




This slideshow presents only a summary of the Code of Official Conduct (Senate Rules 34-43) prepared by Committee staff. For more complete information or advice about specific fact situations, please consult the Senate Ethics Manual, or contact a Committee counsel at (202) 224-2981.

	<p><b>Slide 1</b></p> <p>NOTES:</p>
	<p><b>Slide 2</b></p> <p>NOTES:</p>
	<p><b>Slide 3</b></p> <p>NOTES:</p>

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Select Committee on Ethics  
United States Senate

**Individual Certification of Completion of Ethics Training Requirement**

All Senate Members, Officers and employees (including Senators and Officers) After you have attended/viewed the entire comprehensive ethics training session/video provided by the Select Committee on Ethics, you must complete and sign this form and promptly submit the form to the Ethics Certification Officer (ECO) for your office.

For employees completing the ethics training requirement by viewing the Select Committee on Ethics' training video, you must also have your ECO (or for Staff staff, your State Director, Regional Director or equivalent supervisor) verify your viewing by signing this form.

I, \_\_\_\_\_ hereby certify that I have attended/viewed the entire  
(print full name) (initials and date)  
comprehensive ethics training session/video provided by the Select Committee on Ethics.  
(initials and date)

Date attended/viewed training: \_\_\_\_\_ (initials)  
Date commenced Senate service/employment: \_\_\_\_\_ (initials)

Employing Senate Office: \_\_\_\_\_ (initials)  
Name of Supervising Senator/Officer: \_\_\_\_\_ (initials)  
Office Address: \_\_\_\_\_ (initials)  
Office Phone Number: \_\_\_\_\_ (initials)

Signature _____	Date _____	Signature of ECO/Supervisor _____	Date _____
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Required for all Members, Officers and employees  
Required for verification of training requirement fulfilled by employees through video. State or Regional Director, or equivalent supervisor, may verify that one meets this requirement of completing requirement.

12/87

This category of information on date of commencement of Senate service/employment is to be provided by all Senate Members, Officers or employees beginning Senate service or employment in calendar year 2008 or after.

**Slide 4**

NOTES:

US Senate Select Committee on Ethics

**CODE OF CONDUCT**

**All new Senate personnel must obtain the mandatory Code of Official Conduct training within 60 days of coming on staff.**



**Slide 5**

NOTES:

US Senate Select Committee on Ethics









**COMMITTEE MEMBERS**

 Barbara Boxer California <i>Chairman</i>	 John Cornyn Texas <i>Vice Chairman</i>		
 Mark Pryor Arkansas	 Ken Salazar Colorado	 Pat Roberts Kansas	 Johnny Isakson Georgia

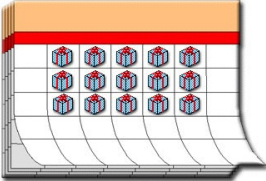


**Slide 6**

NOTES:







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  <h1 style="text-align: center;">Rule GIFTS 35</h1>	<p><b>Slide 7</b></p> <p>NOTES:</p>
  <h2 style="text-align: center;">NO GIFTS FROM LOBBYISTS</h2> <p>Members, officers, and employees of the Senate may no longer accept any gift from a registered lobbyist or foreign agent, or an entity that employs or retains the same, unless a specific exception to the Gifts Rule applies.</p> 	<p><b>Slide 8</b></p> <p>NOTES:</p>
  <h2 style="text-align: center;">GENERAL RULE</h2> <p>If not a lobbyist or foreign agent, or entity that employs or retains a lobbyist or foreign agent.</p> <ol style="list-style-type: none"> <li>1. One time limit - \$49.99</li> <li>2. Yearly aggregate limit - \$99.99</li> <li>3. "no limit" - \$9.99 or less</li> </ol> 	<p><b>Slide 9</b></p> <p>NOTES:</p>


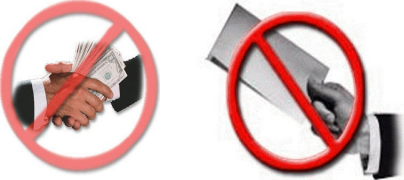

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<p>US Senate Select Committee on Ethics</p> <h2 style="text-align: center;">REPEATED SMALL GIFTS</h2> <p>Should not repeatedly accept small gifts otherwise permitted by the Senate Rules from the same donor</p> 	<p><b>Slide 10</b></p> <p>NOTES:</p>
<p>US Senate Select Committee on Ethics</p> <h2 style="text-align: center;">VALUATION OF GIFTS</h2> <p>General Rule is <b>FAIR MARKET VALUE</b></p> 	<p><b>Slide 11</b></p> <p>NOTES:</p>
<p>US Senate Select Committee on Ethics</p> <h2 style="text-align: center;">Valuation of Sports and Entertainment Tickets</h2> <ul style="list-style-type: none"> <li>☛ Value of the ticket is the face value of the ticket.</li> <li>☛ If the ticket has no face value, then the value of the ticket is the highest face value ticket for the event, unless Member or staffer can establish in <b>ADVANCE</b> with the Ethics Committee that the ticket has equivalent value to another ticket with face value.</li> </ul> 	<p><b>Slide 12</b></p> <p>NOTES:</p>

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 <p><b>WHO IS RESTRICTED?</b></p> <ol style="list-style-type: none"> <li>1. Members, officers, and employees</li> <li>2. Gift to a family member may be attributed to the Member, officer, or employee</li> </ol> 	<p><b>Slide 13</b></p> <p>NOTES:</p>
 <p><b>NO BUY - DOWN</b></p> <p>You cannot buy down a gift to bring it under the \$50 limit.</p> 	<p><b>Slide 14</b></p> <p>NOTES:</p>
 <p><b>AGGREGATION</b></p> <ul style="list-style-type: none"> <li>☞ Divisible Gifts can accept one and refuse or pay for the others</li> <li>☞ Gifts delivered to a Senate office (<i>Softball Rule</i>) may be aggregated and deemed one gift to the Senator</li> <li>☞ Food delivered to an office (<i>Pizza Rule</i>) is always considered a gift to the Senator</li> </ul>  <p>* <i>Pointer:</i> Even if food delivered to an office otherwise complies with the Rule, it may not be accepted if the person sending it has a direct interest in particular legislation that the staff is working on.</p>	<p><b>Slide 15</b></p> <p>NOTES:</p>



