

# ***Widely Attended Gatherings***

**Lisa V. Terry**  
**SVP and Chief Ethics Officer**

**April 16, 2018**

*Reducing Risk. Unleashing Opportunity.*



# The WAG Rule

You may not accept a gift from a prohibited source or a gift given because of your official position...



...unless an exception applies,  
such as the “widely attended gathering” (WAG) rule!

# The WAG Rule



## Widely Attended Gatherings must have the following:

- “Large” number of attendees
- Diversity of interests represented
- Presents an opportunity to exchange ideas/views
- Attendance must be in the interest of EXIM because it will further agency programs and operations
- Agency interest must outweigh possibility of influencing decision-making (or creating such an appearance)
- Prior written approval from an ethics official





## The WAG Rule



**Q: A Bank customer offers you a free ticket to a concert at the Capital One Arena. It is sure to be widely-attended! Can you accept under the WAG rule?**

**A: No. This would be considered purely entertainment and there is not an opportunity to exchange ideas or views.**



## The WAG Rule



**Q: While you are on EXIM business travel in NYC, a Bank customer invites you to an intimate dinner of 5 guests. Can you attend?**

**A: No. Small parties do not meet the definition of a “widely-attended gathering.”**



## The WAG Rule



**Q: You have received an invitation to a cocktail reception, which an Ethics Official has advised qualifies as WAG. Can you also attend the exclusive post-reception dinner?**

**A: Probably not. The dinner is not likely to have a “large number” of attendees.**

## The WAG Rule



**Q: An EXIM participant has invited you a fancy gala sponsored by a well-known non-profit. The participant's company has purchased a table at the event and offered you two seats for you and your spouse, which cost \$400 total. Can you attend?**

**A: No. Different rules apply where a third party pays for attendance, and not the event sponsor. For invitations from *non-sponsors* of the event, more than 100 persons must be expected, and the market value of the free attendance must not exceed \$390 (employee plus guest).**

# The WAG Rule



## *True or False?*

- It's okay for an Ethics Official to give me verbal approval for attendance at a WAG
  - False
- Sporting events will rarely qualify as a WAG.
  - True
- Any event related to my profession will satisfy the “agency interest” requirement for a WAG.
  - False
- Charitable fundraising events are a good thing so the Bank should approve my attendance as long as there are a large number of attendees.
  - False



