

SEC OIG INVESTIGATIVE SUMMARY



Former Division Director failed to file ethics form but did not violate other ethics rules as alleged.

The Securities and Exchange Commission (SEC) Office of Inspector General (OIG) investigated allegations received from a non-governmental organization alleging that a former Division Director did not comply with SEC Office of the Ethics Counsel (OEC) “directives” with respect to an ongoing financial relationship and contacts with a former employing law firm.

OIG found the former employee disclosed their financial interest to OEC when they onboarded at the SEC and took the steps prescribed by SEC ethics officials to mitigate or cure potential conflicts of interest. The individual followed applicable ethics rules in preparing and delivering a speech at a private sector function, but did not submit to OEC the required SEC Form 2432. Finally, OIG did not find evidence that the former employee’s statements during the speech had a direct and predictable effect on their financial interests at the time nor were made for their personal financial gain.