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<p>US Senate Select Committee on Ethics</p> <p><b>NO SOLICITATION EVER!!!</b></p> 	<p><b>Slide 16</b></p> <p>NOTES:</p> <table border="1"><tr><td> </td></tr><tr><td> </td></tr><tr><td> </td></tr><tr><td> </td></tr><tr><td> </td></tr><tr><td> </td></tr><tr><td> </td></tr></table>							
<p>US Senate Select Committee on Ethics</p> <p><b>May NOT accept cash or cash equivalent gifts.</b></p> 	<p><b>Slide 17</b></p> <p>NOTES:</p> <table border="1"><tr><td> </td></tr><tr><td> </td></tr><tr><td> </td></tr><tr><td> </td></tr><tr><td> </td></tr><tr><td> </td></tr><tr><td> </td></tr></table>							
<p>US Senate Select Committee on Ethics</p> <p><b>Some 20+ EXCEPTIONS TO GIFTS RULE</b></p> 	<p><b>Slide 18</b></p> <p>NOTES:</p> <table border="1"><tr><td> </td></tr><tr><td> </td></tr><tr><td> </td></tr><tr><td> </td></tr><tr><td> </td></tr><tr><td> </td></tr><tr><td> </td></tr></table>							

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  <ul style="list-style-type: none"> <li> <b>1. Gifts from Relatives</b> -35.1(b)(1)</li> <li> <b>2. Gifts Based on Personal Friendship</b> -35.1(c)(4)(A)</li> <li> <b>3. Gifts from Another Member or Employee</b> -35.1(c)(6)</li> <li> <b>4. Contributions to Legal Expense Trust Fund</b> -35.1(c)(5)</li> </ul>	<p><b>Slide 19</b></p> <p>NOTES:</p>
  <ul style="list-style-type: none"> <li> <b>5. Benefits resulting from outside business or employment activities</b> (i.e., spouse's law firm)</li> <li> <b>6. Pension and Other Benefits</b> - 35.1(c)8</li> <li> <b>7. Informational Materials</b> - 35.1(c)(9)</li> <li> <b>8. Awards or Prizes from Public Contests</b> -35.1(c)(10)</li> </ul>	<p><b>Slide 20</b></p> <p>NOTES:</p>
  <ul style="list-style-type: none"> <li> <b>9. Honorary Degrees and other Non-Monetary Awards in Recognition of Public Service</b> - 35.1(c)(11)</li> <li> <b>10. Home State Products for Promotional Purposes/Artwork</b> - 35.1(c)(12)</li> <li> <b>11. Officially-Connected Training in Interest of Senate</b> - 35.1(c)(3)</li> <li> <b>12. Bequests and Inheritances</b> - 35.1(c)(14)</li> </ul>	<p><b>Slide 21</b></p> <p>NOTES:</p>

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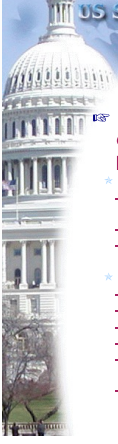
   <p><b>13. Anything (Officially-Connected) Paid for by Federal, State, or Local Governments - 35.1(c)(16) Native American Tribe</b></p>  <p><b>14. Personal Hospitality - 35.1(c)(17)</b></p>  <p><b>15. Widely-Attended Event</b></p>  <p><b>16. Free Attendance at a Charitable Event - 35.1(d)(3)</b></p>  <p><b>17. Attendance at a Fund-raising Event Sponsored by a Political Organization -35.1(c)(2)</b></p>	<p><b>Slide 22</b></p> <p>NOTES:</p>
   <p><b>18. Benefits Available to a Wide Group, Not Defined by Senate Employment - 35.1(c)(19)(A) or (D)</b></p>  <p><b>19. Commemorative plaques and trophies -35.1(c)(20)</b></p>  <p><b>20. Food and Refreshments Other Than As Part of a Meal -35.1(c)(23)</b></p>  <p><b>21. Items of Little Intrinsic Value - 35.1(c)(23)</b></p>	<p><b>Slide 23</b></p> <p>NOTES:</p>
  <p><b>New Exception:</b></p> <p><b>Free Attendance at a constituent event</b></p> <ul style="list-style-type: none"> <li>* must be in home state.</li> <li>* group primarily consists of constituents and at least 5 constituents present at event.</li> <li>* no lobbyist or foreign agent in attendance at event.</li> <li>* value of meal must be \$ 49.99 or less</li> </ul>	<p><b>Slide 24</b></p> <p>NOTES:</p>






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 <p style="text-align: center;"><b>TRAVEL RULES</b></p> <table border="1" data-bbox="240 426 740 693"> <thead> <tr> <th></th> <th>Lobbyists or Foreign Agents</th> <th>Entities That Do Not Employ or Retain Lobbyists or Foreign Agents</th> <th>501(c)(3) Non-profit Organizations That Employ or Retain Lobbyists or Foreign Agents</th> <th>Private Entities That Employ or Retain Lobbyists or Foreign Agents</th> </tr> </thead> <tbody> <tr> <td><b>Time Limits</b></td> <td>NO TRAVEL</td> <td>3 days domestic 7 days foreign</td> <td>3 days domestic 7 days foreign</td> <td>1 day/1 night</td> </tr> <tr> <td><b>Pre-approval Required</b></td> <td>NO TRAVEL</td> <td>Yes</td> <td>Yes</td> <td>Yes</td> </tr> </tbody> </table>		Lobbyists or Foreign Agents	Entities That Do Not Employ or Retain Lobbyists or Foreign Agents	501(c)(3) Non-profit Organizations That Employ or Retain Lobbyists or Foreign Agents	Private Entities That Employ or Retain Lobbyists or Foreign Agents	<b>Time Limits</b>	NO TRAVEL	3 days domestic 7 days foreign	3 days domestic 7 days foreign	1 day/1 night	<b>Pre-approval Required</b>	NO TRAVEL	Yes	Yes	Yes	<p style="text-align: center;"><b>Slide 25</b></p> <p>NOTES:</p>
	Lobbyists or Foreign Agents	Entities That Do Not Employ or Retain Lobbyists or Foreign Agents	501(c)(3) Non-profit Organizations That Employ or Retain Lobbyists or Foreign Agents	Private Entities That Employ or Retain Lobbyists or Foreign Agents												
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<b>Pre-approval Required</b>	NO TRAVEL	Yes	Yes	Yes												
 <p style="text-align: center;"><b>TRAVEL REVIEW PROCESS AND REQUIRED PUBLIC FILINGS</b> (for privately sponsored travel)</p> <p style="background-color: yellow; border: 1px solid black; padding: 2px;">Must submit a completed travel package to the Ethics Committee no later than 30 days prior to the travel departure date.</p> <p><b>Travel Package must include</b></p> <ul style="list-style-type: none"> <li>★ A copy of the invitation from the sponsor.</li> <li>★ A copy of the signed and completed "Private Sponsor Certification Form" with any attachments.</li> <li>★ A copy of the "Employee Advance Travel Authorization and Disclosure Form" with Part I signed by the employee and supervising Senator/Officer.</li> </ul>	<p style="text-align: center;"><b>Slide 26</b></p> <p>NOTES:</p>															
 <p style="text-align: center;"><b>TRAVEL REVIEW PROCESS AND REQUIRED PUBLIC FILINGS</b> (for privately sponsored travel)</p> <ul style="list-style-type: none"> <li>⌚ Within 30 days of returning from trip original documents must be filed with Office of Public Records (OPR) in 232 Hart.</li> <li>⌚ Senators/Officers follow the same procedure <b>except</b> they are required to complete a "Disclosure of Travel Expenses" form rather than a staff travel form.</li> <li>⌚ Incomplete travel packets or complete travel packets submitted later than 30 days prior to travel departure date will <b>not</b> be considered or approved.</li> </ul>	<p style="text-align: center;"><b>Slide 27</b></p> <p>NOTES:</p>															





