

14:42

one of the contractors for service providers or something like that yeah um so you would be able to maybe accept

14:49

that gift notwithstanding the fact that that client may be a primitive source of our agency is that kind of what we're

14:54

getting at here yeah I think that is what I think that is what we're getting at as long as as long as it you know I

15:00

don't get the I don't get the extra big piece of Turkey right exactly so as long as you're not receiving an enhancement

15:06

to the benefit because of your federal position right also sorry let's take

15:12

another example let's imagine that you're still in the long hair industry you have an outside business taken care of lawns and you are one of several

15:19

contractors that work for golf course helps take care of the golf course and they have a golf tournament for their

15:25

service providers oh nice also you can go and participate in that if you were getting the same benefit of

15:30

all the other service providers were receiving right as long as they didn't find out later that I was a federal employee and or beforehand yeah we're

15:38

beforehand it might be a set of clubs for free that not not anybody else got right so what we're looking for is an

15:43

enhancement bona fide gifts associated with outside employment our business

15:49

activities were permissible yeah and again this is an exception so it doesn't mean we have to accept these gifts in all cases which means that there's an

15:55

exception available that we can choose to exercise our words prudent reducer right it's not necessary to use it it's

16:01

not an on/off switch where it must be used every time right probably we have

16:07

III and I think this this one gives people a lot of trouble I think this is a tough one and it's an interesting

16:13

balancing act here so what does III uh provide for us so so III is uh what

16:20

we're talking about and this one is gifts that are customarily provided by a

16:26

prospective employer in connection with bona fide employment employment

16:32

negotiations okay and it says first we have to comply with the requirements of

16:37

subpart F right so that means that we're going to have to recuse under the sea negotiating regulation I if I mean in

16:45

the case that our prospective employers are people that we could affect with our official activity right so let's say

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we've taken care of all of those requirements to recuse and put the recusal place another file the necessary people and the screening arrangements in

16:58

that so we've complied with sub part of the standards so we can accept gifts that are customarily provided by the

17:04

employer to prospective employees I think here is to prospective employees

17:10

but I think here is an important thing in connection with bona fide employment discussions we have to be discussing

17:17

negotiating for opposition right so this isn't oh yes then you shouldn't be

17:22

circumventing this by having pretend employment discussions yeah it should be real employment discussion the employment junket junket with an

17:29

intentional yeah moving towards an actual position and it says customary so

17:36

we can accept these benefits for its customer and I think this is where people get a little heartburn over this and I think they

17:42

early and yeah there's a balancing act that we are were we're doing here and that's between the employees ability to

17:50

seek outside employment to find employment after they leave the government and the government's interest

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in maintaining the impartiality of our employees right and that's always challenging when you have someone who's

18:01

looking to leave government service and go into into private industry or other parts of the economy but particularly when you're looking at like senior

18:08

executives in the government who are thinking about moving into senior executive positions at fortune 500

18:14

companies or industries this can become mmm so let's take this as an example I

18:21

think this is where things get tricky let's say we have an economist who works for agency and the economist is looking

18:28

to move on to that the banking sector okay and they have been in discussions

18:35

with a number of large firms Lord Wall Street firms for weeks or months and

18:42

they've interviewed and one of the firm's is very interested and asked them to come to manhattan to spend a week for

18:49

a second interview to meet the executive team to meet some clients and stakeholders also let's sit let's add a

18:54

wrinkle to it and say to go around the city a little bit let's say that yeah let's do it a little bit of selling the

19:00

city too that's right okay so so this isn't unusual where we would have someone at a senior level in government

19:06

are you thinking about going to a senior level in private industry so they're going to travel they're gonna stay at

19:12

going to stay at the Ritz we are going to be driven around they're going to meet with executives they're going to

19:18

have some interview type things they're going to talk about business strategy they're going to attend some

19:23

entertainment events maybe they're going to go to a Broadway show perhaps are going to go to a number of dinner

19:29

parties these kinds of things yeah that's that's a lot of gifts that is an extravagant package maybe the spouse is

19:35

also going to attend they're going to be toured around oh yeah and all these kinds of things but these are not

19:41

uncommon at the executive level and sometimes you have the firm wants to sell the city and the firm to the

19:47

employee another thing that I've had prospective employers tell us that excels is that seeing the first

19:55

active employee in social social situations is important to the job as an

20:02

executive part of your job is to go to Broadway shows is to go to receptions and network and talk with clients the

20:08

schmoozing part there's moving part yeah it can be a very important part of the job and is in how I would it how an

20:14

applicant or our prospective employer e works out in those situations is critical to our hiring process mm-hmm so

20:21

what do we do here it looks like if that's what they do for everyone at this level if that's the typical way the

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employer vets candidates for for these kinds of positions that that's

20:31

permissible under III can that be right well provided that we've complied with

20:37

everything under subpart F yeah if that's what they customarily do if

20:43

that's what they do for every executive that there that they're trying to hire mm-hm then yeah they could accept those

20:49

gifts interesting but I think we'd have a problem and this is a this is another issues you know if are employed sites to

20:55

decline this offer from limit or an offer doesn't materialize I'm staying with the agency I'd have a very hard

