

**From:** [Leland, Matthew](#)  
**To:** [Megan V. Khaner](#); [Deborah J. Bortot](#); [David J. Apol](#); [Heather A. Jones](#)  
**Cc:** [Jason Mahar](#); [Shashy, Hap](#); [Hrvatín, Claudia](#)  
**Subject:** [GRAYMAIL] RE: DeVos Disclosure - Follow Up Call  
**Date:** Wednesday, January 18, 2017 3:07:11 PM

---

Thanks Megan. We are looking forward to seeing it.

**From:** Megan V. Khaner [mailto:mvkhaner@oge.gov]  
**Sent:** Wednesday, January 18, 2017 3:07 PM  
**To:** Leland, Matthew; Deborah J. Bortot; David J. Apol; Heather A. Jones  
**Cc:** Jason Mahar; Shashy, Hap; Hrvatín, Claudia  
**Subject:** RE: DeVos Disclosure - Follow Up Call

Matt,

We're working to have something for you asap.

Thanks,

mk

**From:** Leland, Matthew [mailto:(b)(6)]  
**Sent:** Wednesday, January 18, 2017 3:06 PM  
**To:** Deborah J. Bortot; David J. Apol; Heather A. Jones; Megan V. Khaner  
**Cc:** Jason Mahar; Shashy, Hap; Hrvatín, Claudia  
**Subject:** [GRAYMAIL] RE: DeVos Disclosure - Follow Up Call

Thanks again for the call this morning. Is there an update from the Education Department on the draft of the ethics agreement?

**From:** Leland, Matthew  
**Sent:** Wednesday, January 18, 2017 10:32 AM  
**To:** 'Deborah J. Bortot'; David J. Apol; Heather A. Jones; 'Megan V. Khaner'  
**Cc:** 'Jason Mahar'; Shashy, Hap; Hrvatín, Claudia  
**Subject:** DeVos Disclosure - Follow Up Call

Deb, Dave, Heather, and Megan,

Will you have time this morning for a call about the divestiture list and some follow up to discussions from yesterday?

Matt

**Matthew M. Leland**

**King & Spalding LLP** | 1700 Pennsylvania Avenue, N.W. | Washington, D.C. 20006

**Firm:** +1 202 737 0500 | (b)(6)

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**From:** [Shashy, Hap](#)  
**To:** [Deborah J. Bortot](#); ["Sprague, Marcia"](#); [Leland, Matthew](#)  
**Cc:** ["Susan Valcq"](#); [David J. Apol](#); [Heather A. Jones](#); [Megan V. Khaner](#); [Goodridge, Marcella](#); ["Jason Mahar"](#); [Hrvatín, Claudia](#); ["Jeff Lambert"](#); ["Jeff Bowerman"](#); [Rowell, Theresa](#); ["Matt Brinks"](#)  
**Subject:** [GRAYMAIL] Re: DeVos Disclosures - Divestiture  
**Date:** Thursday, January 19, 2017 8:30:17 AM

---

Hello Deb,

Yes, we confirmed (b)(4), (6) with RDV last night after talking with you.

RDV is confirming now the answer to Marcia's questions.

Stay tuned.

Hap

Sent from my BlackBerry 10 smartphone.

Original Message

From: Deborah J. Bortot

Sent: Thursday, January 19, 2017 8:17 AM

To: 'Sprague, Marcia'; Shashy, Hap; Leland, Matthew

Cc: 'Susan Valcq'; David J. Apol; Heather A. Jones; Megan V. Khaner; Goodridge, Marcella; 'Jason Mahar'; Hrvatín, Claudia; 'Jeff Lambert'; 'Jeff Bowerman'; Rowell, Theresa; 'Matt Brinks'

Subject: RE: DeVos Disclosures - Divestiture

Matt, Claudia, Hap,

With respect to (b)(6) & (b)(3), were you able to confirm (b)(4), (6) ?

Also, please see Marcia's email below about (b)(6) & (b)(3),  
[REDACTED]

Thanks,  
Deb

Referral to Dept of Education



Referral to Dept of Education

-----Original Message-----

From: Shashy, Hap (b)(6)  
Sent: Thursday, January 19, 2017 7:33 AM  
To: Sprague, Marcia; Leland, Matthew; Deborah J. Bortot  
Cc: 'Susan Valcq'; David J. Apol; Heather A. Jones; Megan V. Khaner; Goodridge, Marcella; 'Jason Mahar'; Hrvatin, Claudia; 'Jeff Lambert'; 'Jeff Bowerman'; 'Matt Brinks'  
Subject: Re: DeVos Disclosures - Divestiture

Hello Marcia,

Based on a follow up discussion with OGE, we concluded there was no need to list it. The DeVos interest is a (b)(4), (6) information received from the (b)(6) & (b)(3) is that the (b)(4)

Hap

Sent from my BlackBerry 10 smartphone.

Original Message

Referral to Dept of Education

-----Original Message-----

From: Leland, Matthew [mailto:(b)(6)]  
Sent: Wednesday, January 18, 2017 7:24 PM  
To: Deborah J. Bortot  
Cc: 'Susan Valcq'; David J. Apol; Heather A. Jones; Megan V. Khaner; Goodridge, Marcella; Sprague, Marcia; 'Jason Mahar'; Shashy, Hap; Hrvatin, Claudia; 'Jeff Lambert'; 'Jeff Bowerman'; 'Matt Brinks'  
Subject: RE: DeVos Disclosures - Divestiture

Deb,

We also will remove (b)(6) & (b)(3) in light of our earlier discussion.

Matt

-----Original Message-----

From: Leland, Matthew

Sent: Wednesday, January 18, 2017 7:20 PM

To: 'Deborah J. Bortot'

Cc: 'Susan Valcq'; David J. Apol; Heather A. Jones; Megan V. Khaner; 'Goodridge, Marcella'; 'Sprague, Marcia'; 'Jason Mahar'; Shashy, Hap; Hrvatin, Claudia; 'Jeff Lambert'; 'Jeff Bowerman'; 'Matt Brinks'

Subject: RE: DeVos Disclosures - Divestiture

Thanks Deb.

Following up on the divestitures:

Please take the following investments off the ED conflict list which were fully liquidated as of 12/31/16.

(b)(6) & (b)(3)  
[Redacted]

(b)(6) & (b)(3)  
[Redacted]

Deb - Claudia and I will follow up with you in a few moments.

-----Original Message-----

From: Deborah J. Bortot [<mailto:djbortot@oge.gov>]

Sent: Wednesday, January 18, 2017 6:47 PM

To: Leland, Matthew

Cc: 'Susan Valcq'; David J. Apol; Heather A. Jones; Megan V. Khaner; 'Goodridge, Marcella'; 'Sprague, Marcia'; 'Jason Mahar'; Shashy, Hap; Hrvatin, Claudia; 'Jeff Lambert'; 'Jeff Bowerman'; 'Matt Brinks'

Subject: RE: DeVos Disclosures - Divestiture

I've attached a revised ethics agreement based on our conversation. Please put assets in Attachment A into either the 90 day or 120 day section

-----Original Message-----

From: Deborah J. Bortot

Sent: Wednesday, January 18, 2017 6:18 PM

Seven pages withheld in full – (b)(3), (4), (6)  
[Redacted]

To: 'Leland, Matthew'  
Cc: Susan Valcq; David J. Apol; Heather A. Jones; Megan V. Khaner; Goodridge, Marcella; Sprague, Marcia; Jason Mahar; Shashy, Hap; Hrvatin, Claudia; Jeff Lambert; Jeff Bowerman; Matt Brinks  
Subject: RE: DeVos Disclosures - Divestiture

Yes. We are calling in now

-----Original Message-----

From: Leland, Matthew [mailto:(b)(6)]  
Sent: Wednesday, January 18, 2017 6:18 PM  
To: Deborah J. Bortot  
Cc: Susan Valcq; David J. Apol; Heather A. Jones; Megan V. Khaner; Goodridge, Marcella; Sprague, Marcia; Jason Mahar; Shashy, Hap; Hrvatin, Claudia; Jeff Lambert; Jeff Bowerman; Matt Brinks  
Subject: [GRAYMAIL] Re: DeVos Disclosures - Divestiture

Sorry - can we get back on the phone very quickly?

Matthew M. Leland  
King & Spalding LLP | 1700 Pennsylvania Avenue N.W. | Washington<x-apple-data-detectors://0/1>, D.C. 20006  
Firm: +1 202 737 0500<tel:+1%20202%20737%200500> | (b)(6)

On Jan 18, 2017, at 5:45 PM, Deborah J. Bortot <djbortot@oge.gov<mailto:djbortot@oge.gov>> wrote:

The attachments you forwarded have:

(b)(6) & (b)(3)  
[Redacted]  
[Redacted]  
[Redacted]  
[Redacted]  
[Redacted]

From: Susan Valcq [mailto:(b)(6)]  
Sent: Wednesday, January 18, 2017 5:39 PM  
To: Deborah J. Bortot; 'Leland, Matthew'; David J. Apol; Heather A. Jones; Megan V. Khaner; 'Goodridge, Marcella'; 'Sprague, Marcia'  
Cc: Jason Mahar; Shashy, Hap; Hrvatin, Claudia; Jeff Lambert; Jeff Bowerman; Matt Brinks  
Subject: [GRAYMAIL] RE: DeVos Disclosures - Divestiture

Deborah,  
Those entities are held in (b)(6) & (b)(3) which is the investment we would like considered for removal from the divestiture list.  
The other two investments are (b)(6) & (b)(3) Information on these two investments was included in a separate attachment.  
Please let us know if you have any other questions, or we can provide more information to you.  
Thank you,  
Susan

From: Deborah J. Bortot [mailto:djbortot@oge.gov]

Sent: Wednesday, January 18, 2017 5:35 PM

To: 'Leland, Matthew' (b)(6) >; David J. Apol <djapol@oge.gov<mailto:djapol@oge.gov>>; Heather A. Jones <hajones@oge.gov<mailto:hajones@oge.gov>>; Megan V. Khaner <mvkhaner@oge.gov<mailto:mvkhaner@oge.gov>>; 'Goodridge, Marcella' (b)(6) <(b)(6)>; 'Sprague, Marcia' (b)(6) <(b)(6)>  
Cc: Mahar, Jason (Windquest) (b)(6) >; Shashy, Hap (b)(6) >; Hrvatin, Claudia (b)(6) >; Valcq, Susan (RDV Corp - Vice President of Finance) <(b)(6)>; Lambert, Jeff (b)(6) >; Bowerman, Jeff (RDV Corp - Tax) (b)(6) >; Brinks, Matt (RDV Corp - Accounting) (b)(6) >  
Subject: RE: DeVos Disclosures - Divestiture

The (b)(6) & (b)(3) attachment lists 18 entities.

Which three entities are a concern?

From: Leland, Matthew [mailto:(b)(6)]  
Sent: Wednesday, January 18, 2017 4:36 PM  
To: Deborah J. Bortot; David J. Apol; Heather A. Jones; Megan V. Khaner; 'Goodridge, Marcella'; 'Sprague, Marcia'  
Cc: Jason Mahar; Shashy, Hap; Hrvatin, Claudia; Susan Valcq; Jeff Lambert; Jeff Bowerman; Matt Brinks  
Subject: [GRAYMAIL] DeVos Disclosures - Divestiture

All,

Since our most recent call, we identified three more holdings that we would like to remove from the Government's divestiture list. Information on these is attached. If there is more information you need, please let us know.

Best regards,

"Four pages withheld in full – (b)(3), (4), (6)"

Matt

Matthew M. Leland  
King & Spalding LLP | 1700 Pennsylvania Avenue, N.W. | Washington, D.C. 20006  
Firm: +1 202 737 0500 | (b)(6)

---

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**From:** [Susan Valcq](#)  
**To:** ["Leland, Matthew"; Deborah J. Bortot](#)  
**Cc:** [David J. Apol](#); [Heather A. Jones](#); [Megan V. Khaner](#); [Goodridge, Marcella](#); [Sprague, Marcia](#); [Jason Mahar](#); [Shashy, Hap](#); [Hrvatn, Claudia](#); [Jeff Lambert](#); [Jeff Bowerman](#); [Matt Brinks](#)  
**Subject:** [GRAYMAIL] RE: DeVos Disclosures - Divestiture  
**Date:** Wednesday, January 18, 2017 6:18:09 PM

---

We're on with Dick and Betsy right now - as soon as we're done, we can call in.

-----Original Message-----

From: Leland, Matthew [[mailto:\(b\)\(6\)@oge.gov](mailto:(b)(6)@oge.gov)]  
Sent: Wednesday, January 18, 2017 6:18 PM  
To: Deborah J. Bortot <[djbortot@oge.gov](mailto:djbortot@oge.gov)>  
Cc: Valcq, Susan (RDV Corp - Vice President of Finance) <(b)(6)>; David J. Apol <[djapol@oge.gov](mailto:djapol@oge.gov)>; Heather A. Jones <[hajones@oge.gov](mailto:hajones@oge.gov)>; Megan V. Khaner <[mvkhaner@oge.gov](mailto:mvkhaner@oge.gov)>; Goodridge, Marcella <(b)(6)>; Sprague, Marcia <(b)(6)>; Mahar, Jason (Windquest) <(b)(6)>; Shashy, Hap <(b)(6)>; Hrvatn, Claudia <(b)(6)>; Lambert, Jeff <(b)(6)>; Bowerman, Jeff (RDV Corp - Tax) <(b)(6)>; Brinks, Matt (RDV Corp - Accounting) <(b)(6)>  
Subject: Re: DeVos Disclosures - Divestiture

Sorry - can we get back on the phone very quickly?

Matthew M. Leland  
King & Spalding LLP | 1700 Pennsylvania Avenue N.W. | Washington <x-apple-data-detectors://0/1>, D.C. 20006  
Firm: +1 202 737 0500 <tel:+1%20202%20737%200500> | <(b)(6)>

On Jan 18, 2017, at 5:45 PM, Deborah J. Bortot <[djbortot@oge.gov](mailto:djbortot@oge.gov)<<mailto:djbortot@oge.gov>>> wrote:

The attachments you forwarded have:

1. <(b)(6) & (b)(3)>

■ <(b)(6)>

■ <(b)(6)>

■ <(b)(6)>

■ <(b)(6)>

From: Susan Valcq [[mailto:\(b\)\(6\)@oge.gov](mailto:(b)(6)@oge.gov)]  
Sent: Wednesday, January 18, 2017 5:39 PM  
To: Deborah J. Bortot; 'Leland, Matthew'; David J. Apol; Heather A. Jones; Megan V. Khaner; 'Goodridge, Marcella'; 'Sprague, Marcia'  
Cc: Jason Mahar; Shashy, Hap; Hrvatn, Claudia; Jeff Lambert; Jeff Bowerman; Matt Brinks  
Subject: [GRAYMAIL] RE: DeVos Disclosures - Divestiture

Deborah,

Those entities are held in <(b)(6) & (b)(3)> which is the investment we would like considered for removal from the divestiture list.

The other two investments are (b)(6) & (b)(3) Information on these two investments was included in a separate attachment. Please let us know if you have any other questions, or we can provide more information to you. Thank you, Susan

From: Deborah J. Bortot [mailto:djbortot@oge.gov]  
Sent: Wednesday, January 18, 2017 5:35 PM  
To: 'Leland, Matthew' (b)(6) >; David J. Apol <djapol@oge.gov<mailto:djapol@oge.gov>>; Heather A. Jones <hajones@oge.gov<mailto:hajones@oge.gov>>; Megan V. Khaner <mvkhaner@oge.gov<mailto:mvkhaner@oge.gov>>; 'Goodridge, Marcella' (b)(6) >>; 'Sprague, Marcia' (b)(6) >>  
Cc: Mahar, Jason (Windquest) (b)(6) >>; Shashy, Hap (b)(6) >>; Hrvatin, Claudia (b)(6) >>; Valcq, Susan (RDV Corp - Vice President of Finance) (b)(6) >; Lambert, Jeff (b)(6) >>; Bowerman, Jeff (RDV Corp - Tax) (b)(6) >>; Brinks, Matt (RDV Corp - Accounting) (b)(6) >>  
Subject: RE: DeVos Disclosures - Divestiture

The (b)(6) & (b)(3) attachment lists 18 entities.

Which three entities are a concern?

From: Leland, Matthew [mailto:(b)(6)]  
Sent: Wednesday, January 18, 2017 4:36 PM  
To: Deborah J. Bortot; David J. Apol; Heather A. Jones; Megan V. Khaner; 'Goodridge, Marcella'; 'Sprague, Marcia'  
Cc: Jason Mahar; Shashy, Hap; Hrvatin, Claudia; Susan Valcq; Jeff Lambert; Jeff Bowerman; Matt Brinks  
Subject: [GRAYMAIL] DeVos Disclosures - Divestiture

All,

Since our most recent call, we identified three more holdings that we would like to remove from the Government's divestiture list. Information on these is attached. If there is more information you need, please let us know.

Best regards,

"Four pages withheld in full - (b)(3), (4), (6)"

Matt

Matthew M. Leland  
King & Spalding LLP | 1700 Pennsylvania Avenue, N.W. | Washington, D.C. 20006  
Firm: +1 202 737 0500 | (b)(6)

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**From:** [Susan Valcq](#)  
**To:** [Deborah J. Bortot](#); "[Leland, Matthew](#)"; [David J. Apol](#); [Heather A. Jones](#); [Megan V. Khaner](#); "[Goodridge, Marcella](#)"; "[Sprague, Marcia](#)"  
**Cc:** [Jason Mahar](#); [Shashy, Hap](#); [Hrvatina, Claudia](#); [Jeff Lambert](#); [Jeff Bowerman](#); [Matt Brinks](#)  
**Subject:** [GRAYMAIL] RE: DeVos Disclosures - Divestiture  
**Date:** Wednesday, January 18, 2017 5:45:47 PM

---

Sorry – you can disregard 4 & 5. We are comfortable divesting of those.

**From:** Deborah J. Bortot [mailto:[djbortot@oge.gov](mailto:djbortot@oge.gov)]  
**Sent:** Wednesday, January 18, 2017 5:45 PM  
**To:** Valcq, Susan (RDV Corp - Vice President of Finance) ; 'Leland, Matthew' ; David J. Apol ; Heather A. Jones ; Megan V. Khaner ; 'Goodridge, Marcella' ; 'Sprague, Marcia'  
**Cc:** Mahar, Jason (Windquest) ; Shashy, Hap ; Hrvatina, Claudia ; Lambert, Jeff ; Bowerman, Jeff (RDV Corp - Tax) ; Brinks, Matt (RDV Corp - Accounting)  
**Subject:** RE: DeVos Disclosures - Divestiture

The attachments you forwarded have:

(b)(6) & (b)(3)

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

**From:** Susan Valcq [mailto:[\[REDACTED\]](mailto:(b)(6) [REDACTED])]  
**Sent:** Wednesday, January 18, 2017 5:39 PM  
**To:** Deborah J. Bortot; 'Leland, Matthew'; David J. Apol; Heather A. Jones; Megan V. Khaner; 'Goodridge, Marcella'; 'Sprague, Marcia'  
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**Subject:** [GRAYMAIL] RE: DeVos Disclosures - Divestiture

Deborah,

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[REDACTED] Information on these two investments was included in a separate attachment.

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Thank you,

Susan

**From:** Deborah J. Bortot [mailto:[djbortot@oge.gov](mailto:djbortot@oge.gov)]

**Sent:** Wednesday, January 18, 2017 5:35 PM  
**To:** 'Leland, Matthew' <(b)(6)>; David J. Apol <[djapol@oge.gov](mailto:djapol@oge.gov)>; Heather A. Jones <[hajones@oge.gov](mailto:hajones@oge.gov)>; Megan V. Khaner <[mykhaner@oge.gov](mailto:mykhaner@oge.gov)>; 'Goodridge, Marcella' <(b)(6)>; 'Sprague, Marcia' <(b)(6)>  
**Cc:** Mahar, Jason (Windquest) <(b)(6)>; Shashy, Hap <(b)(6)>; Hrvatin, Claudia <(b)(6)>; Valcq, Susan (RDV Corp - Vice President of Finance) <(b)(6)>; Lambert, Jeff <(b)(6)>; Bowerman, Jeff (RDV Corp - Tax) <(b)(6)>; Brinks, Matt (RDV Corp - Accounting) <(b)(6)>  
**Subject:** RE: DeVos Disclosures - Divestiture

The (b)(6) & (b)(3) attachment lists 18 entities.

Which three entities are a concern?

**From:** Leland, Matthew [[\(mailto:\(b\)\(6\)\)](mailto:(b)(6))]  
**Sent:** Wednesday, January 18, 2017 4:36 PM  
**To:** Deborah J. Bortot; David J. Apol; Heather A. Jones; Megan V. Khaner; 'Goodridge, Marcella'; 'Sprague, Marcia'  
**Cc:** Jason Mahar; Shashy, Hap; Hrvatin, Claudia; Susan Valcq; Jeff Lambert; Jeff Bowerman; Matt Brinks  
**Subject:** [GRAYMAIL] DeVos Disclosures - Divestiture

All,

Since our most recent call, we identified three more holdings that we would like to remove from the Government's divestiture list. Information on these is attached. If there is more information you need, please let us know.

Best regards,

Four pages withheld in full – (b)(3), (4), (6)

Matt

**Matthew M. Leland**

**King & Spalding LLP** | 1700 Pennsylvania Avenue, N.W. | Washington, D.C. 20006

**Firm:** +1 202 737 0500 | (b)(6)

---

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**From:** [Leland, Matthew](#)  
**To:** [Megan V. Khaner](#); [Susan Valcq](#); [Deborah J. Bortot](#); "[Sprague, Marcia](#)"; [Shashy, Hap](#)  
**Cc:** [David J. Apol](#); [Heather A. Jones](#); [Goodridge, Marcella](#); [Jason Mahar](#); [Hrvatín, Claudia](#); [Jeff Lambert](#); [Jeff Bowerman](#); [Rowell, Theresa](#); [Matt Brinks](#)  
**Subject:** [GRAYMAIL] RE: DeVos Disclosures - Divestiture  
**Date:** Thursday, January 19, 2017 10:49:44 AM

---

Thanks Megan.

-----Original Message-----

From: Megan V. Khaner [<mailto:mvkhaner@oge.gov>]  
Sent: Thursday, January 19, 2017 10:46 AM  
To: Leland, Matthew; Susan Valcq; Deborah J. Bortot; 'Sprague, Marcia'; Shashy, Hap  
Cc: David J. Apol; Heather A. Jones; Goodridge, Marcella; Jason Mahar; Hrvatín, Claudia; Jeff Lambert; Jeff Bowerman; Rowell, Theresa; Matt Brinks  
Subject: RE: DeVos Disclosures - Divestiture

I'll take care of it.

Thanks,  
mk

-----Original Message-----

From: Leland, Matthew [[mailto:\(b\)\(6\)@oge.gov](mailto:(b)(6)@oge.gov)]  
Sent: Thursday, January 19, 2017 10:45 AM  
To: Susan Valcq; Deborah J. Bortot; 'Sprague, Marcia'; Shashy, Hap  
Cc: David J. Apol; Heather A. Jones; Megan V. Khaner; Goodridge, Marcella; Jason Mahar; Hrvatín, Claudia; Jeff Lambert; Jeff Bowerman; Rowell, Theresa; Matt Brinks  
Subject: [GRAYMAIL] RE: DeVos Disclosures - Divestiture

Deb,

Would you like us to add [\(b\)\(6\) & \(b\)\(3\)](#) to the agreement, or are you handling that?

Matt

-----Original Message-----

From: Susan Valcq [[mailto:\(b\)\(6\)@oge.gov](mailto:(b)(6)@oge.gov)]  
Sent: Thursday, January 19, 2017 9:39 AM  
To: 'Deborah J. Bortot'; 'Sprague, Marcia'; Shashy, Hap; Leland, Matthew  
Cc: David J. Apol; Heather A. Jones; Megan V. Khaner; Goodridge, Marcella; Jason Mahar; Hrvatín, Claudia; Jeff Lambert; Jeff Bowerman; Rowell, Theresa; Matt Brinks  
Subject: RE: DeVos Disclosures - Divestiture

Deb,

Please add [\(b\)\(6\) & \(b\)\(3\)](#) to the divestiture list as 102.

Thank you,  
Susan

-----Original Message-----

From: Deborah J. Bortot [<mailto:djbortot@oge.gov>]  
Sent: Thursday, January 19, 2017 8:17 AM  
To: 'Sprague, Marcia' [\(b\)\(6\)](#); Shashy, Hap [\(b\)\(6\)](#); Leland, Matthew [\(b\)\(6\)](#)  
Cc: Valcq, Susan (RDV Corp - Vice President of Finance) [\(b\)\(6\)](#); David J. Apol [djapol@oge.gov](mailto:djapol@oge.gov); Heather A. Jones [hajones@oge.gov](mailto:hajones@oge.gov); Megan V. Khaner [mvkhaner@oge.gov](mailto:mvkhaner@oge.gov); Goodridge, Marcella [\(b\)\(6\)](#); Mahar, Jason (Windquest) [\(b\)\(6\)](#); Hrvatín, Claudia

(b)(6) >; Lambert, Jeff (b)(6) >; Bowerman, Jeff (RDV Corp - Tax)  
(b)(6) ; Rowell, Theresa (b)(6) ; Brinks, Matt (RDV Corp - Accounting)  
(b)(6)

Subject: RE: DeVos Disclosures - Divestiture

Matt, Claudia, Hap,

With respect to (b)(6) & (b)(3), were you able to confirm (b)(4), (6) ?

Also, please see Marcia's email below about (b)(6) & (b)(3)

Thanks,  
Deb

Referral to Dept of Education

From: Shashy, Hap [mailto:(b)(6)]  
Sent: Thursday, January 19, 2017 7:33 AM  
To: Sprague, Marcia; Leland, Matthew; Deborah J. Bortot  
Cc: 'Susan Valcq'; David J. Apol; Heather A. Jones; Megan V. Khaner; Goodridge, Marcella; 'Jason Mahar'; Hrvatin, Claudia; 'Jeff Lambert'; 'Jeff Bowerman'; 'Matt Brinks'  
Subject: Re: DeVos Disclosures - Divestiture

Hello Marcia,

Based on a follow up discussion with OGE, we concluded there was no need to list it. The DeVos interest is a (b)(4), (6), information received from the (b)(6) & (b)(3) is that the (b)(4), (6)



Hap

Sent from my BlackBerry 10 smartphone.

Referral to Dept of Education

-----Original Message-----

From: Leland, Matthew [mailto:(b)(6)]

Sent: Wednesday, January 18, 2017 7:24 PM

To: Deborah J. Bortot

Cc: 'Susan Valcq'; David J. Apol; Heather A. Jones; Megan V. Khaner; Goodridge, Marcella; Sprague, Marcia; 'Jason Mahar'; Shashy, Hap; Hrvatin, Claudia; 'Jeff Lambert'; 'Jeff Bowerman'; 'Matt Brinks'

Subject: RE: DeVos Disclosures - Divestiture

Deb,

We also will remove (b)(6) & (b)(3) in light of our earlier discussion.

Matt

-----Original Message-----

From: Leland, Matthew

Sent: Wednesday, January 18, 2017 7:20 PM

To: 'Deborah J. Bortot'

Cc: 'Susan Valcq'; David J. Apol; Heather A. Jones; Megan V. Khaner; 'Goodridge, Marcella'; 'Sprague, Marcia'; 'Jason Mahar'; Shashy, Hap; Hrvatin, Claudia; 'Jeff Lambert'; 'Jeff Bowerman'; 'Matt Brinks'

Subject: RE: DeVos Disclosures - Divestiture

Thanks Deb.

Following up on the divestitures:

Please take the following investments off the ED conflict list which were fully liquidated as of 12/31/16.

(b)(6) & (b)(3)

(b)(6) & (b)(3)

Deb - Claudia and I will follow up with you in a few moments.

-----Original Message-----

From: Deborah J. Bortot [<mailto:djbortot@oge.gov>]

Sent: Wednesday, January 18, 2017 6:47 PM

To: Leland, Matthew

Cc: 'Susan Valcq'; David J. Apol; Heather A. Jones; Megan V. Khaner; 'Goodridge, Marcella'; 'Sprague, Marcia'; 'Jason Mahar'; Shashy, Hap; Hrvatin, Claudia; 'Jeff Lambert'; 'Jeff Bowerman'; 'Matt Brinks'

Subject: RE: DeVos Disclosures - Divestiture

I've attached a revised ethics agreement based on our conversation. Please put assets in Attachment A into either the 90 day or 120 day section

-----Original Message-----

From: Deborah J. Bortot

Sent: Wednesday, January 18, 2017 6:18 PM

To: 'Leland, Matthew'

Cc: Susan Valcq; David J. Apol; Heather A. Jones; Megan V. Khaner; Goodridge, Marcella; Sprague, Marcia; Jason Mahar; Shashy, Hap; Hrvatin, Claudia; Jeff Lambert; Jeff Bowerman; Matt Brinks

Subject: RE: DeVos Disclosures - Divestiture

Seven pages withheld in full – (b)(3), (4), (6)

Yes. We are calling in now

-----Original Message-----

From: Leland, Matthew [[mailto:\(b\)\(6\)](mailto:(b)(6)@)]

Sent: Wednesday, January 18, 2017 6:18 PM

To: Deborah J. Bortot

Cc: Susan Valcq; David J. Apol; Heather A. Jones; Megan V. Khaner; Goodridge, Marcella; Sprague, Marcia; Jason Mahar; Shashy, Hap; Hrvatin, Claudia; Jeff Lambert; Jeff Bowerman; Matt Brinks

Subject: [GRAYMAIL] Re: DeVos Disclosures - Divestiture

Sorry - can we get back on the phone very quickly?

Matthew M. Leland

King & Spalding LLP | 1700 Pennsylvania Avenue N.W. | Washington<x-apple-data-detectors://0/1>, D.C. 20006

Firm: +1 202 737 0500<tel:+1%20202%20737%200500> (b)(6)

On Jan 18, 2017, at 5:45 PM, Deborah J. Bortot <djbortot@oge.gov<<mailto:djbortot@oge.gov>>> wrote:

The attachments you forwarded have:

(b)(6) & (b)(3)

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From: Susan Valcq [[\(b\)\(6\)](mailto:(b)(6))]  
Sent: Wednesday, January 18, 2017 5:39 PM  
To: Deborah J. Bortot; 'Leland, Matthew'; David J. Apol; Heather A. Jones; Megan V. Khaner; 'Goodridge, Marcella'; 'Sprague, Marcia'  
Cc: Jason Mahar; Shashy, Hap; Hrvatin, Claudia; Jeff Lambert; Jeff Bowerman; Matt Brinks  
Subject: [GRAYMAIL] RE: DeVos Disclosures - Divestiture

Deborah,  
Those entities are held in (b)(6) & (b)(3) which is the investment we would like considered for removal from the divestiture list.  
The other two investments are (b)(6) & (b)(3) and (b)(6) & (b)(3) Information on these two investments was included in a separate attachment.  
Please let us know if you have any other questions, or we can provide more information to you.  
Thank you,  
Susan

From: Deborah J. Bortot [<mailto:djbortot@oge.gov>]  
Sent: Wednesday, January 18, 2017 5:35 PM  
To: 'Leland, Matthew' (b)(6) >>; David J. Apol <djapol@oge.gov<<mailto:djapol@oge.gov>>>; Heather A. Jones <hajones@oge.gov<<mailto:hajones@oge.gov>>>; Megan V. Khaner <mvkhaner@oge.gov<<mailto:mvkhaner@oge.gov>>>; 'Goodridge, Marcella' (b)(6) >>; 'Sprague, Marcia' (b)(6) >  
Cc: Mahar, Jason (Windquest) (b)(6) >>; Shashy, Hap (b)(6) >>; Hrvatin, Claudia (b)(6) >; Valcq, Susan (RDV Corp - Vice President of Finance) (b)(6) >>; Lambert, Jeff (b)(6) >>; Bowerman, Jeff (RDV Corp - Tax) (b)(6) >; Brinks, Matt (RDV Corp - Accounting) (b)(6) >  
Subject: RE: DeVos Disclosures - Divestiture

The (b)(6) & (b)(3) attachment lists 18 entities.

Which three entities are a concern?

From: Leland, Matthew [[\(b\)\(6\)](mailto:(b)(6))]  
Sent: Wednesday, January 18, 2017 4:36 PM

To: Deborah J. Bortot; David J. Apol; Heather A. Jones; Megan V. Khaner; 'Goodridge, Marcella'; 'Sprague, Marcia'  
Cc: Jason Mahar; Shashy, Hap; Hrvatin, Claudia; Susan Valcq; Jeff Lambert; Jeff Bowerman; Matt Brinks  
Subject: [GRAYMAIL] DeVos Disclosures - Divestiture

All,

Since our most recent call, we identified three more holdings that we would like to remove from the Government's divestiture list. Information on these is attached. If there is more information you need, please let us know.

Best regards,

Matt

"Four pages withheld in full – (b)(3), (4), (6)"

Matthew M. Leland

King & Spalding LLP | 1700 Pennsylvania Avenue, N.W. | Washington, D.C. 20006

Firm: +1 202 737 0500 | (b)(6)

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**From:** [Leland, Matthew](#)  
**To:** [Deborah J. Bortot](#)  
**Cc:** [Hrvatina, Claudia](#); [Shashy, Hap](#); [Jason Mahar](#); [Heather A. Jones](#); [Megan V. Khaner](#); [David J. Apol](#); [\(b\)\(6\) Marcella Keller's email](#); [Sprague, Marcia](#); [Rowell, Theresa](#)  
**Subject:** [GRAYMAIL] Re: DeVos Ethics Agreement  
**Date:** Wednesday, January 18, 2017 5:29:17 PM

---

Thanks. We will use your number again.

Matthew M. Leland  
King & Spalding LLP | 1700 Pennsylvania Avenue N.W. | Washington<x-apple-data-detectors://0/1>, D.C. 20006  
Firm: +1 202 737 0500<tel:+1%20202%20737%200500> (b)(6)

On Jan 18, 2017, at 5:28 PM, Deborah J. Bortot <[djbortot@oge.gov](mailto:djbortot@oge.gov)<<mailto:djbortot@oge.gov>>> wrote:

6:00 works for OGE

-----Original Message-----

**From:** Leland, Matthew [[\(b\)\(6\)](mailto:(b)(6))]  
**Sent:** Wednesday, January 18, 2017 5:22 PM  
**To:** Deborah J. Bortot  
**Cc:** Hrvatina, Claudia; Shashy, Hap; Jason Mahar; Heather A. Jones; Megan V. Khaner; David J. Apol; [\(b\)\(6\) Marcella Keller's email address](#); Sprague, Marcia; Rowell, Theresa  
**Subject:** [GRAYMAIL] Re: DeVos Ethics Agreement

Deb,

May we talk at 6:00 pm?