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 <p style="text-align: center;"><b>TRAVEL RULES</b></p> <ul style="list-style-type: none"> <li>ESF Travel must relate to Senator's / Officer's / staff member's official duties.</li> <li>ESF Senate invitees may not participate in trips planned, organized, arranged or requested by a lobbyist or foreign agent.</li> <li>ESF Travel expenses for a Senate invitee's spouse or child (but not both) may be permissible if the family member has received an unsolicited invitation from the sponsor and the supervising Senator determines in advance and in writing that the spouse or child's attendance will assist in representing the Senate.</li> </ul>	<p style="text-align: center;"><b>Slide 28</b></p> <p>NOTES:</p>
 <p style="text-align: center;"><b>TRAVEL RULES</b></p> <ul style="list-style-type: none"> <li>ESF For all trips other than one-day trips paid for by sponsors that employ or retain lobbyists or foreign agents, a lobbyist or foreign agent may not accompany a Senator, Officer, or staff member "at any point throughout the trip."</li> <li>ESF Lobbyist accompaniment is forbidden on any parts of the travel to and from the event, as well as at the event itself or location being visited.</li> <li>ESF For one-day trips paid for by sponsors that employ or retain lobbyists or foreign agents, a lobbyist or foreign agent may not accompany a Senator, Officer or staff member on "any segment of the trip."</li> <li>ESF "Any segment of the trip" means any parts of the travel to and from the event, rather than the event itself or the location being visited.</li> </ul>	<p style="text-align: center;"><b>Slide 29</b></p> <p>NOTES:</p>
 <p style="text-align: center;"><b>TRAVEL RULES</b></p> <ul style="list-style-type: none"> <li>ESF Acceptable sponsor may pay for the "necessary expenses" of travel for participating Senate personnel.</li> <li>ESF "Necessary Expenses" include:             <ul style="list-style-type: none"> <li>- Reasonable expenditures for transportation, lodging, conference fees and materials, and food and refreshments.</li> <li>- Coach rate</li> <li>- Expenses must be generally comparable to the maximum per diem rates for official government travel.</li> </ul> </li> <li>ESF Prohibited Expenses:             <ul style="list-style-type: none"> <li>- Charter airfare is prohibited for third party sponsored travel</li> <li>- Alcoholic beverages</li> <li>- Recreational activities</li> <li>- Personal expenses such as telephone calls.</li> <li>- Entertainment unless provided to all attendees as integral part of the event.</li> <li>- First class airfare without prior written approval from the Ethics Committee.</li> </ul> </li> </ul>	<p style="text-align: center;"><b>Slide 30</b></p> <p>NOTES:</p>






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<p>US Senate Select Committee on Ethics</p> <h2 style="text-align: center;">FOREIGN GOVERNMENT PAID TRAVEL</h2> <p><b>FGDA</b></p> <ul style="list-style-type: none"> <li>* Gifts as souvenir or mark of courtesy up to \$100</li> <li>* Travel expenses completely outside the US</li> </ul> <p><b>§ 108 MECEA</b></p> <ul style="list-style-type: none"> <li>* Program approved by the State Department</li> <li>* Travel must be disclosed on the Annual Financial Disclosure form, but not the RE -1/2 form</li> <li>* (Pre-approval not required)</li> </ul> 	<p><b>Slide 31</b></p> <p>NOTES:</p>
<p>US Senate Select Committee on Ethics</p> <h2 style="text-align: center;">National Party Conventions</h2> <p>During National Party Conventions for their respective political parties, a Member may not participate in an event honoring that Member, if such an event is directly paid for by a lobbyist, or a private entity that employs or retains a lobbyist, unless a Member is being honored as the Party's presidential or vice-presidential nominee or presumptive nominee.</p> 	<p><b>Slide 32</b></p> <p>NOTES:</p>
<p>US Senate Select Committee on Ethics</p> <h2 style="text-align: center;">GOLDEN RULE</h2> <p><i>Never accept a gift if it appears that it is given to influence or reward official action.</i></p> 	<p><b>Slide 33</b></p> <p>NOTES:</p>





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<p>US Senate Select Committee on Ethics</p> <p><b>BRIBERY VS. ILLEGAL GRATUITY</b></p> <ul style="list-style-type: none"> <li><b>Bribery</b> <ul style="list-style-type: none"> <li>is explicit <i>quid pro quo</i>; induces official action</li> </ul> </li> <li><b>Illegal Gratuity</b> <ul style="list-style-type: none"> <li>is a reward for favorable official action</li> </ul> </li> </ul>  	<p><b>Slide 34</b></p> <p>NOTES:</p>
<p>US Senate Select Committee on Ethics</p> <p>Political / Campaign Activity</p> 	<p><b>Slide 35</b></p> <p>NOTES:</p>
<p>US Senate Select Committee on Ethics</p> <p><b>GENERAL RULE</b></p> <ul style="list-style-type: none"> <li>Staff may participate in political / campaign activity: <ul style="list-style-type: none"> <li>on their own time</li> <li>with non-Senate resources</li> </ul> </li> </ul> 	<p><b>Slide 36</b></p> <p>NOTES:</p>




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 <p><b>"Regular" Senate Employee MAY NOT...</b></p> <ul style="list-style-type: none"> <li>☞ receive</li> <li>☞ solicit</li> <li>☞ be custodian of</li> <li>☞ or distribute</li> </ul> <p><b>... campaign funds of any FEDERAL candidate</b></p>	<p><b>Slide 37</b></p> <p>NOTES:</p>
 <p><b>Political Fund Designees = PFD</b></p> <ul style="list-style-type: none"> <li>☞ Senator may Designate up to 3 PFDs</li> <li>☞ at least 1 PFD must be in DC</li> <li>☞ PFDs must have salary of at least \$10,000</li> <li>☞ PFDs must file annual financial disclosure statement regardless of salary level</li> </ul> 	<p><b>Slide 38</b></p> <p>NOTES:</p>
 <p><b>PFD may handle funds for</b></p> <ul style="list-style-type: none"> <li>☞ principal campaign committee of the employing Senator</li> <li>☞ for a committee or organization established and controlled by a Senator or group of Senators <i>(with the employing Senator's permission)</i></li> <li>☞ state or local committee of a national party <i>(with the employing Senator's permission)</i></li> </ul> 	<p><b>Slide 39</b></p> <p>NOTES:</p>






