Sent: Thursday, April 02, 2009 4:33 PM
Subject: Ethics NewsGram

"Loose Lips Sink Ships"

... So Be Careful What You Say (Even on Dry Land at the SEC)

"Loose Lips Sink Ships" was a WWII slogan, coined by the U.S. Office of War Information to limit the possibility of people inadvertently giving useful information to enemy spies (see **The Phrase Finder**, by writer/research Gary Martin). This slogan was needed because during World War II, the majority of volunteer citizen-soldiers had no idea how to conduct themselves to prevent inadvertent disclosure of important information to the enemy. To remedy this, the government established rules of conduct.

Similarly, we have rules of conduct - that is, ethics rules - here at the SEC that prohibit you from disclosing nonpublic information unless you have prior authorization from the Commission. *See* SEC Conduct Regulation, **17 CFR 200.735-3(b)(7)**; and **OGE Standards of Ethical Conduct for Employees of the Executive Branch, 5 CFR 2635.703**. You should consider all information about your work here at the SEC to be nonpublic, unless you have read it in the news or have clearance from your supervisor. Although we do not refer to others as the "enemy," it is still vitally important that you not discuss your work in front of other people unless you are in an appropriate private work environment.

And, by "other people," we mean not only outside visitors to the SEC building, but also any other SEC employee who might overhear your conversations in an SEC elevator, rest room, kitchen, snack bar, public restaurants, the metro, taxis, airports, and so on. As to outside visitors, everyone should ensure that outside visitors are properly escorted by SEC staff during their entire visit to the SEC - at all times. This may take some guts, as referred to in the WWII materials below, because you may find it intimidating to have to ask another SEC employee or official to refrain from speaking about something in front of the visitor when you know or sense that the content of their speech is nonpublic.

The following is excerpted from a WWII document given to each soldier as he entered the battle area.

WRITING HOME

THINK! Where does the enemy get his information -- information that can put you, and has put your comrades, adrift on an open sea: information that has lost battles and can lose more, unless you personally, vigilantly, perform your duty in SAFEGUARDING MILITARY INFORMATION?

EXCERPTS OF PROHIBITED SUBJECTS

1. Don't write military information of Army units -- their location, strength, material,

2. Don't write of military installations. ...

6. Don't mention plans and forecasts or orders for future operations, whether known or just your guess.

7. Don't write about the effect of enemy operations. ...

9. Don't attempt to formulate or use a code system, cipher, or shorthand, or any other means to conceal the true meaning of your letter. Violations of this regulation will result in severe punishment.

10. Don't give your location in any way except as authorized by proper authority. Be sure nothing you write about discloses a more specific location than the one authorized.

TALK
SILENCE MEANS SECURITY -- If violation of protective measures is serious within written communications it is disastrous in conversations. Protect your conversation as you do your letters, and be even more careful. A harmful letter can be nullified by censorship; loose talk is direct delivery to the enemy.

If you come home during war your lips must remain sealed and your written hand must be guided by self-imposed censorship. This takes guts. Have you got them or do you want your buddies and your country to pay the price for your showing off. You've faced the battle front; it's little enough to ask you to face this 'home front.'

See **Loose Lips Sink Ships**, part of the EyeWitness to History Web site. To view more of the interesting graphic designs of "loose talk" warning posters used on the home front, which were usually strong and eye catching, using bright colors for impact, see **Unifying a Nation: World War II Poster from the New Hampshire State Library**.

Ethics Refreshers

Confidentiality

- Discussions with Ethics Officials: Limitations on Confidentiality
- ***Ethics NewsGram:*** *Wait Before You Share!* That Memo You Just Got May Be Confidential! *(March 8, 2006)*
- ***Ethics NewsGram:*** Nonpublic Information – Part 2: Disclosing Nonpublic Information to Your Outside Private Attorney *(May 18, 2005)*
- ***Ethics NewsGram:*** Shhh ... It's Nonpublic! *(May 4, 2005)*

Nonpublic Information

- Part 1 -- Nonpublic Information, Employee Securities Transactions, Financial and Personal Interests, Employment of Family Members
- ***Ethics NewsGram:*** Warning!! Metadata Alert! *(May 28, 2008)*
- ***Ethics NewsGram:*** Writing Samples Redux: Is Redaction Enough? *(July 26, 2006)*
- ***Ethics NewsGram:*** Writing Samples: Are They Really Yours to Give? *(August 24, 2005)*
- ***Ethics NewsGram:*** Is Your Office Planning or Completing a Move? Are You Packing or Unpacking? Please Continue To Be Vigilant About Protecting Nonpublic Information! *(June 29, 2005)*

---

[1] Mundy, Alicia, "Political Lobbying Drove FDA Process," *The Wall Street Journal*, 6 March 2009.
[2] Russel, John, "Lilly faces inquiries over drugs Alimta, Effient," *IndyStar.com*, 28 Feb 2009.