

From: [Kassinger, Theodore W.](#)
To: [Walter M. Shaub](#); [David Maggi \(dMaggi@doc.gov\)](#)
Cc: [Keith Labeledz](#)
Subject: RE: call in for 6:25
Date: Wednesday, January 11, 2017 6:16:51 PM

got it

From: Walter M. Shaub [mailto:wmshaub@oge.gov]
Sent: Wednesday, January 11, 2017 6:16 PM
To: David Maggi (dMaggi@doc.gov); Kassinger, Theodore W.
Cc: Keith Labeledz
Subject: call in for 6:25

(b) (6)

Code: (b) (6)

Walter M. Shaub, Jr.

Director

U.S. Office of Government Ethics

1201 New York Avenue, NW, Suite 500

Washington, DC 20005-3917

Telephone: 202.482.9292

Email: walter.shaub@oge.gov

OGE Confidential Notice: This email, including all attachments, may constitute a Federal record or other Government property that is intended only for the use of the individual or entity to which it is addressed. This email also may contain information that is privileged, confidential, or otherwise protected from disclosure under applicable law. If you are not the intended recipient or the employee or agent responsible for delivering the transmission to the intended recipient, you are hereby notified that any dissemination, distribution, copying or use

of this email or its contents is strictly prohibited. If you have received this email in error, please notify the sender by responding to the email and then immediately delete the email.

From: [Kassinger, Theodore W.](#)
To: [Walter M. Shaub](#); [Deborah J. Bortot](#); [Heather A. Jones](#); [Keith Labeledz](#); [Wilbur Ross](#); [Wendy Teramoto](#); [Schlom, Evan N.](#); [Dorey, David R.](#); [Earl Comstock](#)
Subject: telcon OGE/Commerce/Mr.Ross/OMM
Start: Wednesday, January 11, 2017 7:30:00 PM
End: Wednesday, January 11, 2017 8:30:00 PM
Location: (b) (6); PC; (b) (6)

From: [Kassinger, Theodore W.](#)
To: [Walter M. Shaub](#); [Deborah J. Bortot](#); [Heather A. Jones](#); [Keith Labeledz](#); [Wilbur Ross](#); [Wendy Teramoto](#); [Schlom, Evan N.](#); [Dorey, David R.](#); [Earl Comstock](#)
Subject: telcon OGE/Commerce/Mr.Ross/OMM
Start: Wednesday, January 11, 2017 7:30:00 PM
End: Wednesday, January 11, 2017 8:30:00 PM
Location: (b) (6); PC; (b) (6)

From: Walter M. Shaub [mailto:wmshaub@oge.gov]
Sent: Wednesday, January 11, 2017 5:55 PM
To: Maggi, David (Federal) <dMaggi@doc.gov>
Cc: David J. Apol <djapol@oge.gov>; Deborah J. Bortot <djbortot@oge.gov>; Keith Labeledz <klabeledz@oge.gov>; Heather A. Jones <hajones@oge.gov>
Subject: RE: ethics agreement and call

David, are you free to talk to us now?

Walter M. Shaub, Jr.
Director
U.S. Office of Government Ethics
1201 New York Avenue, NW, Suite 500
Washington, DC 20005-3917

Telephone: 202.482.9292
Email: walter.shaub@oge.gov

From: Walter M. Shaub
Sent: Wednesday, January 11, 2017 5:28 PM
To: 'Maggi, David (Federal)'
Cc: David J. Apol; Deborah J. Bortot; Keith Labeledz; Heather A. Jones
Subject: RE: ethics agreement and call

I just sent him an email suggesting 7:30. I thought I had hit reply all. Let's talk amongst ourselves at 7:00.

Walter M. Shaub, Jr.
Director
U.S. Office of Government Ethics
1201 New York Avenue, NW, Suite 500
Washington, DC 20005-3917

Telephone: 202.482.9292
Email: walter.shaub@oge.gov

Record referred to DOC



OGE Confidential Notice: This email, including all attachments, may constitute a Federal record or other Government property that is intended only for the use of the individual or entity to which it is addressed. This email also may contain information that is privileged, confidential, or otherwise protected from disclosure under applicable law. If you are not the intended recipient or the employee or agent responsible for delivering the transmission to the intended recipient, you are hereby notified that any dissemination, distribution, copying or use of this email or its contents is strictly prohibited. If you have received this email in error, please notify the sender by responding to the email and then immediately delete the email.

From: [Kassinger, Theodore W.](#)
To: [Director of OGE](#); [Heather A. Jones](#); [Keith Labeledz](#); [David Maggi](#); [Walter M. Shaub](#); [Deborah J. Bortot](#); ["wjacobi@doc.gov"](#); ["DJacob@doc.gov"](#); ["gWilliams@doc.gov"](#); ["AWarren@doc.gov"](#); [David J. Apol](#)
Cc: [Wilbur Ross](#); [Earl Comstock](#); [Culvahouse Jr., Arthur B.](#); [Schlom, Evan N.](#); [Dorey, David R.](#); [Sheehan, Matthew J.](#)
Subject: RE: ethics agreement and call
Date: Wednesday, January 11, 2017 1:04:41 PM
Attachments: [WLR EA with Recusals omm revised draft 11Jan 10am.docx](#); [ethics agreement-1-7-2017-A \(1-11 am edits\).docx](#)

Attachment 1 - 9 pages withheld in full - (b)(3), (4), (5), (6); Attachment 2 - 14 pages withheld in full - (b)(3), (4), (5), (6)

Walt and OGE/Commerce teams-

As discussed last night, attached is a revised draft of the proposed Ethics Agreement for Mr. Ross, including a revised exhibit listing divestitures. The document may be reviewed either in redline format or "clean" through the "review" feature of Word.

The draft ^{(b)(4), (5), (6)}

We appreciate your consideration and work. Please let us know when you would like to discuss the draft.

Thanks,

Ted

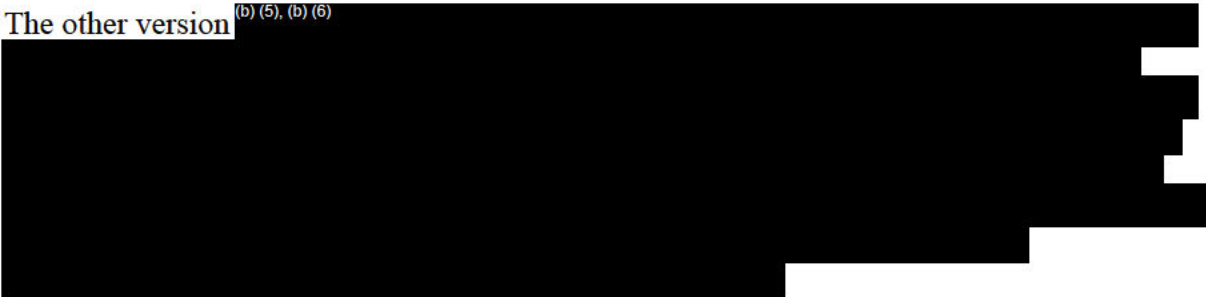
From: Director of OGE [<mailto:director@oge.gov>]
Sent: Tuesday, January 10, 2017 5:40 PM
To: Kassinger, Theodore W.; Director of OGE; Heather A. Jones; Keith Labeledz; David Maggi; Culvahouse Jr., Arthur B.; Sheehan, Matthew J.; Schlom, Evan N.; Dorey, David R.; Walter M. Shaub; Deborah J. Bortot; 'wjacobi@doc.gov'; 'DJacob@doc.gov'; 'gWilliams@doc.gov'; 'AWarren@doc.gov'; David J. Apol
Subject: ethics agreement and call

Ted,

Attachment 1 - 17 pages withheld in full - (b)(3), (5), (6); Attachment 2 - 9 pages withheld in full - (b)(3), (5), (6)

We've been hard at work today drafting two versions of an ethics agreement. I have attached them both.

One version ^{(b) (5), (b) (6)}


The other version ^{(b) (5), (b) (6)}


I'm happy to schedule a time to talk tonight. If you would prefer to have some more time to study these drafts, however, we can schedule to talk in the morning instead. This call will be my top priority.

As a final note, we'll all need to scrub this draft carefully to make sure we haven't left any items out or, perhaps, placed items in the wrong sections. But it's complete enough for a discussion draft.

Walt

Walter M. Shaub, Jr.

Director

U.S. Office of Government Ethics

1201 New York Avenue, NW, Suite 500

Washington, DC 20005-3917

Telephone: 202.482.9292

Email: walter.shaub@oge.gov

OGE Confidential Notice: This email, including all attachments, may constitute a Federal record or other Government property that is intended only for the use of the individual or entity to which it is addressed. This email also may contain information that is privileged, confidential, or otherwise protected from disclosure under applicable law. If you are not the intended recipient or the employee or agent responsible for delivering the transmission to the intended recipient, you are hereby notified that any dissemination, distribution, copying or use of this email or its contents is strictly prohibited. If you have received this email in error, please notify the sender by responding to the email and then immediately delete the email.

From: [Keith Labeledz](#)
To: [Heather A. Jones](#)
Cc: [Deborah J. Bortot](#)
Subject: RE: Revised WLR 278
Date: Wednesday, January 11, 2017 12:35:46 PM

I do not know. Given the complexity of the report, I have to do a manual check in between each round to catch certain un-itemized changes. At this point, I do not want to do that again until they say they are done.

From: Heather A. Jones
Sent: Wednesday, January 11, 2017 12:34 PM
To: Keith Labeledz
Cc: Deborah J. Bortot
Subject: RE: Revised WLR 278
OK, thanks in which part? Or is it spread throughout?

From: Keith Labeledz
Sent: Wednesday, January 11, 2017 11:27 AM
To: Heather A. Jones
Cc: Deborah J. Bortot
Subject: FW: Revised WLR 278
I would hold on your review. It looks like we've lost about 2 pages since yesterday evening.

From: Keith Labeledz
Sent: Wednesday, January 11, 2017 11:26 AM
To: 'Schlom, Evan N.'; Kassinger, Theodore W.; 'Maggi, David (Federal)'
Cc: Dorey, David R.; 'Jacobi, Will (Federal)'; 'Williams, Gaye (Federal)'; 'Warren, Arthur (Federal)'; 'Jacob, Dana (Federal)'; Deborah J. Bortot; Heather A. Jones
Subject: RE: Revised WLR 278

Hello,

Thank you for your response. It appears that other changes have been made to the draft as well. Can you let us know once all the changes have been completed? We will then look again and follow-up with any questions on the changes/ revised draft.

Keith

From: Schlom, Evan N. [<mailto:eschlom@omm.com>]
Sent: Wednesday, January 11, 2017 10:59 AM
To: Keith Labeledz; Kassinger, Theodore W.; 'Maggi, David (Federal)'
Cc: Dorey, David R.; 'Jacobi, Will (Federal)'; 'Williams, Gaye (Federal)'; 'Warren, Arthur (Federal)'; 'Jacob, Dana (Federal)'; Deborah J. Bortot; Heather A. Jones
Subject: [GRAYMAIL] RE: Revised WLR 278

Keith,

We've determined that Mr. Ross is a (b)(3), (4), (6) [REDACTED], so we have removed that position from Part 1 and will keep (b)(3), (6) [REDACTED] in Part 6.

Thanks,

Evan

From: Keith Labeledz [<mailto:klabeledz@oge.gov>]
Sent: Tuesday, January 10, 2017 6:04 PM
To: Schlom, Evan N.; Kassinger, Theodore W.; 'Maggi, David (Federal)'
Cc: Dorey, David R.; 'Jacobi, Will (Federal)'; 'Williams, Gaye (Federal)'; 'Warren, Arthur (Federal)'; 'Jacob, Dana (Federal)'; Deborah J. Bortot; Heather A. Jones
Subject: [WARNING : MESSAGE ENCRYPTED]RE: Revised WLR 278

Hello,

I have attached a follow-up question to the responses.

Thank you.

Attachment - 1 page withheld in full - (b)(3), (5), (6)

Keith

From: Schlom, Evan N. [<mailto:eschlom@omm.com>]

Sent: Tuesday, January 10, 2017 3:23 PM

To: Keith Labeledz; Kassinger, Theodore W.; 'Maggi, David (Federal)'

Cc: Dorey, David R.; 'Jacobi, Will (Federal)'; 'Williams, Gaye (Federal)'; 'Warren, Arthur (Federal)'; 'Jacob, Dana (Federal)'; Deborah J. Bortot; Heather A. Jones

Subject: [GRAYMAIL] [WARNING : MESSAGE ENCRYPTED]RE: Revised WLR 278

Keith,

Our responses to your comments are in the attached document, highlighted in yellow.

Thanks,

Evan

From: Keith Labeledz [<mailto:klabeledz@oge.gov>]

Sent: Tuesday, January 10, 2017 12:30 AM

To: Schlom, Evan N.; Kassinger, Theodore W.; 'Maggi, David (Federal)'

Cc: Dorey, David R.; 'Jacobi, Will (Federal)'; 'Williams, Gaye (Federal)'; 'Warren, Arthur (Federal)'; 'Jacob, Dana (Federal)'; Deborah J. Bortot; Heather A. Jones

Subject: [WARNING : MESSAGE ENCRYPTED]RE: Revised WLR 278

Hello,

Attached are my comments on draft 4 (as it appeared at 5:35 pm on 1/9).

Thank you.

Keith

From: Schlom, Evan N. [<mailto:eschlom@omm.com>]

Sent: Monday, January 09, 2017 2:47 PM

To: Keith Labeledz; Kassinger, Theodore W.; 'Maggi, David (Federal)'

Cc: Dorey, David R.; 'Jacobi, Will (Federal)'; 'Williams, Gaye (Federal)'; 'Warren, Arthur (Federal)'; 'Jacob, Dana (Federal)'; Deborah J. Bortot; Heather A. Jones

Subject: [GRAYMAIL] [WARNING : MESSAGE ENCRYPTED]RE: Revised WLR 278

Keith,

We have revised our SF 278 online in response to your notes and email comments. Attached is Word document containing the written responses and confirmations you asked for, highlighted in yellow.

Thanks,

Evan

From: Keith Labeledz [<mailto:klabeledz@oge.gov>]

Sent: Saturday, January 07, 2017 10:25 PM

To: Schlom, Evan N.; Kassinger, Theodore W.; 'Maggi, David (Federal)'

Cc: Dorey, David R.; 'Jacobi, Will (Federal)'; 'Williams, Gaye (Federal)'; 'Warren, Arthur (Federal)'; 'Jacob, Dana (Federal)'; Deborah J. Bortot; Heather A. Jones

Subject: RE: Revised WLR 278

Please see my responses in red below.

Thank you.

Keith

From: Schlom, Evan N. [<mailto:eschlom@omm.com>]

Sent: Saturday, January 07, 2017 9:36 PM

To: Keith Labeledz; Kassinger, Theodore W.; 'Maggi, David (Federal)'

Cc: Dorey, David R.; 'Jacobi, Will (Federal)'; 'Williams, Gaye (Federal)'; 'Warren, Arthur (Federal)'; 'Jacob, Dana (Federal)'; Deborah J. Bortot; Heather A. Jones

Subject: [GRAYMAIL] RE: Revised WLR 278

Keith,

Your notes on Draft 3 in Part 2 contains a comment regarding

Attachment - 5 pages
withheld in full - (b)(3), (4),
(5), (6)

Attachment - 4 pages
withheld in full - (b)(3), (5), (6)

Attachment - 10 pages
withheld in full - (b)(3),
(4), (5), (6)

(b)(3), (5)

(b) (5) . You identify a number of entities that are (b)(3), (6) but do not include (b)(3), (6) . I have added (b)(3), (6) for two of them (b)(3), (4), (6)). The rest are marked (b)(3), (6) because (b)(3), (4), (6)

Given this information, please let us know if (b)(5) . Please leave the (b)(3), (6) . However, could you add a note in the Description field (or an endnote) indicating that (b)(3), (6) ?

Furthermore, here are two responses to your notes to Part 6 (our responses in red):

1. [related to comment pending from draft 1, repeated in draft 2] lines 21-22. (b)(3), (6)

- o Based on the name, it would appear that the (b) (5), (b) (6)

- I am assuming that the placement is correct given that the interests have not moved in draft 3 (i.e., (b)(5)(6)). If that is not correct, please clarify. (b)(3), (6) . Ok.

2. line 63 (b)(3), (6) and underlying. (b)(3), (6)

Does this mean that 63 (b) (5)

This is also the case for (b)(3), (6)

Please let us know if you want us to report this in a different manner. (b)(5) (6)

Evan

From: Keith Labeledz [<mailto:klabeledz@oge.gov>]

Sent: Saturday, January 07, 2017 4:08 PM

To: Kassinger, Theodore W.; 'Maggi, David (Federal)'

Cc: Schlom, Evan N.; Dorey, David R.; 'Jacobi, Will (Federal)'; 'Williams, Gaye (Federal)'; 'Warren, Arthur (Federal)'; 'Jacob, Dana (Federal)'; Deborah J. Bortot; Heather A. Jones

Subject: [WARNING : MESSAGE ENCRYPTED]RE: Revised WLR 278

Attachment - 9 pages withheld in full - (b)(3), (5), (6)

Hello,

Attached are my technical notes on draft 3, including a few follow-up questions based on the responses to my please-confirm questions. These notes reflect the report as saved at approximately 10:00 am this morning.

Thank you.

Keith

From: Keith Labeledz

Sent: Saturday, January 07, 2017 10:16 AM

To: 'Kassinger, Theodore W.'; Maggi, David (Federal)

Cc: Schlom, Evan N.; Dorey, David R.; Jacobi, Will (Federal); Williams, Gaye (Federal); Warren, Arthur (Federal); Jacob, Dana (Federal); Deborah J. Bortot; Heather A. Jones

Subject: RE: Revised WLR 278

Hello,

I am continuing my review (including of the changes made yesterday evening). It does appear that I will still have a number of questions for round 3 (including a number of clean-up items on the positions that have been pending since round 1). I do not think all items will be resolved Monday from a technical perspective.