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<p>US Senate Select Committee on Ethics</p> <p><b>PFD MAY NOT handle funds for</b></p> <ul style="list-style-type: none"> <li>☛ committee set up by a trade organization</li> <li>☛ interest groups</li> <li>☛ corporations</li> </ul>  <ul style="list-style-type: none"> <li>☛ labor unions</li> <li>☛ public policy or advocacy groups</li> </ul> 	<p><b>Slide 40</b></p> <p>NOTES:</p>
<p>US Senate Select Committee on Ethics</p> <p><b>What may a non-PFD do?</b></p> <ul style="list-style-type: none"> <li>☛ plan events or set-up for fundraiser</li> </ul> 	<p><b>Slide 41</b></p> <p>NOTES:</p>
<p>US Senate Select Committee on Ethics</p> <p><b>No Campaign Activity in a Federal Building - 18 U.S.C. Section 607</b></p> <ul style="list-style-type: none"> <li>☛ NO soliciting or receiving contributions in a federal building by any Member, officer, or employee</li> </ul> 	<p><b>Slide 42</b></p> <p>NOTES:</p>

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<p>US Senate Select Committee on Ethics</p> <p><b>No Campaign Activity in a Federal Building - 18 U.S.C. Section 607</b></p> <ul style="list-style-type: none"> <li>☞ Unsolicited Mail Containing Contributions</li> <li>☞ Unsolicited in Person Contribution</li> <li>☞ Mixed-Purpose Office Visit</li> </ul> 	<p><b>Slide 43</b></p> <p>NOTES:</p>
<p>US Senate Select Committee on Ethics</p> <p><b>Ban on Solicitation of Federal Employees - 18 U.S.C. Section 602</b></p> 	<p><b>Slide 44</b></p> <p>NOTES:</p>
<p>US Senate Select Committee on Ethics</p> <p><b>Ban on Political Contributions to Employing Senator - 18 U.S.C. Section 603</b></p> 	<p><b>Slide 45</b></p> <p>NOTES:</p>

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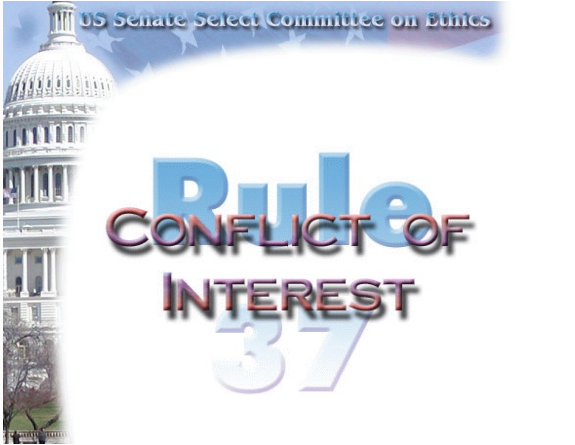


 <p><b>Mixed Purpose (Official &amp; Campaign) Letters/Phone Calls/E-mail</b></p> 	<p><b>Slide 46</b></p> <p>NOTES:</p>
 <p><b>Limited Minimal Overlap of Campaign and Official Activity Is O.K.</b></p> 	<p><b>Slide 47</b></p> <p>NOTES:</p>
 <p><b>Mixed Purpose Travel</b></p> <ul style="list-style-type: none"> <li>☛ Expenses may be pro rated on a reasonable basis to accurately reflect the purpose of the trip</li> <li>☛ FEC Contact: Duane Pugh @ (202) 694 -1006</li> </ul>	<p><b>Slide 48</b></p> <p>NOTES:</p>






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<p>US Senate Select Committee on Ethics</p> <h2 style="text-align: center;">General Appropriations Statute</h2> 	<p><b>Slide 49</b></p> <p>NOTES:</p>
<p>US Senate Select Committee on Ethics</p> <h2 style="text-align: center;">Moratorium</h2> <p>60 days prior to a primary or general election a Senator is prohibited from certain activities.</p> 	<p><b>Slide 50</b></p> <p>NOTES:</p>
<p>US Senate Select Committee on Ethics</p> <h2 style="text-align: center;">Moratorium</h2> <p>60 Moratorium</p> <ul style="list-style-type: none"> <li>No mass mailing 60 days prior to primary (only if up for re-election) or general biennial election (regardless of being up for re-election)</li> <li>No use of Senate television or radio recording studios.</li> <li>May not send out unsolicited e-mail (if up for re-election) if not in direct response</li> <li>Senate will not pay for the maintenance of a mobile office.</li> <li>Other than the actual costs of transportation, the Senate will not pay for the cost of official travel (no food or lodging per diem)</li> </ul>  <p>No moratorium if election is uncontested and no legal possibility for a write-in candidate.</p>	<p><b>Slide 51</b></p> <p>NOTES:</p>







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	<p><b>Slide 52</b></p> <p>NOTES:</p>
	<p><b>Slide 53</b></p> <p>NOTES:</p>
	<p><b>Slide 54</b></p> <p>NOTES:</p>






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<p>US Senate Select Committee on Ethics</p> <p><b>A Principal Purpose of Legislation cannot be :</b></p> <ul style="list-style-type: none"> <li>☛ To further financial or monetary interest of             <ul style="list-style-type: none"> <li>* Primarily Member, Officer, or employee</li> <li>* Or of a <b>limited class</b> to which a Member, Officer, or employee belongs</li> </ul> </li> </ul> 	<p><b>Slide 55</b></p> <p>NOTES:</p>
<p>US Senate Select Committee on Ethics</p> <p><b>Appropriations Rule</b></p> <ul style="list-style-type: none"> <li>☛ A Senator who requests an earmark shall certify in writing to the Chairman and Ranking Member of the committee of jurisdiction, the purpose of the earmark, and that neither the Senator nor the Senator's immediate family has a financial or monetary interest in the earmark.</li> </ul> 	<p><b>Slide 56</b></p> <p>NOTES:</p>
<p>US Senate Select Committee on Ethics</p> <p><b>Immediate Family (defined)</b></p> <ul style="list-style-type: none"> <li>☛ father, mother, son, daughter, brother, sister, husband, wife, father-in-law and mother-in-law.</li> </ul> 	<p><b>Slide 57</b></p> <p>NOTES:</p>