21:02

time removing the refusal under subpart F for quite a while I I would to be very

21:09

uncomfortable with them participating in government matters that would affect the financial interest of that prospective

21:14

employer given they receive all these gifts and maybe even more so because a job offer either didn't materialize or

21:21

was rejected by the employee so that could pose a problem for us as an agency

21:26

right there's a like there's two sides of this point right so there's that there's the side where we would worry

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that you know the employees impartiality would be affected because of all of the gifts even though they didn't end up

21:37

taking taking the position they may think very kindly right of this company

21:43

that's right huh you know for the helicopter ride around Manhattan yes but there's also the other side of it which

21:48

I like to call the sour grapes right side of it where you know they went out and accepted all of these gifts and

21:54

offered it materialized and they are feeling very snubbed and so now they're going to look very unkindly on this

22:00

company yeah so you know that's that's going to be an issue and I think this is a place where when you're counseling employees you know it's not our place to

22:07

get in the way air of their they're seeking outside employment we want to make sure the

22:12

safeguards are in place to protect the government and integrity of their processes but we we have to find ways

22:18

for people who have a if they desire to move on to outside employment we shouldn't impede that process but also

22:25

we should make employees aware of the consequences of accepting some of these gifts because I think in this case if or

22:30

employee was like maybe one percent a possibility that they would think about

22:36

accepting this job that they're just sort of doing an exploratory search and that realistically they don't think

22:41

they're going to end up in this position that they think they can stay with the government might ask them to consider that because there will be consequences

22:47

when they come back in the form of refusals that will have to go on for some time right because of the

22:53

acceptance of the gift in that in the negotiations yeah so that's a tricky one and I think that's maybe a little a

23:00

little counterintuitive for some folks but again with e we have the three permissions we have spouses outside

23:06

business relationship that's current business relationship the employee him or herself having outside business

23:11

relationships in jeff's associated therewith and finally III which are the gifts associated with the employment

23:17

seeking process by current federal employees so if you have those kinds of scenarios remember that you have on

23:23

point set of exceptions one thing real quick we also have it at Eve for just a note here that says for purposes of the

23:31

paragraphs that we just discussed a 1 through 3 that employment is going to be

23:36

defined at 26-35 603 a so go back and

23:42

take a look at take a look at that definition whatever you have to consider any of these and that's a good thing to note that when we only cross-reference

23:48

definitions yeah alright well it's good to know that those are there and it's always good to get there because

23:54

sometimes I find we have students who especially with respect to e 1 I want to

24:00

try and use the exception for personal gifts or gifts from you know friends and family mm-hmm and e 1 is actually in

24:07

some ways a better one when it fits right I'll always remember to consider that when you're talking about gifts

24:12

associated with the spouses outside employment activities so should we move on to Gibson

24:17

connection with political activities permitted by the hat jacket form yeah and I think I you know this is going to

24:23

be a fairly brief discussion where we've made a carve-out for other statutory authorities mm-hmm right so that the

24:30

Hatch Act for those of you who are maybe new to the practice and don't know about the Hatch Act is the law that governs

24:35

political activities by federal employees right and there are all sorts of categories of federal employees and

24:41

degrees to which they can participate in the electoral process and what we've done here is sort of Korra out and then

24:49

made sure to be respectful of the rights convened by the Hatch Act to certain categories of employees yeah so so

24:55

basically all we're saying is that in that if there is an employee who is acting in accordance with the Hatch Act

25:03

in participating in playing an active part of political management our political campaigns yeah they can accept

25:09

that you know meals lodgings transportation other benefits including free attendance at events when provided

25:16

in connection with that act of participation which they're allowed to have under the Hatch Act this is a lot like e to but it's for specifically for

25:24

these kinds of permitted political activities right looks like an outside business relationship but outside

25:31

political relationship as permitted by the Hatch Act we can do the same thing that we can do under a 2 mm-hmm and just

25:36

as a also as a separate note to this any ancillary personnel such as a security

25:43

detail or that sort of thing that are that are going along with this employee can also accept those gifts yeah

25:48

provided that the official duties require him to be accompanied by that person right so you know this is

25:53

something to be mindful of when you have politically associated gifts you're going to want to be very careful

25:58

probably start your analysis in these cases with the hatch act itself yeah and then you can come back here and see the

26:04

carve out the doji is providing a support be that allows for the acceptance of those associated gifts yep

26:10

upper the meat of your analysis here is probably going to be under the hatch act itself mm-hmm and if you need guidance on that you can find that at the office

26:17

of special councils website which is OSC Gulf

26:22

okay so that that was very brief that was quite brief but it's important to know that that's there and this is

26:28

another case where you might get to e2 first and try using e2 when the exception of F is one point mm-hmm so

26:36

let's go ahead and move on to the next one which we're not doing today yes tomorrow we're going to be talking about

26:42

wisely attended gatherings right and the reason why we're why we're skipping that one today is because we want to focus exclusively on those tomorrow it's a

26:51

it's a kind of a gnarly process to run through to do an analysis of these with many different branches depending on

