




**U.S. COMMODITY FUTURES TRADING COMMISSION**

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**Office of the  
General Counsel**

**TO:** A. Roy Lavik, Inspector General  
Judith A. Ringle, Deputy Inspector General & Chief Counsel

**FROM:** Daniel J. Davis   
General Counsel & Designated Agency Ethics Official

**CC:** J. Christopher Giancarlo, Acting Chairman  
Sharon Y. Bowen, Commissioner

**DATE:** April 21, 2017

**SUBJECT:** Management Responses to Recommendations in the *Addendum to the Investigation into Potential Violation of 18 U.S.C. § 208 – Acts Affecting a Personal Financial Interest*

The Management of Commodity Futures Trading Commission (CFTC or Commission) appreciates the opportunity to review and provide responses to the recommendations set forth in the *Addendum to the Investigation into Potential Violation of 18 U.S.C. § 208 – Acts Affecting a Personal Financial Interest (Report Addendum)*, dated March 30, 2017, and prepared by the Office of the Inspector General (OIG). The *Report Addendum* presented the following two recommendations for consideration by CFTC Management: (1) the development and implementation of a system to track open/unanswered requests for ethics advice; and (2) the implementation of a supervisory review requirement for financial disclosure reports filed by CFTC staff.

CFTC Management agrees with the first recommendation and the CFTC Ethics Program is working with the Office of Data and Technology to create a shared electronic database for the CFTC Ethics Program attorneys to log and track requests for ethics advice and guidance. This database will also enable the CFTC Ethics Program to ensure consistency in guidance provided and to identify areas in need of further ethics guidance for all CFTC staff.

With regard to the second recommendation, CFTC Management agrees with the OIG that supervisors play an important part in identifying and preventing conflicts of interests. The CFTC Ethics Program plans to provide in person training to all CFTC supervisors this calendar year and will send written guidance to all CFTC supervisors about their additional ethics responsibilities as set forth in 5 C.F.R. § 2638.103.

In closing, CFTC Management sincerely appreciates the opportunity to provide its responses to the recommendations in the *Report Addendum* and is committed to continuing to work with the OIG to further the work of the CFTC. Please let me know if you have any questions about these responses.