

MEMORANDUM

February 27, 1998

To: T. Jeremy Gunn
Executive Director &
General Counsel

From: Ronald G. Haron
Associate General Counsel &
Designated Agency Ethics Officer

CC: Chet Rhodes

Subject: Outside Employment of Chet Rhodes

You have asked me to determine whether there are any ethical prohibitions on Mr. Chet Rhodes' working part-time at The Washington Post. Mr. Rhodes' work at The Post would involve working on their Web page and, thus, is computer-related.

I have reviewed the relevant sections of the Standards of Ethical Conduct for Employees of the Executive Branch, 5 C.F. R. § 2635, namely the provisions on outside activities (including particularly conflicting outside employment) (§2635.801 *et seq.*), conflicting financial interests (§ 2635.401 *et seq.*), impartiality in performing official duties, (§ 2635.501 *et seq.*), and misuse of position (§2635.701 *et seq.*). Based on my review, I have determined that there is no ethical prohibition on Mr. Rhodes' working at The Post while he continues his current employment at the Review Board.

Mr. Rhodes should be reminded that he cannot use nonpublic information, Government property, or official time in connection with his work at The Post. *See* 5 C.F.R. §§ 2635.702-705.