In terms of a discussion of the ethics agreement, I agree with David's analysis that the

(b)(5), (6)

In addition, ethics agreements typically treat the filer's agreements/arrangements, particularly exit arrangements from firms, and the details on many arrangements have just been added in round 3. I am copying Deborah Bortot, Chief of the Presidential Nominations Branch, and Heather Jones, Senior Counsel for Financial Disclosure, as they will be involved in the ultimate review and preclearance of the report and ethics agreement. I think they would need to participate in any discussion from OGE's perspective on the next draft ethics agreement.

Thank you.

Keith

From: Kassinger, Theodore W. [<mailto:tkassinger@omm.com>]

Sent: Friday, January 06, 2017 10:18 PM

To: Maggi, David (Federal)

Cc: Keith Labeledz; Schlom, Evan N.; Dorey, David R.; Jacobi, Will (Federal); Williams, Gaye (Federal); Warren, Arthur (Federal); Jacob, Dana (Federal)

Subject: [GRAYMAIL] Re: Revised WLR 278

Thanks, David.

(b)(5), (6)

I don't think any such assets have been newly identified, but I'll review. In any case,

(b)(5), (6)

(b)(3), (5), (6)

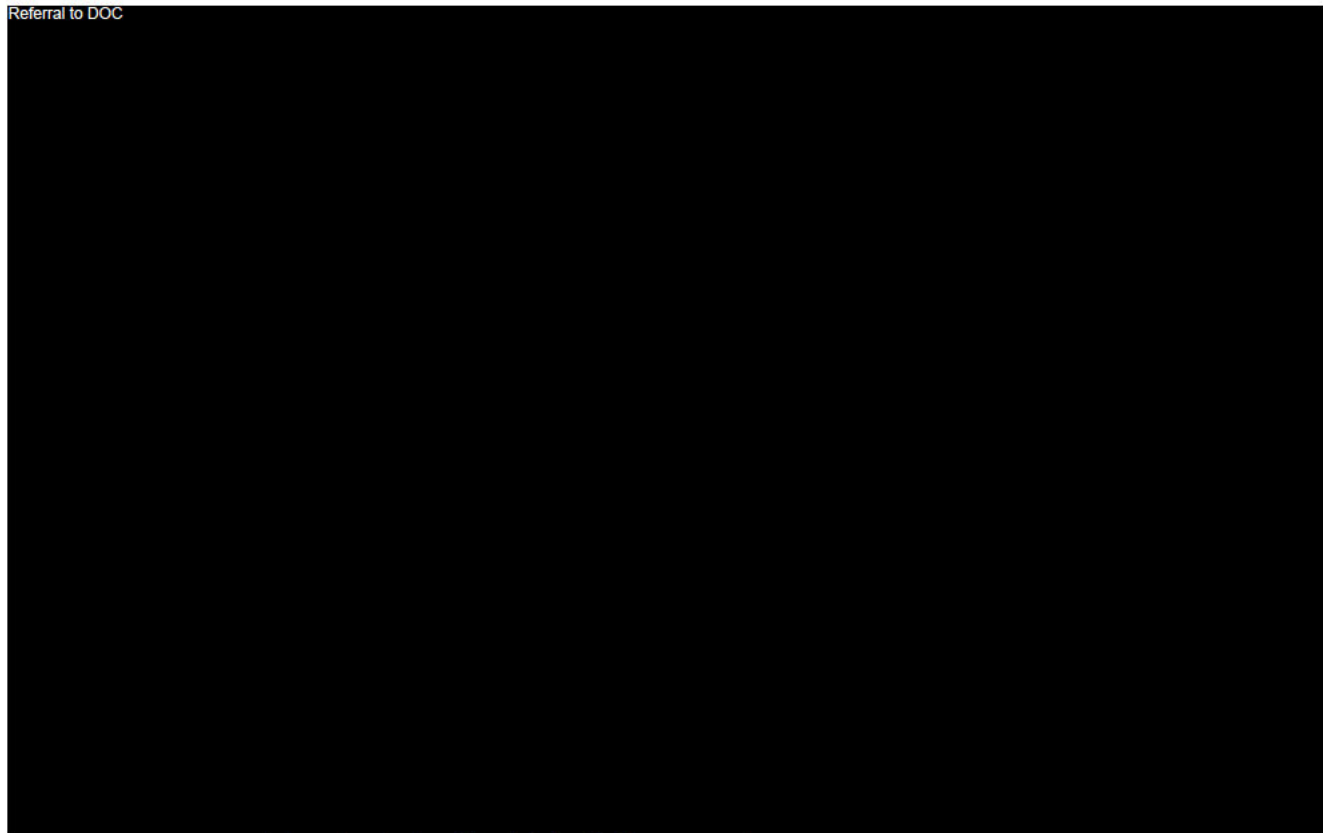
(b)(5), (6)

We cannot wait until Monday to discuss these issues. Unless otherwise directed, we are instructed to do whatever we can to complete the paperwork on Monday. I will be speaking with Mr. Ross tomorrow afternoon at 2pm, and if there are specific issues that I need to address with him, then I would appreciate knowing them ahead of that discussion.

David, I will call you tomorrow morning. If it would be better to have a joint call, then I am available anytime.

Ted

Referral to DOC



From: Keith Labeledz [<mailto:klabeledz@oge.gov>]
Sent: Friday, January 06, 2017 7:34 PM
To: 'Schlom, Evan N.' <eschlom@omm.com>; Kassinger, Theodore W. <tkassinger@omm.com>; Maggi, David (Federal) <dMaggi@doc.gov>; Jacobi, Will (Federal) <wjacobi@doc.gov>; Williams, Gaye (Federal) <gWilliams@doc.gov>
Cc: Dorey, David R. <ddorey@omm.com>
Subject: RE: Revised WLR 278

Thank you. I will review and incorporate any clarifying questions that I might have into the round 3 comments.

Keith

From: Schlom, Evan N. [<mailto:eschlom@omm.com>]
Sent: Friday, January 06, 2017 7:17 PM
To: Keith Labeledz; Kassinger, Theodore W.; David Maggi; 'wjacobi@doc.gov'; gwilliams@doc.gov
Cc: Dorey, David R.
Subject: [WARNING : MESSAGE ENCRYPTED]RE: Revised WLR 278

2 Attachments - 26 pages withheld in full - (b)(3), (4), (5), (6)

Keith,

Line 17.4 is the (b)(3), (4), (6) . It is currently (b)(3), (4), (6)

I have updated the “description” on the form in accordance with the guidance for (b)(3), (6) on the disclosure guide online, and put (b)(3), (6)” in the EIF column. The (b)(3), (4), (6) in Part 6 is a (b)(3), (4), (6)

Per your request, please see our responses to the “please confirm” questions in the attached documents. Our responses are in red type next to the items containing “please confirm” questions.

Also, you will see that the cross-references in the endnotes on the updated form are blank. This is in case we have to move things around before the form is finalized, since any cross-references would not automatically update. Once we

have the final form set, we will populate the endnotes with the appropriate cross-references.

Thanks,
Evan

From: Keith Labeledz [<mailto:klabeledz@oge.gov>]

Sent: Friday, January 06, 2017 6:43 PM

To: Kassinger, Theodore W.; Schlom, Evan N.; David Maggi;

'wjacobi@doc.gov'; gwilliams@doc.gov

Cc: Dorey, David R.; Schlom, Evan N.

Subject: RE: Revised WLR 278

Passing along another item ahead of round 3 notes in the interests of time: Please break out the holdings of the (b)(3), (6) at line 17.4. Or is this item in Part 2 an error? There is a different (b)(3), (6) in Part 6.

Thank you.

Keith

From: Kassinger, Theodore W. [<mailto:tkassinger@omm.com>]

Sent: Friday, January 06, 2017 6:15 PM

To: Keith Labeledz; Schlom, Evan N.; David Maggi; 'wjacobi@doc.gov';

gwilliams@doc.gov

Cc: Dorey, David R.; Schlom, Evan N.

Subject: RE: Revised WLR 278

thanks, we'll address these.

From: Keith Labeledz [<mailto:klabeledz@oge.gov>]

Sent: Friday, January 06, 2017 5:58 PM

To: Kassinger, Theodore W.; Schlom, Evan N.; David Maggi;

'wjacobi@doc.gov'; gwilliams@doc.gov

Cc: Dorey, David R.; Schlom, Evan N.

Subject: RE: Revised WLR 278

Thank you. One area that I have noted in my preliminary review of this round is the remaining blank fields for Part 3 and Part 4. I also see that there is a (b)(3), (6) that are new to Part 2 in this draft which would need to be added to Part 3.

I will document in my round 3 notes, but, in the interests of time, I wanted to note now that a (b)(3), (6) (Part 2, line 1.3) (b)(3), (5), (6)

Keith

From: Kassinger, Theodore W. [<mailto:tkassinger@omm.com>]

Sent: Friday, January 06, 2017 5:39 PM

To: Keith Labeledz; Schlom, Evan N.; David Maggi; 'wjacobi@doc.gov';

gwilliams@doc.gov

Cc: Dorey, David R.; Schlom, Evan N.

Subject: RE: Revised WLR 278

Hi, Keith,

We will send you a copy of your notes with responses to each item. The team is doing another cross-check, but I believe we'll be able to say that all "please confirm" questions have been addressed, and that all, or almost all, other comments/questions have been addressed.

Thanks,

Ted

From: Keith Labeledz [<mailto:klabeledz@oge.gov>]

Sent: Friday, January 06, 2017 4:28 PM

To: Schlom, Evan N.; David Maggi; 'wjacobi@doc.gov'; gwilliams@doc.gov

Cc: Kassinger, Theodore W.

Subject: RE: Revised WLR 278

Hello,

Does this new draft answer all of the outstanding questions from the two rounds of written comments or are there items outstanding? In addition, the original round of comments included a number of "please-confirm" questions. I will need a response to those items as a precondition for completing my review, so I want to make sure we do not lose sight of them.

Thank you.

Keith

Keith Labeledz

Senior Program Analyst

Presidential Nominations Branch

U.S. Office of Government Ethics

Telephone: (202) 482-9218

From: Schlom, Evan N. [<mailto:eschlom@omm.com>]

Sent: Friday, January 06, 2017 3:30 PM

To: David Maggi; Keith Labeledz; 'wjacobi@doc.gov'; gwilliams@doc.gov

Cc: Kassinger, Theodore W.

Subject: Revised WLR 278

Hello all,

We have made a number of changes to the 278 in response to our conversations with you and your comments on the previous draft, so please go ahead and review the current update.

Thanks,

Evan

O'Melveny

Evan N. Schlom

eschlom@omm.com

O: +1-202-383-5512

O'Melveny & Myers LLP

1625 Eye Street, NW

Washington, DC 20006

[Website](#) | [LinkedIn](#) | [Twitter](#) | [Bio](#)

This message and any attached documents contain information from the law firm of O'Melveny & Myers LLP that may be confidential and/or privileged. If you are not the intended recipient, you may not read, copy, distribute, or use this information. If you have received this transmission in error, please notify the sender immediately by reply e-mail and then delete this message.

OGE Confidential Notice: This email, including all attachments, may constitute a Federal record or other Government property that is intended only for the use of the individual or entity to which it is addressed. This email also may contain information that is privileged, confidential, or otherwise protected from disclosure under applicable law. If you are not the intended recipient or the employee or agent responsible for delivering the transmission to the intended recipient, you are hereby notified that any dissemination, distribution, copying or use of this email or its contents is strictly prohibited. If you have received this email in error, please notify the sender by responding to the email and then immediately delete the email.

OGE Confidential Notice: This email, including all attachments, may constitute a Federal record or other Government property that is intended only for the use of the individual or entity to which it is addressed. This email also may contain information that is privileged, confidential, or otherwise protected from disclosure under applicable law. If you are not the intended recipient or the employee or agent responsible for delivering the transmission to the intended recipient, you are hereby notified that any dissemination, distribution, copying or use of this email or its contents is strictly prohibited. If you have received this email in error, please notify the sender by responding to the email and then immediately delete the email.

OGE Confidential Notice: This email, including all attachments, may constitute a Federal record or other Government property that is intended only for the use of the individual or entity to which it is addressed. This email also may contain information that is privileged, confidential, or otherwise protected from disclosure under applicable law. If you are not the intended recipient or the employee or agent responsible for delivering the transmission to the intended recipient, you are hereby notified that any dissemination, distribution, copying or use of this email or its contents is strictly prohibited. If you have received this email in error, please notify the sender by responding to the email and then immediately delete the email.

OGE Confidential Notice: This email, including all attachments, may constitute a Federal record or other Government property that is intended only for the use of the individual or entity to which it is addressed. This email also may contain information that is privileged, confidential, or otherwise protected from disclosure under applicable law. If you are not the intended recipient or the employee or agent responsible for delivering the transmission to the intended recipient, you are hereby notified that any dissemination, distribution, copying or use of this email

or its contents is strictly prohibited. If you have received this email in error, please notify the sender by responding to the email and then immediately delete the email.

OGE Confidential Notice: This email, including all attachments, may constitute a Federal record or other Government property that is intended only for the use of the individual or entity to which it is addressed. This email also may contain information that is privileged, confidential, or otherwise protected from disclosure under applicable law. If you are not the intended recipient or the employee or agent responsible for delivering the transmission to the intended recipient, you are hereby notified that any dissemination, distribution, copying or use of this email or its contents is strictly prohibited. If you have received this email in error, please notify the sender by responding to the email and then immediately delete the email.

OGE Confidential Notice: This email, including all attachments, may constitute a Federal record or other Government property that is intended only for the use of the individual or entity to which it is addressed. This email also may contain information that is privileged, confidential, or otherwise protected from disclosure under applicable law. If you are not the intended recipient or the employee or agent responsible for delivering the transmission to the intended recipient, you are hereby notified that any dissemination, distribution, copying or use of this email or its contents is strictly prohibited. If you have received this email in error, please notify the sender by responding to the email and then immediately delete the email.

OGE Confidential Notice: This email, including all attachments, may constitute a Federal record or other Government property that is intended only for the use of the individual or entity to which it is addressed. This email also may contain information that is privileged, confidential, or otherwise protected from disclosure under applicable law. If you are not the intended recipient or the employee or agent responsible for delivering the transmission to the intended recipient, you are hereby notified that any dissemination, distribution, copying or use of this email or its contents is strictly prohibited. If you have received this email in error, please notify the sender by responding to the email and then immediately delete the email.

OGE Confidential Notice: This email, including all attachments, may constitute a Federal record or other Government property that is intended only for the use of the individual or entity to which it is addressed. This email also may contain information that is privileged, confidential, or otherwise protected from disclosure under applicable law. If you are not the intended recipient or the employee or agent responsible for delivering the transmission to the intended recipient, you are hereby notified that any dissemination, distribution, copying or use of this email or its contents is strictly prohibited. If you have received this email in error,

please notify the sender by responding to the email and then immediately delete the email.

From: [Deborah J. Bortot](#)
To: [Walter M. Shaub](#); [Keith Labedz](#); [Heather A. Jones](#)
Subject: RE:
Date: Tuesday, January 10, 2017 10:17:41 PM

Mr. Ross, his rep, and I are on the line

From: Walter M. Shaub
Sent: Tuesday, January 10, 2017 10:12 PM
To: Deborah J. Bortot; Keith Labedz; Heather A. Jones
Subject: FW:

If you're free for a call at 10:15, please feel free to dial in. Here's the number and code. It's Kassinger and possibly Ross

(b) (6) ; PC: (b) (6)

From: [Deborah J. Bortot](#)
To: [Walter M. Shaub](#); [Keith Labedz](#); [Heather A. Jones](#)
Subject: RE:
Date: Tuesday, January 10, 2017 10:16:42 PM

I just called in

From: Walter M. Shaub
Sent: Tuesday, January 10, 2017 10:12 PM
To: Deborah J. Bortot; Keith Labedz; Heather A. Jones
Subject: FW:

If you're free for a call at 10:15, please feel free to dial in. Here's the number and code. It's Kassinger and possibly Ross

(b) (6) ; PC: (b) (6)

From: [Kassinger, Theodore W.](#)
To: [Director of OGE](#); [Heather A. Jones](#); [Keith Labedz](#); [David Maggi](#); [Wilbur Ross](#); [Schlom, Evan N.](#); [Dorey, David R.](#)
Subject: OGE/Commerce/OMM/WLR call
Start: Tuesday, January 10, 2017 10:15:00 PM
End: Tuesday, January 10, 2017 10:45:00 PM
Location: (b) (6); PC: (b) (6)

From: [Kassinger, Theodore W.](#)
To: [Director of OGE](#); [Heather A. Jones](#); [Keith Labeledz](#); [David Maggi](#); [Wilbur Ross](#); [Schlom, Evan N.](#); [Dorey, David R.](#)
Subject: OGE/Commerce/OMM/WLR call

From: [Kassinger, Theodore W.](mailto:Kassinger.Theodore.W)
To: [Director of OGE](mailto:Director.of.OGE); [Heather A. Jones](mailto:Heather.A.Jones); [Keith Labedz](mailto:Keith.Labedz); [David Maggi](mailto:David.Maggi); [Culvahouse Jr., Arthur B.](mailto:Culvahouse.Jr.,Arthur.B.); [Sheehan, Matthew J.](mailto:Sheehan.Matthew.J.); [Schlom, Evan N.](mailto:Schlom.Evan.N.); [Dorey, David R.](mailto:Dorey.David.R.); [Deborah J. Bortot](mailto:Deborah.J.Bortot); "wjacobi@doc.gov"; "DJacob@doc.gov"; "gWilliams@doc.gov"; "AWarren@doc.gov"; [David J. Apol](mailto:David.J.Apol)
Subject: RE: ethics agreement and call
Date: Tuesday, January 10, 2017 6:09:27 PM

thanks

From: Director of OGE [<mailto:director@oge.gov>]
Sent: Tuesday, January 10, 2017 6:08 PM
To: Kassinger, Theodore W.; Director of OGE; Heather A. Jones; Keith Labedz; David Maggi; Culvahouse Jr., Arthur B.; Sheehan, Matthew J.; Schlom, Evan N.; Dorey, David R.; Deborah J. Bortot; 'wjacobi@doc.gov'; 'DJacob@doc.gov'; 'gWilliams@doc.gov'; 'AWarren@doc.gov'; David J. Apol
Subject: RE: ethics agreement and call

I'm satisfied that the circumstances are such that we can agree to the 180-day time period. No further proof is needed.