Matt

Matthew M. Leland  
King & Spalding LLP | 1700 Pennsylvania Avenue N.W. | Washington<x-apple-data-detectors://0/1>, D.C. 20006  
Firm: +1 202 737 0500<tel:+1%20202%20737%200500> | (b)(6)

(b)(6)

On Jan 18, 2017, at 3:39 PM, Deborah J. Bortot <[djbortot@oge.gov](mailto:djbortot@oge.gov)<<mailto:djbortot@oge.gov>>> wrote:

Matthew, Claudia, and Hap,

Seven pages withheld in full – (b)(3), (4), (6)

I've attached the ethics agreement that is based on model language used for nominees. Please note I did not include the certificate of divestiture language below based on the fact that she is not interested in requesting a certificate of divestiture. Please let me know if you would like me to add the certificate of divestiture language.

“I understand that I may be eligible to request a Certificate of Divestiture for qualifying assets and that a Certificate of Divestiture is effective only if obtained prior to divestiture. Regardless of whether I receive a Certificate of Divestiture, I will ensure that all divestitures discussed in this agreement occur within the agreed upon timeframes

and that all proceeds are invested in non-conflicting assets.”

Once you provide the list of additional divestitures, I will insert them in Attachment A.

PTT has created a new report for the filer. Please contact George Hancock (phone: 202-482-9309, email: [ghancock@oge.gov](mailto:ghancock@oge.gov)<<mailto:ghancock@oge.gov>><<mailto:ghancock@oge.gov>>) for assistance in prepopulating.

Thanks,  
Deb

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<DeVos EA - with attachments B and C 1.18.17 2.06pm.docx>

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**From:** [Jason Mahar](#)  
**To:** [Heather A. Jones](#); "[Hrvatın, Claudia](#)"; [Shashy, Hap](#); [Megan V. Khaner](#); [David J. Apol](#); (b)(6) Marcella Keller's email address  
**Cc:** [Deborah J. Bortot](#); [Leland, Matthew](#)  
**Subject:** [GRAYMAIL] Re: Note 45.1.5.1.1.  
**Date:** Thursday, January 19, 2017 7:34:38 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)

---

It's been signed. Can you confirm that it appears as signed on your end.

Best,

Jason

 Jason Mahar  
In-House Counsel  
Windquest Group | (b)(6)

Main office: 616.459.4500 | 201 Monroe Avenue NW, Suite 500, Grand Rapids, MI 49503



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**From:** "Heather A. Jones"  
**Date:** Thursday, January 19, 2017 at 5:45 PM  
**To:** "'Hrvatın, Claudia'", Hap Shashy, Jason Mahar, "Megan V. Khaner", "David J. Apol", (b)(6) Marcella Keller's email address, "Sprague, Marcia", "Rowell, Theresa"  
**Cc:** "Deborah J. Bortot", "Leland, Matthew"  
**Subject:** RE: Note 45.1.5.1.1.

We have received authorization from the PTT. Please ask Ms. DeVos to submit her report.

Thanks,

Heather

**From:** Hrvatın, Claudia [mailto:(b)(6)]  
**Sent:** Thursday, January 19, 2017 5:42 PM  
**To:** Heather A. Jones; Shashy, Hap; Jason Mahar; Megan V. Khaner; David J. Apol; (b)(6) Marcella Keller's email address; Sprague, Marcia; Rowell, Theresa  
**Cc:** Deborah J. Bortot; Leland, Matthew  
**Subject:** [GRAYMAIL] RE: Note 45.1.5.1.1.



Heather – Confirming that all the loose ends are tied, and that we are all on the same email. RDV has confirmed the update, below. We have also received the email from Megan indicating that the 278 has been pre-cleared and is off to PTT. Many thanks.

**From:** Heather A. Jones [<mailto:hajones@oge.gov>]

**Sent:** Thursday, January 19, 2017 4:47 PM

**To:** Hrvatin, Claudia; Shashy, Hap; Jason Mahar; Heather A. Jones; Megan V. Khaner; David J. Apol; (b)(6) Marcella Keller's email address; Sprague, Marcia; Rowell, Theresa

**Cc:** Deborah J. Bortot

**Subject:** Note 45.1.5.1.1.

We are proposing to add the line of business for the following entities for the note above. This information is in the first note for (b)(3), (b)(6) but nor the second.

---

(b)(6) & (b)(3)

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

Heather Jones

(202) 482-9316

Office of Government Ethics

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**From:** [Leland, Matthew](#)  
**To:** [Heather A. Jones](#); [Deborah J. Bortot](#); [David J. Apol](#); [Megan V. Khaner](#)  
**Cc:** [Jason Mahar](#); [Shashy, Hap](#); [Hrvatín, Claudia](#)  
**Subject:** [GRAYMAIL] RE: RE: DeVos Disclosure - Follow Up Call  
**Date:** Wednesday, January 18, 2017 11:07:06 AM

---

Thanks Heather.

**From:** Heather A. Jones [<mailto:hajones@oge.gov>]  
**Sent:** Wednesday, January 18, 2017 11:07 AM  
**To:** Leland, Matthew; Deborah J. Bortot; David J. Apol; Megan V. Khaner  
**Cc:** Jason Mahar; Shashy, Hap; Hrvatín, Claudia  
**Subject:** Re: [GRAYMAIL] RE: DeVos Disclosure - Follow Up Call

Yes use the daily in below

Sent from my BlackBerry 10 smartphone on the Verizon Wireless 4G LTE network.

**From:** Leland, Matthew  
**Sent:** Wednesday, January 18, 2017 10:52 AM  
**To:** Deborah J. Bortot; David J. Apol; Heather A. Jones; Megan V. Khaner  
**Cc:** Jason Mahar; Shashy, Hap; Hrvatín, Claudia  
**Subject:** [GRAYMAIL] RE: DeVos Disclosure - Follow Up Call

Thanks Deb. Should we use the dial in below?

**From:** Deborah J. Bortot [<mailto:djbortot@oge.gov>]  
**Sent:** Wednesday, January 18, 2017 10:51 AM  
**To:** Leland, Matthew; David J. Apol; Heather A. Jones; Megan V. Khaner  
**Cc:** Jason Mahar; Shashy, Hap; Hrvatín, Claudia  
**Subject:** RE: DeVos Disclosure - Follow Up Call

Yes

**From:** Leland, Matthew [[mailto:\(b\)\(6\)@oge.gov](mailto:(b)(6)@oge.gov)]  
**Sent:** Wednesday, January 18, 2017 10:45 AM  
**To:** Deborah J. Bortot; David J. Apol; Heather A. Jones; Megan V. Khaner  
**Cc:** Jason Mahar; Shashy, Hap; Hrvatín, Claudia  
**Subject:** [GRAYMAIL] RE: DeVos Disclosure - Follow Up Call

Deb,

Thanks for the quick response. Are you free at 11:15 am?

Matt

**From:** Deborah J. Bortot [<mailto:djbortot@oge.gov>]

**Sent:** Wednesday, January 18, 2017 10:33 AM  
**To:** Leland, Matthew; David J. Apol; Heather A. Jones; Megan V. Khaner  
**Cc:** Jason Mahar; Shashy, Hap; Hrvatin, Claudia  
**Subject:** RE: DeVos Disclosure - Follow Up Call

Yes. Let us know when you would like to talk.

We can use my call-in number:

Call-in number: (b) (6)

Participant code: (b) (6)

**From:** Leland, Matthew [[mailto:\(b\) \(6\)@](mailto:(b) (6)@)]  
**Sent:** Wednesday, January 18, 2017 10:32 AM  
**To:** Deborah J. Bortot; David J. Apol; Heather A. Jones; Megan V. Khaner  
**Cc:** Jason Mahar; Shashy, Hap; Hrvatin, Claudia  
**Subject:** [GRAYMAIL] DeVos Disclosure - Follow Up Call

Deb, Dave, Heather, and Megan,

Will you have time this morning for a call about the divestiture list and some follow up to discussions from yesterday?

Matt

**Matthew M. Leland**

**King & Spalding LLP** | 1700 Pennsylvania Avenue, N.W. | Washington, D.C. 20006

**Firm:** +1 202 737 0500 | (b) (6)

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**From:** [Leland, Matthew](#)  
**To:** [Deborah J. Bortot](#)  
**Cc:** [Susan Valcq](#); [David J. Apol](#); [Heather A. Jones](#); [Megan V. Khaner](#); [Goodridge, Marcella](#); [Sprague, Marcia](#); [Jason Mahar](#); [Shashy, Hap](#); [Hrvatn, Claudia](#); [Jeff Lambert](#); [Jeff Bowerman](#); [Matt Brinks](#)  
**Subject:** [GRAYMAIL] Re: Re: RE: DeVos Disclosures - Divestiture  
**Date:** Wednesday, January 18, 2017 10:26:13 PM

---

Deb -

We will aim to get our comments to you tonight.

Matt

Matthew M. Leland  
King & Spalding LLP | 1700 Pennsylvania Avenue N.W. | Washington<x-apple-data-detectors://0/1>, D.C. 20006  
Firm: +1 202 737 0500<tel:+1%20202%20737%200500> | (b)(6)

Seven pages withheld in full – (b)(3), (4), (6)

On Jan 18, 2017, at 9:51 PM, Deborah J. Bortot <djbortot@oge.gov<<mailto:djbortot@oge.gov>>> wrote:

Attached is a tracked changes version of the updated ethics agreement. I'm not certain if we have allowed digital signatures for ethics agreements, so I will have to run that up the chain. If the concern is getting the original, we do allow scanned copies. She can print it, sign it, scan it, and email it as long as it is a clear scan. Otherwise, I'll have to check about using a digital signature.

-----Original Message-----

**From:** Leland, Matthew [[\(b\)\(6\)](mailto:(b)(6))]  
**Sent:** Wednesday, January 18, 2017 9:21 PM  
**To:** Deborah J. Bortot  
**Cc:** Susan Valcq; David J. Apol; Heather A. Jones; Megan V. Khaner; Goodridge, Marcella; Sprague, Marcia; Jason Mahar; Shashy, Hap; Hrvatn, Claudia; Jeff Lambert; Jeff Bowerman; Matt Brinks  
**Subject:** [GRAYMAIL] Re: RE: DeVos Disclosures - Divestiture

Thanks Deb.

Matthew M. Leland  
King & Spalding LLP | 1700 Pennsylvania Avenue N.W. | Washington<x-apple-data-detectors://0/1>, D.C. 20006  
Firm: +1 202 737 0500<tel:+1%20202%20737%200500> (b)(6)

On Jan 18, 2017, at 9:09 PM, Deborah J. Bortot <djbortot@oge.gov<<mailto:djbortot@oge.gov>>> wrote:

We are working on the revision right now Sent from my BlackBerry 10 smartphone on the Verizon Wireless 4G LTE network.

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Subject: [GRAYMAIL] RE: DeVos Disclosures - Divestiture

Deb,

Following up on our call, we can forgo language about divesting within 120 days and commit to divest within 90 days.

Is an electronic signature on the letter acceptable, or is an original signature required?

Finally, how quickly may we get a revised agreement?

Thanks so much.

Matt

-----Original Message-----

From: Leland, Matthew

Sent: Wednesday, January 18, 2017 7:24 PM

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Subject: RE: DeVos Disclosures - Divestiture

Deb,

We also will remove (b)(6) & (b)(3) in light of our earlier discussion.

Matt

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To: 'Deborah J. Bortot'

Cc: 'Susan Valcq'; David J. Apol; Heather A. Jones; Megan V. Khaner; 'Goodridge, Marcella'; 'Sprague, Marcia'; 'Jason Mahar'; Shashy, Hap; Hrvatin, Claudia; 'Jeff Lambert'; 'Jeff Bowerman'; 'Matt Brinks'

Subject: RE: DeVos Disclosures - Divestiture

Thanks Deb.

Following up on the divestitures:

Please take the following investments off the ED conflict list which were fully liquidated as of 12/31/16.

(b)(6) & (b)(3)

(b)(6) & (b)(3)

(b)(6) & (b)(3)

Deb - Claudia and I will follow up with you in a few moments.

-----Original Message-----

From: Deborah J. Bortot [<mailto:djbortot@oge.gov>]

Sent: Wednesday, January 18, 2017 6:47 PM

To: Leland, Matthew

Cc: 'Susan Valcq'; David J. Apol; Heather A. Jones; Megan V. Khaner; 'Goodridge, Marcella'; 'Sprague, Marcia'; 'Jason Mahar'; Shashy, Hap; Hrvatin, Claudia; 'Jeff Lambert'; 'Jeff Bowerman'; 'Matt Brinks'

Subject: RE: DeVos Disclosures - Divestiture

I've attached a revised ethics agreement based on our conversation. Please put assets in Attachment A into either the 90 day or 120 day section

-----Original Message-----

Seven pages withheld in full – (b)(3), (4), (6)

From: Deborah J. Bortot

Sent: Wednesday, January 18, 2017 6:18 PM

To: 'Leland, Matthew'

Cc: Susan Valcq; David J. Apol; Heather A. Jones; Megan V. Khaner; Goodridge, Marcella; Sprague, Marcia; Jason Mahar; Shashy, Hap; Hrvatin, Claudia; Jeff Lambert; Jeff Bowerman; Matt Brinks

Subject: RE: DeVos Disclosures - Divestiture

Yes. We are calling in now

-----Original Message-----

From: Leland, Matthew [[mailto:\(b\)\(6\)](mailto:(b)(6)@)]

Sent: Wednesday, January 18, 2017 6:18 PM

To: Deborah J. Bortot

Cc: Susan Valcq; David J. Apol; Heather A. Jones; Megan V. Khaner; Goodridge, Marcella; Sprague, Marcia; Jason Mahar; Shashy, Hap; Hrvatin, Claudia; Jeff Lambert; Jeff Bowerman; Matt Brinks

Subject: [GRAYMAIL] Re: DeVos Disclosures - Divestiture

Sorry - can we get back on the phone very quickly?

Matthew M. Leland

King & Spalding LLP | 1700 Pennsylvania Avenue N.W. | Washington<x-apple-data-detectors://0/1>, D.C. 20006

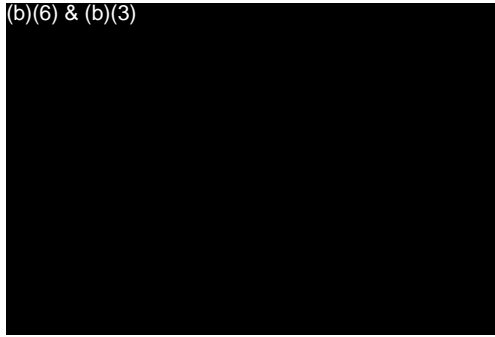
Firm: +1 202 737 0500<tel:+1%20202%20737%200500> | (b)(6)



On Jan 18, 2017, at 5:45 PM, Deborah J. Bortot <djbortot@oge.gov<<mailto:djbortot@oge.gov>><<mailto:djbortot@oge.gov>><<mailto:djbortot@oge.gov>>> wrote:

The attachments you forwarded have:

(b)(6) & (b)(3)



From: Susan Valcq [[\(b\)\(6\)](mailto:(b)(6))] ]  
Sent: Wednesday, January 18, 2017 5:39 PM  
To: Deborah J. Bortot; 'Leland, Matthew'; David J. Apol; Heather A. Jones; Megan V. Khaner; 'Goodridge, Marcella'; 'Sprague, Marcia'  
Cc: Jason Mahar; Shashy, Hap; Hrvatin, Claudia; Jeff Lambert; Jeff Bowerman; Matt Brinks  
Subject: [GRAYMAIL] RE: DeVos Disclosures - Divestiture

Deborah,  
Those entities are held in (b)(6) & (b)(3) which is the investment we would like considered for removal from the divestiture list.  
The other two investments are (b)(6) & (b)(3). Information on these two investments was included in a separate attachment.  
Please let us know if you have any other questions, or we can provide more information to you.  
Thank you,  
Susan

From: Deborah J. Bortot [<mailto:djbortot@oge.gov>]  
Sent: Wednesday, January 18, 2017 5:35 PM  
To: 'Leland, Matthew' (b)(6)  
(b)(6) David J. Apol  
<djapol@oge.gov<<mailto:djapol@oge.gov>><<mailto:djapol@oge.gov>><<mailto:djapol@oge.gov>>>; Heather A. Jones <hajones@oge.gov<<mailto:hajones@oge.gov>><<mailto:hajones@oge.gov>><<mailto:hajones@oge.gov>>>; Megan V. Khaner <mvkhaner@oge.gov<<mailto:mvkhaner@oge.gov>><<mailto:mvkhaner@oge.gov>><<mailto:mvkhaner@oge.gov>>>; 'Goodridge, Marcella' (b)(6) Marcella Keller's email address  
(b)(6) Marcella Keller's email address ; 'Sprague, Marcia'  
(b)(6)  
Cc: Mahar, Jason (Windquest) (b)(6)  
(b)(6) ; Shashy, Hap  
(b)(6) Hrvatin, Claudia (b)(6)  
(b)(6) >; Valcq, Susan (RDV Corp - Vice President of Finance) (b)(6)  
(b)(6) Lambert, Jeff (b)(6)  
(b)(6) ; Bowerman, Jeff (RDV Corp - Tax)  
(b)(6);  
Brinks, Matt (RDV Corp - Accounting) (b)(6)  
(b)(6)  
Subject: RE: DeVos Disclosures - Divestiture

The (b)(6) & (b)(3) attachment lists 18 entities.

Which three entities are a concern?

From: Leland, Matthew [mailto:(b)(6)]  
Sent: Wednesday, January 18, 2017 4:36 PM  
To: Deborah J. Bortot; David J. Apol; Heather A. Jones; Megan V. Khaner; 'Goodridge, Marcella'; 'Sprague, Marcia'  
Cc: Jason Mahar; Shashy, Hap; Hrvatin, Claudia; Susan Valcq; Jeff Lambert; Jeff Bowerman; Matt Brinks  
Subject: [GRAYMAIL] DeVos Disclosures - Divestiture

All,

Since our most recent call, we identified three more holdings that we would like to remove from the Government's divestiture list. Information on these is attached. If there is more information you need, please let us know.

Best regards,

Four pages withheld in full – (b)(3), (4), (6)

Matt

Matthew M. Leland  
King & Spalding LLP | 1700 Pennsylvania Avenue, N.W. | Washington, D.C. 20006  
Firm: +1 202 737 0500 (b)(6)

---

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<DeVos EA - with attachments B and C 1.18.17 9.17pm.docx>

**From:** [Leland, Matthew](#)  
**To:** [Deborah J. Bortot](#)  
**Cc:** [Susan Valcq](#); [David J. Apol](#); [Heather A. Jones](#); [Megan V. Khaner](#); [Goodridge, Marcella](#); [Sprague, Marcia](#); [Jason Mahar](#); [Shashy, Hap](#); [Hrvatn, Claudia](#); [Jeff Lambert](#); [Jeff Bowerman](#); [Matt Brinks](#)  
**Subject:** [GRAYMAIL] Re: Re: RE: DeVos Disclosures - Divestiture  
**Date:** Wednesday, January 18, 2017 10:04:17 PM

---

Thank you, Deb.

Matthew M. Leland  
King & Spalding LLP | 1700 Pennsylvania Avenue N.W. | Washington<x-apple-data-detectors://0/1>, D.C. 20006  
Firm: +1 202 737 0500<tel:+1%20202%20737%200500> | (b)(6)

On Jan 18, 2017, at 9:51 PM, Deborah J. Bortot <djbortot@oge.gov<<mailto:djbortot@oge.gov>>> wrote:

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Sent: Wednesday, January 18, 2017 9:21 PM  
To: Deborah J. Bortot  
Cc: Susan Valcq; David J. Apol; Heather A. Jones; Megan V. Khaner; Goodridge, Marcella; Sprague, Marcia; Jason Mahar; Shashy, Hap; Hrvatn, Claudia; Jeff Lambert; Jeff Bowerman; Matt Brinks  
Subject: [GRAYMAIL] Re: RE: DeVos Disclosures - Divestiture

Thanks Deb.

Matthew M. Leland  
King & Spalding LLP | 1700 Pennsylvania Avenue N.W. | Washington<x-apple-data-detectors://0/1>, D.C. 20006  
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We are working on the revision right now Sent from my BlackBerry 10 smartphone on the Verizon Wireless 4G LTE network.  
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Subject: RE: DeVos Disclosures - Divestiture

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(b)(6) & (b)(3)

(b)(6) & (b)(3)

(b)(6) & (b)(3)

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Cc: 'Susan Valcq'; David J. Apol; Heather A. Jones; Megan V. Khaner; 'Goodridge, Marcella'; 'Sprague, Marcia'; 'Jason Mahar'; Shashy, Hap; Hrvatin, Claudia; 'Jeff Lambert'; 'Jeff Bowerman'; 'Matt Brinks'

Subject: RE: DeVos Disclosures - Divestiture

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Seven pages withheld in full – (b)(3), (4), (6)

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Subject: [GRAYMAIL] Re: DeVos Disclosures - Divestiture

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Matthew M. Leland

King & Spalding LLP | 1700 Pennsylvania Avenue N.W. | Washington<x-apple-data-detectors://0/1>, D.C. 20006

Firm: +1 202 737 0500<tel:+1%20202%20737%200500> | (b)(6)

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Sent: Wednesday, January 18, 2017 4:36 PM  
To: Deborah J. Bortot; David J. Apol; Heather A. Jones; Megan V. Khaner; 'Goodridge, Marcella'; 'Sprague, Marcia'  
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Subject: [GRAYMAIL] DeVos Disclosures - Divestiture

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Best regards,

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Matthew M. Leland  
King & Spalding LLP | 1700 Pennsylvania Avenue, N.W. | Washington, D.C. 20006  
Firm: +1 202 737 0500 | (b)(6)

---

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<DeVos EA - with attachments B and C 1.18.17 9.17pm.docx>

**From:** [Leland, Matthew](#)  
**To:** [Deborah J. Bortot](#)  
**Cc:** [Susan Valcq](#); [David J. Apol](#); [Heather A. Jones](#); [Megan V. Khaner](#); [Goodridge, Marcella](#); [Sprague, Marcia](#); [Jason Mahar](#); [Shashy, Hap](#); [Hrvatn, Claudia](#); [Jeff Lambert](#); [Jeff Bowerman](#); [Matt Brinks](#)  
**Subject:** [GRAYMAIL] RE: Re: RE: RE: DeVos Disclosures - Divestiture  
**Date:** Thursday, January 19, 2017 9:40:45 AM

---

Thanks Deb. The new report is populated and we expect to submit it to the PTT this morning.

-----Original Message-----

From: Deborah J. Bortot [<mailto:djbortot@oge.gov>]  
Sent: Thursday, January 19, 2017 9:12 AM  
To: Leland, Matthew  
Cc: Susan Valcq; David J. Apol; Heather A. Jones; Megan V. Khaner; Goodridge, Marcella; Sprague, Marcia; Jason Mahar; Shashy, Hap; Hrvatn, Claudia; Jeff Lambert; Jeff Bowerman; Matt Brinks  
Subject: RE: [GRAYMAIL] Re: RE: RE: RE: DeVos Disclosures - Divestiture

My understanding is that PTT created a new report for the filer.

Has the filer prepopulated the new report and submitted it to PTT?

Thanks,  
Deb

-----Original Message-----

From: Leland, Matthew [[mailto:\(b\)\(6\)](mailto:(b)(6)@oge.gov)]  
Sent: Thursday, January 19, 2017 6:55 AM  
To: Deborah J. Bortot  
Cc: Susan Valcq; David J. Apol; Heather A. Jones; Megan V. Khaner; Goodridge, Marcella; Sprague, Marcia; Jason Mahar; Shashy, Hap; Hrvatn, Claudia; Jeff Lambert; Jeff Bowerman; Matt Brinks  
Subject: [GRAYMAIL] Re: RE: RE: RE: DeVos Disclosures - Divestiture

Thank you, Deb.

Matthew M. Leland  
King & Spalding LLP | 1700 Pennsylvania Avenue N.W. | Washington<x-apple-data-detectors://0/1>, D.C. 20006  
Firm: +1 202 737 0500<tel:+1%20202%20737%200500> [\(b\)\(6\)](#)

On Jan 19, 2017, at 6:51 AM, Deborah J. Bortot <[djbortot@oge.gov](mailto:djbortot@oge.gov)<<mailto:djbortot@oge.gov>>> wrote:

We will make those changes and circulate a new draft

Sent from my BlackBerry 10 smartphone on the Verizon Wireless 4G LTE network.

Original Message

From: Leland, Matthew  
Sent: Wednesday, January 18, 2017 11:57 PM  
To: Deborah J. Bortot  
Cc: Susan Valcq; David J. Apol; Heather A. Jones; Megan V. Khaner; Goodridge, Marcella; Sprague, Marcia; Jason Mahar; Shashy, Hap; Hrvatn, Claudia; Jeff Lambert; Jeff Bowerman; Matt Brinks  
Subject: [GRAYMAIL] RE: Re: RE: DeVos Disclosures - Divestiture

Deb,

Thanks for turning this around so quickly. There are only minor edits in this copy.

- The signature line now reads Elisabeth Prince DeVos

- Line 15: Should be (b)(3), (b)(6)

- Line 20: Should be (b)(3), (b)(6)

Those are all of the changes tonight. We will confirm in the morning whether these are the final changes.

Best regards,

Matt

-----Original Message-----

From: Deborah J. Bortot [<mailto:djbortot@oge.gov>]

Sent: Wednesday, January 18, 2017 9:51 PM

To: Leland, Matthew

Cc: Susan Valcq; David J. Apol; Heather A. Jones; Megan V. Khaner; Goodridge, Marcella; Sprague, Marcia; Jason

Mahar; Shashy, Hap; Hrvatin, Claudia; Jeff Lambert; Jeff Bowerman; Matt Brinks

Subject: RE: [GRAYMAIL] Re: RE: DeVos Disclosures - Divestiture

7 pages withheld in full - (b)(3), (4), (6)

Attached is a tracked changes version of the updated ethics agreement. I'm not certain if we have allowed digital signatures for ethics agreements, so I will have to run that up the chain. If the concern is getting the original, we do allow scanned copies. She can print it, sign it, scan it, and email it as long as it is a clear scan. Otherwise, I'll have to check about using a digital signature.

-----Original Message-----

From: Leland, Matthew [[mailto:\(b\)\(6\)@oge.gov](mailto:(b)(6)@oge.gov)]

Sent: Wednesday, January 18, 2017 9:21 PM

To: Deborah J. Bortot

Cc: Susan Valcq; David J. Apol; Heather A. Jones; Megan V. Khaner; Goodridge, Marcella; Sprague, Marcia; Jason

Mahar; Shashy, Hap; Hrvatin, Claudia; Jeff Lambert; Jeff Bowerman; Matt Brinks

Subject: [GRAYMAIL] Re: RE: DeVos Disclosures - Divestiture

Thanks Deb.

Matthew M. Leland

King & Spalding LLP | 1700 Pennsylvania Avenue N.W. | Washington<x-apple-data-detectors://0/1>, D.C. 20006

Firm: +1 202 737 0500<tel:+1%20202%20737%200500> | (b)(6)

On Jan 18, 2017, at 9:09 PM, Deborah J. Bortot <djbortot@oge.gov<<mailto:djbortot@oge.gov>>>

<<mailto:djbortot@oge.gov>>> wrote:

We are working on the revision right now Sent from my BlackBerry 10 smartphone on the Verizon Wireless 4G LTE network.

Original Message

From: Leland, Matthew

Sent: Wednesday, January 18, 2017 8:11 PM

To: Deborah J. Bortot

Cc: 'Susan Valcq'; David J. Apol; Heather A. Jones; Megan V. Khaner; 'Goodridge, Marcella'; 'Sprague, Marcia'; 'Jason Mahar'; Shashy, Hap; Hrvatin, Claudia; 'Jeff Lambert'; 'Jeff Bowerman'; 'Matt Brinks'

Subject: [GRAYMAIL] RE: DeVos Disclosures - Divestiture

Deb,

Following up on our call, we can forgo language about divesting within 120 days and commit to divest within 90 days.

Is an electronic signature on the letter acceptable, or is an original signature required?

Finally, how quickly may we get a revised agreement?

Thanks so much.

Matt

-----Original Message-----

From: Leland, Matthew

Sent: Wednesday, January 18, 2017 7:24 PM

To: 'Deborah J. Bortot'

Cc: 'Susan Valcq'; 'David J. Apol'; 'Heather A. Jones'; 'Megan V. Khaner'; 'Goodridge, Marcella'; 'Sprague, Marcia'; 'Jason Mahar'; Shashy, Hap; Hrvatin, Claudia; 'Jeff Lambert'; 'Jeff Bowerman'; 'Matt Brinks'

Subject: RE: DeVos Disclosures - Divestiture

Deb,

We also will remove (b)(6) & (b)(3) in light of our earlier discussion.

Matt

-----Original Message-----

From: Leland, Matthew

Sent: Wednesday, January 18, 2017 7:20 PM

To: 'Deborah J. Bortot'

Cc: 'Susan Valcq'; David J. Apol; Heather A. Jones; Megan V. Khaner; 'Goodridge, Marcella'; 'Sprague, Marcia'; 'Jason Mahar'; Shashy, Hap; Hrvatin, Claudia; 'Jeff Lambert'; 'Jeff Bowerman'; 'Matt Brinks'

Subject: RE: DeVos Disclosures - Divestiture

Thanks Deb.

Following up on the divestitures:

Please take the following investments off the ED conflict list which were fully liquidated as of 12/31/16.

(b)(6) & (b)(3)

(b)(6) & (b)(3)

(b)(6) & (b)(3)

Deb - Claudia and I will follow up with you in a few moments.

-----Original Message-----

From: Deborah J. Bortot [<mailto:djbortot@oge.gov>]

Sent: Wednesday, January 18, 2017 6:47 PM

To: Leland, Matthew

Cc: 'Susan Valcq'; David J. Apol; Heather A. Jones; Megan V. Khaner; 'Goodridge, Marcella'; 'Sprague, Marcia'; 'Jason Mahar'; Shashy, Hap; Hrvatin, Claudia; 'Jeff Lambert'; 'Jeff Bowerman'; 'Matt Brinks'

Subject: RE: DeVos Disclosures - Divestiture

I've attached a revised ethics agreement based on our conversation. Please put assets in Attachment A into either the 90 day or 120 day section

Seven pages withheld in full – (b)(3), (4), (b)(6)

-----Original Message-----

From: Deborah J. Bortot

Sent: Wednesday, January 18, 2017 6:18 PM

To: 'Leland, Matthew'

Cc: Susan Valcq; David J. Apol; Heather A. Jones; Megan V. Khaner; Goodridge, Marcella; Sprague, Marcia; Jason Mahar; Shashy, Hap; Hrvatin, Claudia; Jeff Lambert; Jeff Bowerman; Matt Brinks

Subject: RE: DeVos Disclosures - Divestiture

Yes. We are calling in now

-----Original Message-----

From: Leland, Matthew [[\(b\)\(6\)](mailto:(b)(6))]

Sent: Wednesday, January 18, 2017 6:18 PM

To: Deborah J. Bortot

Cc: Susan Valcq; David J. Apol; Heather A. Jones; Megan V. Khaner; Goodridge, Marcella; Sprague, Marcia; Jason Mahar; Shashy, Hap; Hrvatin, Claudia; Jeff Lambert; Jeff Bowerman; Matt Brinks

Subject: [GRAYMAIL] Re: DeVos Disclosures - Divestiture

Sorry - can we get back on the phone very quickly?

Matthew M. Leland

King & Spalding LLP | 1700 Pennsylvania Avenue N.W. | Washington<x-apple-data-detectors://0/1>, D.C. 20006

Firm: +1 202 737 0500<tel:+1%20202%20737%200500> (b)(6)

On Jan 18, 2017, at 5:45 PM, Deborah J. Bortot <djbortot@oge.gov<<mailto:djbortot@oge.gov>>>

<<mailto:djbortot@oge.gov>><<mailto:djbortot@oge.gov>>> wrote:

The attachments you forwarded have:

(b)(6) & (b)(3)

From: Susan Valcq (b)(6)  
Sent: Wednesday, January 18, 2017 5:39 PM  
To: Deborah J. Bortot; 'Leland, Matthew'; David J. Apol; Heather A. Jones; Megan V. Khaner; 'Goodridge, Marcella'; 'Sprague, Marcia'  
Cc: Jason Mahar; Shashy, Hap; Hrvatin, Claudia; Jeff Lambert; Jeff Bowerman; Matt Brinks  
Subject: [GRAYMAIL] RE: DeVos Disclosures - Divestiture

Deborah,  
Those entities are held in (b)(6) & (b)(3) which is the investment we would like considered for removal from the divestiture list.  
The other two investments are (b)(6) & (b)(3) Information on these two investments was included in a separate attachment.  
Please let us know if you have any other questions, or we can provide more information to you.  
Thank you,  
Susan

From: Deborah J. Bortot [<mailto:djbortot@oge.gov>]  
Sent: Wednesday, January 18, 2017 5:35 PM  
To: 'Leland, Matthew' (b)(6)  
>>; David J. Apol  
<[djapol@oge.gov](mailto:djapol@oge.gov)><<mailto:djapol@oge.gov>><<mailto:djapol@oge.gov>><<mailto:djapol@oge.gov>>>; Heather A. Jones <[hajones@oge.gov](mailto:hajones@oge.gov)><<mailto:hajones@oge.gov>><<mailto:hajones@oge.gov>><<mailto:hajones@oge.gov>>>; Megan V. Khaner <[mvkhaner@oge.gov](mailto:mvkhaner@oge.gov)><<mailto:mvkhaner@oge.gov>><<mailto:mvkhaner@oge.gov>><<mailto:mvkhaner@oge.gov>>>; 'Goodridge, Marcella'  
(b)(6)  
'Sprague, Marcia'  
(b)(6)  
Cc: Mahar, Jason (Windquest) (b)(6)  
Shashy, Hap  
(b)(6)  
Hrvatin, Claudia (b)(6)  
Valcq, Susan (RDV Corp - Vice President of Finance) (b)(6)  
Lambert, Jeff (b)(6)  
Bowerman, Jeff (RDV Corp - Tax) >;  
(b)(6)  
Brinks, Matt (RDV Corp - Accounting) (b)(6)  
Subject: RE: DeVos Disclosures - Divestiture

The (b)(6) & (b)(3) attachment lists 18 entities.

Which three entities are a concern?

From: Leland, Matthew [mailto:(b)(6)]  
Sent: Wednesday, January 18, 2017 4:36 PM  
To: Deborah J. Bortot; David J. Apol; Heather A. Jones; Megan V. Khaner; 'Goodridge, Marcella'; 'Sprague, Marcia'  
Cc: Jason Mahar; Shashy, Hap; Hrvatin, Claudia; Susan Valcq; Jeff Lambert; Jeff Bowerman; Matt Brinks  
Subject: [GRAYMAIL] DeVos Disclosures - Divestiture

All,

Since our most recent call, we identified three more holdings that we would like to remove from the Government's divestiture list. Information on these is attached. If there is more information you need, please let us know.

