



**Office of Inspector General  
Office of Investigations**

## **Employee Integrity**

### *Former EXIM Bank Employee Media Allegations of Possible Conflicts of Interest*

This case was opened to investigate allegations against a former Export-Import Bank of the United States (EXIM Bank) employee contained in civil lawsuits filed in two states. While not the subject of the lawsuits, the filings implied that the named employee, along with two unnamed former EXIM Bank employees may have failed to follow EXIM Bank post-employment regulations and laws in violation of 18 USC § 208 (Acts affecting a personal financial interest). The investigation determined that while the employees did negotiate post-employment positions in the private sector while employed at EXIM Bank, they also filed the appropriate Notification of Post-Employment Negotiation or Agreement and Recusal Statement forms, which were approved by the EXIM Bank Ethics Officer. The findings of the investigation were brought to the Public Integrity Unit of the US Department of Justice (DOJ). DOJ declined to pursue the matter and the investigation was closed.