

## MEMORANDUM

September 25, 1995

To: David G. Marwell  
T. Jeremy Gunn

From: Dennis J. Quinn

Subject: Ethics Opinion on ARRB Attendance at COPA Conference

Last week, Jeremy asked me to research the ethical implications of Board members and staff attending the annual Coalition On Political Assassination (COPA) conference.

### Question Presented:

May ARRB Board members and staff attend the COPA Conference if the registration fee is waived.

Answer: Yes

### Discussion:

While the acceptance of free admission to a widely attended gathering or event is considered a gift from an outside source, it is specifically excepted from the general prohibition against such gifts contained in section 2635.202 of the Standards of Ethical Conduct. 5 C.F.R. §2635.204(g)(1).

The “widely attended gathering” exception holds that when an employee’s attendance at such an event is determined to be in the interest of the agency, an employee may accept a sponsor’s unsolicited gift of free attendance at all or appropriate parts of the gathering. 5 C.F.R. §2635.204(g)(2).

In addition, the term “free attendance” may include the provision of food or refreshments furnished to all attendees as an integral part of the event. It does not include meals taken *other than in a group setting with all other attendees*. §2635.204(g)(4). However, if the value of the meal is less than \$20, an employee may accept the offer under the separate authority of §2635.204(a).