# The WAG Rule

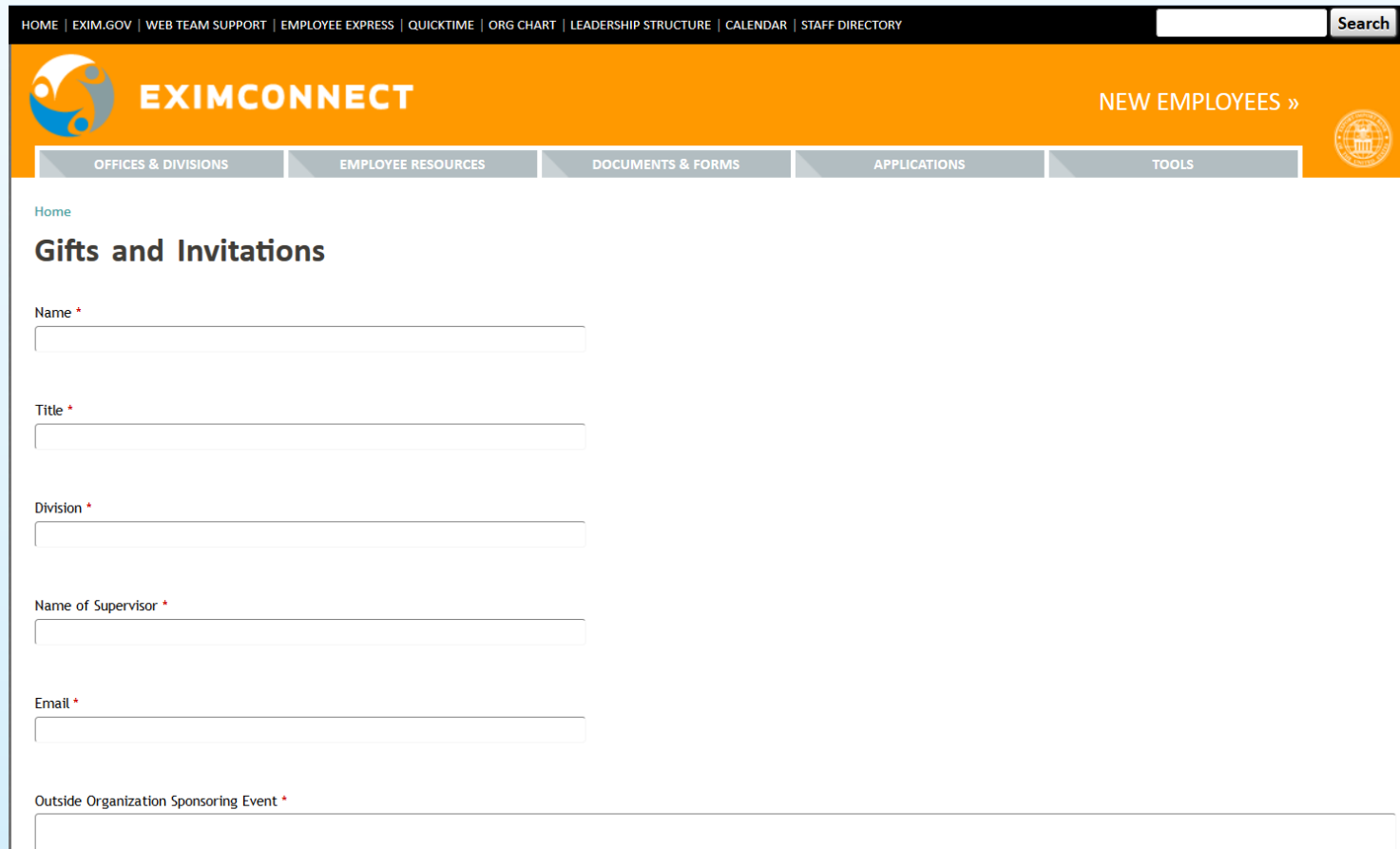


## *True or False (cont.)?*

- › If an Ethics Official approves my attendance at a WAG, I can bring my spouse as well.
  - False
- › Even if an event qualifies as a WAG it would be inappropriate to ask the sponsor of the event for an invitation.
  - True
- › All events around the annual conference are considered WAGs.
  - False

# The WAG Rule

## WAG Event Clearance Form available on the Ethics page via EXIMConnect:



The screenshot displays the EXIMCONNECT web portal. At the top, a black navigation bar contains links: HOME | EXIM.GOV | WEB TEAM SUPPORT | EMPLOYEE EXPRESS | QUICKTIME | ORG CHART | LEADERSHIP STRUCTURE | CALENDAR | STAFF DIRECTORY, followed by a search bar. Below this is an orange header with the EXIMCONNECT logo and a link for NEW EMPLOYEES. A grey navigation bar lists categories: OFFICES & DIVISIONS, EMPLOYEE RESOURCES, DOCUMENTS & FORMS, APPLICATIONS, and TOOLS. The main content area, titled 'Home', features the 'Gifts and Invitations' form. This form includes input fields for Name, Title, Division, Name of Supervisor, Email, and Outside Organization Sponsoring Event, each with a red asterisk indicating it is a required field.

HOME | EXIM.GOV | WEB TEAM SUPPORT | EMPLOYEE EXPRESS | QUICKTIME | ORG CHART | LEADERSHIP STRUCTURE | CALENDAR | STAFF DIRECTORY

EXIMCONNECT

NEW EMPLOYEES »

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Home

**Gifts and Invitations**

Name \*

Title \*

Division \*

Name of Supervisor \*

Email \*

Outside Organization Sponsoring Event \*

# Office of Ethics

**Lisa Terry**  
**SVP and Chief Ethics Officer**  
**Phone: 202-565-3195**  
**Email: [lisa.terry@exim.gov](mailto:lisa.terry@exim.gov)**

**Felice Smith**  
**Alternate Designated Agency Ethics Official**  
**Phone: 202-565-3234**  
**Email: [felice.smith@exim.gov](mailto:felice.smith@exim.gov)**

**Any Questions?**

Felice Smith  
Alternate Designated Agency Ethics Official (Acting)  
Felice C. Smith  
Senior Counsel  
(202) 565-3234

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**800-565-3946 | [exim.gov](https://exim.gov)**

