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# MEMORANDUM

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August 8, 2000

**To:** Barbara Hannigan

**From:** Walter Stachnik

**Re:** Voluntary contributions guidance (OIG-314)

We recently investigated allegations in a regional office that several staff felt pressured to contribute for a senior manager's going away party. Because of a funding shortfall for the party, staff that had not yet contributed were sent an e-mail (with a cc: copy to a senior office manager). Some staff may also have been visited by one of the party organizers.

We understand that you received a similar complaint, and that your office worked out procedures with the regional office to help prevent a repetition. Because farewell parties are frequently held, "best practices" guidance would be helpful for all Commission staff.

This guidance would summarize the relevant ethics rules, and include a discussion of the following issues:

- Contributions are voluntary, and nothing should be done to suggest otherwise;
- Memoranda soliciting contributions should be sent from an anonymous mailbox to everyone, not just to those who have not contributed;
- Solicitation memoranda should be reviewed by the ethics liaison in advance;
- In person solicitations are not appropriate; and
- Solicitations from a supervisor to a subordinate are prohibited.

**Recommendation A**

The Ethics Counsel in the Office of the General Counsel should issue guidance to the staff on voluntary contributions for farewell parties, as discussed above. The guidance should be posted on the Intranet for ease of reference.

cc: David Becker  
Bill Lenox  
Estee Levine  
Jim McConnell  
Darlene Pryor