Best regards,

Matt

"Four pages withheld in full – (b)(3), (4), (b)(6)"

Matthew M. Leland  
King & Spalding LLP | 1700 Pennsylvania Avenue, N.W. | Washington, D.C. 20006  
Firm: +1 202 737 0500 | (b)(6)

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**From:** [Leland, Matthew](#)  
**To:** [Deborah J. Bortot](#)  
**Cc:** [Jason Mahar](#)  
**Subject:** [GRAYMAIL] RE: RE: RE: RE: RE: DeVos Disclsoures  
**Date:** Wednesday, January 18, 2017 1:16:28 PM

---

Deb,

I just wanted to confirm my understanding from our call that we are expected only to look at funds, not operating companies, when identifying interests that are still actively acquiring investments.

If an operating company in the portfolio acquires an education related asset in the future, how is that conflict resolved? For example, one of the operating companies is (b)(6) & (b)(3). We would not expect it would acquire anything related to education, but if did, how would the conflict be resolved?

Matt

**From:** Deborah J. Bortot [mailto:djbortot@oge.gov]  
**Sent:** Tuesday, January 17, 2017 2:53 PM  
**To:** Leland, Matthew  
**Subject:** RE: [GRAYMAIL] RE: RE: RE: RE: DeVos Disclsoures

Could you give me a quick call? I just want to make sure you understand what we mean by funds acquiring new assets.

**From:** Leland, Matthew [mailto:(b)(6)]  
**Sent:** Tuesday, January 17, 2017 1:57 PM  
**To:** Deborah J. Bortot  
**Subject:** [GRAYMAIL] RE: RE: RE: RE: DeVos Disclsoures

Yes, please.

**From:** Deborah J. Bortot [mailto:djbortot@oge.gov]  
**Sent:** Tuesday, January 17, 2017 1:56 PM  
**To:** Leland, Matthew  
**Subject:** RE: [GRAYMAIL] RE: RE: RE: DeVos Disclsoures

Thanks. We are ready to send the list. Should I include Claudia, Jason, and Hap?

**From:** Leland, Matthew [mailto:(b)(6)]  
**Sent:** Tuesday, January 17, 2017 1:42 PM  
**To:** Deborah J. Bortot; David J. Apol  
**Cc:** Jason Mahar; Shashy, Hap; Hrvatin, Claudia  
**Subject:** [GRAYMAIL] RE: RE: RE: DeVos Disclsoures

Yes, 2:30 pm will work.

(b) (6)

Passcode: (b) (6)

Thanks Deb and Dave.

**From:** Deborah J. Bortot [<mailto:djbortot@oge.gov>]  
**Sent:** Tuesday, January 17, 2017 1:31 PM  
**To:** Leland, Matthew; David J. Apol  
**Cc:** Jason Mahar; Shashy, Hap; Hrvatin, Claudia  
**Subject:** RE: [GRAYMAIL] RE: RE: DeVos Disclsoures

Dave's not available at 2:00. 2:30 would work.

**From:** Leland, Matthew [[mailto:\(b\)\(6\)@oge.gov](mailto:(b)(6)@oge.gov)]  
**Sent:** Tuesday, January 17, 2017 1:28 PM  
**To:** Deborah J. Bortot; David J. Apol  
**Cc:** Jason Mahar; Shashy, Hap; Hrvatin, Claudia  
**Subject:** [GRAYMAIL] RE: RE: DeVos Disclsoures

May we talk at 2:00 pm? To make scheduling easier, I think it can be limited to the folks on this email.

**From:** Deborah J. Bortot [<mailto:djbortot@oge.gov>]  
**Sent:** Tuesday, January 17, 2017 12:45 PM  
**To:** Leland, Matthew; David J. Apol  
**Cc:** Jason Mahar; Shashy, Hap; Hrvatin, Claudia  
**Subject:** RE: [GRAYMAIL] RE: DeVos Disclsoures

Education is finalizing the list right now that we will circulate. Should we talk after you receive the list or would you like to talk right?

**From:** Leland, Matthew [[mailto:\(b\)\(6\)@oge.gov](mailto:(b)(6)@oge.gov)]  
**Sent:** Tuesday, January 17, 2017 12:22 PM  
**To:** Deborah J. Bortot; David J. Apol  
**Cc:** Jason Mahar; Shashy, Hap; Hrvatin, Claudia  
**Subject:** [GRAYMAIL] RE: DeVos Disclsoures

Thanks Deb. We'll wait to hear back from you.

**From:** Deborah J. Bortot [<mailto:djbortot@oge.gov>]  
**Sent:** Tuesday, January 17, 2017 12:21 PM  
**To:** Leland, Matthew; David J. Apol  
**Cc:** Jason Mahar; Shashy, Hap; Hrvatin, Claudia  
**Subject:** Re: [GRAYMAIL] DeVos Disclsoures

We are on the phone with Department of Education right now. I will let you know when we are done.

Sent from my BlackBerry 10 smartphone on the Verizon Wireless 4G LTE network.

**From:** Leland, Matthew

**Sent:** Tuesday, January 17, 2017 12:15 PM

**To:** Deborah J. Bortot; David J. Apol

**Cc:** Jason Mahar; Shashy, Hap; Hrvatin, Claudia

**Subject:** [GRAYMAIL] DeVos Disclsoures

Deb and Dave,

Would you both be available for a call with us at 12:30 pm? We wanted to follow up with you on progress and ask you some other related questions.

If that time works, we can use my dial in:

(b)(6)

Matt

**Matthew M. Leland**

**King & Spalding LLP** | 1700 Pennsylvania Avenue, N.W. | Washington, D.C. 20006

**Firm:** +1 202 737 0500 | (b)(6)

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**From:** [Hrvatín, Claudia](#)  
**To:** [Leland, Matthew](#); [Deborah J. Bortot](#)  
**Cc:** [Megan V. Khaner](#); [Heather A. Jones](#); [Susan Valcq](#); [David J. Apol](#); [Goodridge, Marcella](#); [Sprague, Marcia](#); [Jason Mahar](#); [Shashy, Hap](#); [Jeff Lambert](#); [Jeff Bowerman](#); [Matt Brinks](#)  
**Subject:** [GRAYMAIL] RE: RE: Re: RE: Re: RE: DeVos Disclosures - Divestiture  
**Date:** Thursday, January 19, 2017 12:46:34 PM

---

Thank you, Deb. No changes here.

**From:** Leland, Matthew  
**Sent:** Thursday, January 19, 2017 12:41 PM  
**To:** Deborah J. Bortot  
**Cc:** Hrvatín, Claudia; Megan V. Khaner; Heather A. Jones; Susan Valcq; David J. Apol; Goodridge, Marcella; Sprague, Marcia; Jason Mahar; Shashy, Hap; Jeff Lambert; Jeff Bowerman; Matt Brinks  
**Subject:** Re: [GRAYMAIL] RE: RE: Re: RE: Re: RE: DeVos Disclosures - Divestiture

I have no changes.

**Matthew M. Leland**

**King & Spalding LLP** | [1700 Pennsylvania Avenue N.W.](#) | [Washington](#), D.C. 20006

**Firm:** [+1 202 737 0500](#) | (b)(6)

On Jan 19, 2017, at 12:35 PM, Deborah J. Bortot <[djbortot@oge.gov](mailto:djbortot@oge.gov)> wrote:

See attached. We corrected (b)(6) & (b)(3) and fixed the formatting.

7 pages withheld in full - (b)(3), (4), (6)

OGE has the pen on any further changes to the 278 and the ethics agreement. Please do not make any other changes.

Thanks,  
Deb

-----Original Message-----

**From:** Hrvatín, Claudia [[mailto:\(b\)\(6\)@](mailto:(b)(6)@)]  
**Sent:** Thursday, January 19, 2017 12:28 PM  
**To:** Megan V. Khaner; Heather A. Jones; Leland, Matthew; Deborah J. Bortot  
**Cc:** Susan Valcq; David J. Apol; Goodridge, Marcella; Sprague, Marcia; Jason Mahar; Shashy, Hap; Jeff Lambert; Jeff Bowerman; Matt Brinks  
**Subject:** [GRAYMAIL] RE: RE: Re: RE: Re: RE: DeVos Disclosures - Divestiture

Megan -- Let us know if you need help with the formatting. We have one clarification to Attachment A: #19 should only be (b)(6) & (b)(3) is not one of the holdings.

Claudia

-----Original Message-----

From: Megan V. Khaner [<mailto:mvkhaner@oge.gov>]

Sent: Thursday, January 19, 2017 12:10 PM

To: Heather A. Jones; Leland, Matthew; Deborah J. Bortot

Cc: Susan Valcq; David J. Apol; Goodridge, Marcella; Sprague, Marcia; Jason Mahar; Shashy, Hap; Hrvatin, Claudia; Jeff Lambert; Jeff Bowerman; Matt Brinks

Subject: RE: [GRAYMAIL] RE: Re: RE: Re: RE: DeVos Disclosures - Divestiture

7 pages withheld in full (b)(3), (4), (6)

Attached find the updated draft ethics agreement. I can't fix the indent on the final three divestiture assets, if someone can fix that I'd appreciate it.

Thanks,

mk

-----Original Message-----

From: Heather A. Jones

Sent: Thursday, January 19, 2017 11:49 AM

To: 'Leland, Matthew'; Deborah J. Bortot

Cc: Susan Valcq; David J. Apol; Megan V. Khaner; Goodridge, Marcella; Sprague, Marcia; Jason Mahar; Shashy, Hap; Hrvatin, Claudia; Jeff Lambert; Jeff Bowerman; Matt Brinks

Subject: RE: [GRAYMAIL] RE: Re: RE: Re: RE: DeVos Disclosures - Divestiture

That is fine. We can use Deb's call in number.

(b)(6)

-----Original Message-----

From: Leland, Matthew [[mailto:\(b\)\(6\)@oge.gov](mailto:(b)(6)@oge.gov)]

Sent: Thursday, January 19, 2017 11:32 AM

To: Deborah J. Bortot

Cc: Susan Valcq; David J. Apol; Heather A. Jones; Megan V. Khaner; Goodridge, Marcella; Sprague, Marcia; Jason Mahar; Shashy, Hap; Hrvatin, Claudia; Jeff Lambert; Jeff Bowerman; Matt Brinks

Subject: [GRAYMAIL] RE: Re: RE: Re: RE: DeVos Disclosures - Divestiture

Deb,

Are you all available at noon for a call to discuss the final steps?

Matt

-----Original Message-----

From: Deborah J. Bortot [<mailto:djbortot@oge.gov>]

Sent: Thursday, January 19, 2017 9:12 AM

To: Leland, Matthew

Cc: Susan Valcq; David J. Apol; Heather A. Jones; Megan V. Khaner; Goodridge,

Marcella; Sprague, Marcia; Jason Mahar; Shashy, Hap; Hrvatin, Claudia; Jeff Lambert; Jeff Bowerman; Matt Brinks  
Subject: RE: [GRAYMAIL] Re: RE: Re: RE: DeVos Disclosures - Divestiture

My understanding is that PTT created a new report for the filer.

Has the filer prepopulated the new report and submitted it to PTT?

Thanks,  
Deb

-----Original Message-----

From: Leland, Matthew [mailto:(b)(6)]  
Sent: Thursday, January 19, 2017 6:55 AM  
To: Deborah J. Bortot  
Cc: Susan Valcq; David J. Apol; Heather A. Jones; Megan V. Khaner; Goodridge, Marcella; Sprague, Marcia; Jason Mahar; Shashy, Hap; Hrvatin, Claudia; Jeff Lambert; Jeff Bowerman; Matt Brinks  
Subject: [GRAYMAIL] Re: RE: Re: RE: DeVos Disclosures - Divestiture

Thank you, Deb.

Matthew M. Leland  
King & Spalding LLP | 1700 Pennsylvania Avenue N.W. | Washington, D.C.  
20006  
Firm: +1 202 737 0500<tel:+1%20202%20737%200500> | (b)(6)

On Jan 19, 2017, at 6:51 AM, Deborah J. Bortot  
<[djbortot@oge.gov](mailto:djbortot@oge.gov)<<mailto:djbortot@oge.gov>>> wrote:

We will make those changes and circulate a new draft

Sent from my BlackBerry 10 smartphone on the Verizon Wireless 4G LTE network.

Original Message

From: Leland, Matthew  
Sent: Wednesday, January 18, 2017 11:57 PM  
To: Deborah J. Bortot  
Cc: Susan Valcq; David J. Apol; Heather A. Jones; Megan V. Khaner; Goodridge, Marcella; Sprague, Marcia; Jason Mahar; Shashy, Hap; Hrvatin, Claudia; Jeff Lambert; Jeff Bowerman; Matt Brinks  
Subject: [GRAYMAIL] RE: Re: RE: DeVos Disclosures - Divestiture

Deb,

Thanks for turning this around so quickly. There are only minor edits in this copy.

- The signature line now reads Elisabeth Prince DeVos
- Line 15: Should be (b)(3), (b)(6)
- Line 20: Should be (b)(3), (b)(6)

Those are all of the changes tonight. We will confirm in the morning whether these are the final changes.

Best regards,

Matt

-----Original Message-----

From: Deborah J. Bortot [<mailto:djbortot@oge.gov>]

Sent: Wednesday, January 18, 2017 9:51 PM

To: Leland, Matthew

Cc: Susan Valcq; David J. Apol; Heather A. Jones; Megan V. Khaner; Goodridge, Marcella; Sprague, Marcia; Jason Mahar; Shashy, Hap; Hrvatin, Claudia; Jeff Lambert; Jeff Bowerman; Matt Brinks

Subject: RE: [GRAYMAIL] Re: RE: DeVos Disclosures - Divestiture

7 pages withheld in full - (b)(3), (4), (6)

Attached is a tracked changes version of the updated ethics agreement. I'm not certain if we have allowed digital signatures for ethics agreements, so I will have to run that up the chain. If the concern is getting the original, we do allow scanned copies. She can print it, sign it, scan it, and email it as long as it is a clear scan. Otherwise, I'll have to check about using a digital signature.

-----Original Message-----

From: Leland, Matthew [[mailto:\(b\)\(6\)@oge.gov](mailto:(b)(6)@oge.gov)]

Sent: Wednesday, January 18, 2017 9:21 PM

To: Deborah J. Bortot

Cc: Susan Valcq; David J. Apol; Heather A. Jones; Megan V. Khaner; Goodridge, Marcella; Sprague, Marcia; Jason Mahar; Shashy, Hap; Hrvatin, Claudia; Jeff Lambert; Jeff Bowerman; Matt Brinks

Subject: [GRAYMAIL] Re: RE: DeVos Disclosures - Divestiture

Thanks Deb.

Matthew M. Leland

King & Spalding LLP | 1700 Pennsylvania Avenue N.W. | Washington, D.C.  
20006

Firm: +1 202 737 0500 <<tel:+1202020207370500>> | (b)(6)



(b)(6)

On Jan 18, 2017, at 9:09 PM, Deborah J. Bortot  
<[djbortot@oge.gov](mailto:djbortot@oge.gov)<<mailto:djbortot@oge.gov>><<mailto:djbortot@oge.gov>>>  
wrote:

We are working on the revision right now Sent from my BlackBerry 10  
smartphone on the Verizon Wireless 4G LTE network.

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From: Leland, Matthew

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Cc: 'Susan Valcq'; David J. Apol; Heather A. Jones; Megan V. Khaner;  
'Goodridge, Marcella'; 'Sprague, Marcia'; 'Jason Mahar'; Shashy, Hap; Hrvatin,  
Claudia; 'Jeff Lambert'; 'Jeff Bowerman'; 'Matt Brinks'

Subject: [GRAYMAIL] RE: DeVos Disclosures - Divestiture

Deb,

Following up on our call, we can forgo language about divesting within 120 days  
and commit to divest within 90 days.

Is an electronic signature on the letter acceptable, or is an original signature  
required?

Finally, how quickly may we get a revised agreement?

Thanks so much.

Matt

-----Original Message-----

From: Leland, Matthew

Sent: Wednesday, January 18, 2017 7:24 PM

To: 'Deborah J. Bortot'

Cc: 'Susan Valcq'; 'David J. Apol'; 'Heather A. Jones'; 'Megan V. Khaner';  
'Goodridge, Marcella'; 'Sprague, Marcia'; 'Jason Mahar'; Shashy, Hap; Hrvatin,  
Claudia; 'Jeff Lambert'; 'Jeff Bowerman'; 'Matt Brinks'

Subject: RE: DeVos Disclosures - Divestiture

Deb,

We also will remove (b)(6) & (b)(3) in light of our earlier  
discussion.

Matt

-----Original Message-----

From: Leland, Matthew

Sent: Wednesday, January 18, 2017 7:20 PM

To: 'Deborah J. Bortot'

Cc: 'Susan Valcq'; David J. Apol; Heather A. Jones; Megan V. Khaner; 'Goodridge, Marcella'; 'Sprague, Marcia'; 'Jason Mahar'; Shashy, Hap; Hrvatin, Claudia; 'Jeff Lambert'; 'Jeff Bowerman'; 'Matt Brinks'

Subject: RE: DeVos Disclosures - Divestiture

Thanks Deb.

Following up on the divestitures:

Please take the following investments off the ED conflict list which were fully liquidated as of 12/31/16.

(b)(6) & (b)(3)

[Redacted]

(b)(6) & (b)(3)

[Redacted]

Deb - Claudia and I will follow up with you in a few moments.

-----Original Message-----

From: Deborah J. Bortot [<mailto:djbortot@oge.gov>]

Sent: Wednesday, January 18, 2017 6:47 PM

To: Leland, Matthew

Cc: 'Susan Valcq'; David J. Apol; Heather A. Jones; Megan V. Khaner; 'Goodridge, Marcella'; 'Sprague, Marcia'; 'Jason Mahar'; Shashy, Hap; Hrvatin, Claudia; 'Jeff Lambert'; 'Jeff Bowerman'; 'Matt Brinks'

Subject: RE: DeVos Disclosures - Divestiture

I've attached a revised ethics agreement based on our conversation. Please put assets in Attachment A into either the 90 day or 120 day section

-----Original Message-----

From: Deborah J. Bortot  
Sent: Wednesday, January 18, 2017 6:18 PM  
To: 'Leland, Matthew'  
Cc: Susan Valcq; David J. Apol; Heather A. Jones; Megan V. Khaner; Goodridge, Marcella; Sprague, Marcia; Jason Mahar; Shashy, Hap; Hrvatin, Claudia; Jeff Lambert; Jeff Bowerman; Matt Brinks  
Subject: RE: DeVos Disclosures - Divestiture

Seven pages withheld in full – (b)(4), (b)(6)

Yes. We are calling in now

-----Original Message-----

From: Leland, Matthew [(b)(6)]  
Sent: Wednesday, January 18, 2017 6:18 PM  
To: Deborah J. Bortot  
Cc: Susan Valcq; David J. Apol; Heather A. Jones; Megan V. Khaner; Goodridge, Marcella; Sprague, Marcia; Jason Mahar; Shashy, Hap; Hrvatin, Claudia; Jeff Lambert; Jeff Bowerman; Matt Brinks  
Subject: [GRAYMAIL] Re: DeVos Disclosures - Divestiture

Sorry - can we get back on the phone very quickly?

Matthew M. Leland  
King & Spalding LLP | 1700 Pennsylvania Avenue N.W. | Washington, D.C.  
20006

Firm: +1 202 737 0500<tel:+1%20202%20737%200500> | (b)(6)

On Jan 18, 2017, at 5:45 PM, Deborah J. Bortot  
<[djbortot@oge.gov](mailto:djbortot@oge.gov)<<mailto:djbortot@oge.gov>><<mailto:djbortot@oge.gov>>  
<<mailto:djbortot@oge.gov>>> wrote:

The attachments you forwarded have:

(b)(6) & (b)(3)

[Redacted]

[Redacted]

[Redacted]

5. (b)(6) & (b)(3)

From: Susan Valcq [mailto:(b)(6)]  
Sent: Wednesday, January 18, 2017 5:39 PM  
To: Deborah J. Bortot; 'Leland, Matthew'; David J. Apol; Heather A. Jones; Megan V. Khaner; 'Goodridge, Marcella'; 'Sprague, Marcia'  
Cc: Jason Mahar; Shashy, Hap; Hrvatin, Claudia; Jeff Lambert; Jeff Bowerman; Matt Brinks  
Subject: [GRAYMAIL] RE: DeVos Disclosures - Divestiture

Deborah,  
Those entities are held in (b)(6) & (b)(3) which is the investment we would like considered for removal from the divestiture list. The other two investments are (b)(6) & (b)(3). Information on these two investments was included in a separate attachment. Please let us know if you have any other questions, or we can provide more information to you. Thank you,  
Susan

From: Deborah J. Bortot [mailto:djbortot@oge.gov]  
Sent: Wednesday, January 18, 2017 5:35 PM  
To: 'Leland, Matthew' (b)(6); David J. Apol <djapol@oge.gov<mailto:djapol@oge.gov><mailto:djapol@oge.gov><mailto:djapol@oge.gov>>>; Heather A. Jones <hajones@oge.gov<mailto:hajones@oge.gov><mailto:hajones@oge.gov><mailto:hajones@oge.gov>>>; Megan V. Khaner <mvkhaner@oge.gov<mailto:mvkhaner@oge.gov><mailto:mvkhaner@oge.gov><mailto:mvkhaner@oge.gov>>>; 'Goodridge, Marcella' (b)(6); 'Sprague, Marcia' (b)(6)  
Cc: Mahar, Jason (Windquest) (b)(6); Shashy, Hap (b)(6); Hrvatin, Claudia <(b)(6)>; Valcq, Susan (RDV Corp - Vice President of Finance) (b)(6); Lambert, Jeff (b)(6); Bowerman, Jeff (RDV Corp - Tax) (b)(6)

(b)(6) >; Brinks, Matt  
(RDV Corp - Accounting) (b)(6)  
Subject: RE: DeVos Disclosures - Divestiture

The (b)(6) & (b)(3) attachment lists 18 entities.

Which three entities are a concern?

From: Leland, Matthew [mailto:(b)(6)]  
Sent: Wednesday, January 18, 2017 4:36 PM  
To: Deborah J. Bortot; David J. Apol; Heather A. Jones; Megan V. Khaner; 'Goodridge, Marcella'; 'Sprague, Marcia'  
Cc: Jason Mahar; Shashy, Hap; Hrvatin, Claudia; Susan Valcq; Jeff Lambert; Jeff Bowerman; Matt Brinks  
Subject: [GRAYMAIL] DeVos Disclosures - Divestiture

All,

Since our most recent call, we identified three more holdings that we would like to remove from the Government's divestiture list. Information on these is attached. If there is more information you need, please let us know.

Best regards,

"Four pages withheld in full – (b)(4), (b)(6)"

Matt

Matthew M. Leland  
King & Spalding LLP | 1700 Pennsylvania Avenue, N.W. | Washington, D.C.  
20006  
Firm: +1 202 737 0500 | (b)(6)

---

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**From:** [Hrvatín, Claudia](#)  
**To:** [Deborah J. Bortot](#)  
**Subject:** [GRAYMAIL] RE: RE: RE: Re: RE: Re: RE: DeVos Disclosures - Divestiture  
**Date:** Thursday, January 19, 2017 1:35:38 PM  
**Importance:** High

---

Deb: Just left you a voicemail. Can you give me a call to discuss when we will get the final-final and schedules for the rest of the day. I'd like to patch in Jason with Windquest who has been in touch with the PTT. Or, we can use your number.

-----Original Message-----

From: Deborah J. Bortot [<mailto:djbortot@oge.gov>]  
Sent: Thursday, January 19, 2017 12:35 PM  
To: Hrvatín, Claudia; Megan V. Khaner; Heather A. Jones; Leland, Matthew  
Cc: Susan Valcq; David J. Apol; Goodridge, Marcella; Sprague, Marcia; Jason Mahar; Shashy, Hap; Jeff Lambert; Jeff Bowerman; Matt Brinks  
Subject: RE: [GRAYMAIL] RE: RE: Re: RE: Re: RE: DeVos Disclosures - Divestiture

See attached. We corrected (b)(6) & (b)(3) and fixed the formatting.

7 pages withheld in full - (b)(3), (4), (6)

OGE has the pen on any further changes to the 278 and the ethics agreement. Please do not make any other changes.

Thanks,  
Deb

-----Original Message-----

From: Hrvatín, Claudia [[mailto:\(b\)\(6\)@oge.gov](mailto:(b)(6)@oge.gov)]  
Sent: Thursday, January 19, 2017 12:28 PM  
To: Megan V. Khaner; Heather A. Jones; Leland, Matthew; Deborah J. Bortot  
Cc: Susan Valcq; David J. Apol; Goodridge, Marcella; Sprague, Marcia; Jason Mahar; Shashy, Hap; Jeff Lambert; Jeff Bowerman; Matt Brinks  
Subject: [GRAYMAIL] RE: RE: Re: RE: Re: RE: DeVos Disclosures - Divestiture

Megan -- Let us know if you need help with the formatting. We have one clarification to Attachment A: #19 should only be (b)(6) & (b)(3) is not one of the holdings.

Claudia

-----Original Message-----

From: Megan V. Khaner [<mailto:mvkhaner@oge.gov>]  
Sent: Thursday, January 19, 2017 12:10 PM  
To: Heather A. Jones; Leland, Matthew; Deborah J. Bortot  
Cc: Susan Valcq; David J. Apol; Goodridge, Marcella; Sprague, Marcia; Jason Mahar; Shashy, Hap; Hrvatín, Claudia; Jeff Lambert; Jeff Bowerman; Matt Brinks  
Subject: RE: [GRAYMAIL] RE: Re: RE: Re: RE: DeVos Disclosures - Divestiture

7 pages withheld in full - (b)(3), (4), (6)

Attached find the updated draft ethics agreement. I can't fix the indent on the final three divestiture assets, if someone can fix that I'd appreciate it.

Thanks,  
mk

-----Original Message-----

From: Heather A. Jones  
Sent: Thursday, January 19, 2017 11:49 AM

To: 'Leland, Matthew'; Deborah J. Bortot  
Cc: Susan Valcq; David J. Apol; Megan V. Khaner; Goodridge, Marcella; Sprague, Marcia; Jason Mahar; Shashy, Hap; Hrvatin, Claudia; Jeff Lambert; Jeff Bowerman; Matt Brinks  
Subject: RE: [GRAYMAIL] RE: Re: RE: Re: RE: DeVos Disclosures - Divestiture

That is fine. We can use Deb's call in number.

(b)(6)

-----Original Message-----

From: Leland, Matthew [mailto:(b)(6)]  
Sent: Thursday, January 19, 2017 11:32 AM  
To: Deborah J. Bortot  
Cc: Susan Valcq; David J. Apol; Heather A. Jones; Megan V. Khaner; Goodridge, Marcella; Sprague, Marcia; Jason Mahar; Shashy, Hap; Hrvatin, Claudia; Jeff Lambert; Jeff Bowerman; Matt Brinks  
Subject: [GRAYMAIL] RE: Re: RE: Re: RE: DeVos Disclosures - Divestiture

Deb,

Are you all available at noon for a call to discuss the final steps?

Matt

-----Original Message-----

From: Deborah J. Bortot [mailto:djbortot@oge.gov]  
Sent: Thursday, January 19, 2017 9:12 AM  
To: Leland, Matthew  
Cc: Susan Valcq; David J. Apol; Heather A. Jones; Megan V. Khaner; Goodridge, Marcella; Sprague, Marcia; Jason Mahar; Shashy, Hap; Hrvatin, Claudia; Jeff Lambert; Jeff Bowerman; Matt Brinks  
Subject: RE: [GRAYMAIL] Re: RE: Re: RE: DeVos Disclosures - Divestiture

My understanding is that PTT created a new report for the filer.

Has the filer prepopulated the new report and submitted it to PTT?

Thanks,  
Deb

-----Original Message-----

From: Leland, Matthew [mailto:(b)(6)]  
Sent: Thursday, January 19, 2017 6:55 AM  
To: Deborah J. Bortot  
Cc: Susan Valcq; David J. Apol; Heather A. Jones; Megan V. Khaner; Goodridge, Marcella; Sprague, Marcia; Jason Mahar; Shashy, Hap; Hrvatin, Claudia; Jeff Lambert; Jeff Bowerman; Matt Brinks  
Subject: [GRAYMAIL] Re: RE: Re: RE: DeVos Disclosures - Divestiture

Thank you, Deb.

Matthew M. Leland  
King & Spalding LLP | 1700 Pennsylvania Avenue N.W. | Washington<x-apple-data-detectors://0/1>, D.C. 20006  
Firm: +1 202 737 0500<tel:+1%20202%20737%200500> | (b)(6)

On Jan 19, 2017, at 6:51 AM, Deborah J. Bortot <djbortot@oge.gov<<mailto:djbortot@oge.gov>>> wrote:

We will make those changes and circulate a new draft

Sent from my BlackBerry 10 smartphone on the Verizon Wireless 4G LTE network.

Original Message

From: Leland, Matthew

Sent: Wednesday, January 18, 2017 11:57 PM

To: Deborah J. Bortot

Cc: Susan Valcq; David J. Apol; Heather A. Jones; Megan V. Khaner; Goodridge, Marcella; Sprague, Marcia; Jason Mahar; Shashy, Hap; Hrvatin, Claudia; Jeff Lambert; Jeff Bowerman; Matt Brinks

Subject: [GRAYMAIL] RE: Re: RE: DeVos Disclosures - Divestiture

Deb,

Thanks for turning this around so quickly. There are only minor edits in this copy.

- The signature line now reads Elisabeth Prince DeVos

- Line 15: Should be (b)(3), (b)(6)

- Line 20: Should be (b)(3), (b)(6)

Those are all of the changes tonight. We will confirm in the morning whether these are the final changes.

Best regards,

Matt

-----Original Message-----

From: Deborah J. Bortot [<mailto:djbortot@oge.gov>]

Sent: Wednesday, January 18, 2017 9:51 PM

To: Leland, Matthew

Cc: Susan Valcq; David J. Apol; Heather A. Jones; Megan V. Khaner; Goodridge, Marcella; Sprague, Marcia; Jason Mahar; Shashy, Hap; Hrvatin, Claudia; Jeff Lambert; Jeff Bowerman; Matt Brinks

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Subject: [GRAYMAIL] Re: RE: DeVos Disclosures - Divestiture

Thanks Deb.

Matthew M. Leland

King & Spalding LLP | 1700 Pennsylvania Avenue N.W. | Washington<x-apple-data-detectors://0/1>, D.C. 20006  
Firm: +1 202 737 0500<tel:+1%20202%20737%200500> | (b)(6)

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Finally, how quickly may we get a revised agreement?

Thanks so much.

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Cc: 'Susan Valcq'; 'David J. Apol'; 'Heather A. Jones'; 'Megan V. Khaner'; 'Goodridge, Marcella'; 'Sprague, Marcia'; 'Jason Mahar'; Shashy, Hap; Hrvatin, Claudia; 'Jeff Lambert'; 'Jeff Bowerman'; 'Matt Brinks'

Subject: RE: DeVos Disclosures - Divestiture

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Cc: 'Susan Valcq'; David J. Apol; Heather A. Jones; Megan V. Khaner; 'Goodridge, Marcella'; 'Sprague, Marcia'; 'Jason Mahar'; Shashy, Hap; Hrvatin, Claudia; 'Jeff Lambert'; 'Jeff Bowerman'; 'Matt Brinks'

Subject: RE: DeVos Disclosures - Divestiture

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(b)(6) & (b)(3)

(b)(6) & (b)(3)

Deb - Claudia and I will follow up with you in a few moments.

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Sent: Wednesday, January 18, 2017 6:47 PM

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Subject: RE: DeVos Disclosures - Divestiture

Yes. We are calling in now

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Seven pages withheld in full - (b)(4), (b)(6)

Subject: [GRAYMAIL] Re: DeVos Disclosures - Divestiture

Sorry - can we get back on the phone very quickly?

Matthew M. Leland

King & Spalding LLP | 1700 Pennsylvania Avenue N.W. | Washington<x-apple-data-detectors://0/1>, D.C. 20006

Firm: +1 202 737 0500<tel:+1%20202%20737%200500> (b)(6)

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The other two investments are (b)(6) & (b)(3) Information on these two investments was included in a separate attachment.  
Please let us know if you have any other questions, or we can provide more information to you.  
Thank you,  
Susan

From: Deborah J. Bortot [<mailto:djbortot@oge.gov>]  
Sent: Wednesday, January 18, 2017 5:35 PM  
To: 'Leland, Matthew' <(b)(6)>  
(b)(6) David J. Apol  
<djapol@oge.gov<<mailto:djapol@oge.gov>><<mailto:djapol@oge.gov>><<mailto:djapol@oge.gov>>>>; Heather A. Jones <hajones@oge.gov<<mailto:hajones@oge.gov>><<mailto:hajones@oge.gov>><<mailto:hajones@oge.gov>>>>; Megan V. Khaner <mvkhaner@oge.gov<<mailto:mvkhaner@oge.gov>><<mailto:mvkhaner@oge.gov>><<mailto:mvkhaner@oge.gov>>>>; 'Goodridge, Marcella'

(b)(6)  
'Sprague, Marcia'  
(b)(6)

Cc: Mahar, Jason (Windquest) (b)(6) [redacted]; Shashy, Hap (b)(6) [redacted]; Hrvatin, Claudia (b)(6) [redacted]; Valcq, Susan (RDV Corp - Vice President of Finance) (b)(6) [redacted]; Lambert, Jeff (b)(6) [redacted]; Bowerman, Jeff (RDV Corp - Tax) (b)(6) [redacted]; Brinks, Matt (RDV Corp - Accounting) (b)(6) [redacted];

Subject: RE: DeVos Disclosures - Divestiture

The (b)(6) & (b)(3) [redacted] attachment lists 18 entities.

Which three entities are a concern?

From: Leland, Matthew [mailto:(b)(6) [redacted]]  
Sent: Wednesday, January 18, 2017 4:36 PM  
To: Deborah J. Bortot; David J. Apol; Heather A. Jones; Megan V. Khaner; 'Goodridge, Marcella'; 'Sprague, Marcia'  
Cc: Jason Mahar; Shashy, Hap; Hrvatin, Claudia; Susan Valcq; Jeff Lambert; Jeff Bowerman; Matt Brinks  
Subject: [GRAYMAIL] DeVos Disclosures - Divestiture

All,

Since our most recent call, we identified three more holdings that we would like to remove from the Government's divestiture list. Information on these is attached. If there is more information you need, please let us know.

Best regards,

"Four pages withheld in full – (b)(4), (b)(6)" [redacted]

Matt

Matthew M. Leland  
King & Spalding LLP | 1700 Pennsylvania Avenue, N.W. | Washington, D.C. 20006  
Firm: +1 202 737 0500 | (b)(6) [redacted]

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responding to the email and then immediately delete the email.