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 <p><b>Committee Staff Holdings</b> <i>Senate Rule 37.7</i> <b>The Basics</b></p> <ul style="list-style-type: none"> <li>EST <b>Committee staffer</b> <ul style="list-style-type: none"> <li>* earning more than \$25,000 a year</li> <li>* employed for more than 90 days</li> </ul> </li> <li>◇ <b>must divest himself of any substantial holdings which may be directly affected by the actions of the employing committee</b></li> </ul> 	<p><b>Slide 58</b></p> <p>NOTES:</p>
 <p><b>Outside Employment</b> <i>Senate Rule 37.5</i></p> <ul style="list-style-type: none"> <li>EST <b>May not conflict with Senate duties;</b></li> <li>EST <b>Must be approved by supervising Senator in writing;</b></li> <li>EST <b>Must report to Senator on starting of activity and each May 15<sup>th</sup> thereafter.</b></li> </ul> 	<p><b>Slide 59</b></p> <p>NOTES:</p>
 <p><b>Anyone earning \$25,000 - \$114,468 a year and employed for more than 90 days in a calendar year</b> <i>Senate Rule 37.5(a)</i></p> <ul style="list-style-type: none"> <li>EST <b>MAY NOT:</b> <ul style="list-style-type: none"> <li>* Affiliate with outside business for purpose of providing professional services for compensation;</li> <li>* Permit their name to be used by outside business providing professional services for compensation; (<i>IR 145</i>).</li> <li>* Practice a profession for compensation to any extent during regular office hours in the employing Senate office.</li> </ul> </li> <li>EST <b>MAY DO:</b> <ul style="list-style-type: none"> <li>* As long as the individual avoids affiliating with a firm, he or she may practice a profession during off hours.</li> </ul> </li> </ul> 	<p><b>Slide 60</b></p> <p>NOTES:</p>





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 <p><b>Anyone making at or above 120% of GS-15 = \$114,468 (CY 2008)</b> Senate Rule 37.5(b)</p> <p><b>MAY NOT:</b></p> <ul style="list-style-type: none"> <li>Receive compensation for affiliating with or being employed by a firm, partnership, association, corporation, or other entity which provides professional services involving a fiduciary relationship;</li> <li>Provide professional services resulting in a fiduciary relationship to anyone for compensation;</li> <li>Be employed by a firm that provides professional services;</li> <li>Outside earned income limit of \$25,830.</li> </ul>	<p><b>Slide 61</b></p> <p>NOTES:</p>
 <p><b>Officer, Board or Advisory Service Rule</b> Senate Rule 37.6(a)</p> <p>Service on the board of an outside organization involves a fiduciary duty and an increased potential for an appearance of a conflict of interest.</p> 	<p><b>Slide 62</b></p> <p>NOTES:</p>
 <p><b>If employed for more than 90-days and earn over \$25,000</b></p> <p><b>MAY NOT</b></p> <ul style="list-style-type: none"> <li>Serve as officers or members of the board of any publicly-held or publicly-regulated company.</li> </ul> <p><b>MAY DO</b></p> <ul style="list-style-type: none"> <li>Uncompensated service as an officer or board member of             <ul style="list-style-type: none"> <li>a tax-exempt organization (IRC Section 501(c)(3)), and</li> <li>an organization which is principally available to Members, officers and employees of the Senate and their families.</li> </ul> </li> </ul> 	<p><b>Slide 63</b></p> <p>NOTES:</p>




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 <p><b>BUT WATCH FOR...</b></p> <ul style="list-style-type: none"> <li>Federal-Funding Conflict</li> <li>Subject-Matter Overlap Conflict</li> </ul> 	<p><b>Slide 64</b></p> <p>NOTES:</p>
 <p><b>Charitable Fundraising Events</b></p> <ul style="list-style-type: none"> <li>In their personal capacity Senators may serve as <b>honorary</b> chairpersons of non-profit events or charity events if consistent with Rule 37.</li> </ul> 	<p><b>Slide 65</b></p> <p>NOTES:</p>
 <p><b>Post-Employment Lobbying Restrictions</b></p> <p><i>Senate Rules 37.8 and 37.9</i></p>  <ul style="list-style-type: none"> <li><b>Members:</b> <ul style="list-style-type: none"> <li>Can not lobby Congress for two years</li> </ul> </li> <li><b>Staff paid more than 75% (\$126,975 for CY 2008) of a Member salary:</b> <ul style="list-style-type: none"> <li>Can not lobby the Senate for one year</li> </ul> </li> <li><b>Staff paid less than 75% (\$126,975 for CY 2008) of a Member's salary:</b> <ul style="list-style-type: none"> <li>Can not lobby employing office or committee for one year</li> </ul> </li> </ul>	<p><b>Slide 66</b></p> <p>NOTES:</p>

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 <p><b>Rule on Negotiating for future employment</b></p> <ul style="list-style-type: none"> <li>Senator who wants to negotiate for jobs involving lobbying must wait until successor is elected.</li> <li>Senator who negotiates for employment not involving lobbying are similarly restricted unless, Senator files statement with Secretary of the Senate within 3 days of beginning such negotiations.</li> </ul>	<p><b>Slide 67</b></p> <p>NOTES:</p>
 <p><b>Rule on Negotiating for future employment</b></p> <ul style="list-style-type: none"> <li>Senior Staff who earn more than 75% of a Member's Salary (<i>\$126,975 for CY 2008</i>) must notify the Ethics Committee in writing within 3 days of beginning job negotiations or entering an arrangement with a private employer.</li> <li>Senior Staff engaging in job negotiations with private employers must recuse themselves from legislative matters that create a conflict of interest, or the appearance of a conflict of interest and notify the Ethics Committee in writing of such recusals and negotiations.</li> </ul>	<p><b>Slide 68</b></p> <p>NOTES:</p>
 <p><b>Negotiations (defined)</b></p> <ul style="list-style-type: none"> <li>The discussion of terms and conditions of employment after an offer has been made and the Senator or staffer is considering accepting.</li> </ul> 	<p><b>Slide 69</b></p> <p>NOTES:</p>

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 <p style="text-align: center;"><b>Rule on Lobbying by Member Spouses and Family</b></p> <p>☛ If a Member's spouse or immediate family member is a registered lobbyist, or is employed or retained by such a registered lobbyist, or an entity that hires or retains a registered lobbyist, that Member shall prohibit all staff supervised by that Member from having any contact with that spouse or family member that constitutes a lobbying contact.</p>	<p style="text-align: center;"><b>Slide 70</b></p> <p>NOTES:</p>
 <p style="text-align: center;"><b>Lobbying by Member Spouses and Family</b></p> <p>☛ Staff of a Member are also prohibited from having any lobbying contact with a Member's spouse who is a registered lobbyist, or is employed or retained by such a registered lobbyist.</p>	<p style="text-align: center;"><b>Slide 71</b></p> <p>NOTES:</p>
 <p style="text-align: center;"><b>Lobbying Contact (defined)</b></p> <p style="text-align: center;"><small>2 USC § 1602(8)</small></p> <p>☛ The term "lobbying contact" means any oral or written communication (including an electronic communication) to a covered executive branch official or a covered legislative branch official that is made on behalf of a client with regard to--</p> <p style="text-align: right;">Continued...</p>	<p style="text-align: center;"><b>Slide 72</b></p> <p>NOTES:</p>









