

UNITED STATES GOVERNMENT  
National Labor Relations Board  
Office of the General Counsel  
Region 19



## Memorandum

TO: Carolyn McConnell, Field Attorney

FROM: Ron Hooks, Regional Director

DATE: October 15, 2024

SUBJECT: Letter of Counseling

This memorandum serves as a Letter of Counseling regarding your submission of an op-ed published in the *Seattle Times* and your filing of a petition on behalf of the North Cascades Conservation Council (NCCC) with the Secretary of the Interior and the National Park Service Director. These actions likely violated 18 U.S.C. § 205(a)(2), which states, in relevant part, “[a]n employee of an agency of the United States, other than in the course of their official duties, may not act as an ‘agent... for anyone before any... agency... in connection with any covered matter in which the United States is a party or has a direct and substantial interest[.]’”<sup>1</sup>

Despite the restrictions under this statute, you chose to proceed with the publishing of the op-ed article even after the Office of Ethics (Ethics) had warned you of the potential risks associated with this action. Your conduct reflected a disregard for the guidance offered by Ethics which was intended to help you avoid this violation.

Additionally, you have engaged in outside employment with NCCC for several years without requesting or obtaining the necessary authorization until very recently.

Please be advised that this Letter of Counseling does not constitute formal discipline and will not be placed in your Electronic Official Personnel Folder (eOPF). In deciding against disciplinary action, I reviewed the Report of Investigation issued by the Office of Inspector General and considered several mitigating factors. These include your initial request for approval of the op-ed; the nature of your association with this non-profit and your non-compensatory position; the

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<sup>1</sup> Even though no criminal charges were filed against you, the Agency’s Office of Inspector General issued a Report of Investigation finding that your actions violated 18 U.S.C. § 205(a)(2).

possible misunderstanding of your rights to publish and petition; your several years of excellent performance at the Agency; and your lack of any prior discipline.

This Letter of Counseling serves as a reminder of the ethical obligations of your role within the Agency and a reminder to consider the advice and guidance of Ethics more seriously in the future. On behalf of the Agency, I consider this matter closed, but I am available to discuss this memorandum if you have any questions.

Along with this Letter of Counseling, I am providing you with a copy of the Office of Inspector General's Report of Investigation for your records.