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**From:** [Leland, Matthew](#)  
**To:** [Deborah J. Bortot](#)  
**Subject:** [GRAYMAIL] RE: Responses to 1/12/2017 Questions/Comments  
**Date:** Monday, January 16, 2017 7:37:15 PM

---

Okay. Please give me a minute or two.

-----Original Message-----

From: Deborah J. Bortot [<mailto:djbortot@oge.gov>]  
Sent: Monday, January 16, 2017 7:33 PM  
To: Leland, Matthew  
Subject: RE: Responses to 1/12/2017 Questions/Comments

Matt,

I think it would be a good idea to have a status call. We are on the call-inline now. Go ahead and call-in

-----Original Message-----

From: Leland, Matthew [[mailto:\(b\)\(6\)@oge.gov](mailto:(b)(6)@oge.gov)]  
Sent: Monday, January 16, 2017 7:32 PM  
To: Deborah J. Bortot; Hrvatin, Claudia; Shashy, Hap  
Cc: David J. Apol; Heather A. Jones; Megan V. Khaner; Lorna A. Syme  
Subject: [GRAYMAIL] RE: Responses to 1/12/2017 Questions/Comments

I just had a few quick questions for Megan. There is no need to intrude on everyone's time. Megan, are you free?

-----Original Message-----

From: Deborah J. Bortot [<mailto:djbortot@oge.gov>]  
Sent: Monday, January 16, 2017 7:25 PM  
To: Hrvatin, Claudia; Leland, Matthew; Shashy, Hap  
Cc: David J. Apol; Heather A. Jones; Megan V. Khaner; Lorna A. Syme  
Subject: RE: Responses to 1/12/2017 Questions/Comments

Matthew asked if we could have a call. Are you available now?

We can use this call-in number:

(b)(6)

Thanks,  
Deb

-----Original Message-----

From: Deborah J. Bortot  
Sent: Monday, January 16, 2017 5:29 PM  
To: 'Hrvatin, Claudia'; Leland, Matthew; Shashy, Hap  
Cc: David J. Apol; Heather A. Jones  
Subject: RE: Responses to 1/12/2017 Questions/Comments

Claudia, Hap, and Matthew,

Are you available for a call to discuss most recent status?

Thanks,  
Deb

-----Original Message-----

From: Hrvatin, Claudia [mailto:(b)(6)]  
Sent: Monday, January 16, 2017 2:08 PM  
To: Leland, Matthew; Deborah J. Bortot; Shashy, Hap  
Cc: David J. Apol; Heather A. Jones  
Subject: [GRAYMAIL] Re: Responses to 1/12/2017 Questions/Comments

I will be on as well. Thank you.

Sent from my BlackBerry 10 smartphone.

Original Message  
From: Leland, Matthew  
Sent: Monday, January 16, 2017 2:06 PM  
To: Deborah J. Bortot; Hrvatin, Claudia; Shashy, Hap  
Cc: David J. Apol; Heather A. Jones  
Subject: RE: Responses to 1/12/2017 Questions/Comments

Yes, I can join at 2:15 pm. Claudia may join, too, if she is available.

-----Original Message-----

From: Deborah J. Bortot [mailto:djbortot@oge.gov]  
Sent: Monday, January 16, 2017 2:04 PM  
To: Leland, Matthew; Hrvatin, Claudia; Shashy, Hap  
Cc: David J. Apol; Heather A. Jones  
Subject: RE: Responses to 1/12/2017 Questions/Comments

How about 2:15?

We can use this call-in number:

(b)(6)

-----Original Message-----

From: Leland, Matthew [mailto:(b)(6)]  
Sent: Monday, January 16, 2017 1:59 PM  
To: Deborah J. Bortot; Hrvatin, Claudia; Shashy, Hap  
Cc: David J. Apol; Heather A. Jones  
Subject: [GRAYMAIL] RE: Responses to 1/12/2017 Questions/Comments

Thank you, Deb. When would you like to speak? Some of us are available now.

-----Original Message-----

From: Deborah J. Bortot [mailto:djbortot@oge.gov]  
Sent: Monday, January 16, 2017 1:49 PM  
To: Hrvatin, Claudia; Shashy, Hap; Leland, Matthew  
Cc: David J. Apol; Heather A. Jones  
Subject: RE: Responses to 1/12/2017 Questions/Comments

Claudia, Hap, and Matthew,

Are you available for a call to discuss the ethics agreement?

Thanks,  
Deb

-----Original Message-----

From: Hrvatin, Claudia [mailto:(b)(6)]  
Sent: Monday, January 16, 2017 12:25 PM  
To: 'Sprague, Marcia'; 'Goodridge, Marcella'; 'Rowell, Theresa (b)(6)'; Megan V. Khaner; Deborah J. Bortot; Lorna A. Syme  
Cc: 'Jason Mahar ((b)(6))'; Jeff Lambert (b)(6); 'Jeff Bowerman' (b)(6); Susan Valcq (b)(6); Matt Brinks (b)(6); Shashy, Hap; Leland, Matthew  
Subject: [GRAYMAIL] Re: Responses to 1/12/2017 Questions/Comments

2 pages withheld in full  
(b)(3), (4), (6)

Megan, Marcella/Marcia - Attached please find a list of additions for divestiture and a letter from (b)(3), (b)(6) regarding its holdings.

Claudia

Sent from my BlackBerry 10 smartphone.

From: Hrvatin, Claudia  
Sent: Sunday, January 15, 2017 8:44 PM  
To: 'Sprague, Marcia'; 'Goodridge, Marcella'; 'Rowell, Theresa (b)(6)'; 'mvkhaner@oge.gov'; 'djbortot@oge.gov'; 'lasyme@oge.gov'  
Cc: 'Jason Mahar (b)(6)'; Jeff Lambert (b)(6); 'Jeff Bowerman' (b)(6); Susan Valcq (b)(6); Matt Brinks (b)(6); Shashy, Hap; Leland, Matthew  
Subject: RE: Responses to 1/12/2017 Questions/Comments

Marcia:

We are following up on our questions, below.

Of note, and pursuant to the second bullet, below, securities held by (b)(3), (b)(6) and (b)(3), (b)(6) have been added to the End Notes in the 278. Please provide us with a list of those securities which present a potential conflict. More specifically, we note that there are (b)(5), (b)(6) , but look to you for direction in this regard.

Could we obtain a response by 10 AM tomorrow? Many thanks,

Claudia

Claudia A. Hrvatin  
Attorney at Law  
King & Spalding LLP  
1700 Pennsylvania Avenue, NW, Suite 200  
Washington, DC 20006

(b)(6)

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From: Hrvatin, Claudia  
Sent: Saturday, January 14, 2017 6:44 PM  
To: 'Sprague, Marcia'; Goodridge, Marcella; Rowell, Theresa (b)(6); mvkhaner@oge.gov; djbortot@oge.gov; lasyme@oge.gov; Jeff Lambert (b)(6); Susan Valcq (b)(6); 'Jeff Bowerman' (b)(6)  
Cc: Jason Mahar ((b)(6)); Shashy, Hap; Leland, Matthew

Subject: RE: Responses to 1/12/2017 Questions/Comments

Thank you, Marcia. We are adding the team from RDV so that everyone can see the communications in real time, given that time is of the essence. Please "Reply To All" to facilitate our communications.

Below are our comments and questions:

(b)(6) & (b)(3)



2 pages withheld in full -  
(b)(3), (4), (6)

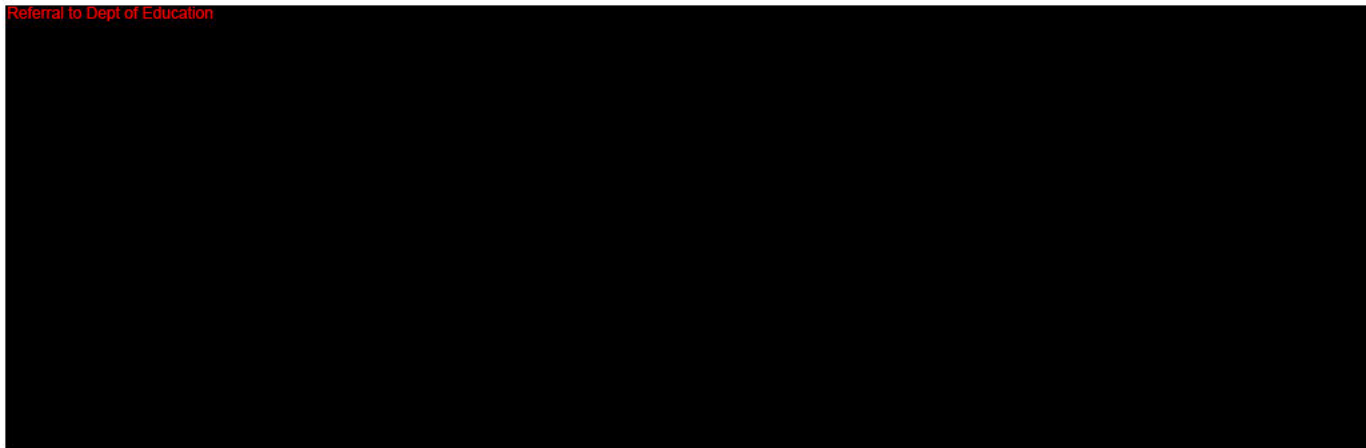


n Are there specific investments that item #57 (on most recent list provided, attached for reference) is referring to, and what do you need to complete that review?

Many thanks. Please let us know when a conference call tomorrow works – we are looking at 12:15 PM. Best,

Claudia

Referral to Dept of Education



From: Hrvatin, Claudia [mailto:(b)(6)]  
Sent: Saturday, January 14, 2017 2:27 PM  
To: 'mvkhaner@oge.gov'; 'djbortot@oge.gov'; 'lasyme@oge.gov'; Goodridge, Marcella; Sprague, Marcia; Rowell, Theresa  
Cc: Shashy, Hap; Leland, Matthew  
Subject: RE: Responses to 1/12/2017 Questions/Comments

Megan, Marcia – The DeVos team is continuing to work through the various questions and comments provided

today and over the last several days. Would it be possible to convene a call this afternoon to discuss some questions that have arisen? Perhaps around 3:30 or thereabouts? Please let us know.

Claudia

From: Hrvatin, Claudia

Sent: Saturday, January 14, 2017 10:57 AM

To: mvkhaner@oge.gov<<mailto:mvkhaner@oge.gov>>; 'djbortot@oge.gov'; 'lasyme@oge.gov';

(b)(6) Marcella Keiller's email address  
(b)(6) Sprague, Marcia

(b)(6) ); Rowell, Theresa

(b)(6)

Cc: Jason Mahar (b)(6) ); Shashy, Hap; Leland, Matthew

Subject: RE: Responses to 1/12/2017 Questions/Comments

Megan: The 278 in Integrity has been updated to reflect the holdings for Items 38 and 41, pursuant to your questions on the last page (page 6) of your questions/comments document (re-attached for reference).

6 pages withheld in full - (b)(3), (4), (6)

Megan/Marcella: In considering these entities, could we obtain information on which specific assets present potential conflicts?

Many thanks,

Claudia

Claudia A. Hrvatin

Attorney at Law

King & Spalding LLP

1700 Pennsylvania Avenue, NW, Suite 200

Washington, DC 20006

(b)(6)

[www.kslaw.com](http://www.kslaw.com)<<http://www.kslaw.com>>

From: Hrvatin, Claudia

Sent: Friday, January 13, 2017 7:23 PM

To: Megan V. Khaner; djbortot@oge.gov<<mailto:djbortot@oge.gov>>; lasyme@oge.gov<<mailto:lasyme@oge.gov>>

Cc: Jason Mahar (b)(6) ); Shashy, Hap; Leland, Matthew

Subject: Responses to 1/12/2017 Questions/Comments

6 pages withheld in full - (b)(4), (6)

Megan, Deborah and Lorna:

Attached please find responses to the list of comments and questions you provided yesterday. You will see that there are a few items for which we are awaiting additional information.

Claudia

Claudia A. Hrvatin

Attorney at Law

King & Spalding LLP

1700 Pennsylvania Avenue, NW, Suite 200

Washington, DC 20006

(b)(6)

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From: Hrvatin, Claudia  
Sent: Friday, January 13, 2017 5:39 PM  
To: 'Megan V. Khaner'  
Cc: Jason Mahar (b)(6) >; Shashy, Hap; Leland, Matthew  
Subject: RE: Contact information

Thank you, Megan, for this additional contact information and for speaking with us a bit ago. I am copying Hap and Matt, and Jason with Windquest – as soon as we obtain updates tonight and through the weekend, we will circulate to your team. If any questions or comments arise on your end, please let us know as soon as you can.

Thank you, again,  
Claudia

Claudia A. Hrvatin  
Attorney at Law  
King & Spalding LLP  
1700 Pennsylvania Avenue, NW, Suite 200  
Washington, DC 20006

(b)(6)

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From: Megan V. Khaner [<mailto:mvkhaner@oge.gov>]  
Sent: Friday, January 13, 2017 4:27 PM  
To: Hrvatin, Claudia  
Subject: Contact information

Deborah Bortot [djbortot@oge.gov](mailto:djbortot@oge.gov)<<mailto:djbortot@oge.gov>>  
Lorna Syme [lasyme@oge.gov](mailto:lasyme@oge.gov)<<mailto:lasyme@oge.gov>>

Megan Khaner  
Program Analyst (Finance)  
Presidential Nominations Branch  
General Counsel and Legal Policy Division  
202.482.9204

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[@OfficeGovEthics](https://twitter.com/OfficeGovEthics)

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**From:** [Hrvatín, Claudia](#)  
**To:** [Megan V. Khaner](#); "[Sprague, Marcia](#)"; "[Goodridge, Marcella](#)"; "[Rowell, Theresa](#) (b)(6)";  
[Deborah J. Bortot](#); [Lorna A. Syme](#)  
**Cc:** "[Jason Mahar](#) (b)(6)"; [Jeff Lambert](#) (b)(6); "[Jeff Bowerman](#)"  
(b)(6); [Susan Valcq](#) (b)(6); [Matt Brinks](#) (b)(6); [Shashy, Hap](#);  
[Leland, Matthew](#)  
**Subject:** [GRAYMAIL] Re: Responses to 1/12/2017 Questions/Comments  
**Date:** Monday, January 16, 2017 4:25:50 PM

---

Many thanks, Megan.

Sent from my BlackBerry 10 smartphone.

Original Message

From: Megan V. Khaner

Sent: Monday, January 16, 2017 4:15 PM

To: Hrvatín, Claudia; 'Sprague, Marcia'; 'Goodridge, Marcella'; 'Rowell, Theresa' (b)(6);  
Deborah J. Bortot; Lorna A. Syme

Cc: 'Jason Mahar' (b)(6); 'Jeff Lambert' (b)(6); 'Jeff Bowerman'  
(b)(6); 'Susan Valcq' (b)(6); 'Matt Brinks' (b)(6); 'Shashy, Hap';  
Leland, Matthew

Subject: RE: Responses to 1/12/2017 Questions/Comments

2 pages withheld in full (b)(3), (6)

Hi Claudia,

We've reviewed the updated report. Attached find our questions (prior outstanding questions in blue, a few additional questions on most recent draft in purple).

Thank you,

mk

-----Original Message-----

From: Hrvatín, Claudia [[mailto:\(b\)\(6\)](#)]

Sent: Monday, January 16, 2017 12:25 PM

To: 'Sprague, Marcia'; 'Goodridge, Marcella'; 'Rowell, Theresa' (b)(6); Megan V. Khaner;  
Deborah J. Bortot; Lorna A. Syme

Cc: 'Jason Mahar' (b)(6); 'Jeff Lambert' (b)(6); 'Jeff Bowerman'  
(b)(6); 'Susan Valcq' (b)(6); 'Matt Brinks' (b)(6); 'Shashy, Hap';  
Leland, Matthew

Subject: [GRAYMAIL] Re: Responses to 1/12/2017 Questions/Comments

2 pages withheld in full - (b)(3), (4), (6)

Megan, Marcella/Marcia - Attached please find a list of additions for divestiture and a letter from (b)(3), (b)(6) regarding its holdings.

Claudia

Sent from my BlackBerry 10 smartphone.

From: Hrvatín, Claudia

Sent: Sunday, January 15, 2017 8:44 PM

To: 'Sprague, Marcia'; 'Goodridge, Marcella'; 'Rowell, Theresa' (b)(6); 'mvkhaner@oge.gov';  
'djbortot@oge.gov'; 'lasyme@oge.gov'

Cc: 'Jason Mahar' (b)(6); 'Jeff Lambert' (b)(6); 'Jeff Bowerman'  
(b)(6); 'Susan Valcq' (b)(6); 'Matt Brinks' (b)(6); 'Shashy, Hap';  
Leland, Matthew

Subject: RE: Responses to 1/12/2017 Questions/Comments

Marcia:

We are following up on our questions, below.

Of note, and pursuant to the second bullet, below, securities held by (b)(6) & (b)(3) and (b)(6) & (b)(3) have been added to the End Notes in the 278. Please provide us with a list of those securities which present a potential conflict. More specifically, we note that there are (b)(3), (b)(6) but look to you for direction in this regard.

Could we obtain a response by 10 AM tomorrow? Many thanks,

Claudia

Claudia A. Hrvatin  
Attorney at Law  
King & Spalding LLP  
1700 Pennsylvania Avenue, NW, Suite 200  
Washington, DC 20006

(b)(6)

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From: Hrvatin, Claudia

Sent: Saturday, January 14, 2017 6:44 PM

To: 'Sprague, Marcia'; Goodridge, Marcella; Rowell, Theresa (b)(6); mvkhaner@oge.gov; djbortot@oge.gov; lasyme@oge.gov; Jeff Lambert (b)(6); Susan Valcq (b)(6)

'Jeff Bowerman' (b)(6)

Cc: Jason Mahar (b)(6); Shashy, Hap; Leland, Matthew

Subject: RE: Responses to 1/12/2017 Questions/Comments

Thank you, Marcia. We are adding the team from RDV so that everyone can see the communications in real time, given that time is of the essence. Please "Reply To All" to facilitate our communications.

Below are our comments and questions:

(b)(6) & (b)(3)

[Redacted]

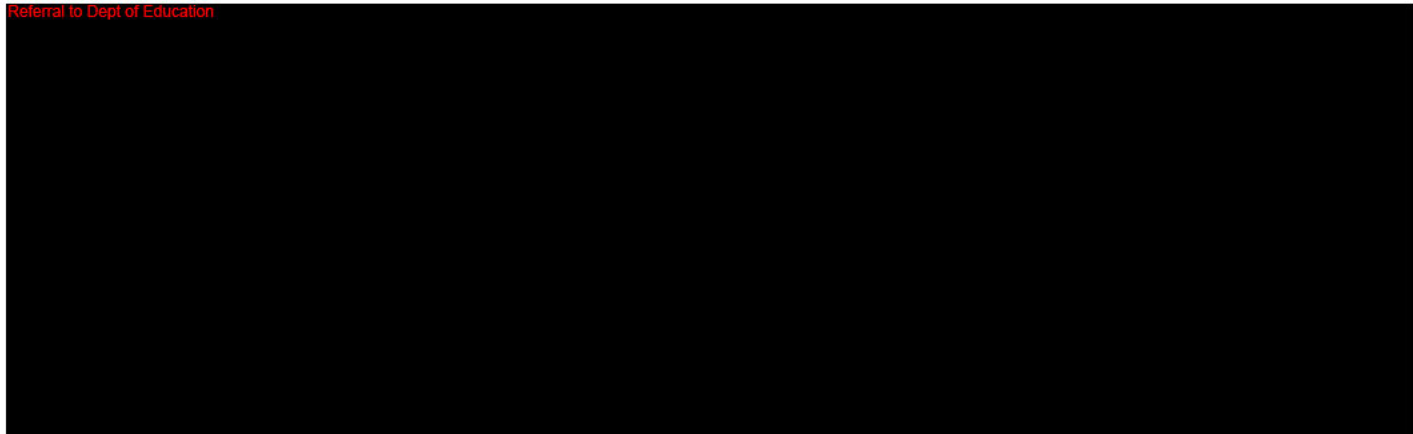
[Redacted]

n Are there specific investments that item #57 (on most recent list provided, attached for reference) is referring to, and what do you need to complete that review?

Many thanks. Please let us know when a conference call tomorrow works – we are looking at 12:15 PM. Best,

Claudia

Referral to Dept of Education



From: Hrvatin, Claudia [mailto:(b)(6)]  
Sent: Saturday, January 14, 2017 2:27 PM  
To: 'mvkhaner@oge.gov'; 'djbertot@oge.gov'; 'lasyme@oge.gov'; Goodridge, Marcella; Sprague, Marcia; Rowell, Theresa  
Cc: Shashy, Hap; Leland, Matthew  
Subject: RE: Responses to 1/12/2017 Questions/Comments

Megan, Marcia – The DeVos team is continuing to work through the various questions and comments provided today and over the last several days. Would it be possible to convene a call this afternoon to discuss some questions that have arisen? Perhaps around 3:30 or thereabouts? Please let us know.

Claudia

From: Hrvatin, Claudia  
Sent: Saturday, January 14, 2017 10:57 AM  
To: mvkhaner@oge.gov<mailto:mvkhaner@oge.gov>; 'djbertot@oge.gov'; 'lasyme@oge.gov'; (b)(6) Marcella Keiller's email address; Sprague, Marcia (b)(6); Rowell, Theresa (b)(6)  
Cc: Jason Mahar (b)(6); Shashy, Hap; Leland, Matthew  
Subject: RE: Responses to 1/12/2017 Questions/Comments

Megan: The 278 in Integrity has been updated to reflect the holdings for Items 38 and 41, pursuant to your questions on the last page (page 6) of your questions/comments document (re-attached for reference).

6 pages withheld in full - (b)(3), (4), (6)

Megan/Marcella: In considering these entities, could we obtain information on which specific assets present potential conflicts?

Many thanks,  
Claudia

Claudia A. Hrvatin  
Attorney at Law  
King & Spalding LLP  
1700 Pennsylvania Avenue, NW, Suite 200

Washington, DC 20006

(b)(6)

www.kslaw.com<<http://www.kslaw.com>>

From: Hrvatin, Claudia

Sent: Friday, January 13, 2017 7:23 PM

To: Megan V. Khaner; djbortot@oge.gov<<mailto:djbortot@oge.gov>>; lasyme@oge.gov<<mailto:lasyme@oge.gov>>

Cc: Jason Mahar (b)(6) Shashy, Hap; Leland, Matthew

Subject: Responses to 1/12/2017 Questions/Comments

Megan, Deborah and Lorna:

6 pages withheld in full - (b)(4), (6)

Attached please find responses to the list of comments and questions you provided yesterday. You will see that there are a few items for which we are awaiting additional information.

Claudia

Claudia A. Hrvatin

Attorney at Law

King & Spalding LLP

1700 Pennsylvania Avenue, NW, Suite 200

Washington, DC 20006

(b)(6)

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From: Hrvatin, Claudia

Sent: Friday, January 13, 2017 5:39 PM

To: 'Megan V. Khaner'

Cc: Jason Mahar (b)(6) Shashy, Hap; Leland, Matthew

Subject: RE: Contact information

Thank you, Megan, for this additional contact information and for speaking with us a bit ago. I am copying Hap and Matt, and Jason with Windquest – as soon as we obtain updates tonight and through the weekend, we will circulate to your team. If any questions or comments arise on your end, please let us know as soon as you can.

Thank you, again,  
Claudia

Claudia A. Hrvatin

Attorney at Law

King & Spalding LLP

1700 Pennsylvania Avenue, NW, Suite 200

Washington, DC 20006

(b)(6)

www.kslaw.com<<http://www.kslaw.com>>

From: Megan V. Khaner [<mailto:mvkhaner@oge.gov>]  
Sent: Friday, January 13, 2017 4:27 PM  
To: Hrvatin, Claudia  
Subject: Contact information

Deborah Bortot [djbortot@oge.gov](mailto:djbortot@oge.gov)<<mailto:djbortot@oge.gov>>  
Lorna Syme [lasyme@oge.gov](mailto:lasyme@oge.gov)<<mailto:lasyme@oge.gov>>

Megan Khaner  
Program Analyst (Finance)  
Presidential Nominations Branch  
General Counsel and Legal Policy Division  
202.482.9204

Visit OGE's website: [www.oge.gov](http://www.oge.gov)<<http://www.oge.gov>> <<http://www.oge.gov>> Follow OGE on Twitter:  
[@OfficeGovEthics](#)

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**From:** [Hrvatín, Claudia](#)  
**To:** [Megan V. Khaner](#); [Deborah J. Bortot](#); [Lorna A. Syme](#); (b)(6) Marcella Keiller's email address; ["Sprague, Marcia \(b\)\(6\)"](#); ["Rowell, Theresa \(b\)\(6\)"](#); [Jeff Lambert \(b\)\(6\)](#); [Susan Valcq \(b\)\(6\)](#); ["Jeff Bowerman" \(b\)\(6\)](#); [Matt Brinks \(b\)\(6\)](#)  
**Cc:** [Shashy, Hap](#); [Leland, Matthew](#)  
**Subject:** [GRAYMAIL] RE: Responses to 1/12/2017 Questions/Comments  
**Date:** Saturday, January 14, 2017 7:19:13 PM

---

Thank you, Megan.

**From:** Megan V. Khaner [mailto:[mvkhaner@oge.gov](mailto:mvkhaner@oge.gov)]  
**Sent:** Saturday, January 14, 2017 7:13 PM  
**To:** Hrvatín, Claudia; Deborah J. Bortot; Lorna A. Syme; (b)(6) Marcella Keiller's email address; 'Sprague, Marcia (b)(6)'; 'Rowell, Theresa (b)(6)'  
**Cc:** Shashy, Hap; Leland, Matthew  
**Subject:** RE: Responses to 1/12/2017 Questions/Comments

Claudia – I'm checking with the team and will keep you posted.

**From:** Hrvatín, Claudia [mailto:[\(b\)\(6\)](mailto:(b)(6))]  
**Sent:** Saturday, January 14, 2017 6:27 PM  
**To:** Megan V. Khaner; Deborah J. Bortot; Lorna A. Syme; (b)(6) Marcella Keiller's email address; 'Sprague, Marcia (b)(6)'; 'Rowell, Theresa (b)(6)'  
**Cc:** Shashy, Hap; Leland, Matthew  
**Subject:** [GRAYMAIL] RE: Responses to 1/12/2017 Questions/Comments

Megan – Might 12:15 work tomorrow, giving people opportunities for (b)(6) and other Sunday morning activities?

**From:** Hrvatín, Claudia  
**Sent:** Saturday, January 14, 2017 5:34 PM  
**To:** 'Megan V. Khaner'; Deborah J. Bortot; Lorna A. Syme; (b)(6) Marcella Keiller's email address; 'Sprague, Marcia (b)(6)'; 'Rowell, Theresa (b)(6)'  
**Cc:** Shashy, Hap; Leland, Matthew  
**Subject:** RE: Responses to 1/12/2017 Questions/Comments

Thank you, Megan. If you and your team could hold 11 AM tomorrow while we check with the DeVos team, we would be very appreciative.

**From:** Megan V. Khaner [mailto:[mvkhaner@oge.gov](mailto:mvkhaner@oge.gov)]  
**Sent:** Saturday, January 14, 2017 5:26 PM  
**To:** Hrvatín, Claudia; Deborah J. Bortot; Lorna A. Syme; (b)(6) Marcella Keiller's email address; 'Sprague, Marcia (b)(6)'; 'Rowell, Theresa (b)(6)'  
**Cc:** Shashy, Hap; Leland, Matthew  
**Subject:** RE: Responses to 1/12/2017 Questions/Comments

Hi Claudia,

Tomorrow morning works best for us. How does 11am sound?

Thanks,

mk

**From:** Hrvatin, Claudia [[mailto:\(b\)\(6\)@oge.gov](mailto:(b)(6)@oge.gov)]  
**Sent:** Saturday, January 14, 2017 2:27 PM  
**To:** Megan V. Khaner; Deborah J. Bortot; Lorna A. Syme; (b)(6) Marcella Keiller's email address; 'Sprague, Marcia (b)(6)@oge.gov'; 'Rowell, Theresa (b)(6)@oge.gov';  
**Cc:** Shashy, Hap; Leland, Matthew  
**Subject:** [GRAYMAIL] RE: Responses to 1/12/2017 Questions/Comments

Megan, Marcia – The DeVos team is continuing to work through the various questions and comments provided today and over the last several days. Would it be possible to convene a call this afternoon to discuss some questions that have arisen? Perhaps around 3:30 or thereabouts? Please let us know.

Claudia

**From:** Hrvatin, Claudia  
**Sent:** Saturday, January 14, 2017 10:57 AM  
**To:** [mvkhaner@oge.gov](mailto:mvkhaner@oge.gov); 'djbortot@oge.gov'; 'lasyme@oge.gov'; (b)(6) Marcella Keiller's email address; Sprague, Marcia (b)(6)@oge.gov; Rowell, Theresa (b)(6)@oge.gov;  
**Cc:** Jason Mahar (b)(6)@oge.gov; Shashy, Hap; Leland, Matthew  
**Subject:** RE: Responses to 1/12/2017 Questions/Comments

6 pages withheld in full - (b)(3), (4), (6)

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Megan/Marcella: In considering these entities, could we obtain information on which specific assets present potential conflicts?

Many thanks,

Claudia

Claudia A. Hrvatin

Attorney at Law

**King & Spalding LLP**

1700 Pennsylvania Avenue, NW, Suite 200

Washington, DC 20006

(b)(6)  
[Redacted]  
[Redacted]

[www.kslaw.com](http://www.kslaw.com)

**From:** Hrvatin, Claudia  
**Sent:** Friday, January 13, 2017 7:23 PM  
**To:** Megan V. Khaner; [djbortot@oge.gov](mailto:djbortot@oge.gov); [lasyme@oge.gov](mailto:lasyme@oge.gov)  
**Cc:** Jason Mahar (b)(6); Shashy, Hap; Leland, Matthew  
**Subject:** Responses to 1/12/2017 Questions/Comments

6 pages withheld in full - (b)(4), (6)

Megan, Deborah and Lorna:

Attached please find responses to the list of comments and questions you provided yesterday. You will see that there are a few items for which we are awaiting additional information.

Claudia

Claudia A. Hrvatin

Attorney at Law

**King & Spalding LLP**

1700 Pennsylvania Avenue, NW, Suite 200

Washington, DC 20006

(b)(6)

(b)(6)

(b)(6)

[www.kslaw.com](http://www.kslaw.com)

**From:** Hrvatin, Claudia  
**Sent:** Friday, January 13, 2017 5:39 PM  
**To:** 'Megan V. Khaner'  
**Cc:** Jason Mahar (b)(6); Shashy, Hap; Leland, Matthew  
**Subject:** RE: Contact information

Thank you, Megan, for this additional contact information and for speaking with us a bit ago. I am copying Hap and Matt, and Jason with Windquest – as soon as we obtain updates tonight and through the weekend, we will circulate to your team. If any questions or comments arise on your end, please let us know as soon as you can.

Thank you, again,

Claudia

Claudia A. Hrvatin

Attorney at Law

**King & Spalding LLP**



1700 Pennsylvania Avenue, NW, Suite 200

Washington, DC 20006

(b)(6)

[www.kslaw.com](http://www.kslaw.com)

**From:** Megan V. Khaner [<mailto:mvkhaner@oge.gov>]

**Sent:** Friday, January 13, 2017 4:27 PM

**To:** Hrvatin, Claudia

**Subject:** Contact information

Deborah Bortot [djbortot@oge.gov](mailto:djbortot@oge.gov)

Lorna Syme [lasyme@oge.gov](mailto:lasyme@oge.gov)

Megan Khaner

Program Analyst (Finance)

Presidential Nominations Branch

General Counsel and Legal Policy Division

202.482.9204

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**From:** [Jason Mahar](#)  
**To:** [Leland, Matthew](#); [Megan V. Khaner](#); [Hrvatın, Claudia](#); "Sprague, Marcia"; "Goodridge, Marcella"; "Rowell, Theresa (b)(6)"; [Deborah J. Bortot](#); [Lorna A. Syme](#)  
**Cc:** [Jeff Lambert](#); [Jeff Bowerman](#); [Susan Valcq](#); [Matt Brinks](#); [Shashy, Hap](#)  
**Subject:** [GRAYMAIL] Re: Responses to 1/12/2017 Questions/Comments  
**Date:** Tuesday, January 17, 2017 8:20:48 AM

---

Megan,

As a follow-up to the first question in the most recent round of questions (outside positions), please be advised that we did end up adding a couple new positions to the 278 (b)(3), (b)(6) and also revised the start dates for (b)(3), (b)(6). You will see those changes in the current version of the report.

Please let me know if you have any questions.

Best,  
Jason

Jason Mahar  
In-House Counsel  
Windquest Group (b)(6)  
Main office: 616.459.4500 | 201 Monroe Avenue NW, Suite 500, Grand Rapids, MI 49503

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On 1/16/17, 8:34 PM, "Leland, Matthew" <(b)(6)> wrote:

Megan,

3 pages withheld in full - (b)(4), (6)

Here are the most recent responses to the report from 4:15 EST today.

Matt

-----Original Message-----

From: Megan V. Khaner [<mailto:mvkhaner@oge.gov>]  
Sent: Monday, January 16, 2017 4:15 PM  
To: Hrvatın, Claudia; 'Sprague, Marcia'; 'Goodridge, Marcella'; 'Rowell, Theresa (b)(6)'; Deborah J. Bortot; Lorna A. Syme  
Cc: 'Jason Mahar (b)(6)'; Jeff Lambert (b)(6); 'Jeff Bowerman' (b)(6); Susan Valcq (b)(6); Matt Brinks (b)(6); Shashy, Hap; Leland, Matthew  
Subject: RE: Responses to 1/12/2017 Questions/Comments

Hi Claudia,

2 pages withheld in full (b)(3), (6)

We've reviewed the updated report. Attached find our questions (prior outstanding questions in blue, a few additional questions on most recent draft in purple).

Thank you,  
mk

-----Original Message-----

From: Hrvatin, Claudia [mailto:(b)(6)]  
Sent: Monday, January 16, 2017 12:25 PM  
To: 'Sprague, Marcia'; 'Goodridge, Marcella'; 'Rowell, Theresa (b)(6)'; Megan V. Khaner; Deborah J. Bortot; Lorna A. Syme  
Cc: 'Jason Mahar (b)(6)'; Jeff Lambert (b)(6)'; 'Jeff Bowerman' (b)(6); Susan Valcq (b)(6); Matt Brinks (b)(6); Shashy, Hap; Leland, Matthew  
Subject: [GRAYMAIL] Re: Responses to 1/12/2017 Questions/Comments

2 pages withheld in full - (b)(3), (4), (6)

Megan, Marcella/Marcia - Attached please find a list of additions for divestiture and a letter from (b)(6) & (b)(3) regarding its holdings.

