

**GOVERNMENT OF THE DISTRICT OF COLUMBIA  
BOARD OF ETHICS AND GOVERNMENT ACCOUNTABILITY**



Office of Government Ethics

**VIA EMAIL**

October 23, 2013

Ms. [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
Washington, D.C. 20009

Re: Nonpublic Informal Letter of Admonition

Dear Ms. [REDACTED]:

This Office has completed a preliminary investigation, which revealed that you received a Starbucks gift card from a vendor who was seeking business with your agency, the [REDACTED] (“[REDACTED]”). Based on the evidence uncovered during the preliminary investigation, I have reason to believe that, by accepting a Starbucks gift card from a vendor seeking business with the District, you violated District Personnel Manual (“DPM”) Chapter 18, § 1803.2(a).<sup>1</sup>

Our preliminary investigation revealed that, in April 2013, you attended a meeting with a vendor who was seeking to provide inventory software services to [REDACTED]. At the conclusion of this meeting, the vendor gave you a \$10 Starbucks gift card, which you accepted. Your acceptance of the \$10 Starbucks gift card violated District Personnel Manual (“DPM”) Chapter 18, § 1803.2(a). We note that you stated that you were unable to locate the gift card and, therefore, we were unable to determine whether the card had been used. That said, your violation of the DPM is based on your acceptance of the gift card, not your use of it.

Accordingly, pursuant to section 221(a)(4)(C)<sup>2</sup> of the Board of Ethics and Government Accountability Establishment and Comprehensive Ethics Reform Amendment Act of 2011 (“Ethics Act”) (as codified in section 2(b) of the Board of Ethics and Government Accountability Temporary Amendment Act of 2013, effective May 18, 2013 (D.C. Law

---

<sup>1</sup> DPM § 1803.2 (a) provides, in pertinent part, that District government employees shall not accept any gift from any person or entity that is seeking to obtain contractual or other business with the District government.

<sup>2</sup> Section 221(a)(4)(C) of the Ethics Act provides, in pertinent part, that “[i]n addition to any civil penalty imposed under this title, a violation of the Code of Conduct may result in the following: . . . A nonpublic informal admonition imposed by the Director of Government Ethics and appealable to the Board for low-level violations of the Code of Conduct . . . .”

20-0003; 60 DCR 4622)), I have issued this Nonpublic Letter of Informal Admonition as the final resolution to this matter. No further sanctions will be issued by this Office against you regarding this matter.

Pursuant to D.C. Official Code § 1-1162.21(a)(3), you may appeal this Nonpublic Letter of Informal Admonition to the Ethics Board. Please be advised that one year from the date of this Letter, you may request that this Nonpublic Letter of Informal Admonition be expunged from the records of the Board of Ethics and Government Accountability (“BEGA”), provided that the Director of Government Ethics has not found reason to believe that you have committed another violation of the Code of Conduct.

Sincerely,

\_\_\_\_\_/s/\_\_\_\_\_  
DARRIN P. SOBIN  
Director of Government Ethics  
Board of Ethics and Government Accountability

# 1041-002