



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

March 5, 2013

OFFICE OF
ENFORCEMENT AND
COMPLIANCE ASSURANCE

MEMORANDUM

SUBJECT: Approval of Request for Outside Activity/Employment

FROM: Jonathan S. Cole 
Deputy Ethics Official
Associate Director
Office of Criminal Enforcement, Forensics and Training

TO: Pasquale Perrotta
Special Agent

You have requested approval for outside employment in accordance with 5 CFR §6401.103, to consult or develop business, or both, for a security firm that will provide cyber-security and denial of service insurance to consumers. The basis for your compensation will be by commission. You state that you will be self-employed in this activity and that you expect to provide consulting to 2-3 clients, for approximately 3-6 hours per week.

You are a GS-13 Special Agent with OCEFT, on the Protective Services Detail. You state that all consulting and business activities relating to this outside employment will be conducted outside of your duty hours or LEAP (availability pay) requirements, or any necessary unexpected or emergency work.

You also state that no official duty time or Government property, resources, or facilities not available to the general public will be used in connection with the outside employment, and that you will not be employed pursuant to an EPA contract or grant.

You indicate that have read, are familiar with, and will abide by the restrictions described in 5 CFR Part 2635 (Subpart H on Outside Activities) and Section 6401.102 (EPA's Supplemental Regulations).

I am approving your request to accept this outside employment and conduct it in accordance with the applicable rules and regulations concerning outside employment. Please keep in mind that if the nature or scope of the duties or services performed changes, you must submit a revised request for approval. Absent such changes, this approval is effective for a

period of five (5) years.

The Office of General Counsel (OGC) has noted certain issues which should guide you in conducting this outside employment. The first issue relates to the use of your official title. In order to comply with ethics guidelines, you should not refer to your official title or position, to avoid creating the appearance that your activities or services are in any way approved by or affiliated with the EPA.

You should also be alert to the potential for conflicts of interest if you represent your outside employer back to the federal government, so you should not do so in relation to any contracts or consulting agreements, or other activities. Please feel free to contact me to discuss any particular situation that might potentially raise a concern.

You must also be sure to report this outside activity on your OGE Form 450, Confidential Financial Disclosure Statement, as appropriate, including as an outside position and a source of income.

If you have any questions concerning this memorandum or the issues discussed, please contact me at (202) 564-2533.

cc: Jonathan S. Cole
Steven Drielak
Brian Maas
Sam Wiggins