Claudia

Sent from my BlackBerry 10 smartphone.  
From: Hrvatin, Claudia  
Sent: Sunday, January 15, 2017 8:44 PM  
To: 'Sprague, Marcia'; 'Goodridge, Marcella'; 'Rowell, Theresa (b)(6)'; 'mvkhaner@oge.gov'; 'djborot@oge.gov'; 'lasyme@oge.gov'  
Cc: 'Jason Mahar (b)(6)'; Jeff Lambert (b)(6)'; 'Jeff Bowerman' (b)(6); Susan Valcq (b)(6); Matt Brinks (b)(6); Shashy, Hap; Leland, Matthew  
Subject: RE: Responses to 1/12/2017 Questions/Comments

Marcia:

We are following up on our questions, below.

Of note, and pursuant to the second bullet, below, securities held by (b)(6) & (b)(3) and (b)(6) & (b)(3) have been added to the End Notes in the 278. Please provide us with a list of those securities which present a potential conflict. More specifically, we note that there are (b)(3), (b)(6) but look to you for direction in this regard.

Could we obtain a response by 10 AM tomorrow? Many thanks,

Claudia

Claudia A. Hrvatin  
Attorney at Law  
King & Spalding LLP  
1700 Pennsylvania Avenue, NW, Suite 200  
Washington, DC 20006

(b)(6)  
(b)(6)

www.kslaw.com<<http://www.kslaw.com>>

From: Hrvatin, Claudia

Sent: Saturday, January 14, 2017 6:44 PM

To: 'Sprague, Marcia'; Goodridge, Marcella; Rowell, Theresa (b)(6); mvkhaner@oge.gov; djbortot@oge.gov; lasyme@oge.gov; Jeff Lambert (b)(6); Susan Valcq (b)(6); 'Jeff Bowerman' (b)(6)  
Cc: Jason Mahar (b)(6); Shashy, Hap; Leland, Matthew  
Subject: RE: Responses to 1/12/2017 Questions/Comments

Thank you, Marcia. We are adding the team from RDV so that everyone can see the communications in real time, given that time is of the essence. Please "Reply To All" to facilitate our communications.

Below are our comments and questions:

(b)(6) & (b)(3)

[Redacted]

[Redacted]

2 pages withheld in full - (b)(3), (4), (6)

n Are there specific investments that item #57 (on most recent list provided, attached for reference) is referring to, and what do you need to complete that review?

Many thanks. Please let us know when a conference call tomorrow works – we are looking at 12:15 PM. Best,

Claudia

Referral to Dept of Education

[Redacted]

From: Hrvatin, Claudia [mailto:(b)(6)]

Sent: Saturday, January 14, 2017 2:27 PM

To: 'mvkhaner@oge.gov'; 'djbortot@oge.gov'; 'lasyme@oge.gov'; Goodridge, Marcella; Sprague, Marcia;

Rowell, Theresa  
Cc: Shashy, Hap; Leland, Matthew  
Subject: RE: Responses to 1/12/2017 Questions/Comments

Megan, Marcia – The DeVos team is continuing to work through the various questions and comments provided today and over the last several days. Would it be possible to convene a call this afternoon to discuss some questions that have arisen? Perhaps around 3:30 or thereabouts? Please let us know.

Claudia

From: Hrvatin, Claudia  
Sent: Saturday, January 14, 2017 10:57 AM  
To: mvkhaner@oge.gov<<mailto:mvkhaner@oge.gov>>; 'djbortot@oge.gov'; 'lasyme@oge.gov';

(b)(6) Marcella Keiller's email address  
(b)(6) ; Sprague, Marcia  
(b)(6) ); Rowell, Theresa

Cc: Jason Mahar ((b)(6)); Shashy, Hap; Leland, Matthew  
Subject: RE: Responses to 1/12/2017 Questions/Comments

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Megan/Marcella: In considering these entities, could we obtain information on which specific assets present potential conflicts?

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Claudia

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Attorney at Law  
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Washington, DC 20006

(b)(6)

[www.kslaw.com](http://www.kslaw.com)<<http://www.kslaw.com>>

From: Hrvatin, Claudia  
Sent: Friday, January 13, 2017 7:23 PM  
To: Megan V. Khaner; djbortot@oge.gov<<mailto:djbortot@oge.gov>>;  
lasyme@oge.gov<<mailto:lasyme@oge.gov>>

Cc: Jason Mahar ((b)(6)); Shashy, Hap; Leland, Matthew  
Subject: Responses to 1/12/2017 Questions/Comments

Megan, Deborah and Lorna:

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Claudia

Claudia A. Hrvatin  
Attorney at Law  
King & Spalding LLP  
1700 Pennsylvania Avenue, NW, Suite 200

Washington, DC 20006

(b)(6)

www kslaw.com<<http://www.kslaw.com>>

From: Hrvatin, Claudia

Sent: Friday, January 13, 2017 5:39 PM

To: 'Megan V. Khaner'

Cc: Jason Mahar ((b)(6)); Shashy, Hap; Leland, Matthew

Subject: RE: Contact information

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Thank you, again,  
Claudia

Claudia A. Hrvatin  
Attorney at Law  
King & Spalding LLP  
1700 Pennsylvania Avenue, NW, Suite 200  
Washington, DC 20006

(b)(6)

www kslaw.com<<http://www.kslaw.com>>

From: Megan V. Khaner [<mailto:mvkhaner@oge.gov>]

Sent: Friday, January 13, 2017 4:27 PM

To: Hrvatin, Claudia

Subject: Contact information

Deborah Bortot [djbortot@oge.gov](mailto:djbortot@oge.gov)<<mailto:djbortot@oge.gov>>

Lorna Syme [lasyme@oge.gov](mailto:lasyme@oge.gov)<<mailto:lasyme@oge.gov>>

Megan Khaner  
Program Analyst (Finance)  
Presidential Nominations Branch  
General Counsel and Legal Policy Division  
202.482.9204

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@OfficeGovEthics

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UNITED STATES OFFICE OF  
GOVERNMENT ETHICS



January 19, 2017

The Honorable Lamar Alexander  
Chairman  
Committee on Health, Education,  
Labor, and Pensions  
United States Senate  
Washington, DC 20510

Dear Mr. Chairman:

In accordance with the Ethics in Government Act of 1978, I enclose a copy of the financial disclosure report filed by Elisabeth P. “Betsy” DeVos. President-Elect Trump has announced his intention to nominate Ms. DeVos for the position of Secretary, Department of Education.


We have reviewed the report and have obtained advice from the agency concerning any possible conflict in light of its functions and the nominee’s proposed duties. Also enclosed is an ethics agreement outlining the actions that the nominee will undertake to avoid conflicts of interest. Unless a date for compliance is indicated in the ethics agreement, the nominee must fully comply within three months of confirmation with any action specified in the ethics agreement.

Based thereon, we believe that this nominee is in compliance with applicable laws and regulations governing conflicts of interest.

Sincerely,

**WALTER  
SHAUB**

Walter M. Shaub, Jr.  
Director

 Digitally signed by WALTER SHAUB  
DN c=US, o=U.S. Government, ou=Office of  
Government Ethics, cn=WALTER SHAUB,  
0.9.2342.19200300.100.1.1=95491000364655  
Date 2017.01.19 20:50:14 -05'00'

Enclosures



January 19, 2017

Marcella Goodridge-Keiller  
Designated Agency Ethics Official  
U.S. Department of Education  
400 Maryland Avenue, SW  
Room 6E225  
Washington, D.C. 20202

Dear Ms. Goodridge-Keiller:

The purpose of this letter is to describe the steps that I will take to avoid any actual or apparent conflict of interest in the event that I am confirmed for the position of Secretary of the U.S. Department of Education.

As required by 18 U.S.C. § 208(a), I will not participate personally and substantially in any particular matter in which I know that I have a financial interest directly and predictably affected by the matter, or in which I know that a person whose interests are imputed to me has a financial interest directly and predictably affected by the matter, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2). I understand that the interests of the following persons are imputed to me: any spouse or minor child of mine; any general partner of a partnership in which I am a limited or general partner; any organization in which I serve as officer, director, trustee, general partner or employee; and any person or organization with which I am negotiating or have an arrangement concerning prospective employment.

Within 90 days of my confirmation, I will divest my interests in the entities listed in Attachment A. With regard to each of these entities, I will not participate personally and substantially in any particular matter that to my knowledge has a direct and predictable effect on the financial interests of the entity until I have divested it, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2). I will ensure that all proceeds are invested in non-conflicting assets.

I previously resigned from my positions with the entities listed in Attachment B. I have no financial interests in any of these entities. For a period of one year after my resignation from each of these entities, I will not participate personally and substantially in any particular matter involving specific parties in which I know that entity is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

I previously resigned from my positions with the entities listed in Attachment C. Because I will continue to have a financial interest in each of these entities, I will not participate personally and substantially in any particular matter that to my knowledge has a direct and

Marcella Goodridge-Keiller  
Designated Agency Ethics Official  
Page 2

predictable effect on the financial interests of any of these entities, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2).

I will retain my position as co-trustee of Family Trusts 2, 11, and 12, identified in my nominee financial disclosure report. My spouse and I are the sole beneficiaries of these trusts. I will not receive any fees for the services that I provide as co-trustee during my appointment to the position of Secretary. I will not participate personally and substantially in any particular matter that to my knowledge has a direct and predictable effect on the financial interests of any of these trusts or their holdings, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2).

As the senior ethics official for the U.S. Department of Education, you have advised me that it is not necessary at this time for me to divest my remaining interests in entities disclosed in my nominee public financial disclosure report, inasmuch as the likelihood that I will need to participate in any particular matter affecting these entities is remote. However, I will remain vigilant in identifying any particular matters affecting the interests of these entities and their holdings, including both particular matters involving specific parties and particular matters of general applicability. You have explained that particular matters of general applicability are much broader than particular matters involving specific parties because they include every matter that is focused on the interests of a discrete and identifiable class of persons, such as an industry.

I have been advised that this ethics agreement will be posted publicly, consistent with 5 U.S.C. § 552, on the website of the U.S. Office of Government Ethics with ethics agreements of other Presidential nominees who file public financial disclosure reports.

Sincerely,



Elisabeth Prince DeVos

**ATTACHMENT A –ASSETS TO BE DIVESTED**

1. Reinhart Partners Inc.
2. The Veritas Capital Fund III, LP
3. Axiom Asia Private Capital Fund II, LP
4. Starboard Fund for New Bancs, LP
5. ICG Strategic Secondaries Carbon Fund, LP
6. VEPF IV Co-Invest 1A, LP
7. Prudential Capital Partners IV, LP
8. Lee Equity Partners, LLC
9. Stage Capital (Laurel) LP
10. Vista Credit Opportunities Fund II, LP
11. Vista Equity Partners Fund VI, LP
12. Rhone Partners IV, LP
13. Pinebridge Vantage Partners, LP
14. Knowledge Universe Education LP a/k/a KinderCare Education
15. RPM Ventures II, LP
16. Vista Equity Partners Fund IV, LP
17. Snow Phipps II, LP
18. Spectrum Equity, LLC
19. Apidos 2014-18-A
20. SG Fund LLC
21. Vinci Capital Partners II-A, LP
22. Pinebridge Asia Partners II, LP
23. Berkshire Hathaway, Inc.
24. Pearl Diver Capital Holdings Limited
25. LMF WF Portfolio III, LLC and Madison Capital Funding
26. TRIO 2016 CLO, LLC
27. MCF CLO IV, LLC
28. LMF WF Portfolio II, LLC
29. Ares XXXII CLO Ltd
30. CIFC Funding 2014-V, Ltd
31. CIFC Funding 2015-V, Ltd
32. Dryden 36 Senior Loan Fund
33. Galaxy XVIII CLO Ltd
34. GoldenTree Loan Opportunities XI, Limited
35. KVK CLO 2014-3 Ltd.
36. Seneca Park CLO Ltd
37. Eagle Point Credit
38. PDC Opportunities IV, LP
39. PDC Opportunities V, LP
40. TICP CLO Partners II, LP
41. AEA Mezzanine Fund III, LP
42. Newstone Capital Partners II, LP

43. Vintage V, LP
44. PineBridge PEP IV Secondary, LP
45. Pinebridge Secondary Partners, LP
46. Cuyahoga Capital Partners I, LP
47. Cuyahoga Capital Partners II, LP
48. Cuyahoga Capital Partners III, LP
49. Cuyahoga Capital Partners IV, LP
50. Partners Group Client Access 7, LP
51. Global Long Short Partners Offshore LP
52. Rho Fund Investors 2005, LP
53. Dyal Capital Partners III Co-Invest Horizon
54. Eurazeo Capital Restructuring
55. Fort Washington Private Equity Investors III, LP
56. Partners Group Secondary 2011 (USD), LP
57. Partners Group Secondary 2015(USD) A, LP
58. Graham Partners II, LP
59. Graham Partners II Co-Investment, LP
60. Huron River Ventures Feeder, LP
61. SG Fund II, LLC
62. Axiom Asia Private Capital Fund III, LP
63. Fort Washington Private Equity Investors IV, LP
64. Fort Washington Private Equity Investors V-B LP
65. RPM Ventures III LP
66. Pinebridge Secondary Partners II, LP
67. Pinebridge Secondary Partners II-A, LP
68. The Veritas Capital Fund IV, LP
69. AEA Mezzanine Fund II, LP
70. Hancock Mezzanine Partners III, LP
71. Hancock Capital Partners IV, LP
72. Vista Equity Partners Fund V, LP
73. Neuberger Berman CLO XVIII, LP
74. AEA Middle Market Debt Fund II LP
75. Nordic Capital VIII Beta LP
76. Cyprium Investors II
77. Industrial Growth Partners III
78. Goldman Sachs Real Estate Mezzanine Partners (US) LP
79. Prudential Capital Partners II
80. Albert Co-Investment Holdings LP
81. Global Long Short Partners LP
82. Coller International Partners VI, LP
83. SwanCap Opportunities Fund SCS-SIF
84. Lakeshore Capital Management, LP
85. Freedom Capital Management, LP
86. Sun Life Financial
87. AEA Investors Fund VI LP

88. Arbor Investments IV, L.P.
89. BDT Capital Partners Fund II, L.P.
90. Cortec Group Fund VI, LP
91. Cyprium Investors IV LP
92. Hancock Capital Partners V, L.P.
93. Partners Group Client Access 19, L.P.
94. Partners Group Direct Equity 2016 (USD) A, L.P.
95. Rhone Partners V, L.P.
96. Snow Phipps III, LP
97. Bimini Capital Management, Inc.
98. Broad Street Real Estate Credit Partners II, L.P.
99. DB Financial, LLC
100. G3 Capital II, LP
101. Ottawa Avenue GP 2016, LLC
102. Honos Co-Investment Holdings, L.P.

**ATTACHMENT B – ENTITIES FROM WHICH I HAVE  
RESIGNED MY POSITIONS AND HAVE NO FINANCIAL INTERESTS**

1. Dick and Betsy DeVos Family Foundation
2. Alliance for School Choice, Inc. (d/b/a “American Federation for Children Growth Fund”)
3. The Philanthropy Roundtable
4. Foundation for Excellence in Education, Inc.
5. American Enterprise Institute for Public Policy Research
6. American Federation for Children, Inc.
7. GLEP Education Fund
8. ArtPrize Grand Rapids
9. All Children Matter, Inc.
10. Great Lakes Education Foundation
11. Excellence in Education in Action
12. American Federation for Children Action Fund, Inc.

**ATTACHMENT C – ENTITIES FROM WHICH I HAVE RESIGNED  
MY POSITIONS AND CONTINUE TO HOLD FINANCIAL INTERESTS**

1. The Stow Company – Holland, Inc.
2. RCB Main Floor, LLC (d/b/a “Reserve GR, LLC”)
3. The Stow Company
4. Neurocore, LLC
5. Windquest Group, Inc.
6. RDV Corporation
7. RDV Sports, Inc.
8. BDV, Inc.



## Jennifer Matis

---

**From:** Teresa L. Williamson  
**Sent:** Thursday, January 19, 2017 8:59 PM  
**To:** 'Shek, Chung (HELP Committee)'  
**Cc:** Deborah J. Bortot; Sandra S. Mabry; Rodrick T. Johnson; Heather A. Jones; Ann Donaldson (b)(6)  
**Subject:** Public Financial Disclosure Report of Elisabeth P. "Betsy" DeVos  
**Attachments:** DeVos, Elisabeth P. finalEA.pdf; DeVos, Elisabeth P. final278.pdf; DeVos, Elisabeth P. finalsenateltr.pdf

278 report withheld in full (b)(3)

Good Evening,

I've attached the financial disclosure package for Elisabeth P. "Betsy" DeVos. President-Elect Trump has announced his intention to nominate Ms. DeVos for the position of Secretary, Department of Education.

The hard copy of the attached documents will be placed at OGE reception for pick up by a Senate rider page per our agreement. If you have any questions, please contact Teresa Williamson @ 202-482-9283.

**Please respond to this message to confirm receipt of the attached package, and please let me know in your response whether you will send a Senate rider page.**

Thanks!

Teresa Williamson  
Presidential Nominations Branch  
U.S. Office of Government Ethics  
1201 New York Avenue, NW - Suite 500  
Washington, DC 20005  
202-482-9283

**From:** [Ann M Donaldson](#)  
**To:** [Deborah J. Bortot](#); [Heather A. Jones](#)  
**Subject:** DeVos  
**Date:** Thursday, January 19, 2017 11:55:03 AM

---

Should be back to you all.

Ann M. Donaldson  
Associate

[JONES DAY® - One Firm Worldwide<sup>SM</sup>](#)

51 Louisiana Avenue, NW  
Washington, DC 20001

(b)(6)

=====

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=====

**From:** [Deborah J. Bortot](#)  
**To:** [Sprague, Marcia](#); [Goodridge, Marcella](#); [Teresa L. Williamson](#); [Megan V. Khaner](#); [Lorna A. Syme](#)  
**Cc:** [Heather A. Jones](#); [Teresa L. Williamson](#)  
**Subject:** FW: Mrs. Betsy DeVos  
**Date:** Thursday, January 19, 2017 5:41:50 PM

---

**From:** Ann M Donaldson [mailto:[\(b\)\(6\)](#)]  
**Sent:** Thursday, January 19, 2017 5:38 PM  
**To:** Deborah J. Bortot; Heather A. Jones  
**Cc:** Ann Donaldson  
**Subject:** Mrs. Betsy DeVos

On behalf of the President-Elect, this email serves as confirmation that the President-Elect intends to nominate Mrs. Betsy DeVos to be Secretary of Education. Please transmit herpre-cleared 278 report and any accompanying documents to the appropriate Senate committee.

Thanks,  
Annie

Ann M. Donaldson  
Associate  
[JONES DAY® - One Firm Worldwide<sup>SM</sup>](#)  
51 Louisiana Avenue, NW  
Washington, DC 20001  
[\(b\)\(6\)](#)

=====

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=====

**From:** [Deborah J. Bortot](#)  
**To:** ["Ann M. Donaldson"](#)  
**Cc:** [Megan V. Khaner](#)  
**Subject:** Fw: Signed Ethics Agreement  
**Date:** Thursday, January 19, 2017 8:26:53 PM

---

See email below. The ethics agreement has been finalized and signed.

Sent from my BlackBerry 10 smartphone on the Verizon Wireless 4G LTE network.

Original Message

From: Jason Mahar <(b)(6)>  
Sent: Thursday, January 19, 2017 7:34 PM  
To: Goodridge, Marcella  
Cc: Sprague, Marcia; Megan V. Khaner; Shashy, Hap; Hrvatin, Claudia; Leland, Matthew; Jeff Lambert; Jeff Bowerman; Susan Valcq; Deborah J. Bortot  
Subject: Re: Signed Ethics Agreement

Marcella – I'm hearing from the transition team that ED needs to tell OGE to tell the transition team that the ethics agreement is final. Apparently, the transition team is hearing that the ethics agreement is not final.

Can we clear this up, please.

Best,  
Jason

Jason Mahar  
In-House Counsel  
Windquest Group | (b)(6)  
Main office: 616.459.4500 | 201 Monroe Avenue NW, Suite 500, Grand Rapids, MI 49503

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On 1/19/17, 4:15 PM, "Goodridge, Marcella" <(b)(6) Marcella Keiller's email address> wrote:

Thank you Jason.

Sent from my iPhone

> On Jan 19, 2017, at 4:12 PM, Jason Mahar <(b)(6)> wrote:

>

> Hi Marcella, Marcia, and Megan,

>

> Attached please find Mrs. DeVos's signed ethics agreement. Please let me know if you need anything else.

>  
> Megan – I haven't included any of your colleagues on this email but please feel free to forward this to them if appropriate.

>  
> Best,  
> Jason

>  
>  
>  
>

> [cid:image001.png@01D2726E.DC001E50]

>

> Jason Mahar

> In-House Counsel

> Windquest Group | (b)(6)

> Main office: 616.459.4500 | 201 Monroe Avenue NW, Suite 500, Grand Rapids, MI 49503

>

> [cid:image002.png@01D2726E.DC001E50]

>

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> <image001.png>

> <image002.png>

> <DeVos - Signed Ethics Agreement 1 19 17.pdf>

**From:** [Integrity.gov](https://integrity.gov)  
**To:** [Teresa L. Williamson](#)  
**Subject:** Integrity.gov: Report Pending Action  
**Date:** Tuesday, December 13, 2016 9:36:29 AM

---

A 2017 Nominee report for DeVos, Elisabeth P ("Betsy") is pending your action as OGE Nominee Reviewer. You may access the report by logging into integrity at <https://integrity.gov>.

## Jennifer Matis

---

**From:** Deborah J. Bortot  
**Sent:** Tuesday, December 13, 2016 8:25 AM  
**To:** Teresa L. Williamson  
**Subject:** FW: Betsy DeVos

**From:** Ann M Donaldson [[mailto:\(b\)\(6\) contact info](mailto:(b)(6) contact info)]  
**Sent:** Tuesday, December 13, 2016 7:49 AM  
**To:** Deborah J. Bortot  
**Cc:** James Carroll; Katja Bullock  
**Subject:** Betsy DeVos

Good morning,

The Public Financial Disclosure Report (OGE-278) for Betsy DeVos is now available for your review in *Integrity* regarding a possible nomination by the President-Elect to be Secretary of the Department of Education.

Because Mrs. DeVos has not been formally nominated, please treat the identity and contents of the report confidentially, unless and until the Presidential Transition Team makes an official announcement.

Mrs. DeVos can be reached via Greg McNelly ((b)(6) contact info) or Josh Venable ((b)(6) contact info).

Please begin your review of the report and coordinate with our office as soon as possible. The Presidential Transition Team contact currently assigned to this matter is Jim Carroll. Mr. Carroll can be reached at ((b)(6) contact info) or by email at ((b)(6) contact info).

Thank you,

Presidential Transition Team

Ann M. Donaldson  
Associate  
[JONES DAY® - One Firm Worldwide<sup>SM</sup>](#)  
51 Louisiana Avenue, NW  
Washington, DC 20001  
Office ((b)(6) contact info)

=====

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=====

**From:** [Deborah J. Bortot](#)  
**To:** ["Ann M Donaldson"](#)  
**Cc:** [Megan V. Khaner](#); [David J. Apol](#); [Heather A. Jones](#); [Sandra S. Mabry](#); [Keith Labeledz](#); [Teresa L. Williamson](#); [Rodrick T. Johnson](#); [Emory A. Rounds III](#); [Sprague, Marcia](#); [Goodridge, Marcella](#); [Rowell, Theresa](#); [Passantino \(b\)\(6\)](#)  
**Subject:** PRECLEARED: Elisabeth DeVos  
**Date:** Thursday, January 19, 2017 5:07:55 PM Attachment withheld in full - (b)(4), (6) (b) (5)  
**Attachments:** [ea for preclearance DeVos.docx](#)

---

Annie, Elisabeth DeVos is precleared.  
I've attached the precleared ethics agreement.  
Thanks!  
Deb  
Deborah J. Bortot  
Chief, Presidential Nominations Branch  
U.S. Office of Government Ethics  
1201 New York Ave., NW, Suite 500  
Washington, DC 20005-3917  
Telephone: (202) 482-9227  
Facsimile: (202) 482-9237



**From:** [Deborah J. Bortot](mailto:Deborah.J.Bortot)  
**To:** ["Leland, Matthew"](mailto:Leland.Matthew)  
**Subject:** RE: [GRAYMAIL] Re: RE: DeVos Disclsoures  
**Date:** Tuesday, January 17, 2017 1:05:17 PM

---

I'm thinking within 30 minutes

-----Original Message-----

From: Leland, Matthew [[\(b\)\(6\)](mailto:(b)(6))]  
Sent: Tuesday, January 17, 2017 1:04 PM  
To: Deborah J. Bortot  
Cc: David J. Apol; Jason Mahar; Shashy, Hap; Hrvatin, Claudia  
Subject: [GRAYMAIL] Re: RE: DeVos Disclsoures

What time do you think the list will be available?

Matthew M. Leland  
King & Spalding LLP | 1700 Pennsylvania Avenue N.W. | Washington<x-apple-data-detectors://0/1>, D.C. 20006  
Firm: +1 202 737 0500<tel:+1%20202%20737%200500> | [\(b\)\(6\)](mailto:(b)(6))

On Jan 17, 2017, at 12:45 PM, Deborah J. Bortot <[djbortot@oge.gov](mailto:djbortot@oge.gov)<<mailto:djbortot@oge.gov>>> wrote:

Education is finalizing the list right now that we will circulate. Should we talk after you receive the list or would you like to talk right?

From: Leland, Matthew [[\(b\)\(6\)](mailto:(b)(6))]  
Sent: Tuesday, January 17, 2017 12:22 PM  
To: Deborah J. Bortot; David J. Apol  
Cc: Jason Mahar; Shashy, Hap; Hrvatin, Claudia  
Subject: [GRAYMAIL] RE: DeVos Disclsoures

Thanks Deb. We'll wait to hear back from you.

From: Deborah J. Bortot [<mailto:djbortot@oge.gov>]  
Sent: Tuesday, January 17, 2017 12:21 PM  
To: Leland, Matthew; David J. Apol  
Cc: Jason Mahar; Shashy, Hap; Hrvatin, Claudia  
Subject: Re: [GRAYMAIL] DeVos Disclsoures

We are on the phone with Department of Education right now. I will let you know when we are done.

Sent from my BlackBerry 10 smartphone on the Verizon Wireless 4G LTE network.

From: Leland, Matthew  
Sent: Tuesday, January 17, 2017 12:15 PM  
To: Deborah J. Bortot; David J. Apol  
Cc: Jason Mahar; Shashy, Hap; Hrvatin, Claudia  
Subject: [GRAYMAIL] DeVos Disclsoures

Deb and Dave,

Would you both be available for a call with us at 12:30 pm? We wanted to follow up with you on progress and ask you some other related questions.

If that time works, we can use my dial in:

(b)(6)

Matt

Matthew M. Leland

King & Spalding LLP | 1700 Pennsylvania Avenue, N.W. | Washington, D.C. 20006

Firm: +1 202 737 0500 | (b)(6)

---

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**From:** [Deborah J. Bortot](#)  
**To:** ["Leland, Matthew"; David J. Apol](#)  
**Cc:** [Jason Mahar; Shashy, Hap; Hrvatin, Claudia](#)  
**Subject:** RE: [GRAYMAIL] RE: RE: RE: DeVos Disclsoures  
**Date:** Tuesday, January 17, 2017 2:30:06 PM

---

Let's use my call-in number:

(b)(6)

---

**From:** Leland, Matthew [mailto:(b)(6)]  
**Sent:** Tuesday, January 17, 2017 1:42 PM  
**To:** Deborah J. Bortot; David J. Apol  
**Cc:** Jason Mahar; Shashy, Hap; Hrvatin, Claudia  
**Subject:** [GRAYMAIL] RE: RE: RE: DeVos Disclsoures  
Yes, 2:30 pm will work.

(b)(6)

Thanks Deb and Dave.

**From:** Deborah J. Bortot [<mailto:djbortot@oge.gov>]  
**Sent:** Tuesday, January 17, 2017 1:31 PM  
**To:** Leland, Matthew; David J. Apol  
**Cc:** Jason Mahar; Shashy, Hap; Hrvatin, Claudia  
**Subject:** RE: [GRAYMAIL] RE: RE: DeVos Disclsoures  
Dave's not available at 2:00. 2:30 would work.

**From:** Leland, Matthew [**Sent:** Tuesday, January 17, 2017 1:28 PM  
**To:** Deborah J. Bortot; David J. Apol  
**Cc:** Jason Mahar; Shashy, Hap; Hrvatin, Claudia  
**Subject:** [GRAYMAIL] RE: RE: DeVos Disclsoures  
May we talk at 2:00 pm? To make scheduling easier, I think it can be limited to the folks on this email.

**From:** Deborah J. Bortot [<mailto:djbortot@oge.gov>]  
**Sent:** Tuesday, January 17, 2017 12:45 PM  
**To:** Leland, Matthew; David J. Apol  
**Cc:** Jason Mahar; Shashy, Hap; Hrvatin, Claudia  
**Subject:** RE: [GRAYMAIL] RE: DeVos Disclsoures  
Education is finalizing the list right now that we will circulate. Should we talk after you receive the list or would you like to talk right?

**From:** Leland, Matthew [**Sent:** Tuesday, January 17, 2017 12:22 PM  
**To:** Deborah J. Bortot; David J. Apol  
**Cc:** Jason Mahar; Shashy, Hap; Hrvatin, Claudia  
**Subject:** [GRAYMAIL] RE: DeVos Disclsoures  
Thanks Deb. We'll wait to hear back from you.

**From:** Deborah J. Bortot [<mailto:djbortot@oge.gov>]  
**Sent:** Tuesday, January 17, 2017 12:21 PM  
**To:** Leland, Matthew; David J. Apol  
**Cc:** Jason Mahar; Shashy, Hap; Hrvatin, Claudia  
**Subject:** Re: [GRAYMAIL] DeVos Disclsoures

We are on the phone with Department of Education right now. I will let you know when we are done.

Sent from my BlackBerry 10 smartphone on the Verizon Wireless 4G LTE network.

**From:** Leland, Matthew

**Sent:** Tuesday, January 17, 2017 12:15 PM

**To:** Deborah J. Bortot; David J. Apol

**Cc:** Jason Mahar; Shashy, Hap; Hrvatin, Claudia

**Subject:** [GRAYMAIL] DeVos Disclsoures

Deb and Dave,

Would you both be available for a call with us at 12:30 pm? We wanted to follow up with you on progress and ask you some other related questions.

If that time works, we can use my dial in:

(b)(6)

Matt

**Matthew M. Leland**

**King & Spalding LLP** | 1700 Pennsylvania Avenue, N.W. | Washington, D.C. 20006

**Firm:** +1 202 737 0500 (b)(6)

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**From:** [Deborah J. Bortot](#)  
**To:** "[Leland, Matthew](#)"  
**Cc:** [Susan Valcq](#); [David J. Apol](#); [Heather A. Jones](#); [Megan V. Khaner](#); [Goodridge, Marcella](#); [Sprague, Marcia](#); [Jason Mahar](#); [Shashy, Hap](#); [Hrvatn, Claudia](#); [Jeff Lambert](#); [Jeff Bowerman](#); [Matt Brinks](#)  
**Subject:** RE: [GRAYMAIL] Re: RE: Re: RE: DeVos Disclosures - Divestiture  
**Date:** Thursday, January 19, 2017 8:10:03 AM

---

Sorry. I just realized that you had included the revised draft in your email. We are fine with those changes. It looks like the Department of Education sent some questions just a few minutes ago.

-----Original Message-----

From: Leland, Matthew [[mailto:\(b\)\(6\)](mailto:(b)(6)@)] ]  
Sent: Thursday, January 19, 2017 6:55 AM  
To: Deborah J. Bortot  
Cc: Susan Valcq; David J. Apol; Heather A. Jones; Megan V. Khaner; Goodridge, Marcella; Sprague, Marcia; Jason Mahar; Shashy, Hap; Hrvatn, Claudia; Jeff Lambert; Jeff Bowerman; Matt Brinks  
Subject: [GRAYMAIL] Re: RE: Re: RE: DeVos Disclosures - Divestiture

Thank you, Deb.

Matthew M. Leland  
King & Spalding LLP | 1700 Pennsylvania Avenue N.W. | Washington<x-apple-data-detectors://0/1>, D.C. 20006  
Firm: +1 202 737 0500<tel:+1%20202%20737%200500> | [\(b\)\(6\)](#)

On Jan 19, 2017, at 6:51 AM, Deborah J. Bortot <[djbortot@oge.gov](mailto:djbortot@oge.gov)<<mailto:djbortot@oge.gov>>> wrote:

We will make those changes and circulate a new draft

Sent from my BlackBerry 10 smartphone on the Verizon Wireless 4G LTE network.

Original Message  
From: Leland, Matthew  
Sent: Wednesday, January 18, 2017 11:57 PM  
To: Deborah J. Bortot  
Cc: Susan Valcq; David J. Apol; Heather A. Jones; Megan V. Khaner; Goodridge, Marcella; Sprague, Marcia; Jason Mahar; Shashy, Hap; Hrvatn, Claudia; Jeff Lambert; Jeff Bowerman; Matt Brinks  
Subject: [GRAYMAIL] RE: Re: RE: DeVos Disclosures - Divestiture

Deb,

Thanks for turning this around so quickly. There are only minor edits in this copy.

- The signature line now reads Elisabeth Prince DeVos

- Line 15: Should be [\(b\)\(3\), \(b\)\(6\)](#)

- Line 20: Should be [\(b\)\(3\), \(b\)\(6\)](#)

Those are all of the changes tonight. We will confirm in the morning whether these are the final changes.

Best regards,

Matt

-----Original Message-----

From: Deborah J. Bortot [<mailto:djbortot@oge.gov>]

Sent: Wednesday, January 18, 2017 9:51 PM

To: Leland, Matthew

Cc: Susan Valcq; David J. Apol; Heather A. Jones; Megan V. Khaner; Goodridge, Marcella; Sprague, Marcia; Jason Mahar; Shashy, Hap; Hrvatin, Claudia; Jeff Lambert; Jeff Bowerman; Matt Brinks

Subject: RE: [GRAYMAIL] Re: RE: DeVos Disclosures - Divestiture

7 pages withheld in full (b)(4), (6)

Attached is a tracked changes version of the updated ethics agreement. I'm not certain if we have allowed digital signatures for ethics agreements, so I will have to run that up the chain. If the concern is getting the original, we do allow scanned copies. She can print it, sign it, scan it, and email it as long as it is a clear scan. Otherwise, I'll have to check about using a digital signature.