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<p>US Senate Select Committee on Ethics</p> <h3>Lobbying Contact (defined)</h3> <p>the formulation, modification, or adoption of Federal legislation (including legislative proposals);</p> <ul style="list-style-type: none"> <li>* the formulation, modification, or adoption of Federal Rule, regulation, Executive order, or any other program, policy, or position of the United States Government;</li> <li>* the administration or execution of a Federal program or policy (including the negotiation, award, or administration of a Federal contract, grant, loan, permit, or license); or</li> <li>* the nomination or confirmation of a person for a position subject to confirmation by the Senate.</li> </ul>	<p><b>Slide 73</b></p> <p>NOTES:</p>
<p>US Senate Select Committee on Ethics</p> <h3>Honoraria Ban</h3> <p>Senate Rule 36</p> <ul style="list-style-type: none"> <li>ES* Honorarium is a payment for an appearance, speech, or article (other than a book).</li> <li>ES* Absolute ban on honoraria received by Members, officers, or employees.</li> <li>ES* Committee may not grant waivers for honoraria.</li> </ul> 	<p><b>Slide 74</b></p> <p>NOTES:</p>
<p>US Senate Select Committee on Ethics</p> <h3>Charitable Contribution in Lieu of Honoraria</h3> <ul style="list-style-type: none"> <li>ES* Organization may make \$2,000 charitable contribution in lieu of honorarium to a Senator.</li> <li>* Charity may not benefit Member or employee.</li> <li>* Honoraria must be reported on financial disclosure form.</li> <li>* If donation is from lobbyist or foreign agent, it must be reported to Secretary of the Senate within 30 days</li> </ul> 	<p><b>Slide 75</b></p> <p>NOTES:</p>





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 <p><b>Teaching</b> <i>Senate Rule 37.5(b)</i></p> <ul style="list-style-type: none"> <li>Teaching may not be an avenue to circumvent the honoraria ban.</li> </ul> 	<p><b>Slide 76</b></p> <p>NOTES:</p>
 <p><b>Ethics Committee Approval for Teaching</b></p> <ul style="list-style-type: none"> <li>Members and those earning in excess of 120% of GS-15 ( = \$114,468 ) may not teach for compensation unless they receive prior approval by the Ethics Committee.</li> <li>Staff earning less than 120% of GS-15 are encouraged, but are not required, to receive prior approval to teaching.</li> </ul> 	<p><b>Slide 77</b></p> <p>NOTES:</p>
 <p><b>Rule</b> <b>PROHIBITION ON</b> <b>UNOFFICIAL</b> <b>OFFICE ACCOUNTS</b></p> <p>33</p> <p>AND INTERPRETATIVE RULING 444</p>	<p><b>Slide 78</b></p> <p>NOTES:</p>







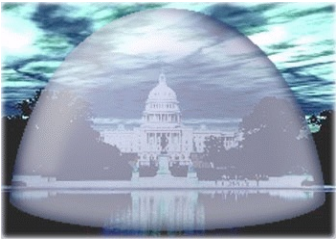
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 <p style="text-align: center;"><b>General Rule</b></p> <ul style="list-style-type: none"> <li>☛ No private donations, cash or goods or services, are allowed in support of official Senate activities or expenses.</li> </ul> 	<p style="background-color: #cccccc;"><b>Slide 79</b></p> <p>NOTES:</p>
 <p style="text-align: center;"><b>Free Interchange of Information</b></p> <ul style="list-style-type: none"> <li>☛ Senator may seek and accept advice on legislative issues from outside organizations.</li> <li>☛ Outside organizations may provide ideas, information, memoranda, research, legislative language to the Senator as long as it is unsolicited.</li> <li>☛ <b>BUT</b> Senate office <b>may not</b> direct or control an outside organization to do Senate work.</li> </ul> 	<p style="background-color: #cccccc;"><b>Slide 80</b></p> <p>NOTES:</p>
 <p style="text-align: center;"><b>"Official" or "Officially - Connected" Expenses May Be Paid From</b></p> <ul style="list-style-type: none"> <li>☛ Appropriated Funds,</li> <li>☛ Member's personal funds,</li> <li>☛ Campaign funds,</li> <li>☛ Reimbursement from private parties in context of approved fact-finding travel.</li> </ul> 	<p style="background-color: #cccccc;"><b>Slide 81</b></p> <p>NOTES:</p>



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 <p><b>Special Rules For Appropriated Funds</b></p> <ul style="list-style-type: none"> <li>☞ Appropriated funds may not be used to pay for gifts or refreshments.</li> <li>☞ Consult Committee on Rules and Administration.</li> </ul> 	<p><b>Slide 82</b></p> <p>NOTES:</p>
 <p><b>Special Rules For Campaign Funds</b></p> <ul style="list-style-type: none"> <li>☞ May not use campaign funds to: <ul style="list-style-type: none"> <li>• Supplement franking allowance (may only use appropriated funds);</li> <li>• Supplement mass mailing (\$50,000 allowance);</li> <li>• Pay employee salaries (may only use appropriated funds or Senator's personal funds);</li> <li>• Pay for office space (may only use appropriated funds);</li> <li>• Buy office equipment and any associated information technology services (use only appropriated funds);</li> <li>• Support Home State Office (may only be paid for with appropriated funds);</li> <li>• Pay Committee expenses (may only be paid for with appropriated funds).</li> </ul> </li> <li>☞ If campaign funds are used to purchase something, campaign funds must be used to maintain it.</li> </ul>	<p><b>Slide 83</b></p> <p>NOTES:</p>
 <p><b>Rule 43</b></p> <p><b>CONSTITUENT SERVICE</b></p>	<p><b>Slide 84</b></p> <p>NOTES:</p>