Walter M. Shaub, Jr.

Director

U.S. Office of Government Ethics

1201 New York Avenue, NW, Suite 500

Washington, DC 20005-3917

Telephone: 202.482.9292

Email: walter.schaub@oge.gov

From: Kassinger, Theodore W. [<mailto:tkassinger@omm.com>]
Sent: Tuesday, January 10, 2017 6:01 PM
To: Walter M. Shaub; Director of OGE; Heather A. Jones; Keith Labedz; David Maggi; Culvahouse Jr., Arthur B.; Sheehan, Matthew J.; Schlom, Evan N.; Dorey, David R.; Deborah J. Bortot; 'wjacobi@doc.gov'; 'DJacob@doc.gov'; 'gWilliams@doc.gov'; 'AWarren@doc.gov'; David J. Apol
Subject: RE: ethics agreement and call

One question: Is there anything in particular that you need for a "hardship" determination?

From: Walter M. Shaub [<mailto:wmshaub@oge.gov>]
Sent: Tuesday, January 10, 2017 5:59 PM
To: Kassinger, Theodore W.; Director of OGE; Heather A. Jones; Keith Labedz; David Maggi; Culvahouse Jr., Arthur B.; Sheehan, Matthew J.; Schlom, Evan N.; Dorey, David R.; Deborah J. Bortot; 'wjacobi@doc.gov'; 'DJacob@doc.gov'; 'gWilliams@doc.gov'; 'AWarren@doc.gov'; David J. Apol
Subject: RE: ethics agreement and call

Great. Thanks, Ted. You'll see we went with (b)(5), (6) [REDACTED]. Just shoot me a message tonight when you want to talk. If you need time to study these documents, we can always talk in the morning.

Walt

Walter M. Shaub, Jr.

Director

U.S. Office of Government Ethics

1201 New York Avenue, NW, Suite 500

Washington, DC 20005-3917

Telephone: 202.482.9292

Email: walter.shaub@oge.gov

From: Kassinger, Theodore W. [<mailto:tkassinger@omm.com>]

Sent: Tuesday, January 10, 2017 5:47 PM

To: Director of OGE; Heather A. Jones; Keith Labeledz; David Maggi; Culvahouse Jr., Arthur B.; Sheehan, Matthew J.; Schlom, Evan N.; Dorey, David R.; Walter M. Shaub; Deborah J. Bortot; 'wjacobi@doc.gov'; 'DJacob@doc.gov'; 'gWilliams@doc.gov'; 'AWarren@doc.gov'; David J. Apol

Subject: RE: ethics agreement and call

Walt and team -

Thanks very much. We will review and talk with Mr. Ross. He may want to have a concepts call this evening to clarify some issues on version 2 in particular; as relayed in my voice mail, he is working to pin down whether (b)(5), (6) [REDACTED].

I will revert asap.

Ted

From: Director of OGE [<mailto:director@oge.gov>]

Sent: Tuesday, January 10, 2017 5:40 PM

To: Kassinger, Theodore W.; Director of OGE; Heather A. Jones; Keith Labeledz; David Maggi; Culvahouse Jr., Arthur B.; Sheehan, Matthew J.; Schlom, Evan N.; Dorey, David R.; Walter M. Shaub; Deborah J. Bortot; 'wjacobi@doc.gov'; 'DJacob@doc.gov'; 'gWilliams@doc.gov'; 'AWarren@doc.gov'; David J. Apol

Subject: ethics agreement and call

Attachment 1 - 17 pages withheld in full - (b)(3), (5), (6); Attachment 2 - 9 pages withheld in full - (b)(3), (5), (6)

Ted,

We've been hard at work today drafting two versions of an ethics agreement. I have attached them both.

One version (b) (5), (b) (6)

The other version (b) (5), (b) (6)

I'm happy to schedule a time to talk tonight. If you would prefer to have some more time to study these drafts, however, we can schedule to talk in the morning instead. This call will be my top priority.

As a final note, we'll all need to scrub this draft carefully to make sure we haven't left any items out or, perhaps, placed items in the wrong sections. But it's complete enough for a discussion draft.

Walt

Walter M. Shaub, Jr.

Director

U.S. Office of Government Ethics

1201 New York Avenue, NW, Suite 500

Washington, DC 20005-3917

Telephone: 202.482.9292

Email: walter.shaub@oge.gov


OGE Confidential Notice: This email, including all attachments, may constitute a Federal

record or other Government property that is intended only for the use of the individual or entity to which it is addressed. This email also may contain information that is privileged, confidential, or otherwise protected from disclosure under applicable law. If you are not the intended recipient or the employee or agent responsible for delivering the transmission to the intended recipient, you are hereby notified that any dissemination, distribution, copying or use of this email or its contents is strictly prohibited. If you have received this email in error, please notify the sender by responding to the email and then immediately delete the email.

OGE Confidential Notice: This email, including all attachments, may constitute a Federal record or other Government property that is intended only for the use of the individual or entity to which it is addressed. This email also may contain information that is privileged, confidential, or otherwise protected from disclosure under applicable law. If you are not the intended recipient or the employee or agent responsible for delivering the transmission to the intended recipient, you are hereby notified that any dissemination, distribution, copying or use of this email or its contents is strictly prohibited. If you have received this email in error, please notify the sender by responding to the email and then immediately delete the email.

OGE Confidential Notice: This email, including all attachments, may constitute a Federal record or other Government property that is intended only for the use of the individual or entity to which it is addressed. This email also may contain information that is privileged, confidential, or otherwise protected from disclosure under applicable law. If you are not the intended recipient or the employee or agent responsible for delivering the transmission to the intended recipient, you are hereby notified that any dissemination, distribution, copying or use of this email or its contents is strictly prohibited. If you have received this email in error, please notify the sender by responding to the email and then immediately delete the email.

Referral to DOC



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

Sent: Tuesday, January 10, 2017 4:48 PM


To: Maggi, David (Federal) <dMaggi@doc.gov>; Walter M. Shaub <wmshaub@oge.gov>; Heather A. Jones <hajones@oge.gov>; Keith Labeledz <klabeledz@oge.gov>; David J. Apol <djapol@oge.gov>

Cc: Williams, Gaye (Federal) <gWilliams@doc.gov>; Warren, Arthur (Federal) <AWarren@doc.gov>; Jacobi, Will (Federal) <wjacobi@doc.gov>; Jacob, Dana (Federal) <DJacob@doc.gov>

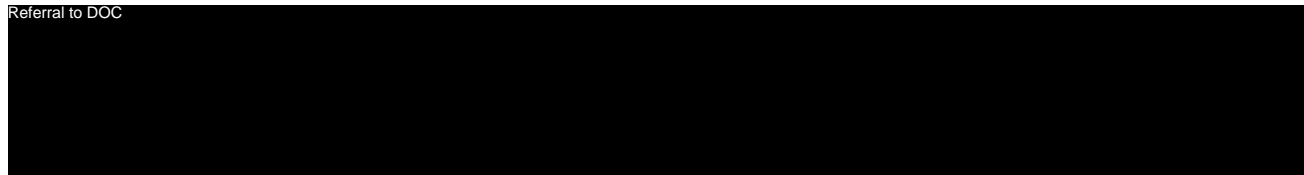
Subject: RE: Ross - Call Re Sale of Assets

Let's make that happen.

Referral to DOC



Referral to DOC



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

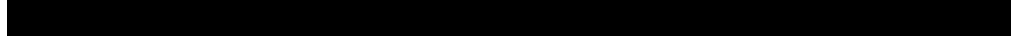
Sent: Tuesday, January 10, 2017 4:37 PM

To: Maggi, David (Federal) <dMaggi@doc.gov>; Walter M. Shaub <wmshaub@oge.gov>; Heather A. Jones <hajones@oge.gov>; Keith Labeledz <klabeledz@oge.gov>; David J. Apol <djapol@oge.gov>

Cc: Williams, Gaye (Federal) <gWilliams@doc.gov>; Warren, Arthur (Federal) <AWarren@doc.gov>; Jacobi, Will (Federal) <wjacobi@doc.gov>; Jacob, Dana (Federal) <DJacob@doc.gov>

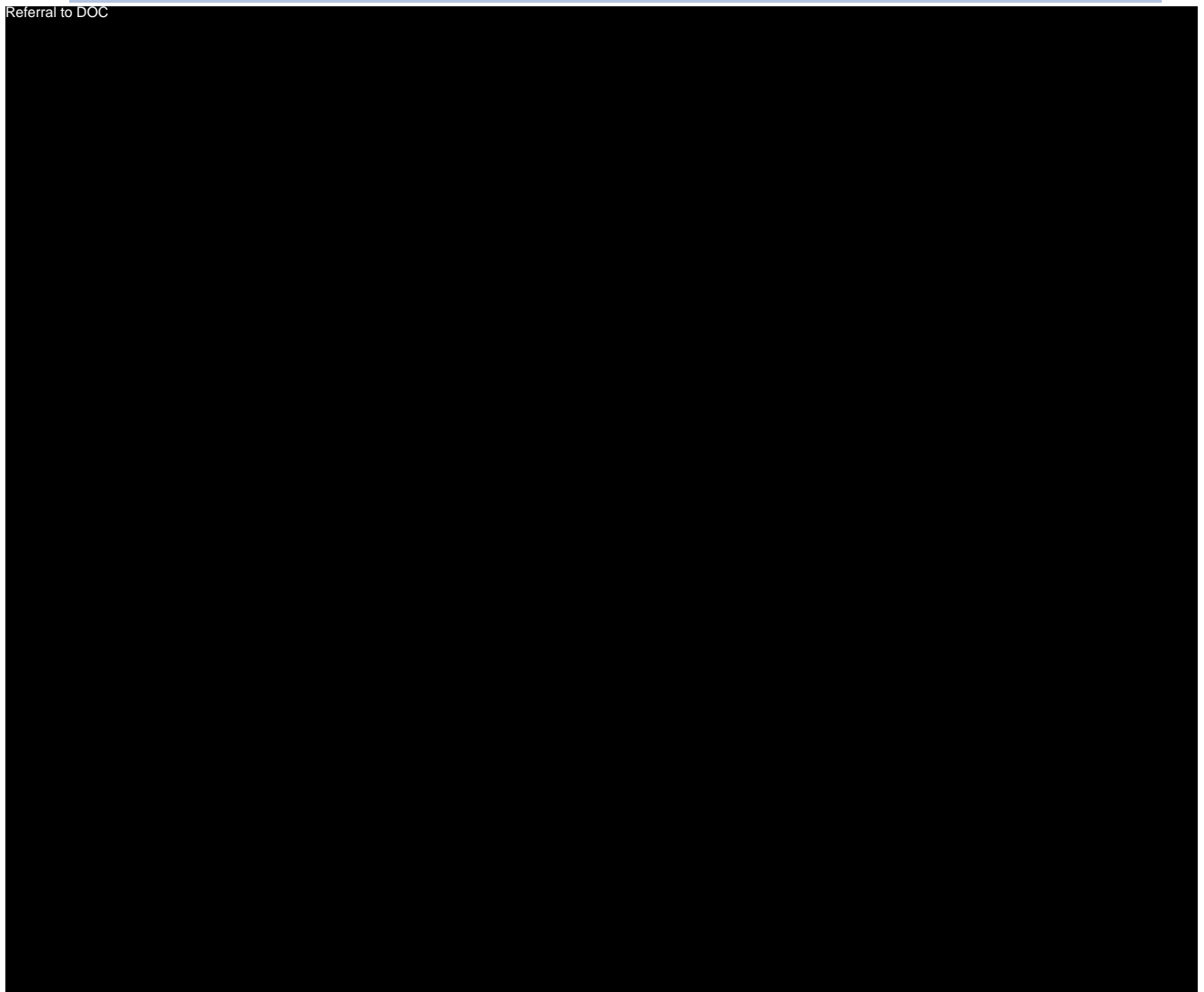
Subject: RE: Ross - Call Re Sale of Assets

Walt says: (b) (5), (b) (6)



”

Referral to DOC



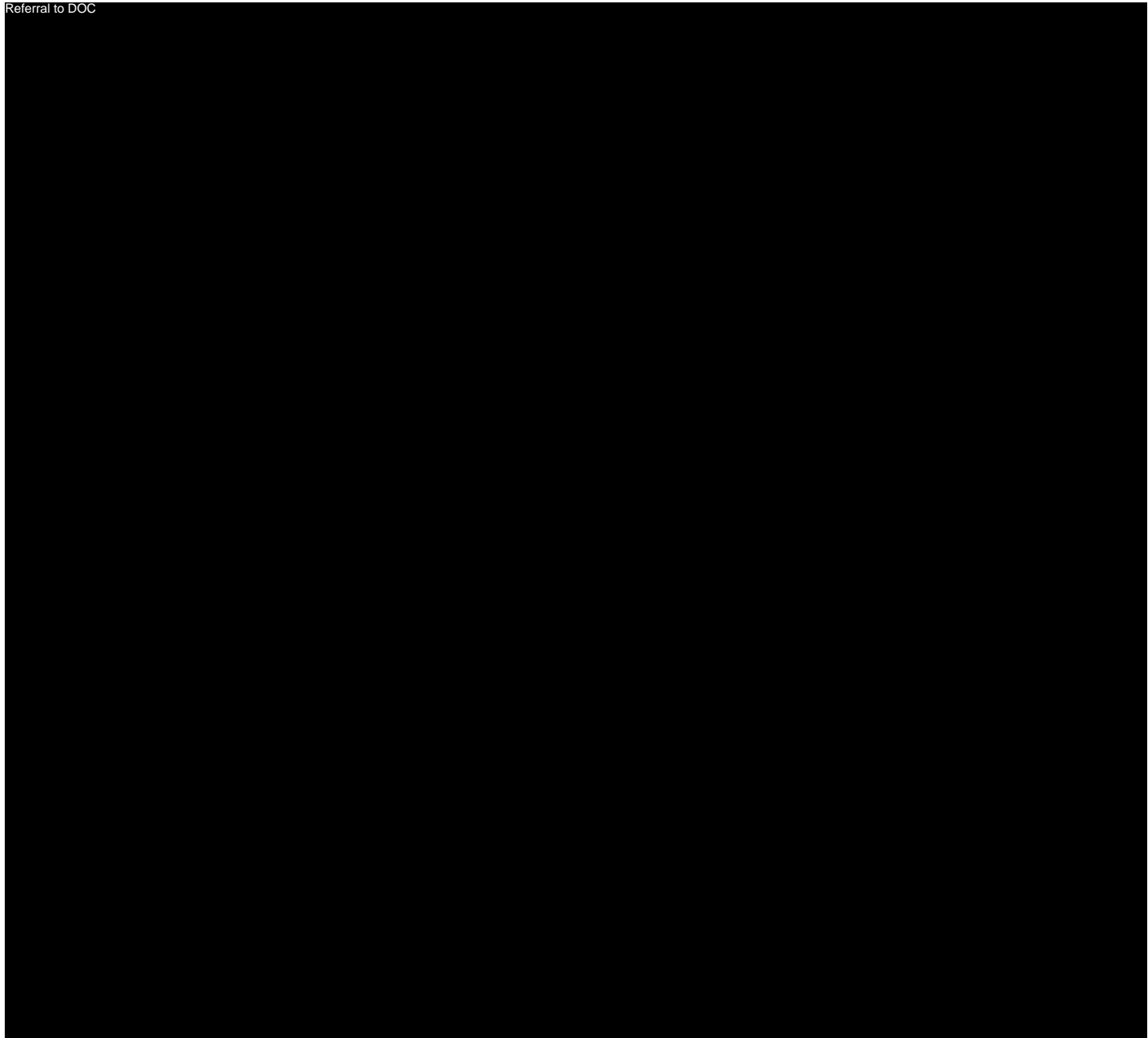
OGE Confidential Notice: This email, including all attachments, may constitute a Federal record or other Government property that is intended only for the use of the individual or entity to which it is addressed. This email also may contain information that is privileged, confidential, or otherwise protected from disclosure under applicable law. If you are not the intended recipient or the employee or agent responsible for delivering the transmission to the intended recipient, you are hereby notified that any dissemination, distribution, copying or use of this email or its contents is strictly prohibited. If you have received this email in error, please notify the sender by responding to the email and then immediately delete the email.

OGE Confidential Notice: This email, including all attachments, may constitute a Federal record or other Government property that is intended only for the use of the individual or entity to which it is addressed. This email also may contain information that is privileged, confidential, or otherwise protected from disclosure under applicable law. If you are not the intended recipient or the employee or agent responsible for delivering the transmission to the intended recipient, you are hereby notified that any dissemination, distribution, copying or use of this email or its contents is strictly prohibited. If you have received this email in error, please notify the sender by responding to the email and then immediately delete the email.

From: [Keith Labedz](#)
To: [Director of OGE](#); [Deborah J. Bortot](#); [Heather A. Jones](#)
Subject: FW: Commerce review of Part 1
Date: Tuesday, January 10, 2017 3:01:42 PM
Attachments: [WLR-EA-resignations-01-10-17.docx](#)

Attachment - Referral to DOC

Referral to DOC



From: [Kassinger, Theodore W.](#)
To: [Director of OGE](#); [Heather A. Jones](#); [Keith Labedz](#); [David Maggi](#); [Culvahouse Jr., Arthur B.](#); [Sheehan, Matthew J.](#); [Schlom, Evan N.](#); [Dorey, David R.](#)
Subject: 2:30pm call
Date: Tuesday, January 10, 2017 2:16:45 PM

All-

While the 2:30pm call remains on the calendar, there has been a scheduling problem and I expect the call to occur later today instead of 2:30pm. We are working with Walt's office to find a time.

Thanks

Ted

Referral to DOC

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

Sent: Tuesday, January 10, 2017 12:54 PM

To: Maggi, David (Federal) ; Director of OGE

Cc: Warren, Arthur (Federal) ; Jacobi, Will (Federal) ; Jacob, Dana (Federal) ; Keith Labeledz

Subject: Re: Ross divestiture information

We are revising the EA. Would you please send a divesture list limited to the assets the need to be sold in Part 5 and part 6? With this list I think we wi be able to have something to you thus afternoon.