26:58

what kind of widely attended gathering it is so and if it was really important to you that you learn about wax right

27:04

now today last month we did a session on widely attended gatherings that's right and you go listen to it or watch it

27:10

right now uh-huh and that one actually offers some practical application if you want yeah that was one of our massive open online courses so if you're really

27:18

interested in on wax will have a brief introduction tomorrow if you're still interested you want to learn more you

27:23

can attend our massive open online course which is available on both the Google+ and YouTube channels right

27:29

alright so we'll do that tomorrow we promise and then we have today just the

27:36

last one the oft-forgotten and very useful social invitations and this is

27:41

one of those cases where we want to be very careful about the general prohibition and the general prohibitions

27:47

are too yes right that's right there is you're prohibited from accepting a gift

27:52

or soliciting a gift from a prohibited source or one that would be given because of your official position okay

27:58

cool with that mm-hmm and this one only applies for gifts that meet one of the two prohibitions so if we have gifts an

28:04

offer or an invitation that is from a primitive source we can't use age right right and if it's from a permanent

28:11

source and because of the official position still can't use each right the only time we can use H is if it's an

28:17

offer of an invitation through an employee mm-hmm from a non prohibited

28:23

source right so that would be the case where it's given because of the official position but not from appropriate source mm-hmm all right so let's take a look at

28:30

it okay so an employee may accept food

28:35

refreshments and entertainment not including travel or lodgings that's important to remember this is different

28:40

from E and F right not talking about travel and lodging here mm-hmm okay at a social event attended by several persons

28:47

where the invitations from a person who is not a primitive source so again not a

28:52

primitive source very important and and no fee is charged to any person in

28:58

attendance so Cheryl has a name that she likes to use for this exceptions heroes duh the Washington hostess or host

29:05

exception I think she's also referred to it as the the Georgetown socialite I yes

29:11

there is that if you're invited to a dinner party mm-hmm or a cocktail reception from someone other than a

29:18

primitive source but it's being offered because you're an important person here in Washington that's what H would allow

29:25

us to accept it's all right that's right so there's no fee being charged we have to establish that first lie and then it

29:31

has to be from someone other than a primitive source right so it's pretty straightforward but I find in a lot of

29:36

cases ethics officials will jump straight to the widely attended gathering exception mm-hmm and go to work doing that analysis which you if

29:45

you can use the social invitation exception you have saved yourself hours right if that's not necessary I that

29:51

social invitation can be a lot simpler mm-hmm and also for smaller gatherings that typically wouldn't qualify for a

29:58

while they attend to gathering authorization right H can be applied so you know a dinner party of five or six

30:04

people might not qualify as a wag but I could be captured underage provided it's

30:09

not being offered by private source and no fee is charged until fee is charged so that's a really good one to know

30:15

about and keep in mind so if you're new to advising employees on gifts do remember that this is here and I think

30:21

it's it once you get here it's pretty straightforward yeah as long as you keep straight the general prohibition your

30:26

mind that there are you can't accept gifts from permitted sources or given because of your official position mm-hmm and we're only talking about gifts

30:32

because of official position here right if they're from a prohibited source we have to look somewhere else like maybe to the widely attended gathering

30:38

exception or it may not be possible to accept the gift right okay so I'm that's

30:44

a lot of ground that is a lot of ground an awful lot of these already already today excellent we're looking forward to

30:51

joining you tomorrow to discuss widely attended gatherings and we're also going

30:56

to be discussing a sort of the cornucopia of other issues with the gift

31:02

regulation so we have some some completeness with our discussion in orientation to the regulation ones that

31:08

come up pretty rarely unless you're in specialized circumstances but it's still

31:14

very good for you to know about and again other recordings of these presentations will be available on Google+ YouTube for posterity so if you

31:21

missed one or both or you can't make one tomorrow fee or not they will be available later and again thank you for

31:27

your patience with the previous broadcast we had some problems routing that but now that should be available on the the YouTube homepage xq tube com /

31:34

Gucci Institute no space and just before we go I'd like to remind everyone that

31:40

tomorrow will again we'll be covering wags in the morning starting at eleven o'clock and we'll be talking about the

31:47

rest of the gift exceptions at one on Friday the 19th will be live streaming of forum day too so we'll be live at NIH

31:55

providing you up-to-the-minute commentary and interesting interviews

32:00

with the speakers and other participants there that's right that should be very exciting on the twenty-second that is

32:06

next Monday will be holding two more virtual sessions on some fairly advanced topics will be having a oh geeez on

32:14

Monica Asher coming in to talk about regulations for non-career employees and

32:20

we'll also be talking about how to brief ethics how to brief senior officials

32:26

about ethics and then finally on the twenty-third we will be closing out the national government ethics virtual

32:32

summit with a live stream formed a 3a formed a three live at FHFA yeah we have a great list of guests for formed a

32:39

three a lot of folks from the outside who you may not have heard from before and look forward to bringing you those

32:44

presentations yeah excellent well thanks very much Ryan and thank all of you for joining us and on behalf of OG in the

32:51

National virtual national government ethics virtual summit I Patrick ever and I'm Ryan Siegrist thanks Patrick

32:59

you