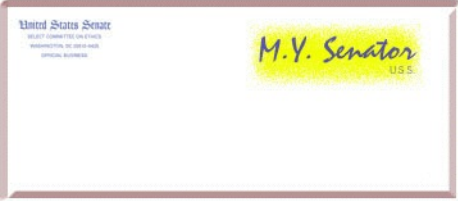




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 <p>US Senate Select Committee on Ethics</p> <p>Constituent Service Rule 43</p> <p>Appropriate Requests to Executive and Independent Government Officials and Agencies</p> <ul style="list-style-type: none"> <li>* status report</li> <li>* urge prompt consideration</li> <li>* arrange interviews or appointments</li> </ul>   <ul style="list-style-type: none"> <li>* express judgments</li> <li>* call for reconsideration</li> <li>* anything similar</li> </ul>	<p><b>Slide 85</b></p> <p>NOTES:</p>
 <p>US Senate Select Committee on Ethics</p> <p>Constituent Service Rule 43</p> <p>Merits of the Request</p> <ul style="list-style-type: none"> <li>* Would Senate office perform similar services for any constituent similarly situated?</li> <li>* Is the constituent a campaign contributor?</li> </ul> <p>Consider:</p> <ul style="list-style-type: none"> <li>&gt; history of donations</li> <li>&gt; proximity of donation and actions requested</li> </ul> 	<p><b>Slide 86</b></p> <p>NOTES:</p>
 <p>US Senate Select Committee on Ethics</p> <p>Constituent Service Rule 43</p> <p>Type of Agency Proceeding</p> <ul style="list-style-type: none"> <li>* Do not do damage to the administrative process by Congressional intervention.</li> </ul> 	<p><b>Slide 87</b></p> <p>NOTES:</p>




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<p>US Senate Select Committee on Ethics</p> <p>Constituent Service Rule 43</p> <p><b>If Agency Is Performing a Quasi-judicial, Adjudicative, or Enforcement Function</b></p> <ul style="list-style-type: none"> <li>▶ <b>DO NOT INTERVENE</b>, because             <ul style="list-style-type: none"> <li>▶ such formal proceeding should only be decided on the record made by the agency, and</li> <li>▶ <i>ex parte</i> communications are forbidden during formal adjudicative proceeding, enforcement or quasi-judicial proceeding</li> </ul> </li> </ul> 	<p><b>Slide 88</b></p> <p>NOTES:</p>
<p>US Senate Select Committee on Ethics</p> <p>Constituent Service Rule 43</p> <p><b>Role of the Congressional Liaison</b></p> <ul style="list-style-type: none"> <li>▶ After deciding that contacting the agency is probably appropriate, the Senate office should always contact congressional liaison:             <ul style="list-style-type: none"> <li>▶ to determine whether the agency has restrictions on outside communications with regard to a matter at issue, and</li> <li>▶ To determine who is the appropriate addressee of the intended communication.</li> </ul> </li> </ul> 	<p><b>Slide 89</b></p> <p>NOTES:</p>
<p>US Senate Select Committee on Ethics</p> <p><b>Rule THE FRANK 40</b></p>	<p><b>Slide 90</b></p> <p>NOTES:</p>

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 <h3 style="text-align: center;">What Is the "Frank"?</h3> <p>☛ The frank is the facsimile signature of a Senator in corner of envelope that takes the place of stamp and authorizes sending OFFICIAL material through the domestic mail without prepayment of postage.</p> 	<h3 style="background-color: #cccccc;">Slide 91</h3> <p>NOTES:</p>
 <h3 style="text-align: center;">Who May Use the Frank?</h3> <ul style="list-style-type: none"> <li>☛ Senators</li> <li>☛ Senators Elect</li> <li>☛ Vice President</li> <li>☛ Secretary of the Senate</li> <li>☛ Sergeant at Arms</li> <li>☛ Legislative Counsel</li> <li>☛ Senate Legal Counsel</li> <li>☛ Surviving Senate Spouses</li> <li>☛ Senate Committees under the frank of the chairman for official Committee business only</li> <li>☛ Republican Conference</li> <li>☛ Democratic Caucus</li> </ul> 	<h3 style="background-color: #cccccc;">Slide 92</h3> <p>NOTES:</p>
 <h3 style="text-align: center;">Who Is Responsible for the Use of the Frank?</h3> <p>☛ Each Senator is personally responsible for ensuring that the use of the frank complies with the law, Senate Rules and regulations and interpretive rulings of the Ethics Committee.</p> <p>☛ Violation of the franking privilege may result in your Senator being held personally responsible for the cost of the mailing. If the office uses the frank for personal purposes, criminal fines are possible.</p> 	<h3 style="background-color: #cccccc;">Slide 93</h3> <p>NOTES:</p>

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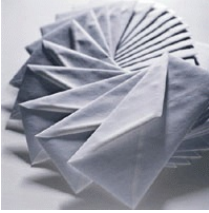


<p>US Senate Select Committee on Ethics</p> <h3>Restitution for Misuse of the Frank</h3> <ul style="list-style-type: none"> <li>The Committee will view as an act of good faith an offer by a Member to pay restitution to the Treasury for the cost of improper use of the franking privilege.</li> </ul> 	<p><b>Slide 94</b></p> <p>NOTES:</p>
<p>US Senate Select Committee on Ethics</p> <h3>No Loan of the Frank</h3> <ul style="list-style-type: none"> <li>May not loan the frank to outside group or organization, e.g., include an outside organization's pamphlet in a franked mailing, may not lend text of document to outside organization.</li> </ul> 	<p><b>Slide 95</b></p> <p>NOTES:</p>
<p>US Senate Select Committee on Ethics</p> <h3>Features of Frankable Mail</h3> <ul style="list-style-type: none"> <li>Must be official;</li> <li>May not be political, partisan, campaign, charitable solicitation, or personal.</li> </ul> 	<p><b>Slide 96</b></p> <p>NOTES:</p>





