#### Contact

www.linkedin.com/in/seandcroston (LinkedIn)

### Top Skills

Administrative Law Appellate Practice Government Ethics

#### Certifications

Admitted Admitted

Honors-Awards

University of Rochester:

#### **Publications**

Congress and the Courts Close Their Eyes: The Continuing Abdication of the Duty to Review Agencies' Non-Compliance with the Congressional Review Act

An Important Member of the Family: The Role of Regulatory Exemptions in Administrative Procedure

It Means What It Says: Deciphering and Respecting the APA's Definition of 'Rule'

The Chairman or the Board? Appointments at Multi-Member Agencies

Incorporating Fourth Amendment Standards in a Model Policy for School Officials' Use of Force to Restrain & Detain Students

# Sean C.

Assistant General Counsel and Designated Agency Ethics Official at Federal Reserve Board

Washington, District of Columbia, United States

### Experience

Federal Reserve Board 9 years 10 months

Assistant General Counsel June 2022 - Present (1 year 5 months)

Special Counsel / Alternate Designated Agency Ethics Official January 2014 - June 2022 (8 years 6 months)

Washington D.C. Metro Area

I manage a team that provides comprehensive oral and written ethics advice regarding criminal and regulatory conflicts of interest to ~2800 employees (including PAS appointees, senior officials, professional staff, and interns), presents weekly in-person ethics training to orientation groups numbering up to 35 new employees, provides one-on-one training to PAS appointees, reviews ~1500 confidential and public financial disclosure reports, analyzes requests for approval of outside employment, non-federal-source travel reimbursements, and waivers or exceptions from applicable requirements, works closely with Office of Government Ethics on PAS nominees, and coordinates with the Federal Reserve Bank ethics officials, the Office of the Inspector General, and human resources staff, assists with the development and management of ethics tracking databases, prepares for routine program audits, and develops new "Ethics Reminders" and other internal training products and procedures.

\* Co-coordinator of first-ever virtual Conference of Federal Reserve Counsel

\*2019 Division Director's Award for role in creating new electronic financial disclosure system.

Speaking engagements:

- \* Cryptocurrencies and Conflicts of Interest
- January 2022 Interagency Ethics Council

- \* Presidential Transition/Senate Committee Questionnaires August 2020 Interagency Ethics Council
- \* Journey to Nomination July 2020 OGE Ethics Summit
- \* Top Ten Ethics Surprises for New Employees February 2017 Interagency Ethics Council
- \* The Ethics Pitfalls of Personal Social Media Use July 2015 OIG Lunch & Learn
- \* Nepotism in the Federal Workplace April 2015 Interagency Ethics Council
- \* Identifying Particular Matters of General Applicability September 2014 OGE Midsize Agency Invitational Forum
- \* Promoting Personal Interests in the Workplace July 2014 OGE Advanced Practitioner Series Webinar

Federal Trade Commission Attorney / Deputy Ethics Official April 2013 - January 2014 (10 months) Washington D.C. Metro Area

Responsible for ethics training, reviewing financial disclosure reports, postemployment requests, financial conflicts of interest, outside activities, FOIA appeals, professional responsibility, and miscellaneous administrative law projects.

U.S. Nuclear Regulatory Commission Attorney / Deputy Ethics Official September 2007 - April 2013 (5 years 8 months) Rockville, MD

Attorney in Honor Law Graduate program. Deputy ethics counselor responsible for training, financial disclosure, Hatch Act, gifts, post-employment, and criminal conflicts analyses; liaison with OIG; lead or co-counsel in several appellate lawsuits and administrative hearings before EEOC and Civilian Board of Contract Appeals; proposed and drafted agency rulemaking actions; key point of contact for FOIA/Privacy Act/Congressional requests for information, appropriations law, Congressional Review Act, and Administrative Procedure Act.

Representative Experience:

\*Proposed, drafted, and finalized a rule in response to Executive Orders regarding regulatory review process - 77 Fed. Reg. 21625 (2012)

\*Vermont Dep't of Pub. Serv. v. NRC, 684 F.3d 189 (D.C. Cir. 2012) (lead counsel)

\*Peterson v. NRC, 411 Fed. Appx. 338 (D.C. Cir. 2011) (lead counsel)

\*San Luis Obispo Mothers for Peace v. NRC, 635 F.3d 1109 (9th Cir. 2011) (co-counsel)

\*New York v. NRC, 589 F.3d 551 (2d Cir. 2009) (co-counsel)

\*Drafted agency's response to high-profile petition for rulemaking regarding Yucca Mountain - 73 Fed. Reg. 62931 (2008)

U.S. Air Force Law Clerk May 2006 - July 2006 (3 months) Langley Air Force Base

Drafted motions in limine for general courts-martial, analyzed federal tort claims, and provided legal aid to military family members.

U.S. Coast Guard

Law Clerk

May 2005 - July 2005 (3 months)

Yorktown Training Center

Provided legal assistance regarding wills and contracts to Coast Guardsmen and their families.

Office of Representative Michael R. McNulty Intern

May 2001 - August 2001 (4 months)

Schenectady, New York

Summarized local news, attended local events, and recorded constituents' concerns on behalf of Representative McNulty.

## Education

The College of William and Mary Doctor of Law (J.D.) · (2004 - 2007)

University of Rochester

Bachelor of Arts (B.A.), Political Science and Government · (2000 - 2004)