Thanks

Heather

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

Referral to DOC

From: Director of OGE [<mailto:director@oge.gov>]

Sent: Tuesday, January 10, 2017 10:45 AM

To: Maggi, David (Federal) <dMaggi@doc.gov>; Director of OGE <director@oge.gov>; Heather A. Jones <hajones@oge.gov>; Keith Labeledz <klabeledz@oge.gov>

Cc: Warren, Arthur (Federal) <AWarren@doc.gov>; Jacobi, Will (Federal) <wjacobi@doc.gov>; Jacob, Dana (Federal) <DJacob@doc.gov>

Subject: RE: Ross divestiture information

(b) (5), (b) (6)

Also, (b) (5), (b) (6)

(b) (5), (b) (6)

. If I understood him correctly, (b) (5), (b) (6)

See this, for example: (b) (5), (b) (6)

Walt

Walter M. Shaub, Jr.

Director

U.S. Office of Government Ethics

1201 New York Avenue, NW, Suite 500

Washington, DC 20005-3917

Telephone: 202.482.9292

Email: walter.shaub@oge.gov

Referral to DOC



From: Kassinger, Theodore W. [<mailto:tkassinger@omm.com>]
Sent: Tuesday, January 10, 2017 8:41 AM
To: Director of OGE <director@oge.gov>; Heather A. Jones <hajones@oge.gov>; Keith Labeledz <klabeledz@oge.gov>; Maggi, David (Federal) <dMaggi@doc.gov>
Cc: Culvahouse Jr., Arthur B. <aculvahouse@omm.com>; Schlom, Evan N. <eschlom@omm.com>; Dorey, David R. <ddorey@omm.com>; Sheehan, Matthew J. <msheehan@omm.com>
Subject: RE: Ross divestiture information

Walt,

Your questions are understandable and highlight terminology issues as well as the difficulty in figuring out exactly how to describe the current status of various entities and assets. We hope this helps:

(1) (b)(5), (6)

In two (b)(3), (6) some of the (b)(5), (6). These two are (b)(3), (6)

For (b)(3), (6) the (b)(4), (6) (b)(3), (6) (b)(4), (5), (6)

For (b)(3), (6) is (b)(4), (6). It was listed for the same reason (b)(3), (6) were listed.

(2) (b)(5), (6) (b)(5), (6)

We did not intend for "(b)(3), (4), (6)" and "(b)(3), (4), (6)" to be different things. We used both terms in our SF 278, but we did not intend to express two different things. We will use (b)(3), (4), (6) in both places. (b)(3), (4), (6)

Per email guidance from Keith, we marked the EIF column (b)(3), (6) for this entity each time it appears on the form, and added endnotes stating that the (b)(3), (4), (6)

(b)(3), (4), (6)

(b)(3), (4), (6)

(b)(3), (4), (6)

[Redacted]

Ted

From: Director of OGE [<mailto:director@oge.gov>]

Sent: Monday, January 09, 2017 11:11 PM

To: Kassinger, Theodore W.; Director of OGE; Heather A. Jones; Keith Labeledz; David Maggi

Cc: Culvahouse Jr., Arthur B.; Schlom, Evan N.; Dorey, David R.; Sheehan, Matthew J.

Subject: RE: Ross divestiture information

I've got to admit that I don't find this helpful at all. I'm afraid I don't follow your analysis. There seem to be two problems: (1) ^{(b)(5), (6)}

[Redacted] and (2) ^{(b)(5), (6)}

[Redacted]

(b)(5), (6)

[Redacted]

[Redacted]

(b) (5), (b) (6)

. Rex

Tillerson's ethics agreement is posted publicly on our website, so I feel comfortable attaching it to this email. (b) (5), (b) (6)

Walt

Walter M. Shaub, Jr.

Director

U.S. Office of Government Ethics

1201 New York Avenue, NW, Suite 500

Washington, DC 20005-3917

Telephone: 202.482.9292

Email: walter.shaub@oge.gov

From: Kassinger, Theodore W. [<mailto:tkassinger@omm.com>]

Sent: Monday, January 09, 2017 9:35 PM

To: Director of OGE; Heather A. Jones; Keith Labeledz; David Maggi

Cc: Culvahouse Jr., Arthur B.; Schlom, Evan N.; Dorey, David R.; Sheehan, Matthew J.

Subject: Ross divestiture information

Attachment - Draft financial disclosure report withheld in full - (b) (3), (4), (5), (6)

All-

As we discussed, attached is a copy of Part 2 of Mr. Ross' SF278, with highlights showing the particular assets that Mr. Ross proposes to hold following his entry into government service, subject to recusals.

(b) (5), (b) (6)

Thanks again for your consideration. We look forward to our call tomorrow.

Ted

(b)(3), (b)(4), (b)(6)

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

(b)(3), (b)(4), (b)(6)

[Redacted text block]

O'Melveny

**Theodore W.
Kassinger**

Partner

tkassinger@omm.com

O: +1-202-383-5170

M: (b)(6)

O'Melveny & Myers
LLP

1625 Eye Street, NW

Washington, DC
20006

[Website](#) | [LinkedIn](#) |
[Twitter](#)

This message and any attached documents contain information from the law firm of O'Melveny & Myers LLP that may be confidential and/or privileged. If you are not the intended recipient, you may not read, copy, distribute, or use this information. If you have received this transmission in error, please notify the sender immediately by reply e-mail and then delete this message.

OGE Confidential Notice: This email, including all attachments, may constitute a Federal record or other Government property that is intended only for the use of the individual or entity to which it is addressed. This email also may contain information that is privileged, confidential, or otherwise protected from disclosure under applicable law. If you are not the intended recipient or the employee or agent responsible for delivering the transmission to the intended recipient, you are hereby notified that any dissemination, distribution, copying or use of this email or its contents is strictly prohibited. If you have received this email in error, please notify the sender by responding to the email and then immediately delete the email.

OGE Confidential Notice: This email, including all attachments, may constitute a Federal record or other Government property that is intended only for the use of the individual or entity to which it is addressed. This email also may contain information that is privileged, confidential, or otherwise protected from disclosure under applicable law. If you are not the intended recipient or the employee or agent responsible for delivering the transmission to the intended recipient, you are hereby notified that any dissemination, distribution, copying or use of this email or its contents is strictly prohibited. If you have received this email in error, please notify the sender by responding to the email and then immediately delete the email.

OGE Confidential Notice: This email, including all attachments, may constitute a Federal record or other Government property that is intended only for the use of the individual or entity to which it is addressed. This email also may contain information that is privileged, confidential, or otherwise protected from disclosure under applicable law. If you are not the intended recipient or the employee or agent responsible for delivering the transmission to the intended recipient, you are hereby notified that any dissemination, distribution, copying or use of this email or its contents is strictly prohibited. If you have received this email in error, please notify the sender by responding to the email and then immediately delete the email.

From: [Kassinger, Theodore W.](#)
To: [Heather A. Jones](#)
Subject: OLC opinion
Date: Tuesday, January 10, 2017 1:38:16 PM

Heather,

You and Walt have mentioned the OLC opinion re (b)(5), (6). It is an issue relevant to several clients. I know that our firm was involved in the nomination that generated the opinion, but we cannot find a copy, and have not identified it among the published OLC opinions. Would you mind sending one to me?

Thanks,

Ted

**O'Melveny
Theodore W. Kassinger**

Partner

tkassinger@omm.com

O: +1-202-383-5170

M: (b)(6)
O'Melveny & Myers LLP

1625 Eye Street, NW

Washington, DC 20006

[Website](#) | [LinkedIn](#) | [Twitter](#)

This message and any attached documents contain information from the law firm of O'Melveny & Myers LLP that may be confidential and/or privileged. If you are not the intended recipient, you may not read, copy, distribute, or use this information. If you have received this transmission in error, please notify the sender immediately by reply e-mail and then delete this message.

From: [Heather A. Jones](#)
To: [Sandra S. Mabry](#)
Subject: Fw: Ross divestiture information
Date: Tuesday, January 10, 2017 1:20:18 PM
Attachments: [WLR SF 278 \(highlighted\).pdf](#)

Attachment - Draft financial disclosure report withheld in full -
(b)(3), (4), (5), (6)

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

From: Kassinger, Theodore W. <tkassinger@omm.com>
Sent: Monday, January 9, 2017 9:35 PM
To: Director of OGE; Heather A. Jones; Keith Labedz; David Maggi
Cc: Culvahouse Jr., Arthur B.; Schlom, Evan N.; Dorey, David R.; Sheehan, Matthew J.
Subject: Ross divestiture information

All-

As we discussed, attached is a copy of Part 2 of Mr. Ross' SF278, with highlights showing the particular assets that Mr. Ross proposes to hold following his entry into government service, subject to recusals.

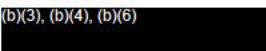
(b) (5), (b) (6)



Thanks again for your consideration. We look forward to our call tomorrow.

Ted

(b)(3), (b)(4), (b)(6)



Rest of chain partially disclosed above



From: [Keith Labeledz](#)
To: [Deborah J. Bortot](#)
Subject: FW: Ross divestiture information
Date: Tuesday, January 10, 2017 11:27:59 AM
Attachments: [WLR SF 278 \(highlighted\) ksl.pdf](#)

Attachment - Draft financial disclosure report withheld in full - (b)(3), (4), (5), (6)

From: Keith Labeledz
Sent: Tuesday, January 10, 2017 9:50 AM
To: Director of OGE; Heather A. Jones
Subject: FW: Ross divestiture information

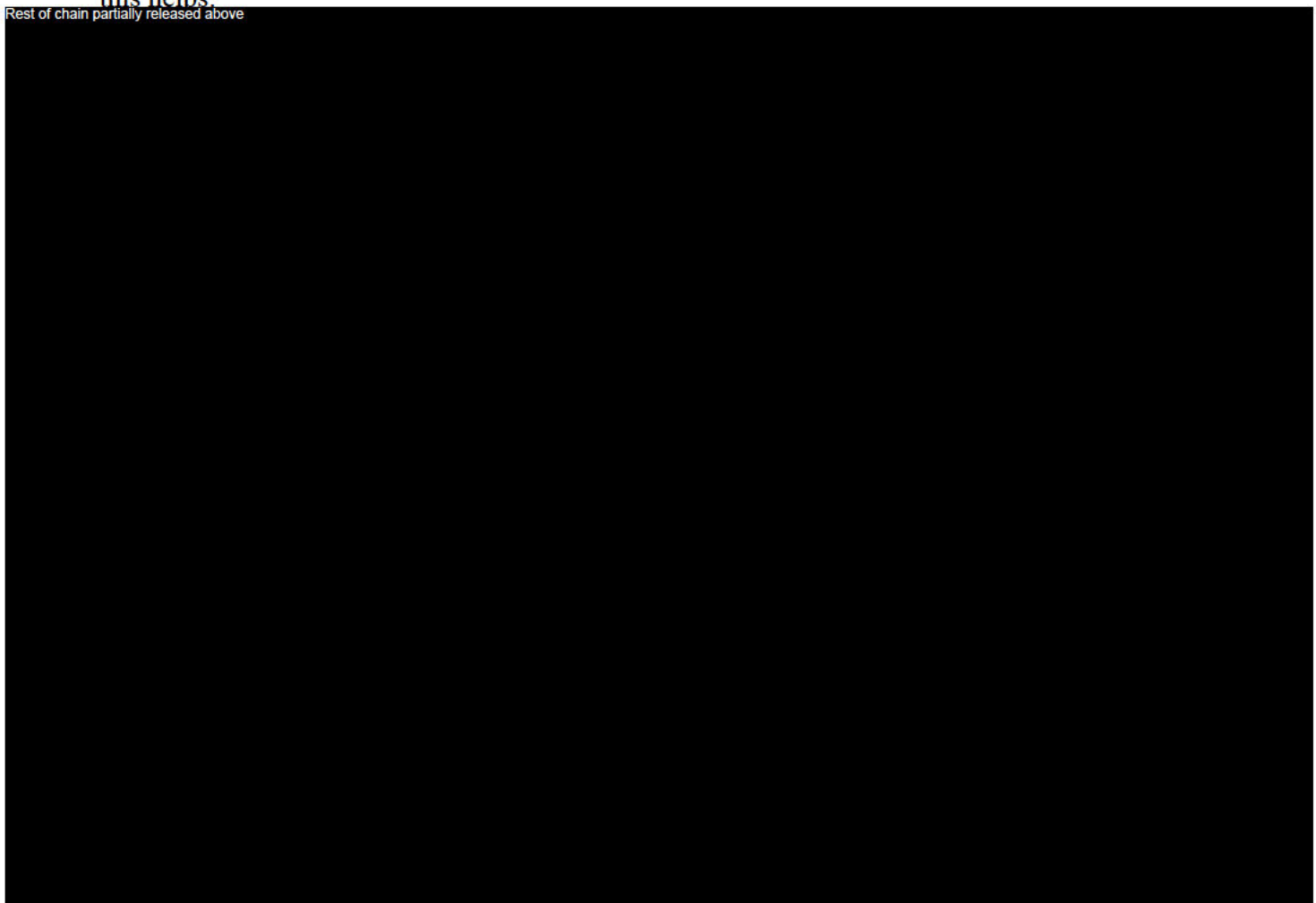
I have added some comments. The comments that begin in all CAPS are the most important.

From: Kassinger, Theodore W. [<mailto:tkassinger@omm.com>]
Sent: Tuesday, January 10, 2017 8:49 AM
To: Director of OGE; Heather A. Jones; Keith Labeledz; David Maggi
Cc: Culvahouse Jr., Arthur B.; Schlom, Evan N.; Dorey, David R.; Sheehan, Matthew J.
Subject: RE: Ross divestiture information
to clarify one point: ^{(b) (4), (b) (6)} [REDACTED]

From: Kassinger, Theodore W.
Sent: Tuesday, January 10, 2017 8:41 AM
To: 'Director of OGE'; Heather A. Jones; Keith Labeledz; David Maggi
Cc: Culvahouse Jr., Arthur B.; Schlom, Evan N.; Dorey, David R.; Sheehan, Matthew J.
Subject: RE: Ross divestiture information
Walt,

Your questions are understandable and highlight terminology issues as well as the difficulty in figuring out exactly how to describe the current status of various entities and assets. We hope this helps:

Rest of chain partially released above



From: [Van Beek, Jason \(Commerce\)](#)
To: [Sandra S. Mabry](#)
Subject: Wilbur Ross OGE package
Date: Tuesday, January 10, 2017 11:08:04 AM

Hi Sandy, sorry to pester you again on this, but I was just curious if you can offer any insight on when we can expect to receive the OGE package for Wilbur Ross (Commerce Secretary nominee).

We are planning to hold a hearing on his nomination on Thursday.

Any information you can offer would be appreciated. I can be reached directly at (b) (6), -
Jason

From: [Director of OGE](#)
To: [Keith Labeledz](#); [Director of OGE](#); [Heather A. Jones](#)
Subject: RE: Ross divestiture information
Date: Tuesday, January 10, 2017 10:47:35 AM

Please do that.

Walter M. Shaub, Jr.
Director
U.S. Office of Government Ethics
1201 New York Avenue, NW, Suite 500
Washington, DC 20005-3917
Telephone: 202.482.9292
Email: walter.shaub@oge.gov

From: Keith Labeledz
Sent: Tuesday, January 10, 2017 9:10 AM
To: Director of OGE; Heather A. Jones
Subject: FW: Ross divestiture information

(b)(5), (6)



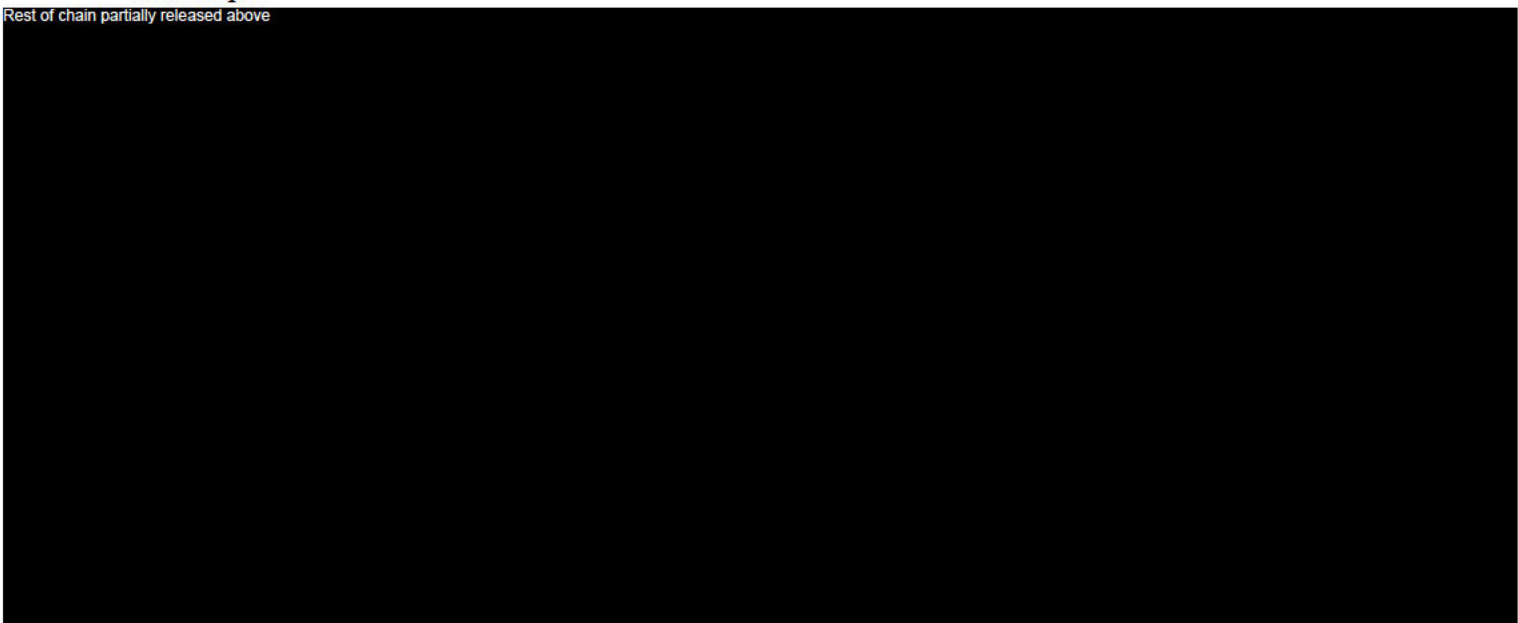
From: Kassinger, Theodore W. [<mailto:tkassinger@omm.com>]
Sent: Tuesday, January 10, 2017 8:49 AM
To: Director of OGE; Heather A. Jones; Keith Labeledz; David Maggi
Cc: Culvahouse Jr., Arthur B.; Schlom, Evan N.; Dorey, David R.; Sheehan, Matthew J.
Subject: RE: Ross divestiture information
to clarify one point: (b) (4), (b) (6)

From: Kassinger, Theodore W.
Sent: Tuesday, January 10, 2017 8:41 AM
To: 'Director of OGE'; Heather A. Jones; Keith Labeledz; David Maggi
Cc: Culvahouse Jr., Arthur B.; Schlom, Evan N.; Dorey, David R.; Sheehan, Matthew J.
Subject: RE: Ross divestiture information

Walt,

Your questions are understandable and highlight terminology issues as well as the difficulty in figuring out exactly how to describe the current status of various entities and assets. We hope this helps:

Rest of chain partially released above



From: [Kassinger, Theodore W.](#)
To: [Director of OGE](#); [Heather A. Jones](#); [Keith Labedz](#); [David Maggi](#); [Wilbur Ross](#); [Wendy Teramoto](#); [Culvahouse Jr., Arthur B.](#); [Schlom, Evan N.](#); [Dorey, David R.](#); [Sheehan, Matthew J.](#)
Subject: OGE/Commerce/OMM/WLR call

From: [Kassinger, Theodore W.](#)
To: [Director of OGE](#); [Heather A. Jones](#); [Keith Labedz](#); [David Maggi](#); [Wilbur Ross](#); [Wendy Teramoto](#); [Culvahouse Jr., Arthur B.](#); [Schlom, Evan N.](#); [Dorey, David R.](#); [Sheehan, Matthew J.](#)
Subject: OGE/Commerce/OMM/WLR call

From: [Keith Labeledz](#)
To: [Heather A. Jones](#)
Subject: RE: EA.docx
Date: Tuesday, January 10, 2017 9:22:05 AM

Looking through the highlighted document from OMM. (b) (5)

. I will keep looking.