-----Original Message-----

From: Leland, Matthew [[mailto:\(b\)\(6\)@oge.gov](mailto:(b)(6)@oge.gov)]

Sent: Wednesday, January 18, 2017 9:21 PM

To: Deborah J. Bortot

Cc: Susan Valcq; David J. Apol; Heather A. Jones; Megan V. Khaner; Goodridge, Marcella; Sprague, Marcia; Jason Mahar; Shashy, Hap; Hrvatin, Claudia; Jeff Lambert; Jeff Bowerman; Matt Brinks

Subject: [GRAYMAIL] Re: RE: DeVos Disclosures - Divestiture

Thanks Deb.

Matthew M. Leland

King & Spalding LLP | 1700 Pennsylvania Avenue N.W. | Washington<x-apple-data-detectors://0/1>, D.C. 20006

Firm: +1 202 737 0500<tel:+1%20202%20737%200500> | [mailto:\(b\)\(6\)@oge.gov](mailto:(b)(6)@oge.gov)

On Jan 18, 2017, at 9:09 PM, Deborah J. Bortot <djbortot@oge.gov<<mailto:djbortot@oge.gov>>> wrote:

We are working on the revision right now Sent from my BlackBerry 10 smartphone on the Verizon Wireless 4G LTE network.

Original Message

From: Leland, Matthew

Sent: Wednesday, January 18, 2017 8:11 PM

To: Deborah J. Bortot

Cc: 'Susan Valcq'; David J. Apol; Heather A. Jones; Megan V. Khaner; 'Goodridge, Marcella'; 'Sprague, Marcia'; 'Jason Mahar'; Shashy, Hap; Hrvatin, Claudia; 'Jeff Lambert'; 'Jeff Bowerman'; 'Matt Brinks'

Subject: [GRAYMAIL] RE: DeVos Disclosures - Divestiture

Deb,

Following up on our call, we can forgo language about divesting within 120 days and commit to divest within 90 days.

Is an electronic signature on the letter acceptable, or is an original signature required?

Finally, how quickly may we get a revised agreement?

Thanks so much.

Matt

-----Original Message-----

From: Leland, Matthew

Sent: Wednesday, January 18, 2017 7:24 PM

To: 'Deborah J. Bortot'

Cc: 'Susan Valcq'; 'David J. Apol'; 'Heather A. Jones'; 'Megan V. Khaner'; 'Goodridge, Marcella'; 'Sprague, Marcia'; 'Jason Mahar'; Shashy, Hap; Hrvatin, Claudia; 'Jeff Lambert'; 'Jeff Bowerman'; 'Matt Brinks'

Subject: RE: DeVos Disclosures - Divestiture

Deb,

We also will remove (b)(6) & (b)(3) in light of our earlier discussion.

Matt

-----Original Message-----

From: Leland, Matthew

Sent: Wednesday, January 18, 2017 7:20 PM

To: 'Deborah J. Bortot'

Cc: 'Susan Valcq'; David J. Apol; Heather A. Jones; Megan V. Khaner; 'Goodridge, Marcella'; 'Sprague, Marcia'; 'Jason Mahar'; Shashy, Hap; Hrvatin, Claudia; 'Jeff Lambert'; 'Jeff Bowerman'; 'Matt Brinks'

Subject: RE: DeVos Disclosures - Divestiture

Thanks Deb.

Following up on the divestitures:

Please take the following investments off the ED conflict list which were fully liquidated as of 12/31/16.

(b)(6) & (b)(3)

(b)(6) & (b)(3)



Deb - Claudia and I will follow up with you in a few moments.

-----Original Message-----

From: Deborah J. Bortot [<mailto:djbortot@oge.gov>]

Sent: Wednesday, January 18, 2017 6:47 PM

To: Leland, Matthew

Cc: 'Susan Valcq'; David J. Apol; Heather A. Jones; Megan V. Khaner; 'Goodridge, Marcella'; 'Sprague, Marcia'; 'Jason Mahar'; Shashy, Hap; Hrvatin, Claudia; 'Jeff Lambert'; 'Jeff Bowerman'; 'Matt Brinks'

Subject: RE: DeVos Disclosures - Divestiture

I've attached a revised ethics agreement based on our conversation. Please put assets in Attachment A into either the 90 day or 120 day section

Seven pages withheld in full – (b)(4), (b)(6)

-----Original Message-----

From: Deborah J. Bortot

Sent: Wednesday, January 18, 2017 6:18 PM

To: 'Leland, Matthew'

Cc: Susan Valcq; David J. Apol; Heather A. Jones; Megan V. Khaner; Goodridge, Marcella; Sprague, Marcia; Jason Mahar; Shashy, Hap; Hrvatin, Claudia; Jeff Lambert; Jeff Bowerman; Matt Brinks

Subject: RE: DeVos Disclosures - Divestiture

Yes. We are calling in now

-----Original Message-----

From: Leland, Matthew [[mailto:\(b\)\(6\)@oge.gov](mailto:(b)(6)@oge.gov)]

Sent: Wednesday, January 18, 2017 6:18 PM

To: Deborah J. Bortot

Cc: Susan Valcq; David J. Apol; Heather A. Jones; Megan V. Khaner; Goodridge, Marcella; Sprague, Marcia; Jason Mahar; Shashy, Hap; Hrvatin, Claudia; Jeff Lambert; Jeff Bowerman; Matt Brinks

Subject: [GRAYMAIL] Re: DeVos Disclosures - Divestiture

Sorry - can we get back on the phone very quickly?

Matthew M. Leland

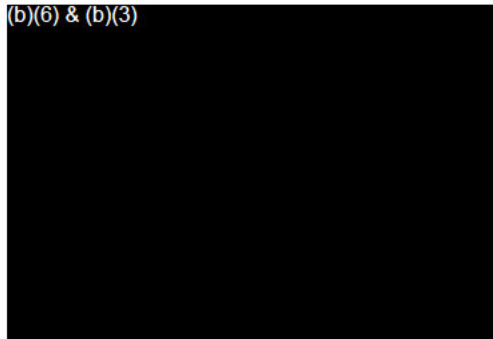
King & Spalding LLP | 1700 Pennsylvania Avenue N.W. | Washington<x-apple-data-detectors://0/1>, D.C. 20006

Firm: +1 202 737 0500<tel:+1%20202%20737%200500> (b)(6)

On Jan 18, 2017, at 5:45 PM, Deborah J. Bortot <djbortot@oge.gov<<mailto:djbortot@oge.gov>>>  
<<mailto:djbortot@oge.gov>><<mailto:djbortot@oge.gov>>> wrote:

The attachments you forwarded have:

(b)(6) & (b)(3)



From: Susan Valcq [mailto:(b)(6)]  
Sent: Wednesday, January 18, 2017 5:39 PM  
To: Deborah J. Bortot; 'Leland, Matthew'; David J. Apol; Heather A. Jones; Megan V. Khaner; 'Goodridge, Marcella'; 'Sprague, Marcia'  
Cc: Jason Mahar; Shashy, Hap; Hrvatin, Claudia; Jeff Lambert; Jeff Bowerman; Matt Brinks  
Subject: [GRAYMAIL] RE: DeVos Disclosures - Divestiture

Deborah,  
Those entities are held in (b)(6) & (b)(3) which is the investment we would like considered for removal from the divestiture list.  
The other two investments are (b)(6) & (b)(3) Information on these two investments was included in a separate attachment.  
Please let us know if you have any other questions, or we can provide more information to you.  
Thank you,  
Susan

From: Deborah J. Bortot [mailto:djbortot@oge.gov]  
Sent: Wednesday, January 18, 2017 5:35 PM  
To: 'Leland, Matthew' (b)(6)  
(b)(6) David J. Apol  
<djapol@oge.gov<mailto:djapol@oge.gov><mailto:djapol@oge.gov><mailto:djapol@oge.gov>>; Heather A. Jones <hajones@oge.gov<mailto:hajones@oge.gov><mailto:hajones@oge.gov><mailto:hajones@oge.gov>>; Megan V. Khaner <mvkhaner@oge.gov<mailto:mvkhaner@oge.gov><mailto:mvkhaner@oge.gov><mailto:mvkhaner@oge.gov>>; 'Goodridge, Marcella'  
(b)(6) 'Sprague, Marcia'  
(b)(6)  
Cc: Mahar, Jason (Windquest) (b)(6)  
(b)(6) Shashy, Hap  
(b)(6) Hrvatin, Claudia (b)(6)  
(b)(6) >; Valcq, Susan (RDV Corp - Vice President of Finance) (b)(6)  
(b)(6) Lambert, Jeff (b)(6)  
(b)(6) Bowerman, Jeff (RDV Corp - Tax) >;  
(b)(6) Brinks, Matt (RDV Corp - Accounting) (b)(6)  
Subject: RE: DeVos Disclosures - Divestiture

The (b)(6) & (b)(3) attachment lists 18 entities.

Which three entities are a concern?

From: Leland, Matthew [mailto:(b)(6)]  
Sent: Wednesday, January 18, 2017 4:36 PM  
To: Deborah J. Bortot; David J. Apol; Heather A. Jones; Megan V. Khaner; 'Goodridge, Marcella'; 'Sprague, Marcia'  
Cc: Jason Mahar; Shashy, Hap; Hrvatin, Claudia; Susan Valcq; Jeff Lambert; Jeff Bowerman; Matt Brinks  
Subject: [GRAYMAIL] DeVos Disclosures - Divestiture

All,

Since our most recent call, we identified three more holdings that we would like to remove from the Government's

divestiture list. Information on these is attached. If there is more information you need, please let us know.

Best regards,

"Four pages withheld in full – (b)(4), (b)(6)"

Matt

Matthew M. Leland

King & Spalding LLP | 1700 Pennsylvania Avenue, N.W. | Washington, D.C. 20006

Firm: +1 202 737 0500 | (b)(6)

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**From:** [Deborah J. Bortot](mailto:Deborah.J.Bortot)  
**To:** "Leland, Matthew"  
**Subject:** RE: [GRAYMAIL] RE: RE: RE: DeVos Disclsoures  
**Date:** Tuesday, January 17, 2017 2:54:53 PM

---

You can reach me at 202-482-9227

---

**From:** Leland, Matthew [mailto:(b)(6)]  
**Sent:** Tuesday, January 17, 2017 1:57 PM  
**To:** Deborah J. Bortot  
**Subject:** [GRAYMAIL] RE: RE: RE: DeVos Disclsoures  
Yes, please.

**From:** Deborah J. Bortot [mailto:[djbortot@oge.gov](mailto:djbortot@oge.gov)]  
**Sent:** Tuesday, January 17, 2017 1:56 PM  
**To:** Leland, Matthew

**Subject:** RE: [GRAYMAIL] RE: RE: RE: DeVos Disclsoures  
Thanks. We are ready to send the list. Should I include Claudia, Jason, and Hap?

**From:** Leland, Matthew [mailto:(b)(6)]  
**Sent:** Tuesday, January 17, 2017 1:42 PM  
**To:** Deborah J. Bortot; David J. Apol  
**Cc:** Jason Mahar; Shashy, Hap; Hrvatin, Claudia  
**Subject:** [GRAYMAIL] RE: RE: RE: DeVos Disclsoures  
Yes, 2:30 pm will work.

(b)(6)

Thanks Deb and Dave.

**From:** Deborah J. Bortot [mailto:[djbortot@oge.gov](mailto:djbortot@oge.gov)]  
**Sent:** Tuesday, January 17, 2017 1:31 PM  
**To:** Leland, Matthew; David J. Apol  
**Cc:** Jason Mahar; Shashy, Hap; Hrvatin, Claudia  
**Subject:** RE: [GRAYMAIL] RE: RE: DeVos Disclsoures  
Dave's not available at 2:00. 2:30 would work.

**From:** Leland, Matthew [mailto:(b)(6)]  
**Sent:** Tuesday, January 17, 2017 1:28 PM  
**To:** Deborah J. Bortot; David J. Apol  
**Cc:** Jason Mahar; Shashy, Hap; Hrvatin, Claudia  
**Subject:** [GRAYMAIL] RE: RE: DeVos Disclsoures

May we talk at 2:00 pm? To make scheduling easier, I think it can be limited to the folks on this email.

**From:** Deborah J. Bortot [mailto:[djbortot@oge.gov](mailto:djbortot@oge.gov)]  
**Sent:** Tuesday, January 17, 2017 12:45 PM  
**To:** Leland, Matthew; David J. Apol  
**Cc:** Jason Mahar; Shashy, Hap; Hrvatin, Claudia  
**Subject:** RE: [GRAYMAIL] RE: DeVos Disclsoures

Education is finalizing the list right now that we will circulate. Should we talk after you receive the list or would you like to talk right?

**From:** Leland, Matthew [mailto:(b)(6)]  
**Sent:** Tuesday, January 17, 2017 12:22 PM  
**To:** Deborah J. Bortot; David J. Apol  
**Cc:** Jason Mahar; Shashy, Hap; Hrvatin, Claudia  
**Subject:** [GRAYMAIL] RE: DeVos Disclsoures  
Thanks Deb. We'll wait to hear back from you.

**From:** Deborah J. Bortot [<mailto:djbortot@oge.gov>]

**Sent:** Tuesday, January 17, 2017 12:21 PM

**To:** Leland, Matthew; David J. Apol

**Cc:** Jason Mahar; Shashy, Hap; Hrvatin, Claudia

**Subject:** Re: [GRAYMAIL] DeVos Disclsoures

We are on the phone with Department of Education right now. I will let you know when we are done.

Sent from my BlackBerry 10 smartphone on the Verizon Wireless 4G LTE network.

**From:** Leland, Matthew

**Sent:** Tuesday, January 17, 2017 12:15 PM

**To:** Deborah J. Bortot; David J. Apol

**Cc:** Jason Mahar; Shashy, Hap; Hrvatin, Claudia

**Subject:** [GRAYMAIL] DeVos Disclsoures

Deb and Dave,

Would you both be available for a call with us at 12:30 pm? We wanted to follow up with you on progress and ask you some other related questions.

If that time works, we can use my dial in:

(b)(6)

Matt

**Matthew M. Leland**

**King & Spalding LLP** | 1700 Pennsylvania Avenue, N.W. | Washington, D.C. 20006

**Firm:** +1 202 737 0500 | (b)(6)

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-----Original Message-----

From: Deborah J. Bortot [<mailto:djbortot@oge.gov>]

Sent: Thursday, January 19, 2017 12:35 PM

To: 'Hrvatina, Claudia'; Megan V. Khaner; Heather A. Jones; Leland, Matthew

Cc: Susan Valcq; David J. Apol; Goodridge, Marcella; Sprague, Marcia; Jason Mahar; Shashy, Hap; Jeff Lambert; Jeff Bowerman; Matt Brinks

Subject: RE: [GRAYMAIL] RE: RE: Re: RE: Re: RE: DeVos Disclosures - Divestiture

7 pages withheld in full - (b)(3), (4), (6)

See attached. We corrected (b)(3), (b)(6) and fixed the formatting.

OGE has the pen on any further changes to the 278 and the ethics agreement. Please do not make any other changes.

Thanks,  
Deb

-----Original Message-----

From: Hrvatina, Claudia [[mailto:\(b\)\(6\)@oge.gov](mailto:(b)(6)@oge.gov)]

Sent: Thursday, January 19, 2017 12:28 PM

To: Megan V. Khaner; Heather A. Jones; Leland, Matthew; Deborah J. Bortot

Cc: Susan Valcq; David J. Apol; Goodridge, Marcella; Sprague, Marcia; Jason Mahar; Shashy, Hap; Jeff Lambert; Jeff Bowerman; Matt Brinks

Subject: [GRAYMAIL] RE: RE: Re: RE: Re: RE: DeVos Disclosures - Divestiture

Megan -- Let us know if you need help with the formatting. We have one clarification to Attachment A: #19 should only be (b)(6) & (b)(3) is not one of the holdings.

Claudia



-----Original Message-----

From: Megan V. Khaner [<mailto:mvkhaner@oge.gov>]

Sent: Thursday, January 19, 2017 12:10 PM

To: Heather A. Jones; Leland, Matthew; Deborah J. Bortot

Cc: Susan Valcq; David J. Apol; Goodridge, Marcella; Sprague, Marcia; Jason Mahar; Shashy, Hap; Hrvatin, Claudia; Jeff Lambert; Jeff Bowerman; Matt Brinks

Subject: RE: [GRAYMAIL] RE: Re: RE: Re: RE: DeVos Disclosures - Divestiture

7 pages withheld in full - (b)(3), (4), (6)

Attached find the updated draft ethics agreement. I can't fix the indent on the final three divestiture assets, if someone can fix that I'd appreciate it.

Thanks,

mk

-----Original Message-----

From: Heather A. Jones

Sent: Thursday, January 19, 2017 11:49 AM

To: 'Leland, Matthew'; Deborah J. Bortot

Cc: Susan Valcq; David J. Apol; Megan V. Khaner; Goodridge, Marcella; Sprague, Marcia; Jason Mahar; Shashy, Hap; Hrvatin, Claudia; Jeff Lambert; Jeff Bowerman; Matt Brinks

Subject: RE: [GRAYMAIL] RE: Re: RE: Re: RE: DeVos Disclosures - Divestiture

That is fine. We can use Deb's call in number.

(b)(6)

-----Original Message-----

From: Leland, Matthew [[mailto:\(b\)\(6\)@oge.gov](mailto:(b)(6)@oge.gov)]

Sent: Thursday, January 19, 2017 11:32 AM

To: Deborah J. Bortot

Cc: Susan Valcq; David J. Apol; Heather A. Jones; Megan V. Khaner; Goodridge, Marcella; Sprague, Marcia; Jason Mahar; Shashy, Hap; Hrvatin, Claudia; Jeff Lambert; Jeff Bowerman; Matt Brinks

Subject: [GRAYMAIL] RE: Re: RE: Re: RE: DeVos Disclosures - Divestiture

Deb,

Are you all available at noon for a call to discuss the final steps?

Matt

-----Original Message-----

From: Deborah J. Bortot [<mailto:djbortot@oge.gov>]

Sent: Thursday, January 19, 2017 9:12 AM

To: Leland, Matthew

Cc: Susan Valcq; David J. Apol; Heather A. Jones; Megan V. Khaner; Goodridge, Marcella; Sprague, Marcia; Jason Mahar; Shashy, Hap; Hrvatin, Claudia; Jeff Lambert; Jeff Bowerman; Matt Brinks

Subject: RE: [GRAYMAIL] Re: RE: Re: RE: DeVos Disclosures - Divestiture

My understanding is that PTT created a new report for the filer.

Has the filer prepopulated the new report and submitted it to PTT?

Thanks,

Deb

-----Original Message-----

From: Leland, Matthew [mailto:(b) (6)]  
Sent: Thursday, January 19, 2017 6:55 AM  
To: Deborah J. Bortot  
Cc: Susan Valcq; David J. Apol; Heather A. Jones; Megan V. Khaner; Goodridge, Marcella; Sprague, Marcia; Jason Mahar; Shashy, Hap; Hrvatin, Claudia; Jeff Lambert; Jeff Bowerman; Matt Brinks  
Subject: [GRAYMAIL] Re: RE: Re: RE: DeVos Disclosures - Divestiture

Thank you, Deb.

Matthew M. Leland  
King & Spalding LLP | 1700 Pennsylvania Avenue N.W. | Washington<x-apple-data-detectors://0/1>, D.C. 20006  
Firm: +1 202 737 0500<tel:+1%20202%20737%200500> | (b)(6)

On Jan 19, 2017, at 6:51 AM, Deborah J. Bortot <djbortot@oge.gov<mailto:djbortot@oge.gov>> wrote:

We will make those changes and circulate a new draft

Sent from my BlackBerry 10 smartphone on the Verizon Wireless 4G LTE network.

Original Message

From: Leland, Matthew

Sent: Wednesday, January 18, 2017 11:57 PM

To: Deborah J. Bortot

Cc: Susan Valcq; David J. Apol; Heather A. Jones; Megan V. Khaner; Goodridge, Marcella; Sprague, Marcia; Jason Mahar; Shashy, Hap; Hrvatin, Claudia; Jeff Lambert; Jeff Bowerman; Matt Brinks

Subject: [GRAYMAIL] RE: Re: RE: DeVos Disclosures - Divestiture

Deb,

Thanks for turning this around so quickly. There are only minor edits in this copy.

- The signature line now reads Elisabeth Prince DeVos

- Line 15: Should be (b)(3), (b)(6)

- Line 20: Should be (b)(3), (b)(6)

Those are all of the changes tonight. We will confirm in the morning whether these are the final changes.

Best regards,

Matt

-----Original Message-----

From: Deborah J. Bortot [mailto:djbortot@oge.gov]

Sent: Wednesday, January 18, 2017 9:51 PM

To: Leland, Matthew

Cc: Susan Valcq; David J. Apol; Heather A. Jones; Megan V. Khaner; Goodridge, Marcella; Sprague, Marcia; Jason Mahar; Shashy, Hap; Hrvatin, Claudia; Jeff Lambert; Jeff Bowerman; Matt Brinks

Subject: RE: [GRAYMAIL] Re: RE: DeVos Disclosures - Divestiture

7 pages withheld in full (b)(4), (6)

Attached is a tracked changes version of the updated ethics agreement. I'm not certain if we have allowed digital signatures for ethics agreements, so I will have to run that up the chain. If the concern is getting the original, we do allow scanned copies. She can print it, sign it, scan it, and email it as long as it is a clear scan. Otherwise, I'll have to check about using a digital signature.

-----Original Message-----

From: Leland, Matthew [mailto:(b)(6)]  
Sent: Wednesday, January 18, 2017 9:21 PM  
To: Deborah J. Bortot  
Cc: Susan Valcq; David J. Apol; Heather A. Jones; Megan V. Khaner; Goodridge, Marcella; Sprague, Marcia; Jason Mahar; Shashy, Hap; Hrvatin, Claudia; Jeff Lambert; Jeff Bowerman; Matt Brinks  
Subject: [GRAYMAIL] Re: RE: DeVos Disclosures - Divestiture

Thanks Deb.

Matthew M. Leland  
King & Spalding LLP | 1700 Pennsylvania Avenue N.W. | Washington<x-apple-data-detectors://0/1>, D.C. 20006  
Firm: +1 202 737 0500<tel:+1%20202%20737%200500> | (b)(6)

On Jan 18, 2017, at 9:09 PM, Deborah J. Bortot <djbortot@oge.gov<mailto:djbortot@oge.gov>>  
<mailto:djbortot@oge.gov>> wrote:

We are working on the revision right now Sent from my BlackBerry 10 smartphone on the Verizon Wireless 4G LTE network.

Original Message

From: Leland, Matthew  
Sent: Wednesday, January 18, 2017 8:11 PM  
To: Deborah J. Bortot  
Cc: 'Susan Valcq'; David J. Apol; Heather A. Jones; Megan V. Khaner; 'Goodridge, Marcella'; 'Sprague, Marcia'; 'Jason Mahar'; Shashy, Hap; Hrvatin, Claudia; 'Jeff Lambert'; 'Jeff Bowerman'; 'Matt Brinks'  
Subject: [GRAYMAIL] RE: DeVos Disclosures - Divestiture

Deb,

Following up on our call, we can forgo language about divesting within 120 days and commit to divest within 90 days.

Is an electronic signature on the letter acceptable, or is an original signature required?

Finally, how quickly may we get a revised agreement?

Thanks so much.

Matt

-----Original Message-----

From: Leland, Matthew  
Sent: Wednesday, January 18, 2017 7:24 PM  
To: 'Deborah J. Bortot'

Cc: 'Susan Valcq'; 'David J. Apol'; 'Heather A. Jones'; 'Megan V. Khaner'; 'Goodridge, Marcella'; 'Sprague, Marcia'; 'Jason Mahar'; Shashy, Hap; Hrvatin, Claudia; 'Jeff Lambert'; 'Jeff Bowerman'; 'Matt Brinks'  
Subject: RE: DeVos Disclosures - Divestiture

Deb,

We also will remove (b)(6) & (b)(3) in light of our earlier discussion.

Matt

-----Original Message-----

From: Leland, Matthew  
Sent: Wednesday, January 18, 2017 7:20 PM  
To: 'Deborah J. Bortot'  
Cc: 'Susan Valcq'; David J. Apol; Heather A. Jones; Megan V. Khaner; 'Goodridge, Marcella'; 'Sprague, Marcia'; 'Jason Mahar'; Shashy, Hap; Hrvatin, Claudia; 'Jeff Lambert'; 'Jeff Bowerman'; 'Matt Brinks'  
Subject: RE: DeVos Disclosures - Divestiture

Thanks Deb.

Following up on the divestitures:

Please take the following investments off the ED conflict list which were fully liquidated as of 12/31/16.

(b)(6) & (b)(3)

(b)(6) & (b)(3)

Deb - Claudia and I will follow up with you in a few moments.

-----Original Message-----

From: Deborah J. Bortot [<mailto:djbortot@oge.gov>]  
Sent: Wednesday, January 18, 2017 6:47 PM  
To: Leland, Matthew  
Cc: 'Susan Valcq'; David J. Apol; Heather A. Jones; Megan V. Khaner; 'Goodridge, Marcella'; 'Sprague, Marcia'; 'Jason Mahar'; Shashy, Hap; Hrvatin, Claudia; 'Jeff Lambert'; 'Jeff Bowerman'; 'Matt Brinks'  
Subject: RE: DeVos Disclosures - Divestiture

I've attached a revised ethics agreement based on our conversation. Please put assets in Attachment A into either the 90 day or 120 day section

Seven pages withheld in full - (b)(4), (b)(6)

-----Original Message-----

From: Deborah J. Bortot

Sent: Wednesday, January 18, 2017 6:18 PM

To: 'Leland, Matthew'

Cc: Susan Valcq; David J. Apol; Heather A. Jones; Megan V. Khaner; Goodridge, Marcella; Sprague, Marcia; Jason Mahar; Shashy, Hap; Hrvatin, Claudia; Jeff Lambert; Jeff Bowerman; Matt Brinks

Subject: RE: DeVos Disclosures - Divestiture

Yes. We are calling in now

-----Original Message-----

From: Leland, Matthew [mailto:(b)(6)]

Sent: Wednesday, January 18, 2017 6:18 PM

To: Deborah J. Bortot

Cc: Susan Valcq; David J. Apol; Heather A. Jones; Megan V. Khaner; Goodridge, Marcella; Sprague, Marcia; Jason Mahar; Shashy, Hap; Hrvatin, Claudia; Jeff Lambert; Jeff Bowerman; Matt Brinks

Subject: [GRAYMAIL] Re: DeVos Disclosures - Divestiture

Sorry - can we get back on the phone very quickly?

Matthew M. Leland

King & Spalding LLP | 1700 Pennsylvania Avenue N.W. | Washington<x-apple-data-detectors://0/1>, D.C. 20006

Firm: +1 202 737 0500<tel:+1%20202%20737%200500> | (b)(6)

On Jan 18, 2017, at 5:45 PM, Deborah J. Bortot <djbortot@oge.gov<mailto:djbortot@oge.gov>>  
<mailto:djbortot@oge.gov><mailto:djbortot@oge.gov>> wrote:

The attachments you forwarded have:

(b)(6) & (b)(3)

From: Susan Valcq [mailto:(b)(6)]

Sent: Wednesday, January 18, 2017 5:39 PM

To: Deborah J. Bortot; 'Leland, Matthew'; David J. Apol; Heather A. Jones; Megan V. Khaner; 'Goodridge, Marcella'; 'Sprague, Marcia'

Cc: Jason Mahar; Shashy, Hap; Hrvatin, Claudia; Jeff Lambert; Jeff Bowerman; Matt Brinks

Subject: [GRAYMAIL] RE: DeVos Disclosures - Divestiture

Deborah,

Those entities are held in (b)(6) & (b)(3) which is the investment we would like considered for removal from the divestiture list.

The other two investments are (b)(6) & (b)(3) Information on

these two investments was included in a separate attachment.  
Please let us know if you have any other questions, or we can provide more information to you.  
Thank you,  
Susan

From: Deborah J. Bortot [<mailto:djbortot@oge.gov>]  
Sent: Wednesday, January 18, 2017 5:35 PM  
To: 'Leland, Matthew' (b)(6)

(b)(6) David J. Apol  
<djapol@oge.gov<<mailto:djapol@oge.gov>><<mailto:djapol@oge.gov>><<mailto:djapol@oge.gov>>>>; Heather A. Jones <hajones@oge.gov<<mailto:hajones@oge.gov>><<mailto:hajones@oge.gov>><<mailto:hajones@oge.gov>>>>; Megan V. Khaner <mvkhaner@oge.gov<<mailto:mvkhaner@oge.gov>><<mailto:mvkhaner@oge.gov>>>>; 'Goodridge, Marcella'

(b)(6) 'Sprague, Marcia'  
(b)(6)

Cc: Mahar, Jason (Windquest) (b)(6)  
(b)(6) Shashy, Hap  
(b)(6) Hrvatin, Claudia <(b)(6)>  
(b)(6) Valcq, Susan (RDV Corp - Vice President of Finance) (b)(6)  
(b)(6) Lambert, Jeff (b)(6)  
(b)(6) Bowerman, Jeff (RDV Corp - Tax);  
(b)(6) Brinks, Matt (RDV Corp - Accounting) <(b)(6)>

Subject: RE: DeVos Disclosures - Divestiture

The (b)(6) & (b)(3) attachment lists 18 entities.

Which three entities are a concern?

From: Leland, Matthew [[\(b\)\(6\)](mailto:(b)(6))]  
Sent: Wednesday, January 18, 2017 4:36 PM  
To: Deborah J. Bortot; David J. Apol; Heather A. Jones; Megan V. Khaner; 'Goodridge, Marcella'; 'Sprague, Marcia'  
Cc: Jason Mahar; Shashy, Hap; Hrvatin, Claudia; Susan Valcq; Jeff Lambert; Jeff Bowerman; Matt Brinks  
Subject: [GRAYMAIL] DeVos Disclosures - Divestiture

All,

Since our most recent call, we identified three more holdings that we would like to remove from the Government's divestiture list. Information on these is attached. If there is more information you need, please let us know.

Best regards,

"Four pages withheld in full – (b)(4), (b)(6)"

Matt

Matthew M. Leland  
King & Spalding LLP | 1700 Pennsylvania Avenue, N.W. | Washington, D.C. 20006  
Firm: +1 202 737 0500 | (b)(6)

---

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**From:** [Megan V. Khaner](#)  
**To:** "[Susan Valcq](#)"; "[Leland, Matthew](#)"; [Deborah J. Bortot](#)  
**Cc:** [Hrvatn, Claudia](#); [Sprague, Marcia](#); [Goodridge, Marcella](#); [Rowell, Theresa](#) (b)(6); [Lorna A. Syme](#); [Jason Mahar](#); [Jeff Lambert](#); [Jeff Bowerman](#); [Matt Brinks](#); [Shashy, Hap](#); [Heather A. Jones](#); [David J. Apol](#)  
**Subject:** RE: [GRAYMAIL] RE: Re: RE: Responses to 1/12/2017 Questions/Comments  
**Date:** Tuesday, January 17, 2017 10:28:18 AM

---

Thanks, Susan.  
mk

-----Original Message-----

From: Susan Valcq [[\(b\)\(6\)](mailto:(b)(6))]  
Sent: Tuesday, January 17, 2017 10:24 AM  
To: Megan V. Khaner; 'Leland, Matthew'; Deborah J. Bortot  
Cc: Hrvatn, Claudia; Sprague, Marcia; Goodridge, Marcella; Rowell, Theresa (b)(6); Lorna A. Syme; Jason Mahar; Jeff Lambert; Jeff Bowerman; Matt Brinks; Shashy, Hap; Heather A. Jones; David J. Apol  
Subject: [GRAYMAIL] RE: Re: RE: Responses to 1/12/2017 Questions/Comments

Megan,

The entities listed below are all (b)(3), (4), (6)

Let us know if you have any other questions.

Thanks,  
Susan

-----Original Message-----

From: Megan V. Khaner [<mailto:mvkhaner@oge.gov>]  
Sent: Tuesday, January 17, 2017 10:19 AM  
To: 'Leland, Matthew' (b)(6); Deborah J. Bortot <[djbortot@oge.gov](mailto:djbortot@oge.gov)>  
Cc: Hrvatn, Claudia (b)(6); Sprague, Marcia (b)(6); Goodridge, Marcella (b)(6); Rowell, Theresa (b)(6); Lorna A. Syme <[lasyme@oge.gov](mailto:lasyme@oge.gov)>; Mahar, Jason (Windquest) (b)(6); Lambert, Jeff (b)(6); Bowerman, Jeff (RDV Corp - Tax) (b)(6); Valcq, Susan (RDV Corp - Vice President of Finance) (b)(6); Brinks, Matt (RDV Corp - Accounting) (b)(6); Shashy, Hap (b)(6); Heather A. Jones <[hajones@oge.gov](mailto:hajones@oge.gov)>; David J. Apol <[djapol@oge.gov](mailto:djapol@oge.gov)>  
Subject: RE: [GRAYMAIL] Re: RE: Responses to 1/12/2017 Questions/Comments

Also, which of the following are family entities/do they control?

(b)(6) & (b)(3)

Thanks,  
mk

-----Original Message-----

From: Leland, Matthew [[\(b\)\(6\)](mailto:(b)(6))]  
Sent: Tuesday, January 17, 2017 7:04 AM  
To: Deborah J. Bortot

Cc: Megan V. Khaner; Hrvatin, Claudia; Sprague, Marcia; Goodridge, Marcella; Rowell, Theresa (b)(6); Lorna A. Syme; Jason Mahar (b)(6); Jeff Lambert (b)(6); 'Jeff Bowerman' (b)(6); Susan Valcq (b)(6); Matt Brinks (b)(6); Shashy, Hap; Heather A. Jones; David J. Apol  
Subject: [GRAYMAIL] Re: RE: Responses to 1/12/2017 Questions/Comments

Deb,

We are checking on this.

Matt

Matthew M. Leland  
King & Spalding LLP | 1700 Pennsylvania Avenue N.W. | Washington<x-apple-data-detectors://0/1>, D.C. 20006  
Firm: +1 202 737 0500<tel:+1%20202%20737%200500> | (b)(6)

On Jan 16, 2017, at 9:14 PM, Deborah J. Bortot <djbortot@oge.gov<<mailto:djbortot@oge.gov>>> wrote:

Matt,

We will review the changes to the report.

I do not see a response in the Word document you circulated to the following item.

(b)(3), (4), (6)

?

Thanks,  
Deb

Sent from my BlackBerry 10 smartphone on the Verizon Wireless 4G LTE network.

Original Message

From: Leland, Matthew

Sent: Monday, January 16, 2017 8:34 PM

To: Megan V. Khaner; Hrvatin, Claudia; 'Sprague, Marcia'; 'Goodridge, Marcella'; 'Rowell, Theresa

(b)(6) <[\(b\)\(6\)](mailto:(b)(6))>'; Deborah J. Bortot; Lorna A. Syme

Cc: 'Jason Mahar (b)(6)'; Jeff Lambert

(b)(6); 'Jeff Bowerman'

(b)(6); Susan Valcq

(b)(6); Matt Brinks

(b)(6); Shashy, Hap

Subject: [GRAYMAIL] RE: Responses to 1/12/2017 Questions/Comments

3 pages withheld in full (b)(4), (6)

Megan,

Here are the most recent responses to the report from 4:15 EST today.