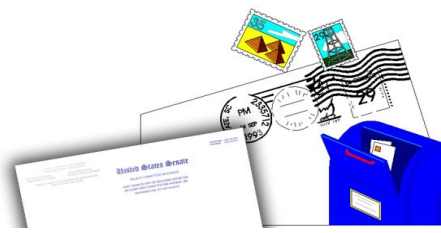

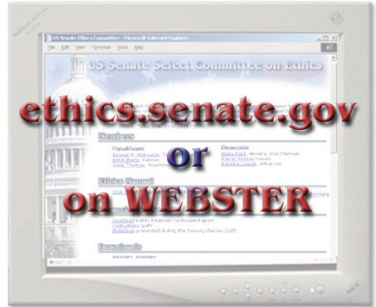
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 <h3 style="text-align: center;">Frankable Mail</h3> <ul style="list-style-type: none"> <li>☛ Matters of Public Concern and Congressional Actions;</li> <li>☛ Official Newsletters and Press Releases;</li> <li>☛ Questionnaires Seeking Public Opinion;</li> <li>☛ Mail between DC and State Office;</li> <li>☛ Mail to Other Members of Congress and all other legislators;</li> <li>☛ Congratulations on Public Distinction.</li> </ul> <div style="text-align: right;">  </div>	<h3 style="background-color: #cccccc;">Slide 97</h3> <p>NOTES:</p>
 <h3 style="text-align: center;">Frankable Mail</h3> <ul style="list-style-type: none"> <li>☛ Federal Regulations or Federal Publications Containing General Information;</li> <li>☛ Nonpartisan Voter Registration or Election Information;</li> <li>☛ Biographical Material or Pictures in Federal Publications or in Direct Response;</li> <li>☛ Whole or part of the Congressional Record;</li> <li>☛ Public Service Material;             <ul style="list-style-type: none"> <li>★ Created with government appropriated funds;</li> </ul> </li> <li>☛ Seeds and Agricultural Reports.</li> </ul>	<h3 style="background-color: #cccccc;">Slide 98</h3> <p>NOTES:</p>
 <h3 style="text-align: center;">Nonfrankable Mail</h3> <ul style="list-style-type: none"> <li>☛ Laudatory and Complimentary to Member on Personal Rather than Official Basis;</li> <li>☛ Holiday Greetings Unless They Are Incidental Reference in Otherwise Frankable Mail;</li> <li>☛ Member's Family Activities Other Than in Connection With Official Function;</li> <li>☛ Solicitations for Political Support or Financial Assistance;</li> <li>☛ Personal Mail;</li> <li>☛ Condolences or Congratulations on Personal Distinction;</li> </ul>	<h3 style="background-color: #cccccc;">Slide 99</h3> <p>NOTES:</p>





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<p>US Senate Select Committee on Ethics</p> <h3>Mass Mailing</h3> <ul style="list-style-type: none"> <li>Mass Mailings must be franked. Mass Mailing is a mailing of 500 or more substantially similar pieces of mail within 1 session of Congress, regardless of whether the pieces are mailed at same time or separately.</li> </ul> 	<p><b>Slide 100</b></p> <p>NOTES:</p>
<p>US Senate Select Committee on Ethics</p> <h3>What Isn't a Mass Mailing</h3> <ul style="list-style-type: none"> <li>Mail in Direct Response</li> <li>Mail to other Members of Congress, federal, state, or local officials;</li> <li>News Releases to the Media;</li> <li>Town Meeting Notices;</li> <li>Federal Publication or Item Provided to All Senators or Made Available for Purchase With Official Funds for Distributions;</li> <li>Responding to signed petition.</li> </ul> 	<p><b>Slide 101</b></p> <p>NOTES:</p>
<p>US Senate Select Committee on Ethics</p> <h3>More about Mass Mailings</h3> <p><i>(Often seen in form of newsletters)</i></p> <ul style="list-style-type: none"> <li>Not more than 2 legal-size sheets;</li> <li>Prepared by or for Senator making the mailing;</li> <li>Information concerning views of or otherwise relating to Senator;</li> <li>No gratuitous biographical information;</li> <li>Limited to 8 personal references (name of Senator) per page;</li> <li>Senator's name other than in the masthead may not have font larger than 1/4 of an inch;</li> <li>Limited to 4 photos of the Senator;</li> <li>Photos must relate to the text;</li> </ul> 	<p><b>Slide 102</b></p> <p>NOTES:</p>

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 <h3 style="text-align: center;">More about Mass Mailings</h3> <p style="text-align: center;"><i>(Often seen in form of newsletters)</i></p> <ul style="list-style-type: none"> <li>☛ At bottom of first page must print the phrase "PREPARED, PUBLISHED, AND MAILED AT TAXPAYER EXPENSE" in 7 point type.</li> <li>☛ May not be personal or partisan</li> <li>☛ Committee newsletters send under the frank of the chairman must be relating to normal and regular business of the committee and not focus unduly on chairman;</li> <li>☛ Must be prepared by the office of Printing, Graphics, and Direct Mail, may not use private funds to purchase paper, print or prepare any mass mailing material;</li> <li>☛ Mass mailings must be registered quarterly.</li> </ul>	<h3 style="background-color: #cccccc;">Slide 103</h3> <p>NOTES:</p>
 <h3 style="text-align: center;">Senate Letterhead</h3> <p>☛ Official Senate Letterhead may only be used for official Senate business.</p> 	<h3 style="background-color: #cccccc;">Slide 104</h3> <p>NOTES:</p>
 <h3 style="text-align: center;">Ethics Committee Website</h3> 	<h3 style="background-color: #cccccc;">Slide 105</h3> <p>NOTES:</p>

This slideshow presents only a summary of the Code of Official Conduct (Senate Rules 34-43) prepared by Committee staff. For more complete information or advice about specific fact situations, please consult the Senate Ethics Manual, or contact a Committee counsel at (202) 224-2981.

 <p><b>Helpful Items on Website</b></p> <ul style="list-style-type: none"> <li>• <b>Ethics Manual</b></li> <li>• <b>Financial Disclosure Report</b></li> <li>• <b>Travel Forms</b> <ul style="list-style-type: none"> <li>• Private Sponsor Travel Certification Form</li> <li>• Privately-Sponsored Travel Checklist</li> <li>• Regulations and Guidelines for Privately-Sponsored Travel</li> <li>• Regulations and Guidelines for Privately-Sponsored Travel (Glossary)</li> <li>• Senators and Officers: Disclosure of Travel Expenses</li> <li>• Employee Advanced Travel Authorization and Disclosure Form</li> <li>• Acceptance of Gifts From a Foreign Government or Multinational Organization</li> </ul> </li> <li>• <b>Training Forms</b> <ul style="list-style-type: none"> <li>• Training Implementation Memo</li> <li>• Ethics Certification Officer Designation Form</li> </ul> </li> <li>• <b>Other Forms</b> <ul style="list-style-type: none"> <li>• Disclosure by Senior Staff of Employment Negotiations and Recusal</li> <li>• Form 37.3 Statement of Outside Business or Professional Activity or Employment</li> <li>• Form 37.14 Disclosure by Member of Employment Negotiations and Recusal</li> <li>• Form 41.1 Designation of Staff for Limited Political Fund Activity</li> <li>• Form 41.3 Agreement to Comply with the Senate Code of Official Conduct</li> <li>• Form 41.4 Agreement to Comply with the Senate Code of Official Conduct</li> <li>• Form 41.6 Supervisor's Report on Individuals Who Perform Senate Services</li> <li>• Sample Blind Trust Agreement</li> </ul> </li> </ul> 	<p><b>Slide 106</b></p> <p>NOTES:</p>
 <p><b>IF YOU HAVE ANY QUESTIONS, PLEASE CALL</b></p> <p><b>The Senate Select Committee on Ethics</b></p>  <p><b>224-2981 (main)</b>  <b>224-7416 (fax)</b>  <a href="mailto:mailbox_office@ethics.senate.gov">mailbox_office@ethics.senate.gov (email)</a></p> <p><small>ES</small> <i>All Advice is Confidential</i></p>	<p><b>Slide 107</b></p> <p>NOTES:</p>