From: Heather A. Jones
Sent: Tuesday, January 10, 2017 9:20 AM
To: Keith Labeledz
Subject: RE: EA.docx

Sounds like I plan. I will let Walt know.

From: Keith Labeledz
Sent: Monday, January 09, 2017 11:28 PM
To: Heather A. Jones
Subject: FW: EA.docx

I've finished an initial pass through draft 4. (b)(3), (5), (6)

From: Walter M. Shaub
Sent: Monday, January 09, 2017 9:02 PM
To: David Maggi (dMaggi@doc.gov)
Cc: Heather A. Jones; Keith Labeledz; Director of OGE
Subject: EA.docx

Attachment - 6 pages withheld in full - (b)(3), (5), (6)

David, please review this ethics agreement and contact us. Do not share it before we have spoken.

Thanks.

From: [Kassinger, Theodore W.](#)
To: [Keith Labeledz](#); [Schlom, Evan N.](#); "Maggi, David (Federal)"
Cc: [Dorey, David R.](#); "Jacobi, Will (Federal)"; "Williams, Gaye (Federal)"; "Warren, Arthur (Federal)"; "Jacob, Dana (Federal)"; [Deborah J. Bortot](#); [Heather A. Jones](#)
Subject: [GRAYMAIL] RE: Revised WLR 278
Date: Tuesday, January 10, 2017 8:00:17 AM

Thanks, Keith. We'll address these promptly.

From: Keith Labeledz [mailto:klabeledz@oge.gov]
Sent: Tuesday, January 10, 2017 12:30 AM
To: Schlom, Evan N.; Kassinger, Theodore W.; 'Maggi, David (Federal)'
Cc: Dorey, David R.; 'Jacobi, Will (Federal)'; 'Williams, Gaye (Federal)'; 'Warren, Arthur (Federal)'; 'Jacob, Dana (Federal)'; Deborah J. Bortot; Heather A. Jones
Subject: [WARNING : MESSAGE ENCRYPTED]RE: Revised WLR 278

Hello,

Attachment - 4 pages withheld in full - (b) (3), (5), (6)

Attached are my comments on draft 4 (as it appeared at 5:35 pm on 1/9).

Thank you.

Keith

From: Schlom, Evan N. [mailto:eschlom@omm.com]
Sent: Monday, January 09, 2017 2:47 PM
To: Keith Labeledz; Kassinger, Theodore W.; 'Maggi, David (Federal)'
Cc: Dorey, David R.; 'Jacobi, Will (Federal)'; 'Williams, Gaye (Federal)'; 'Warren, Arthur (Federal)'; 'Jacob, Dana (Federal)'; Deborah J. Bortot; Heather A. Jones
Subject: [GRAYMAIL] [WARNING : MESSAGE ENCRYPTED]RE: Revised WLR 278

Attachment - 10 pages withheld in full - (b)(3), (4), (5), (6)

Keith,

We have revised our SF 278 online in response to your notes and email comments. Attached is Word document containing the written responses and confirmations you asked for, highlighted in yellow.

Thanks,

Evan

From: Keith Labeledz [mailto:klabeledz@oge.gov]
Sent: Saturday, January 07, 2017 10:25 PM
To: Schlom, Evan N.; Kassinger, Theodore W.; 'Maggi, David (Federal)'
Cc: Dorey, David R.; 'Jacobi, Will (Federal)'; 'Williams, Gaye (Federal)'; 'Warren, Arthur (Federal)'; 'Jacob, Dana (Federal)'; Deborah J. Bortot; Heather A. Jones
Subject: RE: Revised WLR 278

Please see my responses in red below.

Thank you.

From: [Kassinger, Theodore W.](#)
To: [Director of OGE](#)
Cc: [Keith Labeledz](#); [Heather A. Jones](#)
Subject: RE: Ross Status Update
Date: Monday, January 09, 2017 8:43:02 PM

Walt,

We're about 30 minutes away. Apologies for the delay, but we worked through the assets and options again with Mr. Ross. As Keith pointed out, ^{(b)(4), (6)} [REDACTED] [REDACTED]. In addition to the highlighted document, we will send you a road map that we hope will make it much easier to navigate what is real and what is not.

We appreciate your work, and I hope we don't keep you up too late on this. (I expect you have others to keep you busy as well.)

Ted

**O'Melveny
Theodore W. Kassinger**

Partner

tkassinger@omm.com

O: +1-202-383-5170

M: ^{(b) (6)} [REDACTED]
O'Melveny & Myers LLP

1625 Eye Street, NW

Washington, DC 20006

[Website](#) | [LinkedIn](#) | [Twitter](#)

This message and any attached documents contain information from the law firm of O'Melveny & Myers LLP that may be confidential and/or privileged. If you are not the intended recipient, you may not read, copy, distribute, or use this information. If you have received this transmission in error, please notify the sender immediately by reply e-mail and then delete this message.

From: Director of OGE [mailto:director@oge.gov]
Sent: Monday, January 09, 2017 7:47 PM
To: Kassinger, Theodore W.; Director of OGE
Cc: Keith Labeledz; Heather A. Jones
Subject: RE: Ross Status Update

Ted,

We're working on the ethics agreement and report now. With regard to the list of assets he's

hoping to retain, do you anticipate being able to send it tonight? If so, can you give me a ballpark time when we can expect to see it?

Walt

Walter M. Shaub, Jr.

Director

U.S. Office of Government Ethics

1201 New York Avenue, NW, Suite 500

Washington, DC 20005-3917

Telephone: 202.482.9292

Email: walter.shaub@oge.gov

From: Kassinger, Theodore W. [<mailto:tkassinger@omm.com>]

Sent: Monday, January 09, 2017 12:02 PM

To: Director of OGE

Subject: RE: Ross Status Update

Thanks. Let's set 2:30pm. Should I circulate a dial in number again?

Ted

O'Melveny

Theodore W. Kassinger

Partner

tkassinger@omm.com

O: +1-202-383-5170

M: (b) (6)

O'Melveny & Myers LLP

1625 Eye Street, NW

Washington, DC 20006

[Website](#) | [LinkedIn](#) | [Twitter](#)

This message and any attached documents contain information from the law firm of O'Melveny & Myers LLP that may be confidential and/or privileged. If you are not the intended recipient, you may not read, copy, distribute, or use this information. If you have received this transmission in error, please notify the sender immediately by reply e-mail and then delete this message.

From: Director of OGE [<mailto:director@oge.gov>]
Sent: Monday, January 09, 2017 12:00 PM
To: Kassinger, Theodore W.
Subject: RE: Ross Status Update

Hello Mr. Kassinger,

This is Matt Marinec, Confidential Assistant to Director Shaub. We could do 2:30 pm or later.

Thank You,
Matt Marinec

Matthew Marinec, M.P.P.

Confidential Assistant to the Director

U.S. Office of Government Ethics

1201 New York Ave., NW, Suite 500

Washington, DC 20005-3917

Tel. 202.482.9286

Visit OGE's website: www.oge.gov

Follow OGE on Twitter: @OfficeGovEthics

From: Kassinger, Theodore W. [<mailto:tkassinger@omm.com>]
Sent: Monday, January 09, 2017 11:46 AM
To: Director of OGE; Heather A. Jones; Schlom, Evan N.; Dorey, David R.
Cc: David J. Apol; Deborah J. Bortot; Keith Labeledz; 'Maggi, David (Federal)'; 'Jacobi, Will (Federal)'; Culvahouse Jr., Arthur B.
Subject: RE: Ross Status Update

I cancelled the provisional noon call. Please advise if you are available at 2pm or after.

From: Kassinger, Theodore W.
Sent: Monday, January 09, 2017 9:46 AM
To: 'Director of OGE'; 'Heather A. Jones'; Schlom, Evan N.; Dorey, David R.
Cc: 'David J. Apol'; 'Deborah J. Bortot'; 'Keith Labeledz'; 'Maggi, David (Federal)'; 'Jacobi, Will (Federal)'; Culvahouse Jr., Arthur B.
Subject: RE: Ross Status Update

Walt,

Mr. Ross now must meet with Senator Duckworth at 1pm. He is available for a noon call if that frees up on your schedule. if not, 2:30pm or later.

Thank you.

Ted

From: Kassinger, Theodore W.
Sent: Sunday, January 08, 2017 10:57 PM
To: 'Director of OGE'; Heather A. Jones; Schlom, Evan N.; Dorey, David R.
Cc: David J. Apol; Deborah J. Bortot; Keith Labeledz; 'Maggi, David (Federal)'; 'Jacobi, Will (Federal)'; Culvahouse Jr., Arthur B.
Subject: RE: Ross Status Update

Walt,

Earlier emails flagged questions about the plans for divestitures. Mr. Ross asked me to provide you before the following call with the following information relating to the process by which he plans to sell his interests in (b)(3), (6).

(b) (4), (b) (5), (b) (6)

While you may not be able to discuss specific issues, he thought it would be good for you and colleagues to know the direction he is headed and if there are any particular considerations that he would need to take into account.

Thanks,

Ted

From: Director of OGE [<mailto:director@oge.gov>]
Sent: Sunday, January 08, 2017 9:56 PM
To: Kassinger, Theodore W.; Director of OGE; Heather A. Jones; Schlom, Evan N.; Dorey, David R.
Cc: David J. Apol; Deborah J. Bortot; Keith Labeledz; 'Maggi, David (Federal)'; 'Jacobi, Will (Federal)'; Culvahouse Jr., Arthur B.
Subject: RE: Ross Status Update

I'd be happy to talk to him. My morning is booked solid with meetings that would be hard to cancel at this point. I might be able to talk as early as 12:00. How about if we say 1:00 pm, and I'll shoot an email by mid-morning if I can clear 12:00? You'll have to warn him that I'm not going to be able to discuss any of the issues. I'm happy to listen, though. I've only had briefings on the various issues. I would not normally be involved until the report is closer to finished, but in light of the hearings schedule I'm getting involved earlier than I normally would. I'll be working to get familiar with his report in-depth tomorrow afternoon and Tuesday morning, as well as working on the other outstanding nominees we're trying to push across the finish line before the committees hold these hearings. I trust that you'll be on the line, too, when we talk.

Walt

Walter M. Shaub, Jr.

Director

U.S. Office of Government Ethics
1201 New York Avenue, NW, Suite 500
Washington, DC 20005-3917
Telephone: 202.482.9292

Email: walter.shaub@oge.gov

From: Kassinger, Theodore W. [<mailto:tkassinger@omm.com>]
Sent: Sunday, January 08, 2017 8:22 PM
To: Director of OGE; Heather A. Jones; Schlom, Evan N.; Dorey, David R.
Cc: David J. Apol; Deborah J. Bortot; Keith Labedz; 'Maggi, David (Federal)'; 'Jacobi, Will (Federal)'; Culvahouse Jr., Arthur B.
Subject: RE: Ross Status Update

Thanks for the additional information.

Mr. Ross would like personally to have a call with you tomorrow morning. Recognizing that you might not have had time to review the next draft of the report, I nevertheless believe it would be a very good use of time for him to convey his thinking on some of the high level issues you raise about divestiture plans and the details of his separation, for example, and to hear your thoughts. That discussion is likely to speed up the process.

Please let me know if you are available for a call.

Thanks,

Ted

From: Director of OGE [<mailto:director@oge.gov>]
Sent: Sunday, January 08, 2017 7:50 PM
To: Heather A. Jones; Kassinger, Theodore W.; Schlom, Evan N.; Dorey, David R.
Cc: Director of OGE; David J. Apol; Deborah J. Bortot; Keith Labedz; 'Maggi, David (Federal)'; 'Jacobi, Will (Federal)'; Culvahouse Jr., Arthur B.
Subject: RE: Ross Status Update

Thanks for the response.

We will definitely need him to make a written request for the name change.

We will also need the details of the separation, as well as either the written policy on

(b)(5), (6)



I'm not sure what you mean by "straightforward" divestiture plan. If he has (b)(3), (6)

how will he eliminate those?

(b)(5), (6)

We'd like to look over the next draft of the report and the responses to the questions before scheduling a time to talk. Talking before we're up to speed on the changes and responses could cause delays. We're trying to keep this moving forward as fast as possible.

Walt

Walter M. Shaub, Jr.

Director

U.S. Office of Government Ethics

1201 New York Avenue, NW, Suite 500

Washington, DC 20005-3917

Telephone: 202.482.9292

Email: walter.shaub@oge.gov

From: Heather A. Jones

Sent: Sunday, January 08, 2017 7:17 PM

To: Kassinger, Theodore W.; Schlom, Evan N.; Dorey, David R.

Cc: Director of OGE; David J. Apol; Deborah J. Bortot; Keith Labeledz; 'Maggi, David (Federal)'; 'Jacobi, Will (Federal)'; Culvahouse Jr., Arthur B.

Subject: Re: Ross Status Update

Regarding the name issue, I just want to highlight that this has been a sticky issue with Senate committees in the past, (b)(4), (6). We typically ask that the filer make a formal written request to remove their name from the business and provide us with a copy of that request.

In addition, there are statutory limitations on a company using a public official's name to advertise if that business practices before the government. (b)(5), (b)(6)

Regarding the call, I will check with the team.

Best,

Heather

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

From: Kassinger, Theodore W.

Sent: Sunday, January 8, 2017 6:27 PM

To: Heather A. Jones; Schlom, Evan N.; Dorey, David R.

Cc: Director of OGE; David J. Apol; Deborah J. Bortot; Keith Labeledz; 'Maggi, David (Federal)'; 'Jacobi, Will (Federal)'; Culvahouse Jr., Arthur B.

Subject: RE: Ross Status Update

Thanks, Heather.

We appreciate the attention that Keith, David and his Commerce team, you and others at OGE are giving to the financial disclosure report and ethics agreement.

We are close to finalizing responses to the questions and comments that Keith sent yesterday. I note that a large number of those are requests for confirmations or clarifications, or details such as missing dates.

The terms of Mr. Ross' separation from (b) (3), (b) (6) will be quite straightforward and consistent with company precedent. Similarly, his divestiture plan will be straightforward.

Regarding use of the company name, (b) (4), (b) (6)

Please advise what documentation you need, if any, regarding that question.

We will alert you when the revised report is submitted. I suggest that we have a call tomorrow to go over where things stand and the path forward. Is there a time tomorrow morning that works for you?

Thanks,

Ted Kassinger

**O'Melveny
Theodore W. Kassinger**

Partner

tkassinger@omm.com

O: +1-202-383-5170

M: (b) (6)
O'Melveny & Myers LLP

1625 Eye Street, NW

Washington, DC 20006

[Website](#) | [LinkedIn](#) | [Twitter](#)

This message and any attached documents contain information from the law firm of O'Melveny & Myers LLP that may be confidential and/or privileged. If you are not the intended recipient, you may not read, copy, distribute, or use this information. If you have received this transmission in error, please notify the sender immediately by reply e-mail and then delete this message.

From: Heather A. Jones [<mailto:hajones@oge.gov>]
Sent: Sunday, January 08, 2017 5:02 PM
To: Kassinger, Theodore W.; Schlom, Evan N.; Dorey, David R.
Cc: Director of OGE; David J. Apol; Deborah J. Bortot; Keith Labedz; 'Maggi, David (Federal)'; 'Jacobi, Will (Federal)'
Subject: Ross Status Update

Here's where things stand on Mr. Ross's report.

OGE is waiting for responses to the roughly 7 pages of outstanding questions that Keith sent yesterday afternoon. These questions address the new draft that we received Friday afternoon.

Although Commerce has drafted some language for an ethics agreement, OGE has not signed off on that language. We will be sending a revised draft to ensure that the ethics agreement tracks the standard language and is consistent with the ethics agreement guide, but we need to wait until the outstanding questions on the report are answered.