Matt

-----Original Message-----

From: Megan V. Khaner [<mailto:mvkhaner@oge.gov>]

Sent: Monday, January 16, 2017 4:15 PM

To: Hrvatin, Claudia; 'Sprague, Marcia'; 'Goodridge, Marcella'; 'Rowell, Theresa

(b)(6) >); Deborah J. Bortot; Lorna A. Syme

Cc: 'Jason Mahar (b)(6) >); Jeff Lambert

(b)(6) >); 'Jeff Bowerman'

(b)(6) >); Susan Valcq

(b)(6) >); Matt Brinks

(b)(6) >); Shashy, Hap; Leland, Matthew

Subject: RE: Responses to 1/12/2017 Questions/Comments

2 pages withheld in full (b)(3), (6)

Hi Claudia,

We've reviewed the updated report. Attached find our questions (prior outstanding questions in blue, a few additional questions on most recent draft in purple).

Thank you,

mk

-----Original Message-----

From: Hrvatin, Claudia [[mailto:\(b\)\(6\)@oge.gov](mailto:(b)(6)@oge.gov)]

Sent: Monday, January 16, 2017 12:25 PM

To: 'Sprague, Marcia'; 'Goodridge, Marcella'; 'Rowell, Theresa

(b)(6) >); Megan V. Khaner; Deborah J. Bortot; Lorna A. Syme

Cc: 'Jason Mahar ((b)(6) >); Jeff Lambert

(b)(6) >); 'Jeff Bowerman'

(b)(6) >); Susan Valcq

(b)(6) >); Matt Brinks

(b)(6) >); Shashy, Hap; Leland, Matthew

Subject: [GRAYMAIL] Re: Responses to 1/12/2017 Questions/Comments

2 pages withheld in full - (b)(3), (4), (6)

Megan, Marcella/Marcia - Attached please find a list of additions for divestiture and a letter from (b)(6) & (b)(3) regarding its holdings.

Claudia

Sent from my BlackBerry 10 smartphone.

From: Hrvatin, Claudia

Sent: Sunday, January 15, 2017 8:44 PM

To: 'Sprague, Marcia'; 'Goodridge, Marcella'; 'Rowell, Theresa

(b)(6) >); 'mvkhaner@oge.gov<<mailto:mvkhaner@oge.gov>>';

'djborot@oge.gov<<mailto:djborot@oge.gov>>'; 'lasyme@oge.gov<<mailto:lasyme@oge.gov>>'

Cc: 'Jason Mahar ((b)(6) >); Jeff Lambert

(b)(6) >); 'Jeff Bowerman'

(b)(6) >); Susan Valcq

(b)(6) >); Matt Brinks

(b)(6) >); Shashy, Hap; Leland, Matthew

Subject: RE: Responses to 1/12/2017 Questions/Comments

Marcia:

We are following up on our questions, below.

Of note, and pursuant to the second bullet, below, securities held by (b)(6) & (b)(3) and (b)(6) & (b)(3) have been added to the End Notes in the 278. Please provide us with a list of those securities which present a potential conflict. More specifically, we note that there are (b)(3), (b)(6) securities, but look to you for direction in this regard.

Could we obtain a response by 10 AM tomorrow? Many thanks,

Claudia

Claudia A. Hrvatin  
Attorney at Law  
King & Spalding LLP  
1700 Pennsylvania Avenue, NW, Suite 200  
Washington, DC 20006

(b) (6)  
[Redacted]

www.kslaw.com<<http://www.kslaw.com>><<http://www.kslaw.com>>

From: Hrvatin, Claudia  
Sent: Saturday, January 14, 2017 6:44 PM  
To: 'Sprague, Marcia'; Goodridge, Marcella; Rowell, Theresa  
(b)(6); mvkhaner@oge.gov<<mailto:mvkhaner@oge.gov>>;  
djbortot@oge.gov<<mailto:djbortot@oge.gov>>; lasyme@oge.gov<<mailto:lasyme@oge.gov>>; Jeff Lambert  
(b)(6); Susan Valcq  
(b)(6); 'Jeff Bowerman'  
(b)(6)  
Cc: Jason Mahar (b)(6) Shashy, Hap; Leland, Matthew  
Subject: RE: Responses to 1/12/2017 Questions/Comments

Thank you, Marcia. We are adding the team from RDV so that everyone can see the communications in real time, given that time is of the essence. Please "Reply To All" to facilitate our communications.

Below are our comments and questions:

(b)(6) & (b)(3)  
[Redacted]

[Redacted]

[Redacted]

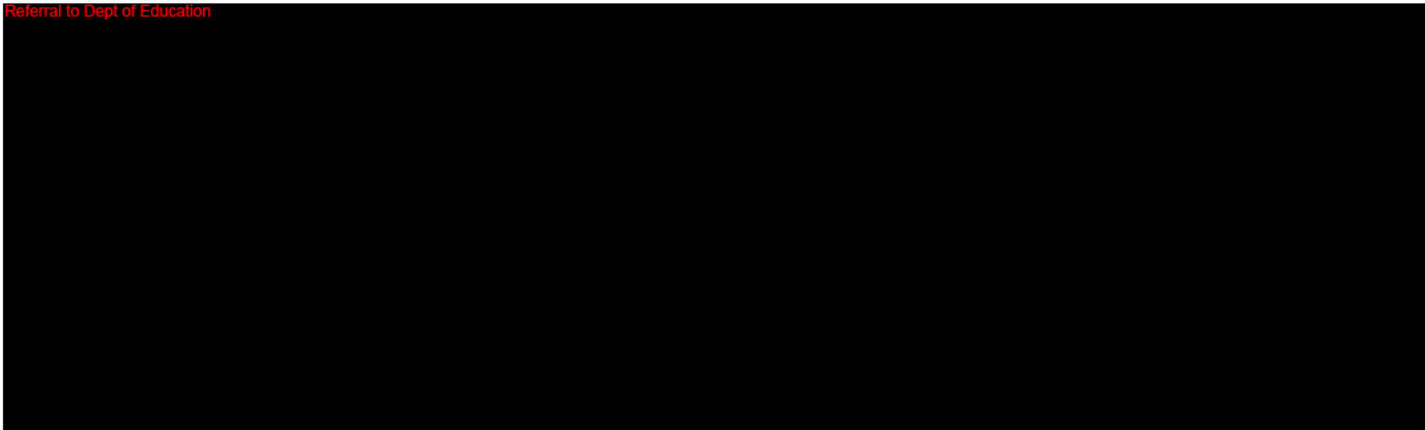
2 pages withheld in full - (b)(3), (4), (6)

n Are there specific investments that item #57 (on most recent list provided, attached for reference) is referring to, and what do you need to complete that review?

Many thanks. Please let us know when a conference call tomorrow works – we are looking at 12:15 PM. Best,

Claudia

Referral to Dept of Education



From: Hrvatin, Claudia [mailto:(b)(6)]  
Sent: Saturday, January 14, 2017 2:27 PM  
To: 'mvkhaner@oge.gov' <mailto:mvkhaner@oge.gov>; 'djbertot@oge.gov' <mailto:djbertot@oge.gov>; 'lasyme@oge.gov' <mailto:lasyme@oge.gov>; Goodridge, Marcella; Sprague, Marcia; Rowell, Theresa  
Cc: Shashy, Hap; Leland, Matthew  
Subject: RE: Responses to 1/12/2017 Questions/Comments

Megan, Marcia – The DeVos team is continuing to work through the various questions and comments provided today and over the last several days. Would it be possible to convene a call this afternoon to discuss some questions that have arisen? Perhaps around 3:30 or thereabouts? Please let us know.

Claudia

From: Hrvatin, Claudia  
Sent: Saturday, January 14, 2017 10:57 AM  
To: mvkhaner@oge.gov <mailto:mvkhaner@oge.gov> <mailto:mvkhaner@oge.gov>; 'djbertot@oge.gov' <mailto:djbertot@oge.gov>; 'lasyme@oge.gov' <mailto:lasyme@oge.gov>; (b)(6) Marcella Keller's email address; Sprague, Marcia (b)(6); Rowell, Theresa (b)(6)  
Cc: Jason Mahar (b)(6)  
Shashy, Hap; Leland, Matthew  
Subject: RE: Responses to 1/12/2017 Questions/Comments

6 pages withheld in full - (b)(3), (b)(4), (b)(6)

Megan: The 278 in Integrity has been updated to reflect the holdings for Items 38 and 41, pursuant to your questions on the last page (page 6) of your questions/comments document (re-attached for reference).

Megan/Marcella: In considering these entities, could we obtain information on which specific assets present potential conflicts?

Many thanks,  
Claudia

Claudia A. Hrvatin  
Attorney at Law  
King & Spalding LLP  
1700 Pennsylvania Avenue, NW, Suite 200  
Washington, DC 20006  
(b)(6)

(b)(6)

www.kslaw.com<<http://www.kslaw.com>><<http://www.kslaw.com>>

From: Hrvatin, Claudia

Sent: Friday, January 13, 2017 7:23 PM

To: Megan V. Khaner; djbortot@oge.gov<<mailto:djbortot@oge.gov>><<mailto:djbortot@oge.gov>>;

lasyme@oge.gov<<mailto:lasyme@oge.gov>><<mailto:lasyme@oge.gov>>

Cc: Jason Mahar (b)(6)

Shashy, Hap; Leland, Matthew

Subject: Responses to 1/12/2017 Questions/Comments

6 pages withheld in full - (b)(4), (6)

Megan, Deborah and Lorna:

Attached please find responses to the list of comments and questions you provided yesterday. You will see that there are a few items for which we are awaiting additional information.

Claudia

Claudia A. Hrvatin

Attorney at Law

King & Spalding LLP

1700 Pennsylvania Avenue, NW, Suite 200

Washington, DC 20006

(b)(6)

(b)(6)

www.kslaw.com<<http://www.kslaw.com>><<http://www.kslaw.com>>

From: Hrvatin, Claudia

Sent: Friday, January 13, 2017 5:39 PM

To: 'Megan V. Khaner'

Cc: Jason Mahar (b)(6)

Shashy, Hap; Leland, Matthew

Subject: RE: Contact information

Thank you, Megan, for this additional contact information and for speaking with us a bit ago. I am copying Hap and Matt, and Jason with Windquest – as soon as we obtain updates tonight and through the weekend, we will circulate to your team. If any questions or comments arise on your end, please let us know as soon as you can.

Thank you, again,

Claudia

Claudia A. Hrvatin

Attorney at Law

King & Spalding LLP

1700 Pennsylvania Avenue, NW, Suite 200

Washington, DC 20006

(b)(6)

www.kslaw.com<<http://www.kslaw.com>><<http://www.kslaw.com>>

From: Megan V. Khaner [<mailto:mvkhaner@oge.gov>]  
Sent: Friday, January 13, 2017 4:27 PM  
To: Hrvatin, Claudia  
Subject: Contact information

Deborah Bortot [djbortot@oge.gov](mailto:djbortot@oge.gov)<<mailto:djbortot@oge.gov>><<mailto:djbortot@oge.gov>>  
Lorna Syme [lasyme@oge.gov](mailto:lasyme@oge.gov)<<mailto:lasyme@oge.gov>><<mailto:lasyme@oge.gov>>

Megan Khaner  
Program Analyst (Finance)  
Presidential Nominations Branch  
General Counsel and Legal Policy Division  
202.482.9204

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**From:** [Deborah J. Bortot](#)  
**To:** ["Leland, Matthew"](#)  
**Cc:** ["Susan Valcq"](#); [David J. Apol](#); [Heather A. Jones](#); [Megan V. Khaner](#); ["Goodridge, Marcella"](#); ["Sprague, Marcia"](#); ["Jason Mahar"](#); [Shashy, Hap](#); [Hrvatina, Claudia](#); ["Jeff Lambert"](#); ["Jeff Bowerman"](#); ["Matt Brinks"](#)  
**Subject:** RE: DeVos Disclosures - Divestiture  
**Date:** Wednesday, January 18, 2017 9:23:42 PM

---

Because the last divestiture item in your list includes 3 entities, we want to confirm that you would like us to delete:

(b)(6) & (b)(3)



-----Original Message-----

**From:** Leland, Matthew [[mailto:\(b\)\(6\)](#)]  
**Sent:** Wednesday, January 18, 2017 7:20 PM  
**To:** Deborah J. Bortot  
**Cc:** 'Susan Valcq'; David J. Apol; Heather A. Jones; Megan V. Khaner; 'Goodridge, Marcella'; 'Sprague, Marcia'; 'Jason Mahar'; Shashy, Hap; Hrvatina, Claudia; 'Jeff Lambert'; 'Jeff Bowerman'; 'Matt Brinks'  
**Subject:** [GRAYMAIL] RE: DeVos Disclosures - Divestiture

Thanks Deb.

Following up on the divestitures:

Please take the following investments off the ED conflict list which were fully liquidated as of 12/31/16.

(b)(6) & (b)(3)



(b)(6) & (b)(3)



Deb - Claudia and I will follow up with you in a few moments.

-----Original Message-----

**From:** Deborah J. Bortot [<mailto:djbortot@oge.gov>]  
**Sent:** Wednesday, January 18, 2017 6:47 PM

To: Leland, Matthew  
Cc: 'Susan Valcq'; David J. Apol; Heather A. Jones; Megan V. Khaner; 'Goodridge, Marcella'; 'Sprague, Marcia'; 'Jason Mahar'; Shashy, Hap; Hrvatin, Claudia; 'Jeff Lambert'; 'Jeff Bowerman'; 'Matt Brinks'  
Subject: RE: DeVos Disclosures - Divestiture

I've attached a revised ethics agreement based on our conversation. Please put assets in Attachment A into either the 90 day or 120 day section

-----Original Message-----

From: Deborah J. Bortot  
Sent: Wednesday, January 18, 2017 6:18 PM  
To: 'Leland, Matthew'  
Cc: Susan Valcq; David J. Apol; Heather A. Jones; Megan V. Khaner; Goodridge, Marcella; Sprague, Marcia; Jason Mahar; Shashy, Hap; Hrvatin, Claudia; Jeff Lambert; Jeff Bowerman; Matt Brinks  
Subject: RE: DeVos Disclosures - Divestiture

Seven pages withheld in full – (b)(4), (b)(6)

Yes. We are calling in now

-----Original Message-----

From: Leland, Matthew [mailto:(b)(6)]  
Sent: Wednesday, January 18, 2017 6:18 PM  
To: Deborah J. Bortot  
Cc: Susan Valcq; David J. Apol; Heather A. Jones; Megan V. Khaner; Goodridge, Marcella; Sprague, Marcia; Jason Mahar; Shashy, Hap; Hrvatin, Claudia; Jeff Lambert; Jeff Bowerman; Matt Brinks  
Subject: [GRAYMAIL] Re: DeVos Disclosures - Divestiture

Sorry - can we get back on the phone very quickly?

Matthew M. Leland  
King & Spalding LLP | 1700 Pennsylvania Avenue N.W. | Washington<x-apple-data-detectors://0/1>, D.C. 20006  
Firm: +1 202 737 0500<tel:+1%20202%20737%200500> | (b)(6)

On Jan 18, 2017, at 5:45 PM, Deborah J. Bortot <djbortot@oge.gov<mailto:djbortot@oge.gov>> wrote:

The attachments you forwarded have:

(b)(6) & (b)(3)

From: Susan Valcq [mailto:(b)(6)]  
Sent: Wednesday, January 18, 2017 5:39 PM  
To: Deborah J. Bortot; 'Leland, Matthew'; David J. Apol; Heather A. Jones; Megan V. Khaner; 'Goodridge, Marcella'; 'Sprague, Marcia'  
Cc: Jason Mahar; Shashy, Hap; Hrvatin, Claudia; Jeff Lambert; Jeff Bowerman; Matt Brinks  
Subject: [GRAYMAIL] RE: DeVos Disclosures - Divestiture

Deborah,

Those entities are held in (b)(6) & (b)(3) which is the investment we would like considered for removal from the divestiture list.

The other two investments are (b)(6) & (b)(3) Information on these two investments was included in a separate attachment.

Please let us know if you have any other questions, or we can provide more information to you.

Thank you,

Susan

From: Deborah J. Bortot [<mailto:djbortot@oge.gov>]

Sent: Wednesday, January 18, 2017 5:35 PM

To: 'Leland, Matthew' (b)(6) >; David J. Apol <djapol@oge.gov<<mailto:djapol@oge.gov>>>; Heather A. Jones <hajones@oge.gov<<mailto:hajones@oge.gov>>>; Megan V. Khaner <mvkhaner@oge.gov<<mailto:mvkhaner@oge.gov>>>; 'Goodridge, Marcella'

(b)(6) >; 'Sprague, Marcia'

(b)(6) >>  
Cc: Mahar, Jason (Windquest) (b)(6) >; Shashy, Hap

(b)(6) >; Hrvatin, Claudia

(b)(6) >; Valcq, Susan (RDV Corp - Vice President of Finance) <(b)(6)>>; Lambert, Jeff

(b)(6) >; Bowerman, Jeff (RDV Corp - Tax)

(b)(6) >; Brinks, Matt (RDV Corp - Accounting)

(b)(6) >>

Subject: RE: DeVos Disclosures - Divestiture

The (b)(6) & (b)(3) attachment lists 18 entities.

Which three entities are a concern?

From: Leland, Matthew [[mailto:\(b\)\(6\)@oge.gov](mailto:(b)(6)@oge.gov)]

Sent: Wednesday, January 18, 2017 4:36 PM

To: Deborah J. Bortot; David J. Apol; Heather A. Jones; Megan V. Khaner; 'Goodridge, Marcella'; 'Sprague, Marcia'

Cc: Jason Mahar; Shashy, Hap; Hrvatin, Claudia; Susan Valcq; Jeff Lambert; Jeff Bowerman; Matt Brinks

Subject: [GRAYMAIL] DeVos Disclosures - Divestiture

All,

Since our most recent call, we identified three more holdings that we would like to remove from the Government's divestiture list. Information on these is attached. If there is more information you need, please let us know.

Best regards,

Matt

Four pages withheld in full - (b)(4), (b)(6)

Matthew M. Leland

King & Spalding LLP | 1700 Pennsylvania Avenue, N.W. | Washington, D.C. 20006

Firm: +1 202 737 0500 | (b)(6)

---

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**From:** [Megan V. Khaner](#)  
**To:** "[Hrvatina, Claudia](#)"; "[Sprague, Marcia](#)"; [Goodridge, Marcella](#); [Rowell, Theresa](#) (b)(6); [Deborah J. Bortot](#); [Lorna A. Syme](#); [Jeff Lambert](#) (b)(6); [Susan Valc](#) (b)(6); "[Jeff Bowerman](#)" (b)(6)  
**Cc:** [Jason Mahar](#) (b)(6); [Shashy, Hap](#); [Leland, Matthew](#)  
**Subject:** RE: Responses to 1/12/2017 Questions/Comments  
**Date:** Sunday, January 15, 2017 1:23:41 PM

---

Hi Claudia,

I neglected to bring up a question from ED on the call. With respect to the highlighted item below, which individual securities are you referring to?

Thanks,  
mk

---

**From:** Hrvatina, Claudia [mailto:(b)(6)]  
**Sent:** Saturday, January 14, 2017 6:44 PM  
**To:** 'Sprague, Marcia'; Goodridge, Marcella; Rowell, Theresa (b)(6); Megan V. Khaner; Deborah J. Bortot; Lorna A. Syme; Jeff Lambert (b)(6); Susan Valc (b)(6); 'Jeff Bowerman' (b)(6)  
**Cc:** Jason Mahar (b)(6); Shashy, Hap; Leland, Matthew  
**Subject:** [GRAYMAIL] RE: Responses to 1/12/2017 Questions/Comments

Thank you, Marcia. We are adding the team from RDV so that everyone can see the communications in real time, given that time is of the essence. Please "Reply To All" to facilitate our communications.

Below are our comments and questions:

(b)(6) & (b)(3)

[Redacted]

[Redacted]

[Redacted]

2 pages withheld in full - (b)(3), (4), (6)

Are there specific investments that item #57 (on most recent list provided, attached for reference) is referring to, and what do you need to complete that review?

Many thanks. Please let us know when a conference call tomorrow works – we are looking at 12:15 PM. Best,

Claudia

Referral to Dept of Education

[Redacted]

**From:** Hrvatin, Claudia [mailto:(b)(6)]

**Sent:** Saturday, January 14, 2017 2:27 PM

**To:** 'mvkhaner@oge.gov'; 'djbortot@oge.gov'; 'lasyme@oge.gov'; Goodridge, Marcella; Sprague, Marcia; Rowell, Theresa

**Cc:** Shashy, Hap; Leland, Matthew

**Subject:** RE: Responses to 1/12/2017 Questions/Comments

Megan, Marcia – The DeVos team is continuing to work through the various questions and comments provided today and over the last several days. Would it be possible to convene a call this afternoon to discuss some questions that have arisen? Perhaps around 3:30 or thereabouts? Please let us know.

Claudia

**From:** Hrvatin, Claudia

**Sent:** Saturday, January 14, 2017 10:57 AM

**To:** mvkhaner@oge.gov; 'djbortot@oge.gov'; 'lasyme@oge.gov'; (b)(6) Marcella Keller's email address

Sprague, Marcia (b)(6); Rowell, Theresa (b)(6)

**Cc:** Jason Mahar (b)(6); Shashy, Hap; Leland, Matthew

**Subject:** RE: Responses to 1/12/2017 Questions/Comments

Megan: The 278 in Integrity has been updated to reflect the holdings for Items 38 and 41, pursuant to your questions on the last page (page 6) of your questions/comments document (re-attached for reference).

Megan/Marcella: In considering these entities, could we obtain information on which specific assets present potential conflicts?

Many thanks,

Claudia

Claudia A. Hrvatin

Attorney at Law

**King & Spalding LLP**

1700 Pennsylvania Avenue, NW, Suite 200

Washington, DC 20006

(b)(6) e

(b)(6)

[www.kslaw.com](http://www.kslaw.com)

**From:** Hrvatin, Claudia

**Sent:** Friday, January 13, 2017 7:23 PM

**To:** Megan V. Khaner; djbortot@oge.gov; lasyme@oge.gov

**Cc:** Jason Mahar (b)(6); Shashy, Hap; Leland, Matthew

**Subject:** Responses to 1/12/2017 Questions/Comments

Megan, Deborah and Lorna:

Attached please find responses to the list of comments and questions you provided yesterday. You will see that there are a few items for which we are awaiting additional information.

Claudia

Claudia A. Hrvatin

Attorney at Law

**King & Spalding LLP**

6 pages withheld in full - (b)(3), (4), (6)

6 pages withheld in full - (b)(4), (6)

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Washington, DC 20006

(b)(6)

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**From:** Hrvatin, Claudia

**Sent:** Friday, January 13, 2017 5:39 PM

**To:** 'Megan V. Khaner'

**Cc:** Jason Mahar (b)(6); Shashy, Hap; Leland, Matthew

**Subject:** RE: Contact information

Thank you, Megan, for this additional contact information and for speaking with us a bit ago. I am copying Hap and Matt, and Jason with Windquest – as soon as we obtain updates tonight and through the weekend, we will circulate to your team. If any questions or comments arise on your end, please let us know as soon as you can.

Thank you, again,

Claudia

Claudia A. Hrvatin

Attorney at Law

**King & Spalding LLP**

1700 Pennsylvania Avenue, NW, Suite 200

Washington, DC 20006

(b)(6)

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**From:** Megan V. Khaner [<mailto:mvkhaner@oge.gov>]

**Sent:** Friday, January 13, 2017 4:27 PM

**To:** Hrvatin, Claudia

**Subject:** Contact information

Deborah Bortot [djbortot@oge.gov](mailto:djbortot@oge.gov)

Lorna Syme [lasyme@oge.gov](mailto:lasyme@oge.gov)

Megan Khaner

Program Analyst (Finance)

Presidential Nominations Branch

General Counsel and Legal Policy Division

202.482.9204

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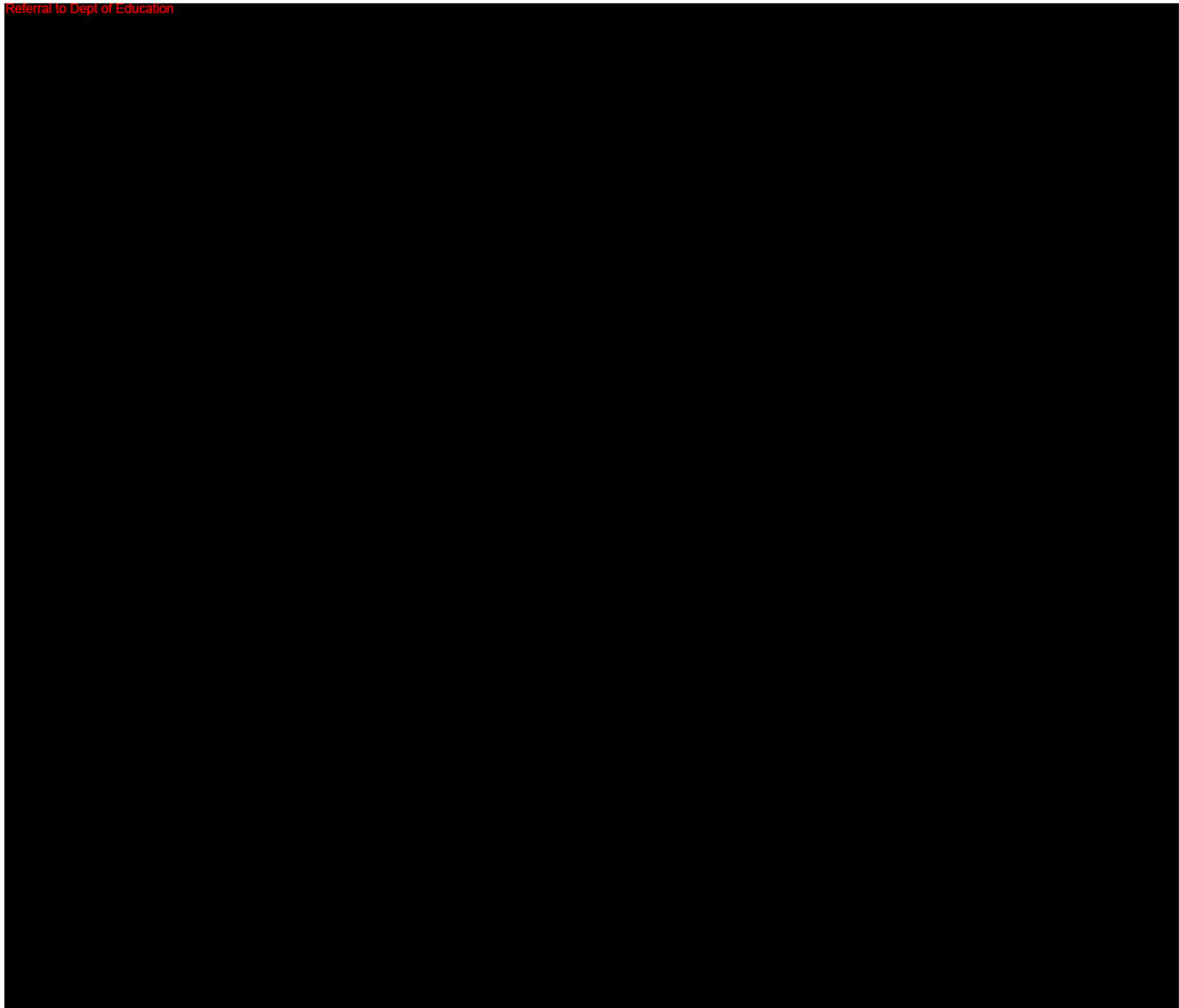
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**From:** Hrvatin, Claudia [mailto:(b) (6)]

**Sent:** Saturday, January 14, 2017 10:57 AM

**To:** mvkhaner@oge.gov; 'djbortot@oge.gov'; 'lasyme@oge.gov'; Goodridge, Marcella; Sprague, Marcia; Rowell, Theresa

**Cc:** Jason Mahar (b) (6); Shashy, Hap; Leland, Matthew

6 pages withheld in full - (b)(3), (4), (6)

**Subject:** RE: Responses to 1/12/2017 Questions/Comments

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Megan/Marcella: In considering these entities, could we obtain information on which specific assets present potential conflicts?

Many thanks,

Claudia

Claudia A. Hrvatin

Attorney at Law

**King & Spalding LLP**

1700 Pennsylvania Avenue, NW, Suite 200  
Washington, DC 20006

(b)(6)

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---

**From:** Hrvatin, Claudia

**Sent:** Friday, January 13, 2017 7:23 PM

**To:** Megan V. Khaner; [djbortot@oge.gov](mailto:djbortot@oge.gov); [lasyme@oge.gov](mailto:lasyme@oge.gov)

**Cc:** Jason Mahar (b)(6); Shashy, Hap; Leland, Matthew

6 pages withheld in full - (b)(4), (6)

**Subject:** Responses to 1/12/2017 Questions/Comments

Megan, Deborah and Lorna:

Attached please find responses to the list of comments and questions you provided yesterday. You will see that there are a few items for which we are awaiting additional information.

Claudia

Claudia A. Hrvatin

Attorney at Law

**King & Spalding LLP**

1700 Pennsylvania Avenue, NW, Suite 200

Washington, DC 20006

(b)(6)

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---

**From:** Hrvatin, Claudia

**Sent:** Friday, January 13, 2017 5:39 PM

**To:** 'Megan V. Khaner'

**Cc:** Jason Mahar (b)(6); Shashy, Hap; Leland, Matthew

**Subject:** RE: Contact information

Thank you, Megan, for this additional contact information and for speaking with us a bit ago. I am copying Hap and Matt, and Jason with Windquest – as soon as we obtain updates tonight and through the weekend, we will circulate to your team. If any questions or comments arise on your end, please let us know as soon as you can.

Thank you, again,

Claudia

Claudia A. Hrvatin

Attorney at Law

**King & Spalding LLP**

1700 Pennsylvania Avenue, NW, Suite 200

Washington, DC 20006

(b)(6)

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---

**From:** Megan V. Khaner [<mailto:mvkhaner@oge.gov>]

**Sent:** Friday, January 13, 2017 4:27 PM

**To:** Hrvatin, Claudia

**Subject:** Contact information

Deborah Bortot [djbortot@oge.gov](mailto:djbortot@oge.gov)

Lorna Syme [lasyme@oge.gov](mailto:lasyme@oge.gov)

Megan Khaner

Program Analyst (Finance)

Presidential Nominations Branch

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**From:** [Lorna A. Syme](#)  
**To:** [Lorna A. Syme](#)  
**Subject:** FW: Responses to 1/12/2017 Questions/Comments2  
**Date:** Monday, January 30, 2017 5:56:47 PM  
**Attachments:** [Response to Comments 1.14.17.docx](#)

4 pages withheld in full - (b)(3), (5), (6)

---

**From:** Lorna A. Syme  
**Sent:** Saturday, January 14, 2017 8:09 PM  
**To:** 'Hrvatín, Claudia'  
**Cc:** Megan V. Khaner  
**Subject:** RE: Responses to 1/12/2017 Questions/Comments

Claudia:

Attached are our responses to the responses you sent yesterday. We have deleted the comments that don't require additional follow-up. OGE's comments are in blue.

Lorna

---

**From:** Hrvatín, Claudia [[mailto:\(b\)\(6\)](#)]  
**Sent:** Saturday, January 14, 2017 5:50 PM  
**To:** Lorna A. Syme  
**Cc:** Megan V. Khaner; Shashy, Hap; Leland, Matthew  
**Subject:** [GRAYMAIL] RE: Responses to 1/12/2017 Questions/Comments

Lorna – Thank you for our conversation today, and this email. We look forward to your additional comments. We are also confirming an 11 AM call tomorrow.

Best,  
Claudia

**From:** Lorna A. Syme [<mailto:lasyme@oge.gov>]  
**Sent:** Saturday, January 14, 2017 5:43 PM  
**To:** Hrvatín, Claudia  
**Cc:** Megan V. Khaner  
**Subject:** RE: Responses to 1/12/2017 Questions/Comments

Claudia – Just wanted to update you that Megan and I are still looking over your responses from yesterday. We hope to email follow-up comments to you this evening.

Lorna

**From:** Hrvatín, Claudia [[mailto:\(b\)\(6\)](#)]  
**Sent:** Saturday, January 14, 2017 5:34 PM  
**To:** Megan V. Khaner; Deborah J. Bortot; Lorna A. Syme; (b)(6)[Marcella Keiller email]; 'Sprague, Marcia (b)(6)'; 'Rowell, Theresa (b)(6)'  
**Cc:** Shashy, Hap; Leland, Matthew  
**Subject:** [GRAYMAIL] RE: Responses to 1/12/2017 Questions/Comments

Thank you, Megan. If you and your team could hold 11 AM tomorrow while we check with the DeVos team, we would be very appreciative.

**From:** Megan V. Khaner [<mailto:mvkhaner@oge.gov>]

**Sent:** Saturday, January 14, 2017 5:26 PM

**To:** Hrvatin, Claudia; Deborah J. Bortot; Lorna A. Syme; (b)(6);  
'Sprague, Marcia (b)(6)'; 'Rowell, Theresa (b)(6)'

**Cc:** Shashy, Hap; Leland, Matthew

**Subject:** RE: Responses to 1/12/2017 Questions/Comments

Hi Claudia,

Tomorrow morning works best for us. How does 11am sound?

Thanks,

mk

**From:** Hrvatin, Claudia [[\(b\)\(6\)](mailto:(b)(6))]

**Sent:** Saturday, January 14, 2017 2:27 PM

**To:** Megan V. Khaner; Deborah J. Bortot; Lorna A. Syme; (b)(6) [Marcella Keiller email];  
'Sprague, Marcia (b)(6)'; 'Rowell, Theresa (b)(6)'

**Cc:** Shashy, Hap; Leland, Matthew

**Subject:** [GRAYMAIL] RE: Responses to 1/12/2017 Questions/Comments

Megan, Marcia – The DeVos team is continuing to work through the various questions and comments provided today and over the last several days. Would it be possible to convene a call this afternoon to discuss some questions that have arisen? Perhaps around 3:30 or thereabouts? Please let us know.

Claudia

**From:** Hrvatin, Claudia

**Sent:** Saturday, January 14, 2017 10:57 AM

**To:** [mvkhaner@oge.gov](mailto:mvkhaner@oge.gov); 'djbortot@oge.gov'; 'lasyme@oge.gov'; (b)(6) [Marcella Keiller email];  
Sprague, Marcia (b)(6); Rowell, Theresa (b)(6)

**Cc:** Jason Mahar (b)(6); Shashy, Hap; Leland, Matthew

**Subject:** RE: Responses to 1/12/2017 Questions/Comments

6 pages withheld in full - (b)(3), (4), (6)

Megan: The 278 in Integrity has been updated to reflect the holdings for Items 38 and 41, pursuant to your questions on the last page (page 6) of your questions/comments document (re-attached for reference).

