



DEPARTMENT OF THE TREASURY  
WASHINGTON, D.C.

February 26, 2021

**MEMORANDUM TO:** Rex (Logan) Sturm, Jr.  
Supervisory International Economist

**FROM:**

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Director of the East Asia Office

(b)(6)

Hanoi Veras, Deputy Assistant General Counsel, Ethics &  
Alternate Designated Agency Ethics Official

**SUBJECT:** Waiver under 18 U.S.C. § 208(b)(1)

This memorandum provides a waiver, pursuant to 18 U.S.C. § 208(b)(1), which will allow you to participate in your position as Supervisory International Economist at the U.S. Department of the Treasury in particular matters affecting the International Monetary Fund (IMF).

As an Executive Branch employee, 18 U.S.C. § 208(a) prohibits you from participating personally and substantially in an official capacity in any particular matter in which you know you have a financial interest directly and predictably affected by the matter, unless you first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1). Financial interests that are imputed to you include those of any person or organization with which you are negotiating or have an arrangement concerning prospective employment.

You are to be proposed as a transferee from the Treasury Department to the IMF as an Advisor to the Office of the U.S. Executive Director (USED), which means that the financial interests of the IMF will be imputed to you under 18 U.S.C. § 208(a). Therefore, prior to your transfer to the IMF, while you remain at the Treasury Department, you normally will be prohibited from participating in any particular matter affecting the IMF's financial interests. However, under 18 U.S.C. § 208(b)(1), we have determined, based on the information discussed below, that your imputed interest will not be so substantial as to be deemed likely to affect the integrity of the services which the Government may expect from you.

The IMF promotes international monetary cooperation and exchange rate stability, facilitates the balanced growth of international trade, and provides resources to help members in balance of payments difficulties or to assist with poverty reduction. The IMF is an international financial institution, made up of 190 member countries, including the United States. Member countries govern the IMF through the Board of Governors and the Board of Executive Directors. The Secretary of the Treasury is traditionally appointed as the United States' Governor to the IMF. The Executive Directors are responsible for the conduct of the general operations of the IMF and exercise all the powers delegated to them by the Board of Governors. Under 22 U.S.C. § 286a, the President, with the advice and consent of the Senate, appoints a USED and an Alternate

USED to the IMF. As a member, and the IMF's largest shareholder, the United States also contributes financially to the IMF's mission.

While the USED is a U.S. government official, his or her staff members are employees of the IMF. Because these staff members work at the sole direction of the USED, it is the responsibility of the IMF member countries to identify potential staff members to work for their respective Executive Directors. Under 5 U.S.C. §§ 3581-3584, U.S. government employees may be transferred to international organizations of which the United States is a member.

You have amassed significant skills and experience working on economic and financial issues, including through your current position at the Treasury Department, and you are to be proposed for the position of Advisor to the USED at the IMF. In your capacity as Advisor, your duties will include providing advice on the U.S. voting position on individual IMF loans to members, providing guidance on proposed IMF policies that require the approval of the Board of Executive Directors, helping United States agencies liaise with staff and management at the IMF, assisting in the oversight of IMF lending operations, and periodically participating in Board meetings.

Because of your imputed interests, you will no longer be able to work on any particular matters at the Treasury Department that affect your prospective employer, the IMF, unless you receive a § 208(b)(1) waiver. However, in this instance, your prospective employer is not a typical non-federal government employer. As noted above, the United States is a member/shareholder of the IMF. By law, the United States' interests are managed by a USED and Alternate USED who are Presidentially-appointed and Senate-confirmed. As mentioned above, at the IMF, you will be working directly for the Office of the USED. Thus, your work at the IMF will be to assist in implementing the policies of the United States, and you will be working under the direction of a U.S. Government official.

Therefore, we have concluded that your financial interest is not so substantial as to be likely to affect the integrity of your services to the Government. With this waiver, you may work on all particular matters affecting the IMF.

The Office of Government Ethics has been consulted and provided a copy of this waiver.