

From: (b)(6)
To: Sonfield, Brian; Vetter, Mark
Subject: FW: Requirement to file a termination OGE Form 278e & post-employment briefing--moving to private sector
Date: Thursday, September 21, 2023 5:21:00 PM
Attachments: Integrity Wizard Basics.pdf
termination 278e reporting periods.doc
OGE Post Employment Q&A.PDF
Filer-prepopulate.pdf
Post Employment Nutshell - 5.3.22.pdf
Ethics Contacts--October 2022.pdf

From: (b)(6)
Sent: Thursday, December 15, 2022 12:06 PM
To: Sarin, Natasha <Natasha.Sarin@treasury.gov>
Cc: (b)(6)@treasury.gov; Vetter, Mark <Mark.Vetter@treasury.gov>
Subject: Requirement to file a termination OGE Form 278e & post-employment briefing--moving to private sector

Hi Natasha,

As promised, since you mentioned you are leaving Treasury on December 23, you are required to file a termination public financial disclosure report (OGE Form 278e) within 30 days of departure, unless you are moving to another covered executive branch OGE Form 278e filing position within 30 days. You may want to complete it the day of your departure so that you do not incur the possibility of a \$200 late filing fee that is imposed by statute for reports received more than 30 days after the due date. If you need a filing extension, please let me know prior to the report due date.

****You may file your report up to 2 weeks prior to your departure if you confirm on the report via an endnote or other means that nothing will have changed as of your departure date and/or that you will provide any amended information to us in a timely manner.****

You will e-file your termination report via *Integrity* at www.Integrity.gov. *Integrity* works best with the Google Chrome internet browser. Note that your Treasury user ID will no longer be valid to access Max.gov (*Integrity*) once your Treasury email account is disabled. If you provide us with a personal email address, we can merge your account to keep it active so that you can file your termination report at your convenience. You will need to cover from January 1, 2022 through your termination date in 2022. I have attached a summary on getting started in *Integrity*.

As a former Treasury employee, you will be subject to post-employment restrictions which may affect matters that you can work on in your new position. Please refer to the attached guidance on post employment for a summary—you may forward this guidance to a personal email account. These restrictions are based on a criminal statute. We strongly encourage you to schedule an individual briefing; please contact an [ethics official](#).

Important Reminders:

- Regardless of whether you complete your termination report prior to departure, **provide**

your personal email address to us in case we need to contact you with questions. You will not be able to access Integrity with your Treasury email after your departure.

- Remember to complete a Negotiating for Employment STOCK Act form if you are seeking employment with a private sector entity.
- Contact the Gift Unit if you have any tangible gifts to pick up or process prior to departure.
- List any agreements or arrangements on Part 3 of your termination OGE 278e.

Please let me know if you have any questions. Thank you and best wishes.

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Ethics Program Manager

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Wizard Basics

Walkthrough: Filer

INTEGRITY^{BOV}
Play your part



1. After logging into Integrity, look at the “My Current Reports” section on your “My Tasks” page. Any outstanding reports will be located here. To open an assigned report, click “Start.”
2. Enter and confirm your basic information and click “Next.”
3. Add any federal position you’ve held in the past 12 months. Do not include the position for which you are filing.
4. Add any outside positions you have held during the covered period.
5. Integrity will then ask you about interests and assets related to your outside positions.
6. Next, Integrity will ask about you about your spouse’s employment and related interests, if applicable.
7. Next, Integrity will ask you about other assets that are not related to any outside positions.
8. The next part covers your transactions (*Annual and Termination reports only*). If you have been timely filing Periodic Transaction Reports (PTRs) using Integrity, you can pre-populate this part with PTR data. Add any transactions not covered in a PTR.
9. Next, add your liabilities.
10. Next, add any gifts or reimbursements you have received (*Annual and Termination reports only*).
11. Finally, you will be shown a preview of your report. After you scroll to the bottom, click “Next” if you are ready to submit the report.

The OGE Form 278e – Termination Report

Part	Report Information for the Following Period...	Report Information for the Following Individuals...
1. Filer's Positions Held Outside United States Government	End of Period Covered by Last Report to Term Date	You
2. Filer's Employment Assets & Income and Retirement Accounts	End of Period Covered by Last Report to Term Date	You
3. Filer's Employment Agreements and Arrangements	End of Period Covered by Last Report to Term Date	You
4. Filer's Sources of Compensation Exceeding \$5,000 in a Year	N/A – Leave this Part blank	N/A – Leave this Part blank
5. Spouse's Employment Assets & Income and Retirement Accounts	End of Period Covered by Last Report to Term Date	Your Spouse
6. Other Assets and Income	End of Period Covered by Last Report to Term Date	You, Your Spouse, and Dependent Children
7. Transactions	End of Period Covered by Last Report to Term Date*	You, Your Spouse, and Dependent Children
8. Liabilities	End of Period Covered by Last Report to Term Date	You, Your Spouse, and Dependent Children
9. Gifts and Travel Reimbursements	End of Period Covered by Last Report to Term Date*	You, Your Spouse, and Dependent Children

* Do not include any period when you were not an officer or employee of the United States Government.

UNITED STATES OFFICE OF
GOVERNMENT ETHICS



September 23, 2016
LA-16-08

LEGAL ADVISORY

TO: Designated Agency Ethics Officials

FROM: Walter M. Shaub, Jr.
Director

SUBJECT: Introduction to the Primary Post-Government Employment Restrictions
Applicable to Former Executive Branch Employees

This Legal Advisory provides a plain language discussion for agency ethics officials, departing employees, and former employees on the post-Government employment restrictions, particularly those found in certain provisions of the primary post-Government employment statute applicable to former employees of the executive branch, 18 U.S.C. § 207. OGE's regulations provide more detailed guidance at 5 C.F.R. part 2641.

Readers should be mindful that additional legal authorities not addressed in this Legal Advisory may be applicable to certain individuals. This Legal Advisory provides a general introduction to the primary post-Government employment restrictions under a criminal law applicable to former executive branch employees but does not offer comprehensive guidance on the application of that law to individual circumstances. Departing and former employees should consult their agencies' ethics officials for guidance regarding their individual circumstances.

The post-Government employment restrictions described in Section I of this Legal Advisory apply to all former employees. The additional restrictions described in Section II apply only to certain high-level officials who are referred to as "senior" and "very senior" employees. The responses to Questions 15 and 17 will help you determine if you are a "senior" or "very senior" employee. It is important to recognize that the restrictions applicable to "senior" and "very senior" employees are in addition to the restrictions applicable to all employees. Therefore, "senior" and "very senior" employees should read both Sections I and II of this Legal Advisory.

I. Restrictions Applicable to All Employees

Q1. What is the purpose of the post-Government restrictions under 18 U.S.C. § 207?

The primary source of post-Government employment ethics restrictions is found at 18 U.S.C. § 207. A critical function of section 207 is to prevent former Government employees from leveraging relationships forged during their Government service to assist others in their