Given the size of the report, it's fair to estimate that we're weeks ahead of schedule compared to where we would normally expect to be. We're going to keep pressing forward as fast as possible, but we need to stay focused. It's premature to focus on the ethics agreement until he has disclosed his assets. If we stray from the normal approach, we'll wind up facing unnecessary delays. For now, the best approach is for the filer to focus on answering Keith's questions.

The filer can also work on figuring out the arrangements for how he will divest the (b)(5),(6)

(b)(5)
OGE will need to understand the approach, be satisfied that the approach is feasible, and be sure that it fully resolves 18 U.S.C. § 208. But we understand the nature of his assets and arrangements.

We also need to discuss what (b)(3), (6) he'll retain, as well as any (b)(3), (6). OGE needs to sign off on these things, as well.

There is also work to be done to evaluate 5 C.F.R. § 2635.503 and 18 U.S.C. § 209 in connection with the (b)(5), (6) (And possibly (b)(3), (b)(6)), but we need clarification as to what these are.) We need to see a written policy or evidence of a consistent practice that has been applied to individuals not going into government. That's something else the filer should be focusing on at this time.

Under 5 U.S.C. app. § 502, he cannot permit (b)(3), (b)(6) to continue using his name. We would accept the use of his initials, as long as the (b)(3), (6) no longer use his name.

Heather Jones

(202) 482-9316

Office of Government Ethics

Visit OGE's website: www.oge.gov

Follow OGE on Twitter: @OfficeGovEthics

OGE Confidential Notice: This email, including all attachments, may constitute a Federal record or other Government property that is intended only for the use of the individual or entity to which it is addressed. This email also may contain information that is privileged, confidential, or otherwise protected from disclosure under applicable law. If you are not the intended recipient or the employee or agent responsible for delivering the transmission to the intended recipient, you are hereby notified that any dissemination, distribution, copying or use of this email or its contents is strictly prohibited. If you have received this email in error, please notify the sender by responding to the email and then immediately delete the email.

OGE Confidential Notice: This email, including all attachments, may constitute a Federal record or other Government property that is intended only for the use of the individual or entity to which it is addressed. This email also may contain information that is privileged, confidential, or otherwise protected from disclosure under applicable law. If you are not the intended recipient or the employee or agent responsible for delivering the transmission to the intended recipient, you are hereby notified that any dissemination, distribution, copying or use of this email or its contents is strictly prohibited. If you have received this email in error, please notify the sender by responding to the email and then immediately delete the email.

OGE Confidential Notice: This email, including all attachments, may constitute a Federal record or other Government property that is intended only for the use of the individual or entity to which it is addressed. This email also may contain information that is privileged, confidential, or otherwise protected from disclosure under applicable law. If you are not the intended recipient or the employee or agent responsible for delivering the transmission to the intended recipient, you are hereby notified that any dissemination, distribution, copying or use of this email or its contents is strictly prohibited. If you have received this email in error, please notify the sender by responding to the email and then immediately delete the email.

OGE Confidential Notice: This email, including all attachments, may constitute a Federal record or other Government property that is intended only for the use of the individual or entity to which it is addressed. This email also may contain information that is privileged, confidential, or otherwise protected from disclosure under applicable law. If you are not the intended recipient or the employee or agent responsible for delivering the transmission to the intended recipient, you are hereby notified that any dissemination, distribution, copying or use of this email or its contents is strictly prohibited. If you have received this email in error, please notify the sender by responding to the email and then immediately delete the email.

OGE Confidential Notice: This email, including all attachments, may constitute a Federal record or other Government property that is intended only for the use of the individual or entity to which it is addressed. This email also may contain information that is privileged, confidential, or otherwise protected from disclosure under applicable law. If you are not the intended recipient or the employee or agent responsible for delivering the transmission to the intended recipient, you are hereby notified that any dissemination, distribution, copying or use of this email or its contents is strictly prohibited. If you have received this email in error, please notify the sender by responding to the email and then immediately delete the email.

From: [Keith Labedz](#)
To: [Heather A. Jones](#)
Subject: EA - Positions
Date: Monday, January 09, 2017 5:18:36 PM

With respect to the positions, note that (b) (5) [REDACTED]
[REDACTED]. I've noted that the (b) (5) [REDACTED]
[REDACTED]. My sense is that (b) (5) [REDACTED]
[REDACTED]

From: [Keith Labeledz](#)
To: ["Schlom, Evan N."](#)
Cc: ["Kassinger, Theodore W."](#)
Subject: RE: Revised WLR 278
Date: Monday, January 09, 2017 4:30:13 PM

Ok. One global comment that I will have on this draft is that we will need the dates for Part 3 and the (b)(3), (6) for Part 8. Also, if these (b)(3), (6) you may want to note that.

In addition:

* We will need the (b)(3), (6) reported in Part 3 even if (b)(3), (6). I would just say the (b)(3), (6).

* The (b)(3), (6) should be added to Part 2 and Part 3. The Public Financial Disclosure Guide has sample entries for both.

* It appears the (b)(3), (6) has been removed. Is that correct?

I will send my full comments as soon as possible.

Thank you.

Keith

From: Schlom, Evan N. [mailto:eschlom@omm.com]
Sent: Monday, January 09, 2017 4:09 PM
To: Keith Labeledz
Cc: Kassinger, Theodore W.
Subject: [GRAYMAIL] RE: Revised WLR 278

Keith,

I just edited Part 2 of the form to address the (b)(3), (6) question discussed on the phone a few minutes ago. The edit I previously made did not save properly.

Thanks,

Evan

From: Keith Labeledz [mailto:klabeledz@oge.gov]

Sent: Saturday, January 07, 2017 10:25 PM

To: Schlom, Evan N.; Kassinger, Theodore W.; 'Maggi, David (Federal)'

Cc: Dorey, David R.; 'Jacobi, Will (Federal)'; 'Williams, Gaye (Federal)'; 'Warren, Arthur (Federal)'; 'Jacob, Dana (Federal)'; Deborah J. Bortot; Heather A. Jones

Subject: RE: Revised WLR 278

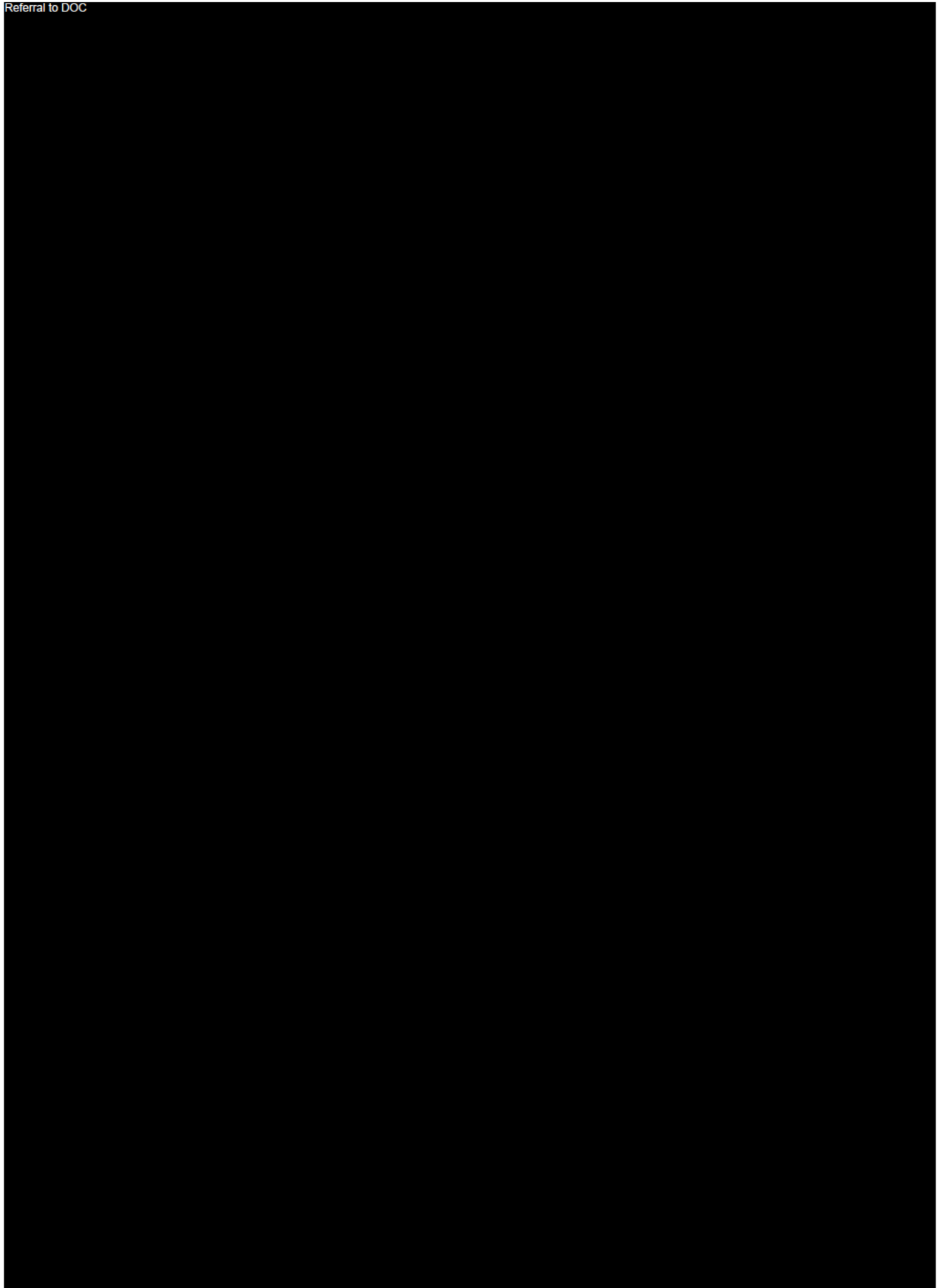
Please see my responses in red below.

Thank you.

Keith

Rest of chain partially released above





From: [Kassinger, Theodore W.](#)
To: [Director of OGE](#); [Heather A. Jones](#); [Deborah J. Bortot](#); [Keith Labeledz](#); [David Maggi](#); [Wilbur Ross](#); [Culvahouse Jr., Arthur B.](#); [Wendy Teramoto](#); [Schlom, Evan N.](#); [Sheehan, Matthew J.](#); [Dorey, David R.](#)
Subject: Telephone conference with Mssrs. Shaub, Ross, OGE, Commerce, OMM teams

From: [Heather A. Jones](#) on behalf of [Kassinger, Theodore W.](#)
To: [Keith Labedz](#); [Director of OGE](#); [Heather A. Jones](#); [Deborah J. Bortot](#); [David Maggi](#); [Wilbur Ross](#); [Culvahouse Jr., Arthur B.](#); [Wendy Teramoto](#); [Schlom, Evan N.](#); [Sheehan, Matthew J.](#); [Dorey, David R.](#)
Subject: Fw: Telephone conference with Mssrs. Shaub, Ross, OGE, Commerce, OMM teams

I think we are going to try to push this to 3

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

From: Kassinger, Theodore W. <tkassinger@omm.com>

Sent: Monday, January 9, 2017 12:12 PM

To: Director of OGE; Heather A. Jones; Deborah J. Bortot; Keith Labedz; David Maggi; Wilbur Ross; Culvahouse Jr., Arthur B.; Wendy Teramoto; Schlom, Evan N.; Sheehan, Matthew J.; Dorey, David R.

Subject: Telephone conference with Mssrs. Shaub, Ross, OGE, Commerce, OMM teams

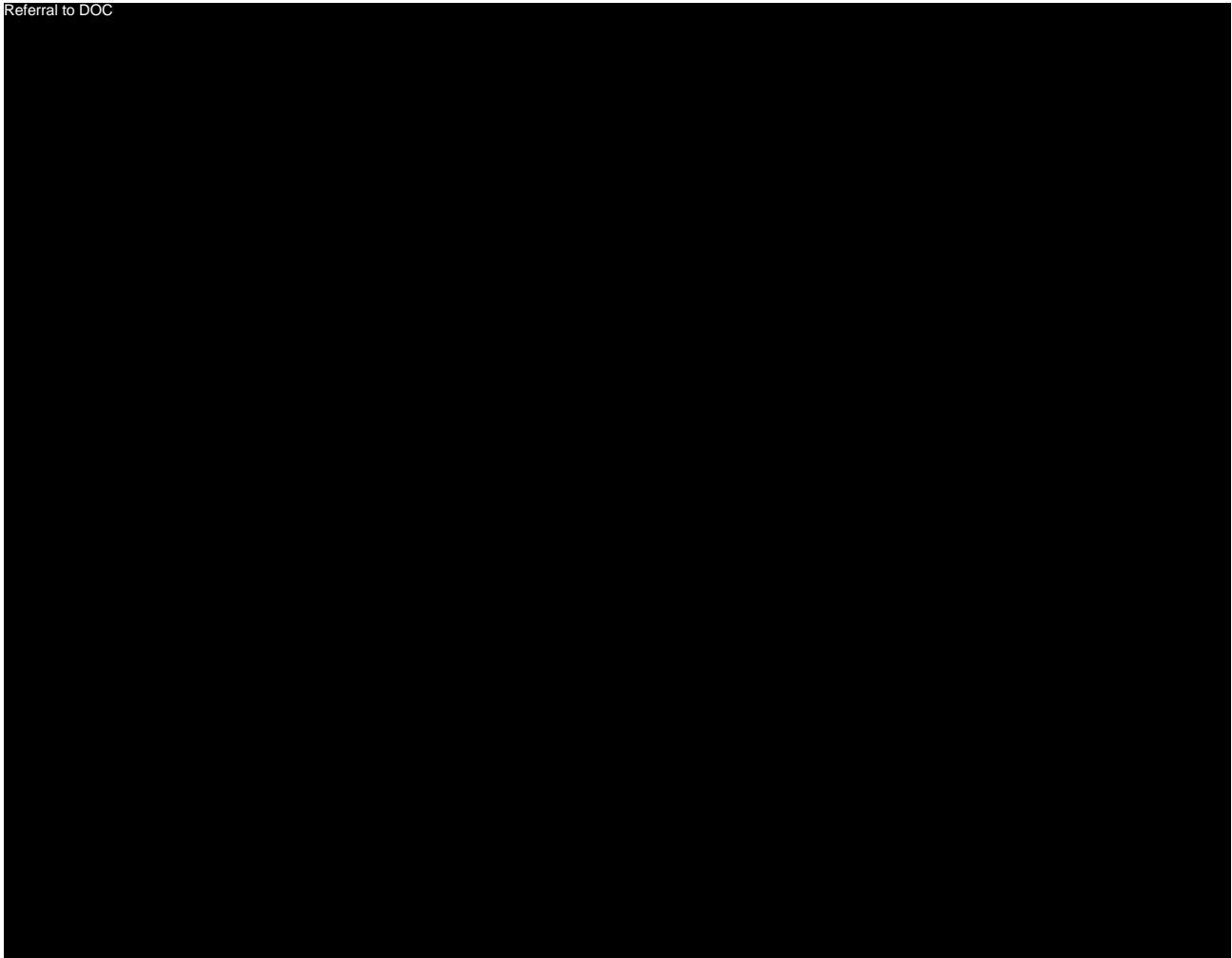
From: [Walter M. Shaub](#)
To: ["Maggi, David \(Federal\)"; David J. Apol](#)
Cc: [Keith Labedz](#); [Warren, Arthur \(Federal\)](#); [Jacobi, Will \(Federal\)](#); [Jacob, Dana \(Federal\)](#)
Subject: RE: Analysis of Recusals for Mr. Ross
Date: Monday, January 09, 2017 2:06:13 PM
Attachments: [image001.png](#)

Just send it as an attachment. Here's what I get when I click on the link: "The system you have attempted to reach is for restricted use only and is not permitted from your source address."

Walter M. Shaub, Jr.
Director
U.S. Office of Government Ethics
1201 New York Avenue, NW, Suite 500
Washington, DC 20005-3917

Telephone: 202.482.9292
Email: walter.shaub@oge.gov

Referral to DOC



From: Kassinger, Theodore W. [mailto:tkassinger@omm.com]
Sent: Monday, January 09, 2017 12:01 PM
To: 'Director of OGE'; 'Heather A. Jones'; Schlom, Evan N.; Dorey, David R.
Cc: 'David J. Apol'; 'Deborah J. Bortot'; 'Keith Labedz'; Maggi, David (Federal); Jacobi, Will (Federal); Culvahouse Jr., Arthur B.
Subject: RE: Ross Status Update

Attachment - 2 pages withheld in full - (b)(4)

Walt and OGE/Commerce teams -

Mr. Ross also asked that I forward the attached letter from (b) (3), (b) (6) that outlines the (b)(3), (6), so that you would be aware of the work on that item identified as among those to be addressed.

Thanks,
Ted

From: Kassinger, Theodore W.
Sent: Sunday, January 08, 2017 10:57 PM
To: 'Director of OGE'; Heather A. Jones; Schlom, Evan N.; Dorey, David R.
Cc: David J. Apol; Deborah J. Bortot; Keith Labedz; Maggi, David (Federal); Jacobi, Will (Federal); Culvahouse Jr., Arthur B.
Subject: RE: Ross Status Update

Walt,

Earlier emails flagged questions about the plans for divestitures. Mr. Ross asked me to provide you before the following call with the following information relating to the process by which he plans to sell his interests in (b)(3), (6).

