

## MEMORANDUM

January 25, 1996

To: T. Jeremy Gunn

From: Dennis J. Quinn, Designated Agency Ethics Officer

Subject: Advisory Ethics Opinion Concerning Your Participation In An Outside  
Activity

This is in response to your question regarding whether you are ethically permitted to participate in a certain outside activity for which you will be compensated. Specifically, you have been invited to participate in a project studying Religious Human Rights which will be sponsored by the Law and Religion Program at Emory University Law School and Carter Center. This study will be supported by a grant from the Pew Charitable Trusts. Your work on this project will take place on your own time and is not related in anyway to your official duties here at the Review Board. As part of your participation in this project, you have been asked to write a chapter of the book which will result from the study.

The compensation you will receive is not an honorarium, at least not as defined by 5 C.F.R. § 2636.203. As you describe it, the money you will be paid is actually "compensation for goods or services other than appearing, speaking or writing, even though . . . writing an article may be an incidental task associated with the provision of goods or services" which is specifically exempted from the definition of "honorarium" 5 C.F.R. § 2636.203(6).

Accordingly, you are permitted under the ethical regulations to participate in this project.