Megan/Marcella: In considering these entities, could we obtain information on which specific assets present potential conflicts?

Many thanks,

Claudia

Claudia A. Hrvatin

Attorney at Law

**King & Spalding LLP**

1700 Pennsylvania Avenue, NW, Suite 200

Washington, DC 20006

(b) (6)

[www.kslaw.com](http://www.kslaw.com)

**From:** Hrvatin, Claudia

**Sent:** Friday, January 13, 2017 7:23 PM

**To:** Megan V. Khaner; [djbortot@oge.gov](mailto:djbortot@oge.gov); [lasyme@oge.gov](mailto:lasyme@oge.gov)

**Cc:** Jason Mahar (b)(6); Shashy, Hap; Leland, Matthew

**Subject:** Responses to 1/12/2017 Questions/Comments

Megan, Deborah and Lorna:

6 pages withheld in full - (b)(4), (6)

Attached please find responses to the list of comments and questions you provided yesterday. You will see that there are a few items for which we are awaiting additional information.

Claudia

Claudia A. Hrvatin

Attorney at Law

**King & Spalding LLP**

1700 Pennsylvania Avenue, NW, Suite 200

Washington, DC 20006

(b) (6)

[www.kslaw.com](http://www.kslaw.com)

**From:** Hrvatin, Claudia

**Sent:** Friday, January 13, 2017 5:39 PM

**To:** 'Megan V. Khaner'

**Cc:** Jason Mahar (b)(6); Shashy, Hap; Leland, Matthew

**Subject:** RE: Contact information

Thank you, Megan, for this additional contact information and for speaking with us a bit ago. I am copying Hap and Matt, and Jason with Windquest – as soon as we obtain updates tonight and through the weekend, we will circulate to your team. If any questions or comments arise on your end, please let us know as soon as you can.

Thank you, again,  
Claudia

Claudia A. Hrvatin

Attorney at Law

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1700 Pennsylvania Avenue, NW, Suite 200

Washington, DC 20006

(b) (6)

[www.kslaw.com](http://www.kslaw.com)

**From:** Megan V. Khaner [<mailto:mvkhaner@oge.gov>]  
**Sent:** Friday, January 13, 2017 4:27 PM  
**To:** Hrvatin, Claudia  
**Subject:** Contact information

Deborah Bortot [djbortot@oge.gov](mailto:djbortot@oge.gov)  
Lorna Syme [lasyme@oge.gov](mailto:lasyme@oge.gov)

Megan Khaner  
Program Analyst (Finance)  
Presidential Nominations Branch  
General Counsel and Legal Policy Division  
202.482.9204

Visit OGE's website: [www.oge.gov](http://www.oge.gov) <<http://www.oge.gov>>  
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**From:** [Lorna A. Syme](#)  
**To:** [Lorna A. Syme](#)  
**Subject:** FW: Responses to 1/12/2017 Questions/Comments1  
**Date:** Monday, January 30, 2017 5:56:26 PM

---

**From:** Lorna A. Syme  
**Sent:** Saturday, January 14, 2017 5:43 PM  
**To:** 'Hrvatina, Claudia'  
**Cc:** Megan V. Khaner  
**Subject:** RE: Responses to 1/12/2017 Questions/Comments

Claudia – Just wanted to update you that Megan and I are still looking over your responses from yesterday. We hope to email follow-up comments to you this evening.

Lorna

---

**From:** Hrvatina, Claudia [[mailto:\(b\)\(6\)](#)]  
**Sent:** Saturday, January 14, 2017 5:34 PM  
**To:** Megan V. Khaner; Deborah J. Bortot; Lorna A. Syme; (b)(6) [Marcella Keiller email]; 'Sprague, Marcia (b)(6)'; 'Rowell, Theresa (b)(6)'  
**Cc:** Shashy, Hap; Leland, Matthew  
**Subject:** [GRAYMAIL] RE: Responses to 1/12/2017 Questions/Comments

Thank you, Megan. If you and your team could hold 11 AM tomorrow while we check with the DeVos team, we would be very appreciative.

**From:** Megan V. Khaner [[mailto:mykhaner@oge.gov](#)]  
**Sent:** Saturday, January 14, 2017 5:26 PM  
**To:** Hrvatina, Claudia; Deborah J. Bortot; Lorna A. Syme; (b)(6) [Marcella Keiller email]; 'Sprague, Marcia (b)(6)'; 'Rowell, Theresa (b)(6)'  
**Cc:** Shashy, Hap; Leland, Matthew  
**Subject:** RE: Responses to 1/12/2017 Questions/Comments

Hi Claudia,  
Tomorrow morning works best for us. How does 11am sound?  
Thanks,  
mk

**From:** Hrvatina, Claudia [[mailto:C\(b\)\(6\)](#)]  
**Sent:** Saturday, January 14, 2017 2:27 PM  
**To:** Megan V. Khaner; Deborah J. Bortot; Lorna A. Syme; (b)(6) [Marcella Keiller email]; 'Sprague, Marcia (b)(6)'; 'Rowell, Theresa (b)(6)'  
**Cc:** Shashy, Hap; Leland, Matthew  
**Subject:** [GRAYMAIL] RE: Responses to 1/12/2017 Questions/Comments

Megan, Marcia – The DeVos team is continuing to work through the various questions and comments provided today and over the last several days. Would it be possible to convene a call this afternoon to discuss some questions that have arisen? Perhaps around 3:30 or thereabouts? Please let us know.

Claudia

**From:** Hrvatin, Claudia

**Sent:** Saturday, January 14, 2017 10:57 AM

**To:** [mvkhaner@oge.gov](mailto:mvkhaner@oge.gov); 'djbortot@oge.gov'; 'lasyme@oge.gov'; (b)(6)[Marcella Keiller email]

Sprague, Marcia (b)(6); Rowell, Theresa (b)(6)

**Cc:** Jason Mahar (b)(6); Shashy, Hap; Leland, Matthew

**Subject:** RE: Responses to 1/12/2017 Questions/Comments

6 pages withheld in full - (b)(3), (4), (6)

Megan: The 278 in Integrity has been updated to reflect the holdings for Items 38 and 41, pursuant to your questions on the last page (page 6) of your questions/comments document (re-attached for reference).

Megan/Marcella: In considering these entities, could we obtain information on which specific assets present potential conflicts?

Many thanks,  
Claudia

Claudia A. Hrvatin

Attorney at Law

**King & Spalding LLP**

1700 Pennsylvania Avenue, NW, Suite 200

Washington, DC 20006

(b)(6)

[www.kslaw.com](http://www.kslaw.com)

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**Cc:** Jason Mahar (b)(6); Shashy, Hap; Leland, Matthew

**Subject:** Responses to 1/12/2017 Questions/Comments

6 pages withheld in full - (b)(4), (6)

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Claudia

Claudia A. Hrvatin

Attorney at Law

**King & Spalding LLP**

1700 Pennsylvania Avenue, NW, Suite 200

Washington, DC 20006

(b)(6)

(b) (6)

[www.kslaw.com](http://www.kslaw.com)

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**Sent:** Friday, January 13, 2017 5:39 PM  
**To:** 'Megan V. Khaner'  
**Cc:** Jason Mahar (b)(6); Shashy, Hap; Leland, Matthew  
**Subject:** RE: Contact information

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Thank you, again,  
Claudia

Claudia A. Hrvatin  
Attorney at Law  
**King & Spalding LLP**  
1700 Pennsylvania Avenue, NW, Suite 200  
Washington, DC 20006  
(b) (6)  
[www.kslaw.com](http://www.kslaw.com)

**From:** Megan V. Khaner [<mailto:mvkhaner@oge.gov>]  
**Sent:** Friday, January 13, 2017 4:27 PM  
**To:** Hrvatin, Claudia  
**Subject:** Contact information

Deborah Bortot [djbortot@oge.gov](mailto:djbortot@oge.gov)  
Lorna Syme [lasyme@oge.gov](mailto:lasyme@oge.gov)

Megan Khaner  
Program Analyst (Finance)  
Presidential Nominations Branch  
General Counsel and Legal Policy Division  
202.482.9204

Visit OGE's website: [www.oge.gov](http://www.oge.gov) <<http://www.oge.gov>>  
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**From:** [Hrvatín, Claudia](#)  
**To:** [Heather A. Jones](#)  
**Cc:** [Shashy, Hap](#); [Leland, Matthew](#)  
**Subject:** [GRAYMAIL] Re: The report has been sent to the senate  
**Date:** Thursday, January 19, 2017 9:08:04 PM

---

Thank you, Heather. Thanks so much for working with us non-stop over these last several days.

Sent from my BlackBerry 10 smartphone.  
From: Heather A. Jones  
Sent: Thursday, January 19, 2017 9:04 PM  
To: Hrvatín, Claudia  
Subject: The report has been sent to the senate

Sent from my BlackBerry 10 smartphone on the Verizon Wireless 4G LTE network.

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**From:** [Ann M Donaldson](#)  
**To:** [Deborah J. Bortot](#)  
**Cc:** [Megan V. Granahan](#)  
**Subject:** RE: Signed Ethics Agreement  
**Date:** Thursday, January 19, 2017 8:30:25 PM

---

Ok. Please let me know if you need anything else from us on this.  
Thanks,  
Annie

----- Message from "Deborah J. Bortot" <djbortot@oge.gov>; on Fri, 20 Jan 2017 01:26:52 GMT -  
-----

From: "Deborah J. Bortot" <djbortot@oge.gov>  
To: "Ann M Donaldson" <(b)(6)>  
CC: "Megan V. Khaner" <mvkhaner@oge.gov>  
Subject: Fw: Signed Ethics Agreement

See email below. The ethics agreement has been finalized and signed.

Sent from my BlackBerry 10 smartphone on the Verizon Wireless 4G LTE network.

Original Message

From: Jason Mahar <(b)(6)>  
Sent: Thursday, January 19, 2017 7:34 PM  
To: Goodridge, Marcella  
Cc: Sprague, Marcia; Megan V. Khaner; Shashy, Hap; Hrvatin, Claudia; Leland, Matthew; Jeff Lambert; Jeff Bowerman; Susan Valcq; Deborah J. Bortot  
Subject: Re: Signed Ethics Agreement

Marcella – I'm hearing from the transition team that ED needs to tell OGE to tell the transition team that the ethics agreement is final. Apparently, the transition team is hearing that the ethics agreement is not final.

Can we clear this up, please.

Best,  
Jason

Jason Mahar  
In-House Counsel  
Windquest Group | Direct: (b)(6) | Cell: (b)(6)  
Main office: 616.459.4500 | 201 Monroe Avenue NW, Suite 500, Grand Rapids, MI 49503

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On 1/19/17, 4:15 PM, "Goodridge, Marcella" <(b)(6)> wrote:

Thank you Jason.

Sent from my iPhone

> On Jan 19, 2017, at 4:12 PM, Jason Mahar <(b)(6)> wrote:

>

> Hi Marcella, Marcia, and Megan,

>

> Attached please find Mrs. DeVos's signed ethics agreement. Please let me know if you need anything else.

>

> Megan – I haven't included any of your colleagues on this email but please feel free to forward this to them if appropriate.

>

> Best,

> Jason

>

>

>

>

> [cid:image001.png@01D2726E.DC001E50]

>

> Jason Mahar

> In-House Counsel

> Windquest Group | Direct: (b)(6) | Cell: (b)(6)

> Main office: 616.459.4500 | 201 Monroe Avenue NW, Suite 500, Grand Rapids, MI 49503

>

> [cid:image002.png@01D2726E.DC001E50]

>

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> <image001.png>

> <image002.png>

> <DeVos - Signed Ethics Agreement 1 19 17.pdf>

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**From:** [Heather A. Jones](#)  
**To:** "[Hrvatin, Claudia](#)"; [Shashy, Hap](#); [Jason Mahar](#); [Megan V. Khaner](#); [David J. Apol](#); (b)(6) Marcella Keiller  
[Sprague, Marcia](#); [Rowell, Theresa](#)  
**Cc:** [Deborah J. Bortot](#); [Leland, Matthew](#)  
**Subject:** RE: Note 45.1.5.1.1.  
**Date:** Thursday, January 19, 2017 5:42:33 PM

---

Yes, all loose ends are tied up.

---

**From:** Hrvatin, Claudia [mailto:(b)(6)]  
**Sent:** Thursday, January 19, 2017 5:42 PM  
**To:** Heather A. Jones; Shashy, Hap; Jason Mahar; Megan V. Khaner; David J. Apol; (b)(6) - Marcella Keiller email; Sprague, Marcia; Rowell, Theresa  
**Cc:** Deborah J. Bortot; Leland, Matthew  
**Subject:** [GRAYMAIL] RE: Note 45.1.5.1.1.

Heather – Confirming that all the loose ends are tied, and that we are all on the same email. RDV has confirmed the update, below. We have also received the email from Megan indicating that the 278 has been pre-cleared and is off to PTT. Many thanks.

**From:** Heather A. Jones [<mailto:hajones@oge.gov>]  
**Sent:** Thursday, January 19, 2017 4:47 PM  
**To:** Hrvatin, Claudia; Shashy, Hap; Jason Mahar; Heather A. Jones; Megan V. Khaner; David J. Apol; (b)(6) - Marcella Keiller email; Sprague, Marcia; Rowell, Theresa  
**Cc:** Deborah J. Bortot  
**Subject:** Note 45.1.5.1.1.

We are proposing to add the line of business for the following entities for the note above. This information is in the first note for (b)(6), (b)(3) but nor the second.

---

(b)(6), (b)(3)



Heather Jones  
(202) 482-9316  
Office of Government Ethics

Visit OGE's website: [www.oge.gov](http://www.oge.gov)



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**From:** [Deborah J. Bortot](#)  
**To:** ["Ann M. Donaldson"](#)  
**Subject:** DeVos  
**Date:** Thursday, January 19, 2017 2:44:54 PM  
**Attachments:** [ea for preclearance DeVos.docx](#)

Attachment: 7 pages withheld in full (b)(5), (b)(3), (b)(6)

---

I've attached the draft EA

**From:** [Heather A. Jones](#)  
**To:** [Ann M Donaldson](#); [Deborah J. Bortot](#)  
**Subject:** Re: DeVos  
**Date:** Thursday, January 19, 2017 12:03:29 PM

---

Thanks. We have. It


Sent from my BlackBerry 10 smartphone on the Verizon Wireless 4G LTE network.

---

**From:** Ann M Donaldson  
**Sent:** Thursday, January 19, 2017 11:55 AM  
**To:** Deborah J. Bortot; Heather A. Jones  
**Subject:** DeVos

---

Should be back to you all.

Ann M. Donaldson  
Associate  
[JONES DAY® - One Firm Worldwide<sup>SM</sup>](#)  
51 Louisiana Avenue, NW  
Washington, DC 20001  
Office<sup>(b) (6)</sup> 

=====  
This e-mail (including any attachments) may contain information that is private, confidential, or protected by attorney-client or other privilege. If you received this e-mail in error, please delete it from your system without copying it and notify sender by reply e-mail, so that our records can be corrected.  
=====

**From:** [Leland, Matthew](#)  
**To:** "Sprague, Marcia"  
**Cc:** [Deborah J. Bortol](#); [Shashy, Hap](#); [Hrvatín, Claudia](#); "Jason Mahar"  
**Subject:** [GRAYMAIL] Devos (b)(6) (b)(3)  
**Date:** Wednesday, January 18, 2017 7:33:04 PM

---

Marcia,

We confirmed that the listing of (b)(6), (b)(3) in the earlier draft of the 278 was an error. Please let us know if you need any other information about this. Thanks for your help.

Best regards,

Matt

**Matthew M. Leland**

**King & Spalding LLP** | 1700 Pennsylvania Avenue, N.W. | Washington, D.C. 20006

**Firm:** +1 202 737 0500 | **Direct:** (b) (6) | **Email:** (b) (6)

---

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**From:** [Deborah J. Bortot](#)  
**To:** "[Leland, Matthew](#)"  
**Cc:** [Jason Mahar](#); [Shashy, Hap](#); [Hrvatín, Claudia](#); [David J. Apol](#); [Heather A. Jones](#); [Megan V. Khaner](#); [Sprague, Marcia](#); (b)(6) - Marcella Keiler email; [Lorna A. Syme](#)  
**Subject:** Draft list of divestitures  
**Date:** Tuesday, January 17, 2017 2:05:19 PM  
**Attachments:** [BDV - Attachment A V4.doc](#) 6 pages withheld in full - (b)(3), (b)(6)

---

Matthew,

I've attached the draft divestiture list. Please note that once you provide the list of funds that are still in the acquisition phase, new items may need to be added to the divestiture list.

Thanks,  
Deb

**From:** [Hrvatín, Claudia](#)  
**To:** [Lorna A. Syme](#)  
**Cc:** [Megan V. Granahan](#); [Shashy, Hap](#); [Leland, Matthew](#)  
**Subject:** [GRAYMAIL] RE: Responses to 1/12/2017 Questions/Comments  
**Date:** Saturday, January 14, 2017 5:49:18 PM

---

Lorna – Thank you for our conversation today, and this email. We look forward to your additional comments. We are also confirming an 11 AM call tomorrow.

Best,

Claudia

**From:** Lorna A. Syme [mailto:[lasyme@oge.gov](mailto:lasyme@oge.gov)]  
**Sent:** Saturday, January 14, 2017 5:43 PM  
**To:** Hrvatín, Claudia  
**Cc:** Megan V. Khaner  
**Subject:** RE: Responses to 1/12/2017 Questions/Comments

Claudia – Just wanted to update you that Megan and I are still looking over your responses from yesterday. We hope to email follow-up comments to you this evening.

Lorna

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'Sprague, Marcia (b)(6)'; 'Rowell, Theresa (b)(6)'  
**Cc:** Shashy, Hap; Leland, Matthew  
**Subject:** [GRAYMAIL] RE: Responses to 1/12/2017 Questions/Comments

Thank you, Megan. If you and your team could hold 11 AM tomorrow while we check with the DeVos team, we would be very appreciative.

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'Sprague, Marcia (b)(6)'; 'Rowell, Theresa (b)(6)'  
Cc: Shashy, Hap; Leland, Matthew  
Subject: RE: Responses to 1/12/2017 Questions/Comments

Hi Claudia,

Tomorrow morning works best for us. How does 11am sound?

Thanks,

mk

**From:** Hrvatin, Claudia [[\(mailto:\(b\)\(6\)\)](mailto:(b)(6))]  
**Sent:** Saturday, January 14, 2017 2:27 PM  
**To:** Megan V. Khaner; Deborah J. Bortot; Lorna A. Syme (b)(6) - Marcella Keiller email  
'Sprague, Marcia (b)(6)'; 'Rowell, Theresa (b)(6)'  
**Cc:** Shashy, Hap; Leland, Matthew  
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Claudia

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**Sent:** Saturday, January 14, 2017 10:57 AM  
**To:** [mvkhaner@oge.gov](mailto:mvkhaner@oge.gov); 'djbortot@oge.gov'; 'lasyme@oge.gov'; (b)(6) - Marcella Keiller email  
Sprague, Marcia (b)(6); Rowell, Theresa (b)(6)  
**Cc:** Jason Mahar (b)(6) [\(b\)\(6\)@oge.gov](mailto:(b)(6)@oge.gov)); Shashy, Hap; Leland, Matthew  
**Subject:** RE: Responses to 1/12/2017 Questions/Comments  
6 pages withheld in full - (b)(3), (4), (6)

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assets present potential conflicts?

Many thanks,

Claudia

Claudia A. Hrvatin

Attorney at Law

**King & Spalding LLP**

1700 Pennsylvania Avenue, NW, Suite 200

Washington, DC 20006

(b) (6)

[REDACTED]

[REDACTED]

[www.kslaw.com](http://www.kslaw.com)

**From:** Hrvatin, Claudia

**Sent:** Friday, January 13, 2017 7:23 PM

**To:** Megan V. Khaner; [djbortot@oge.gov](mailto:djbortot@oge.gov); [lasyme@oge.gov](mailto:lasyme@oge.gov)

**Cc:** Jason Mahar (b) (6); Shashy, Hap; Leland, Matthew

**Subject:** Responses to 1/12/2017 Questions/Comments

6 pages withheld in full - (b)(4), (6)

Megan, Deborah and Lorna:

Attached please find responses to the list of comments and questions you provided yesterday. You will see that there are a few items for which we are awaiting additional information.

Claudia



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Washington, DC 20006

(b) (6)

[REDACTED]

[REDACTED]

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**From:** Hrvatin, Claudia

**Sent:** Friday, January 13, 2017 5:39 PM

**To:** 'Megan V. Khaner'

**Cc:** Jason Mahar <sup>(b) (6)</sup>; Shashy, Hap; Leland, Matthew

**Subject:** RE: Contact information

Thank you, Megan, for this additional contact information and for speaking with us a bit ago. I am copying Hap and Matt, and Jason with Windquest – as soon as we obtain updates tonight and through the weekend, we will circulate to your team. If any questions or comments arise on your end, please let us know as soon as you can.

Thank you, again,

Claudia

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Attorney at Law

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1700 Pennsylvania Avenue, NW, Suite 200

Washington, DC 20006

(b) (6)

[www.kslaw.com](http://www.kslaw.com)

**From:** Megan V. Khaner [<mailto:mvkhaner@oge.gov>]  
**Sent:** Friday, January 13, 2017 4:27 PM  
**To:** Hrvatin, Claudia  
**Subject:** Contact information

Deborah Bortot [djbortot@oge.gov](mailto:djbortot@oge.gov)

Lorna Syme [lasyme@oge.gov](mailto:lasyme@oge.gov)

Megan Khaner

Program Analyst (Finance)

Presidential Nominations Branch

General Counsel and Legal Policy Division

202.482.9204

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**From:** [Hrvatín, Claudia](#)  
**To:** ["Sprague, Marcia"](#)  
**Cc:** [Jason Mahar](#) <sup>(b) (6)</sup>; [Shashy, Hap](#); [Leland, Matthew](#); [Megan V. Granahan](#); [Deborah J. Bortot](#); [Lorna A. Syme](#); [Goodridge, Marcella](#)  
**Subject:** [GRAYMAIL] RE: Responses to 1/12/2017 Questions/Comments  
**Date:** Saturday, January 14, 2017 11:36:05 AM

---

Thank you, Marcia. We have conveyed your comment to the team.

Referral to Dept. of Education



**From:** Hrvatin, Claudia [[mailto:\[REDACTED\]](mailto:[REDACTED])]  
**Sent:** Saturday, January 14, 2017 10:57 AM  
**To:** [mvkhaner@oge.gov](mailto:mvkhaner@oge.gov); 'djbortot@oge.gov'; 'lasyme@oge.gov'; Goodridge, Marcella; Sprague, Marcia; Rowell, Theresa  
**Cc:** Jason Mahar ([REDACTED]); Shashy, Hap; Leland, Matthew  
**Subject:** RE: Responses to 1/12/2017 Questions/Comments

6 pages withheld in full - (b)(3), (4), (6)

Megan: The 278 in Integrity has been updated to reflect the holdings for Items 38 and 41, pursuant to your questions on the last page (page 6) of your questions/comments document (re-attached for reference).

Megan/Marcella: In considering these entities, could we obtain information on which specific assets present potential conflicts?

Many thanks,

Claudia

Claudia A. Hrvatin

Attorney at Law

**King & Spalding LLP**

1700 Pennsylvania Avenue, NW, Suite 200

Washington, DC 20006

(b) (6)

[REDACTED]

[REDACTED]

[www.kslaw.com](http://www.kslaw.com)

**From:** Hrvatin, Claudia  
**Sent:** Friday, January 13, 2017 7:23 PM  
**To:** Megan V. Khaner; [djbortot@oge.gov](mailto:djbortot@oge.gov); [lasyme@oge.gov](mailto:lasyme@oge.gov)  
**Cc:** Jason Mahar <sup>(b)(6)</sup>; Shashy, Hap; Leland, Matthew  
**Subject:** Responses to 1/12/2017 Questions/Comments

Megan, Deborah and Lorna:

6 pages withheld in full - (b)(4), (6)

Attached please find responses to the list of comments and questions you provided yesterday. You will see that there are a few items for which we are awaiting additional information.

Claudia

Claudia A. Hrvatin

Attorney at Law

**King & Spalding LLP**

1700 Pennsylvania Avenue, NW, Suite 200

Washington, DC 20006

(b) (6)

[Redacted]

[Redacted]

[www.kslaw.com](http://www.kslaw.com)

**From:** Hrvatin, Claudia  
**Sent:** Friday, January 13, 2017 5:39 PM  
**To:** 'Megan V. Khaner'  
**Cc:** Jason Mahar <sup>(b)(6)</sup>; Shashy, Hap; Leland, Matthew

**Subject:** RE: Contact information

Thank you, Megan, for this additional contact information and for speaking with us a bit ago. I am copying Hap and Matt, and Jason with Windquest – as soon as we obtain updates tonight and through the weekend, we will circulate to your team. If any questions or comments arise on your end, please let us know as soon as you can.

Thank you, again,

Claudia

Claudia A. Hrvatin

Attorney at Law

**King & Spalding LLP**

1700 Pennsylvania Avenue, NW, Suite 200

Washington, DC 20006

(b) (6)

[REDACTED]

[REDACTED]

[www.kslaw.com](http://www.kslaw.com)

**From:** Megan V. Khaner [<mailto:mvkhaner@oge.gov>]

**Sent:** Friday, January 13, 2017 4:27 PM

**To:** Hrvatin, Claudia

**Subject:** Contact information

Deborah Bortot [djbortot@oge.gov](mailto:djbortot@oge.gov)

Lorna Syme [lasyme@oge.gov](mailto:lasyme@oge.gov)

Megan Khaner

Program Analyst (Finance)

Presidential Nominations Branch

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**From:** [Deborah J. Bortot](#)  
**To:** [Sandra S. Mabry](#)  
**Cc:** [Megan V. Khaner](#)  
**Subject:** FW: (b)(3), (6)  
**Date:** Monday, January 09, 2017 10:28:15 AM

---

Sandy,

Please take a look at this.

Thanks,  
Deb

---

**From:** Megan V. Khaner  
**Sent:** Monday, January 09, 2017 10:19 AM  
**To:** Deborah J. Bortot  
**Subject:** FW: (b)(3), (6)


Deb,  
See below for the responses to the (b)(3), (6) questions. Can we discuss when we chat?  
Thanks,  
m

**From:** Danielle Segal [[\(b\)\(6\)](mailto:(b)(6))]  
**Sent:** Saturday, January 07, 2017 11:15 PM  
**To:** Shashy, Hap; Hrvatin, Claudia; Leland, Matthew  
**Cc:** Jeffrey Bowerman  
**Subject:** (b)(3), (6)

Hap, Claudia and Matt,

I understand that additional information regarding the (b)(3), (6) has been requested by the OGE in order to finalize the determination that it is a (b)(3), (6). I have included a narrative summary of the relevant (b)(3), (6), as well as summary answers to the specific questions asked by OGE.

(b)(3), (4), (6)



(b)(3), (4), (6)

[Redacted]

[Redacted]

[Redacted]

In summary, please see answers in red below:

(b)(3), (4), (6)

[Redacted]

I hope that this information proves helpful. Please do not hesitate to contact me with any questions that you may have.

Best,  
Danielle

Danielle C. Segal  
Cravath, Swaine & Moore LLP  
825 8th Avenue, 4356  
New York, NY 10019  
<sup>(b) (6)</sup> (Tel.)  
(212) 474-3700 (Fax)

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**From:** [Leland, Matthew](#)  
**To:** [Keith Labeledz](#); [Shashy, Hap](#)  
**Cc:** [Hrvatn, Claudia](#); "[Matt Brinks](#)"  
**Subject:** [GRAYMAIL] RE: Intergrity Question (DeVos Disclosure)  
**Date:** Tuesday, December 27, 2016 9:53:18 AM

---

Thank you, Keith.

Matthew M. Leland  
KING & SPALDING LLP | 1700 Pennsylvania Avenue, N.W. | Washington, D.C. 20006  
Firm: +1 202 737 0500 | Direct: (b)(6) | Email: (b)(6)

-----Original Message-----

From: Keith Labeledz [<mailto:klabeledz@oge.gov>]  
Sent: Tuesday, December 27, 2016 9:45 AM  
To: Shashy, Hap; Leland, Matthew  
Cc: Hrvatn, Claudia; 'Matt Brinks'  
Subject: RE: Intergrity Question (DeVos Disclosure)

Good morning,

The code fixes to Integrity were completed yesterday. If you have any questions or further issues with the report, please let me know.

Thank you.  
Keith

-----Original Message-----

From: Shashy, Hap [[\(b\)\(6\)](mailto:(b)(6))]  
Sent: Friday, December 23, 2016 5:19 PM  
To: Keith Labeledz; Leland, Matthew  
Cc: Hrvatn, Claudia; 'Matt Brinks'  
Subject: [GRAYMAIL] Re: Intergrity Question (DeVos Disclosure)

Thanks Keith.

Have a good holiday.

Sent from my BlackBerry 10 smartphone.  
From: Keith Labeledz  
Sent: Friday, December 23, 2016 4:56 PM  
To: Leland, Matthew  
Cc: Shashy, Hap; Hrvatn, Claudia; 'Matt Brinks'  
Subject: RE: Intergrity Question (DeVos Disclosure)

Hello,

As a further update on our progress: The developers have identified the issue as (b) (5) [REDACTED]. The data structure itself, though, is sound. Therefore, once a code update is applied, the display issue should be corrected without the need for user intervention. Based on a call that I just had with the team, the code updates should be ready for testing tomorrow and the updates will be applied either Monday or Tuesday morning.

Thank you for your patience as we work to resolve this issue.

Keith

From: Keith Labeledz  
Sent: Friday, December 23, 2016 11:43 AM  
To: 'Leland, Matthew'  
Cc: Shashy, Hap; Hrvatin, Claudia; Matt Brinks  
Subject: RE: Intergrity Question (DeVos Disclosure)

Hello,

As an update on our progress: The developers are still examining the issue and have not yet identified a solution. If necessary, work will continue through the holiday weekend. We are obviously hoping for a technical, back-end solution; however, if a manual fix is needed, I and other OGE staff will take responsibility for any data re-entry.

Again, I apologize for the inconvenience. Please do not hesitate to contact me with any questions or concerns.

Keith

Keith Labeledz  
Senior Program Analyst  
Presidential Nominations Branch  
U.S. Office of Government Ethics  
Telephone: (202) 482-9218

From: Leland, Matthew [[mailto:M\(b\)\(6\)@oige.gov](mailto:M(b)(6)@oige.gov)]  
Sent: Thursday, December 22, 2016 6:28 PM  
To: Keith Labeledz  
Cc: Shashy, Hap; Hrvatin, Claudia; Matt Brinks  
Subject: [GRAYMAIL] RE: Intergrity Question (DeVos Disclosure)

Thanks very much, Keith. We appreciate your help.

Matthew M. Leland  
King & Spalding LLP | 1700 Pennsylvania Avenue, N.W. | Washington, D.C. 20006  
Firm: +1 202 737 0500 | Direct: (b)(6) | Email: (b)(6)

From: Keith Labeledz [<mailto:klabeledz@oge.gov>]  
Sent: Thursday, December 22, 2016 6:18 PM  
To: Leland, Matthew  
Cc: Shashy, Hap; Hrvatin, Claudia; Matt Brinks  
Subject: RE: Intergrity Question (DeVos Disclosure)

As follow-up to our conversation, I have escalated the issue to our development team. They have acknowledged receipt and are investigating. Hopefully, they will have an explanation/resolution in the morning. In any case, however, I will provide an update of our progress.

Thank you.  
Keith

From: Leland, Matthew [[mailto:M\(b\)\(6\)@oige.gov](mailto:M(b)(6)@oige.gov)]  
Sent: Thursday, December 22, 2016 5:09 PM  
To: Keith Labeledz  
Cc: Shashy, Hap; Hrvatin, Claudia; Matt Brinks  
Subject: [GRAYMAIL] RE: Intergrity Question (DeVos Disclosure)

Thanks Keith. Can we set the call for 5:20 pm? Let's use my dial in number.

(b)(6)

Matt Brinks - can you join at this time?

Matthew M. Leland

King & Spalding LLP | 1700 Pennsylvania Avenue, N.W. | Washington, D.C. 20006

Firm: +1 202 737 0500 | Direct: (b)(6) | Email: (b)(6) >

From: Keith Labeledz [mailto:klabeledz@oge.gov]

Sent: Thursday, December 22, 2016 5:02 PM

To: Leland, Matthew

Cc: Shashy, Hap; Hrvatin, Claudia; Matt Brinks

Subject: RE: Intergrity Question (DeVos Disclosure)

If you give me 5 minutes to take a look first, I'm available now.

Please just call 202-482-9218 or provide a conference line.

Thank you.

Keith

From: Leland, Matthew [mailto:(b)(6)]

Sent: Thursday, December 22, 2016 4:50 PM

To: Keith Labeledz

Cc: Shashy, Hap; Hrvatin, Claudia; Matt Brinks

Subject: [GRAYMAIL] Intergrity Question (DeVos Disclosure)

Good afternoon, Keith,

Are available for a quick call this afternoon or evening for some guidance on coding specific interests using the Integrity program? We have encountered what appears to be a technical issue and thought you might be able to resolve it fairly quickly.

Best regards,

Matt

Matthew M. Leland

King & Spalding LLP | 1700 Pennsylvania Avenue, N.W. | Washington, D.C. 20006

Firm: +1 202 737 0500 | Direct: (b)(6) | Email: (b)(6) >

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On Jan 19, 2017, at 6:06 PM, Deborah J. Bortot <[djbortot@oge.gov](mailto:djbortot@oge.gov)> wrote:

The report has been signed by the filer and is ready for the DAEO's signature.

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**From:** [Megan V. Khaner](#)  
**To:** [Deborah J. Bortot](#); ["Sprague, Marcia"](#); [Goodridge, Marcella](#); [Rowell, Theresa](#)  
**Cc:** [David J. Apol](#); [Lorna A. Syme](#); [Heather A. Jones](#)  
**Subject:** RE: conference call  
**Date:** Monday, January 16, 2017 7:10:18 PM

---

Ok I'm available.

I also just got an email from Matt Leland requesting a phone call tonight with him and Jason. He said they have a few questions. Can someone from OGE be on that with me?

---

**From:** Deborah J. Bortot  
**Sent:** Monday, January 16, 2017 7:08 PM  
**To:** 'Sprague, Marcia'; Goodridge, Marcella; Rowell, Theresa  
**Cc:** Megan V. Khaner; David J. Apol; Lorna A. Syme; Heather A. Jones  
**Subject:** conference call

We would like to have a quick conference call using my call-in number.

Call-in number: (b) (6)

Participant code: (b) (6)