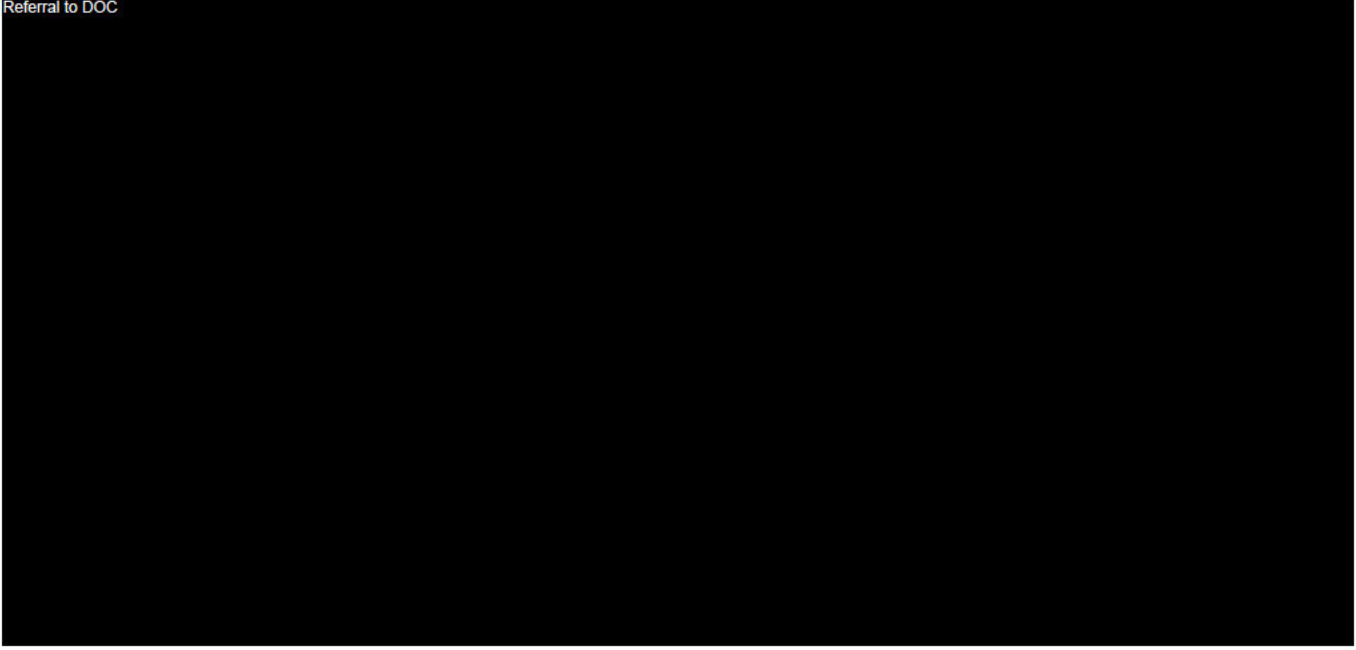
(b) (4), (b) (5), (b) (6)

While you may not be able to discuss specific issues, he thought it would be good for you and colleagues to know the direction he is headed and if there are any particular considerations that he would need to take into account.

Thanks,
Ted

From: [Kassinger, Theodore W.](#)
To: [Director of OGE](#); [Heather A. Jones](#); [Deborah J. Bortot](#); [Keith Labeledz](#); [David Maggi](#); [Wilbur Ross](#); [Culvahouse Jr., Arthur B.](#); [Wendy Teramoto](#); [Schlom, Evan N.](#); [Sheehan, Matthew J.](#); [Dorey, David R.](#)
Subject: Telephone conference with Mssrs. Shaub, Ross, OGE, Commerce, OMM teams

Referral to DOC



From: Kassinger, Theodore W. [mailto:tkassinger@omm.com]

Sent: Monday, January 09, 2017 9:45 AM

To: 'Director of OGE' ; 'Heather A. Jones' ; Schlom, Evan N. ; Dorey, David R.

Cc: 'David J. Apol' ; 'Deborah J. Bortot' ; 'Keith Labeledz' ; Maggi, David (Federal) ; Jacobi, Will (Federal) ; Culvahouse Jr., Arthur B.

Subject: RE: Ross Status Update

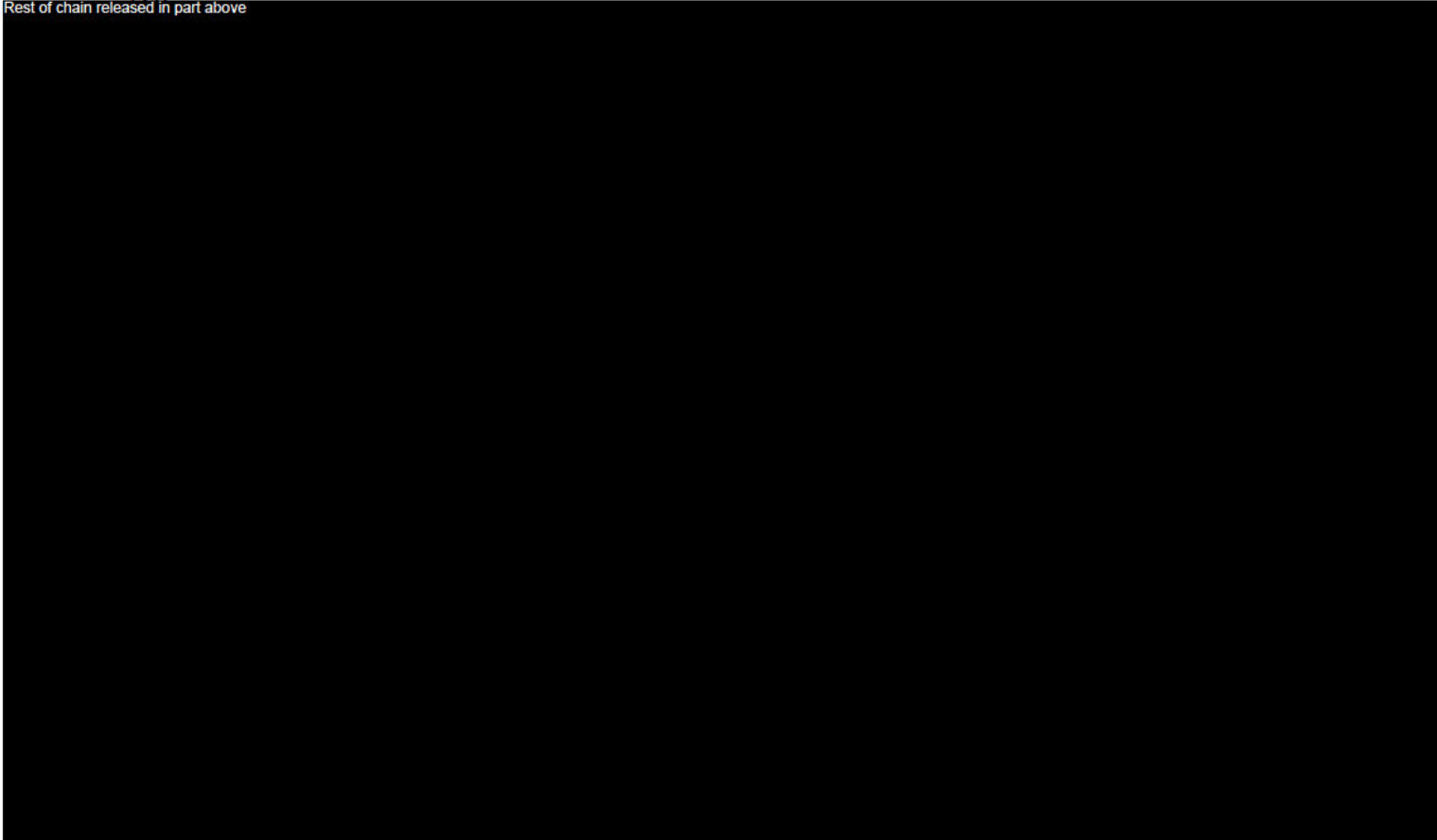
Walt,

Mr. Ross now must meet with Senator Duckworth at 1pm. He is available for a noon call if that frees up on your schedule. if not, 2:30pm or later.

Thank you.

Ted

Rest of chain released in part above



From: [Keith Labeledz](#)
To: [Heather A. Jones](#)
Subject: FW: EA
Date: Monday, January 09, 2017 9:25:08 AM

FYI -- Also, I'm doing a preliminary review and it looks like some changes are substantive.

(b)

(5)

(b)

(6)

From: Keith Labeledz
Sent: Monday, January 09, 2017 8:35 AM
To: Director of OGE; Deborah J. Bortot
Subject: RE: EA

Note: I have not received word a new draft is ready, but it appears the version in Integrity this morning is 10 pages longer than the Saturday morning version (mostly endnotes).

From: Director of OGE
Sent: Sunday, January 08, 2017 10:29 PM
To: Keith Labeledz; Deborah J. Bortot
Subject: EA

(b) (5)

thinking as to

(b) (5)

My

From: [Kassinger, Theodore W.](#)
To: [Director of OGE](#)
Cc: [Heather A. Jones](#); [Schlom, Evan N.](#); [Dorey, David R.](#); [David J. Apol](#); [Deborah J. Bortot](#); [Keith Labeledz](#); [Maggi, David \(Federal\)](#); [Jacobi, Will \(Federal\)](#); [Culvahouse Jr., Arthur B.](#)
Subject: Re: Ross Status Update
Date: Sunday, January 08, 2017 10:39:39 PM

Thanks. 1pm it is, though if earlier works for you, let me know and I'll see if Mr. Ross can do that.

Here is a dial-in number: (b) (6)

Ted

On Jan 8, 2017, at 9:56 PM, "Director of OGE" <director@oge.gov> wrote:

I'd be happy to talk to him. My morning is booked solid with meetings that would be hard to cancel at this point. I might be able to talk as early as 12:00. How about if we say 1:00 pm, and I'll shoot an email by mid-morning if I can clear 12:00? You'll have to warn him that I'm not going to be able to discuss any of the issues. I'm happy to listen, though. I've only had briefings on the various issues. I would not normally be involved until the report is closer to finished, but in light of the hearings schedule I'm getting involved earlier than I normally would. I'll be working to get familiar with his report in-depth tomorrow afternoon and Tuesday morning, as well as working on the other outstanding nominees we're trying to push across the finish line before the committees hold these hearings. I trust that you'll be on the line, too, when we talk.

Walt

Walter M. Shaub, Jr.

Director

U.S. Office of Government Ethics

1201 New York Avenue, NW, Suite 500

Washington, DC 20005-3917

Telephone: 202.482.9292

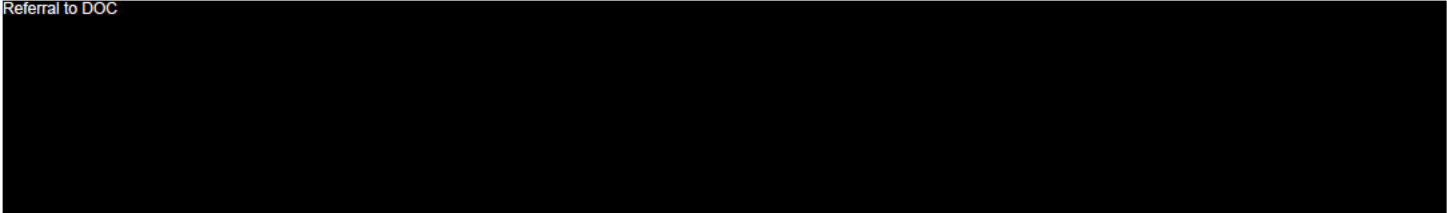
Email: walter.schaub@oge.gov

Rest of chain released in part above



From: [Deborah J. Bortot](#)
To: [Keith Labedz](#); [Heather A. Jones](#)
Subject: FW: Updated Ethics Agreement Attachments
Date: Sunday, January 08, 2017 4:18:21 PM

Referral to DOC



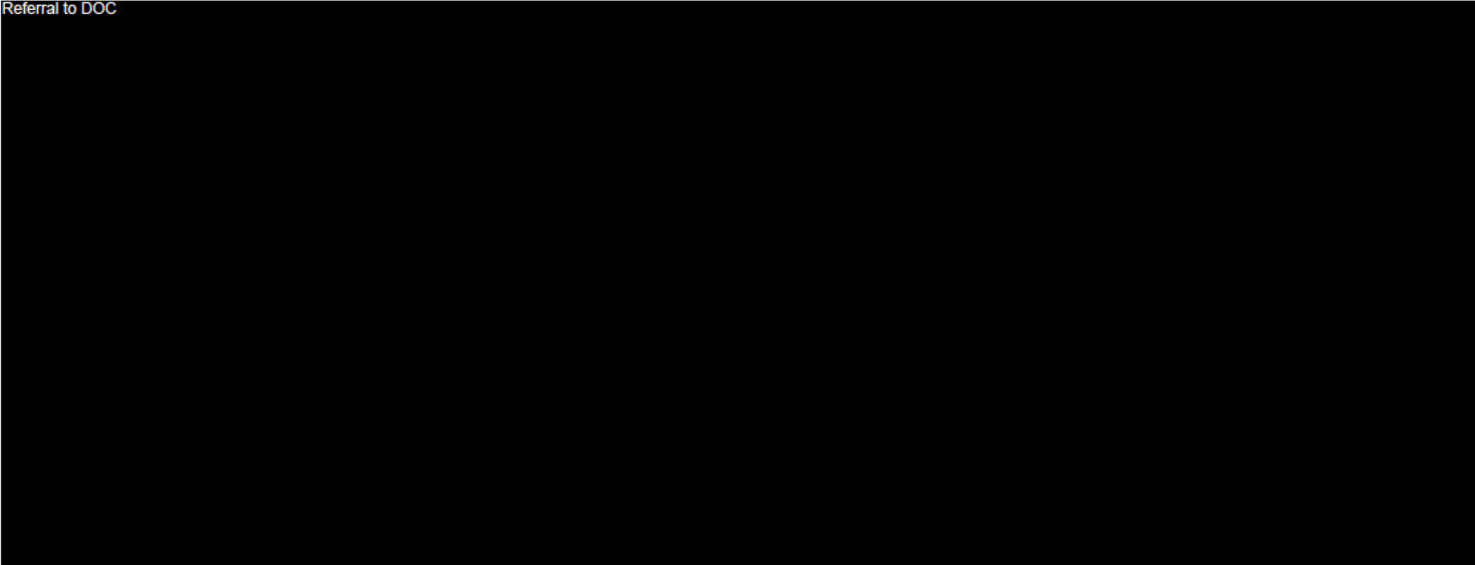
On Jan 8, 2017, at 3:23 PM, Deborah J. Bortot <djbortot@oge.gov> wrote:

David,

I'm not sure this is correct. We have issued CDs for (b)(3), (6) before. I wouldn't say no to this until OGE and Commerce are on the same page.

Thanks,
Deb

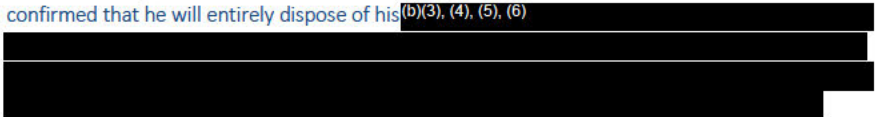
Referral to DOC



On Jan 7, 2017, at 5:48 PM, Kassinger, Theodore W. <tkassinger@omm.com> wrote:


Thanks, David. We really appreciate everyone's work.

We'll revert asap with comments. Based on a call with Mr. Ross this afternoon, we have confirmed that he will entirely dispose of his (b)(3), (4), (5), (6)

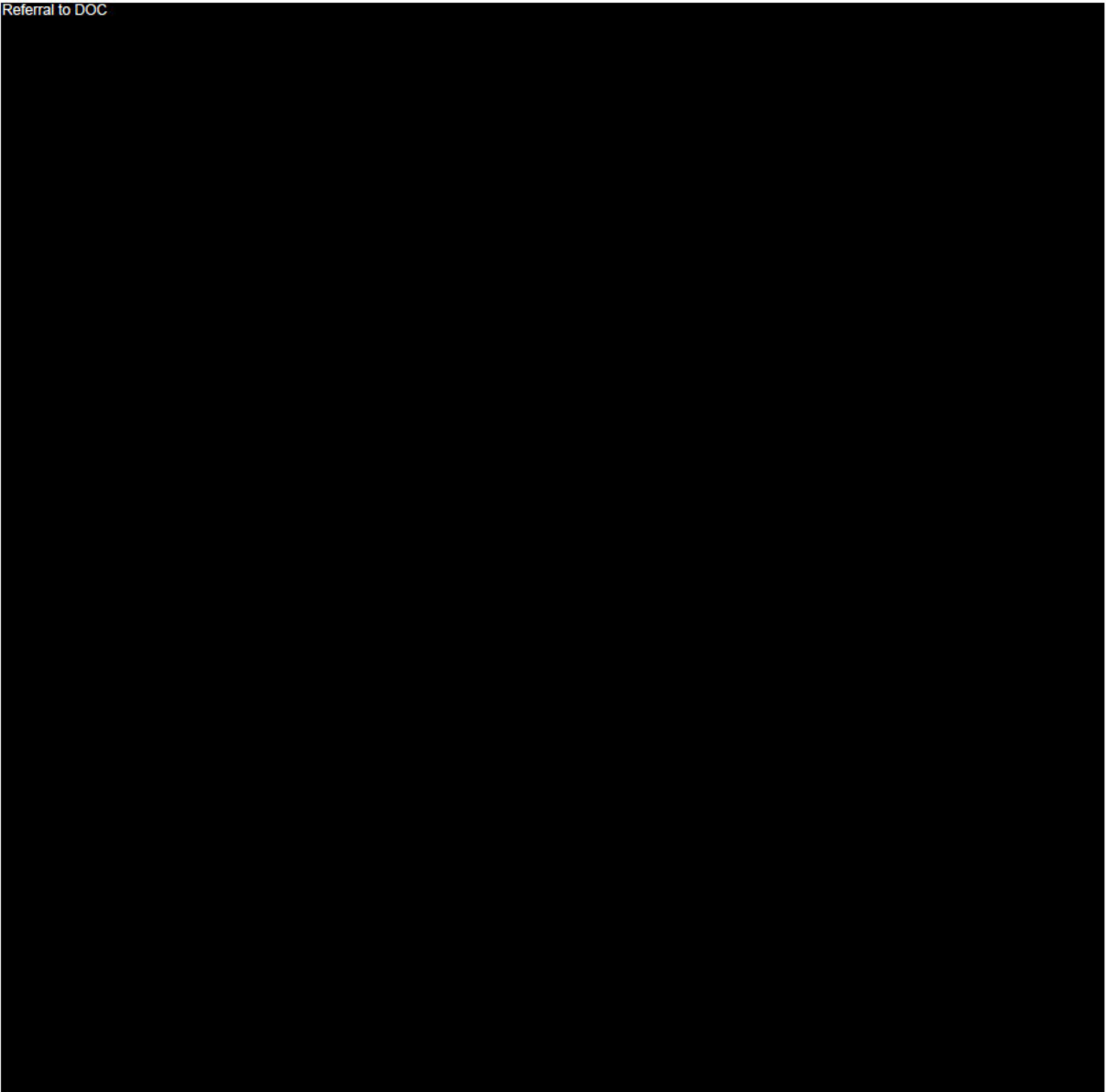


Ted

Referral to DOC



Referral to DOC



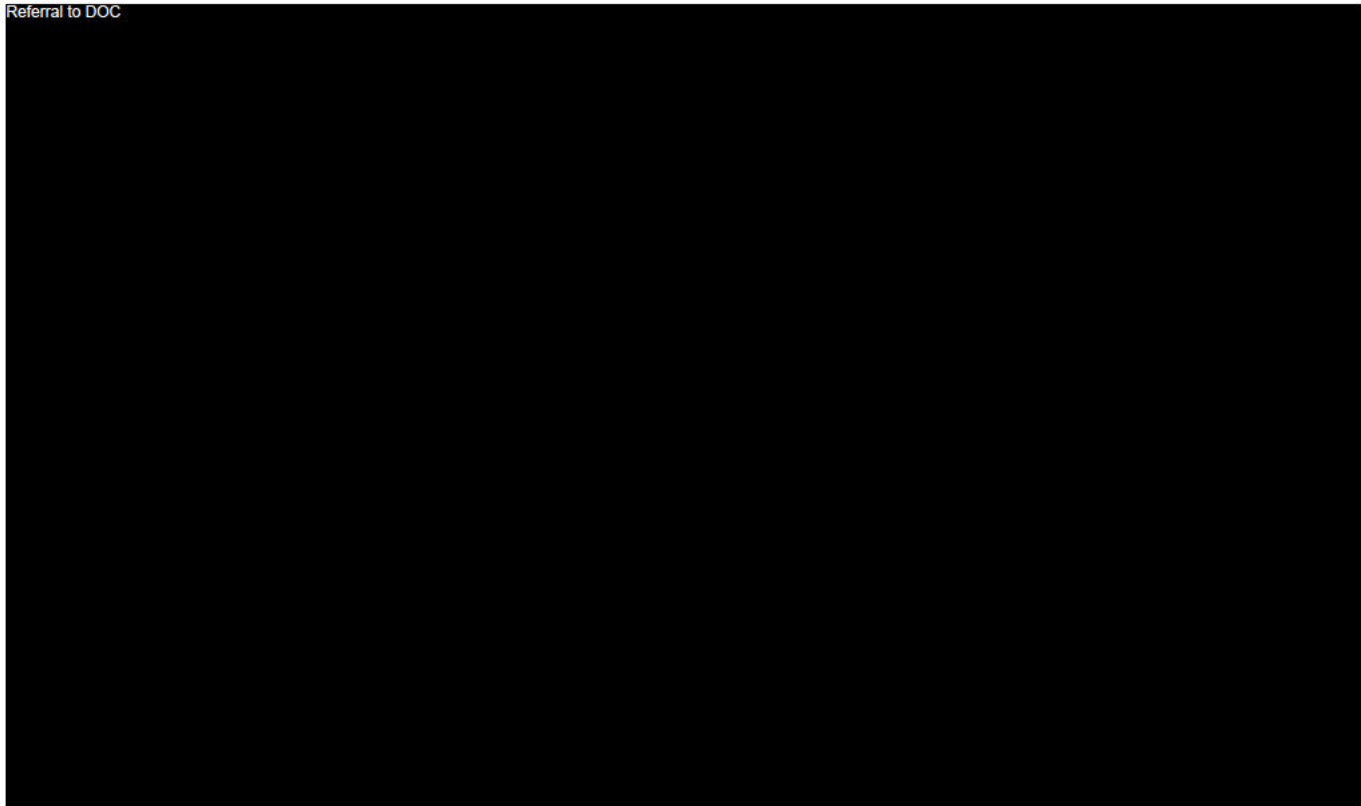
Secured by [Accellion](#)

OGE Confidential Notice: This email, including all attachments, may constitute a Federal record or other Government property that is intended only for the use of the individual or entity to which it is addressed. This email also may contain information that is privileged, confidential, or otherwise protected from disclosure under applicable law. If you are not the intended recipient or the employee or agent responsible for delivering the transmission to the intended recipient, you are hereby notified that any dissemination, distribution, copying or use of this email or its contents is strictly prohibited. If you have received this email in error, please notify the sender by responding to the email and then immediately delete the email.

From: [Kassinger, Theodore W.](#)
To: ["Maggi, David \(Federal\)"](#)
Cc: [Keith Labedz](#); [Warren, Arthur \(Federal\)](#); [Jacobi, Will \(Federal\)](#); [Jacob, Dana \(Federal\)](#); [Williams, Gave \(Federal\)](#); [Dorey, David R.](#); [Schlom, Evan N.](#); [Deborah J. Bortot](#); [Heather A. Jones](#)
Subject: RE: Updated Ethics Agreement Attachments
Date: Sunday, January 08, 2017 12:54:31 PM

Understood, thanks.

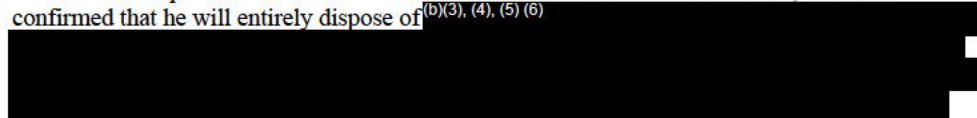
Referral to DOC



On Jan 7, 2017, at 5:48 PM, Kassinger, Theodore W. <tkassinger@omm.com> wrote:

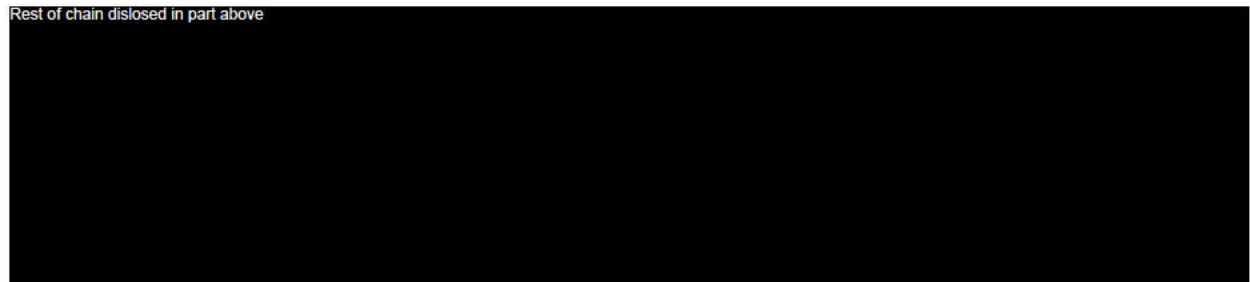
Thanks, David. We really appreciate everyone's work.

We'll revert asap with comments. Based on a call with Mr. Ross this afternoon, we have confirmed that he will entirely dispose of ^{(b)(3), (4), (5) (6)}



Ted

Rest of chain disclosed in part above

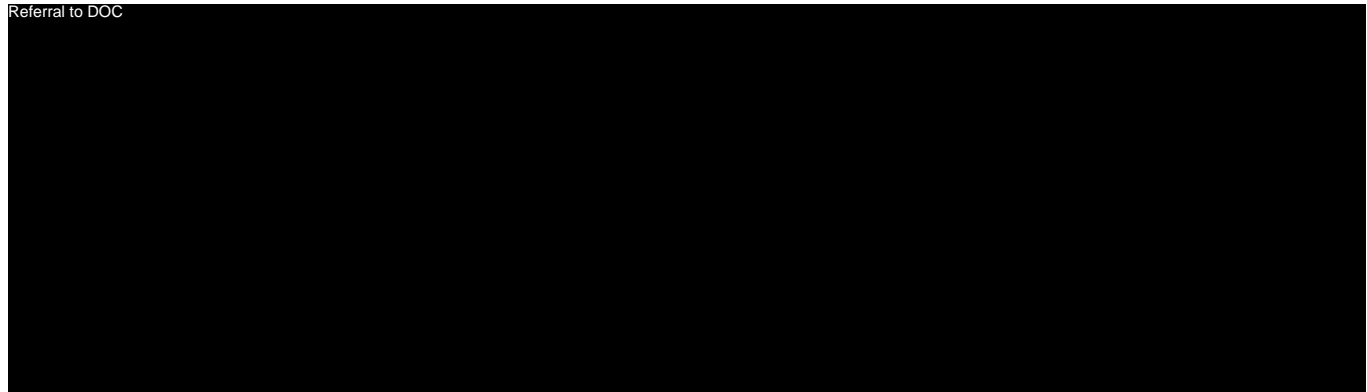


From: [Deborah J. Bortot](#)
To: [Keith Labedz](#); [Heather A. Jones](#); [David J. Apol](#); [Director of OGE](#)
Subject: 3:00 call-in number
Date: Sunday, January 08, 2017 11:54:21 AM

Time: 3:00 today (1/8)

Call-in Number: (b) (6)

Participant Code: Non-responsive



On Jan 8, 2017, at 10:56 AM, Deborah J. Bortot <djbortot@oge.gov> wrote:

David,

I understand that the representative is planning to (b) (5) . Please

(b) (5)

Thanks,
Deb

From: Keith Labeledz
Sent: Sunday, January 08, 2017 10:46 AM
To: Deborah J. Bortot
Subject: RE: call at 3:00

Yes. I worked until after 10:00 last night tracking the EA against 278. (b)(3), (5), (6)

(b)(3), (5), (6)

In addition, (b)(3), (5), (6)

I am also still waiting on the responses to the round 3 questions, which may take me into Monday to digest.

I also see that they are planning to (b) (5)

(b)(3), (5), (6)

From: Deborah J. Bortot
Sent: Sunday, January 08, 2017 10:07 AM
To: Keith Labeledz
Subject: call at 3:00

Keith,

Are you available for a call at 3:00 today with Walt, Heather, Dave Apol, and me?

Thanks,
Deb

OGE Confidential Notice: This email, including all attachments, may constitute a Federal record or other Government property that is intended only for the use of the individual or entity to which it is addressed. This email also may contain information that is privileged, confidential, or otherwise protected from disclosure under applicable law. If you are not the intended recipient or the employee or agent responsible for delivering the transmission to the intended recipient, you are hereby notified that any dissemination, distribution, copying or use of this email or its contents is strictly prohibited. If you have received this email in error, please notify the sender by responding to the email and then immediately delete the email.

From: [Deborah J. Bortot](#)
To: [Keith Labeledz](#)
Cc: [Heather A. Jones](#); [David J. Apol](#)
Subject: RE: call at 3:00
Date: Sunday, January 08, 2017 10:51:41 AM

Thanks Keith. Do you know why the reps want to (b) (5) I'm going to send David Maggi a message now (b) (5).

From: Keith Labeledz
Sent: Sunday, January 08, 2017 10:46 AM
To: Deborah J. Bortot
Subject: RE: call at 3:00

Yes. I worked until after 10:00 last night tracking the EA against 278. (b)(3), (5), (6)
In addition, (b)(3), (5), (6).

I am also still waiting on the responses to the round 3 questions, which may take me into Monday to digest.

I also see that they are planning to (b) (5).

From: Deborah J. Bortot
Sent: Sunday, January 08, 2017 10:07 AM
To: Keith Labeledz
Subject: call at 3:00

Keith,

Are you available for a call at 3:00 today with Walt, Heather, Dave Apol, and me?

Thanks,
Deb

From: [Keith Labeledz](#)
To: [Walter M. Shaub](#)
Cc: [Director of OGE](#)
Subject: RE: question
Date: Sunday, January 08, 2017 10:50:44 AM

I've replied to Deb about a subsequent 3:00 appointment request.

From: Walter M. Shaub
Sent: Saturday, January 07, 2017 11:55 PM
To: Keith Labeledz
Cc: Director of OGE
Subject: RE: question

[Reply to this message instead](#)

From: Walter M. Shaub
Sent: Saturday, January 07, 2017 11:54 PM
To: Keith Labeledz
Subject: question

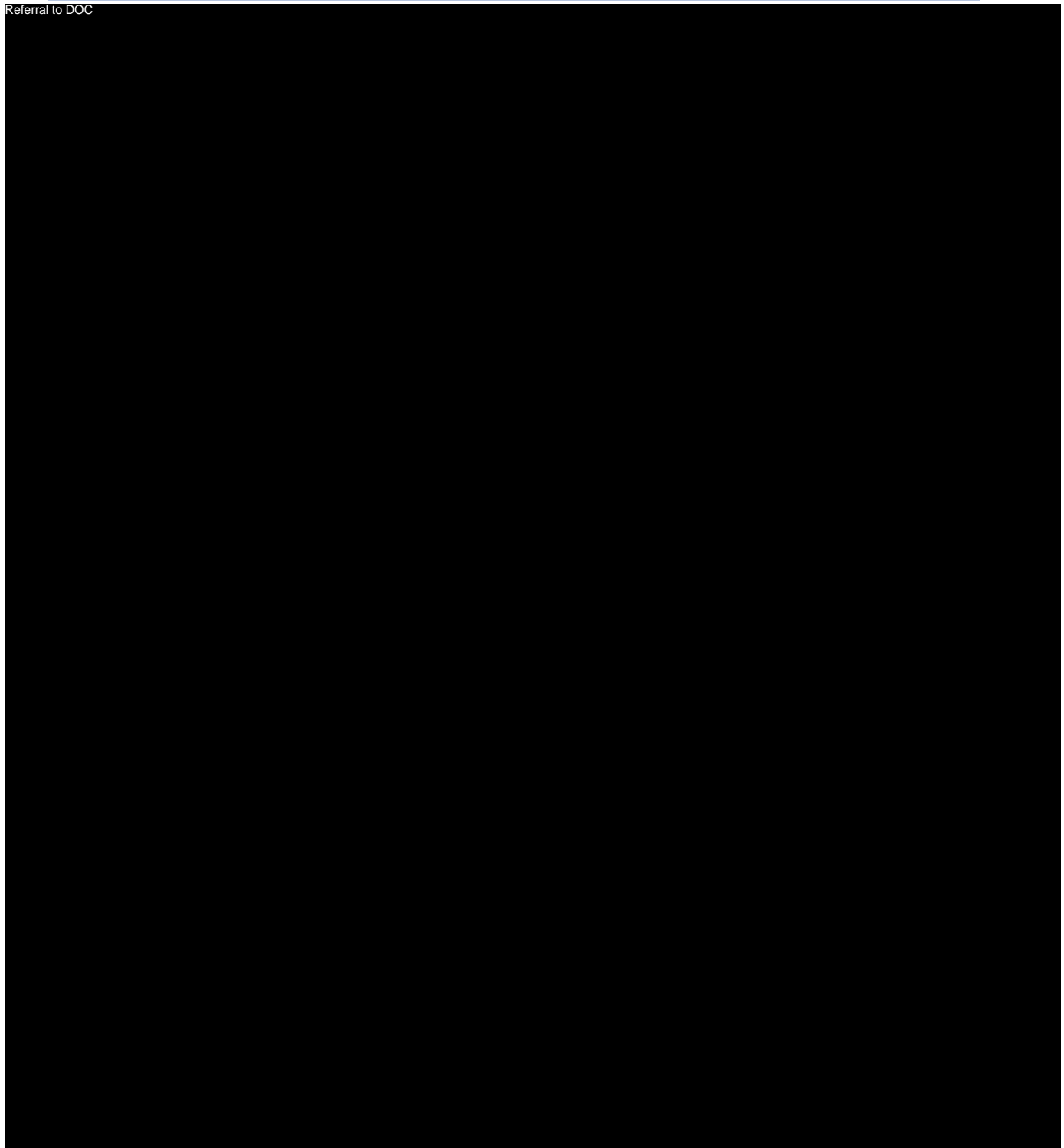
Keith, If you get this, would you have any time for a quick call either at 10:30 Eastern tomorrow morning or any time after 3:30 pm?

From: [Keith Labedz](#)
To: "[Maggi, David \(Federal\)](#)"; [Walter M. Shaub](#)
Cc: [Warren, Arthur \(Federal\)](#); [Williams, Gaye \(Federal\)](#); [Jacob, Dana \(Federal\)](#); [Jacobi, Will \(Federal\)](#); [Smith, Pamela \(Federal\)](#)
Subject: RE: Call tomorrow
Date: Sunday, January 08, 2017 10:48:27 AM

(b) (5)

A large black rectangular redaction box covers the majority of the page content below the header.

Referral to DOC

A very large black rectangular redaction box covers the entire main body of the document, starting from the 'Referral to DOC' text and extending to the bottom of the page.

On Jan 7, 2017, at 11:31 PM, Kassinger, Theodore W.
<tkassinger@omm.com> wrote:

Mr. Ross requests another direct call tomorrow, as early as possible, and he would like to have OGE on the line. I don't think Keith will be able to answer his question. Whom should we get?

Specifically, he wants to walk through the issues on disposition of his interests in the one or two ^{(b)(3), (6)} that may be at issue. ^{(b)(3), (4), (6)}

^{(b)(3), (4), (6)} Question is how to do this in a way that is agreeable to OGE and Commerce. ^{(b)(3), (4), (6)}

Separately, he wants to understand your reference to ^{(b)(3), (5), (6)}

I can talk as early as you available in the morning about this. It is critical to have a call, with OGE. ^{(b)(5), (b)(6)}

thanks,

Ted

From: [Deborah J. Bortot](#)
To: [David J. Apol](#); [Walter M. Shaub](#); [Heather A. Jones](#); [Keith Labeledz](#)
Subject: RE: Call tomorrow
Date: Sunday, January 08, 2017 9:55:48 AM

Sounds good. I think we should have an internal call first.

From: David J. Apol
Sent: Sunday, January 08, 2017 9:53 AM
To: Deborah J. Bortot; Walter M. Shaub; Heather A. Jones; Keith Labeledz
Subject: Re: Call tomorrow

I just talked to Walt. Looks like three is what we are shooting for.

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

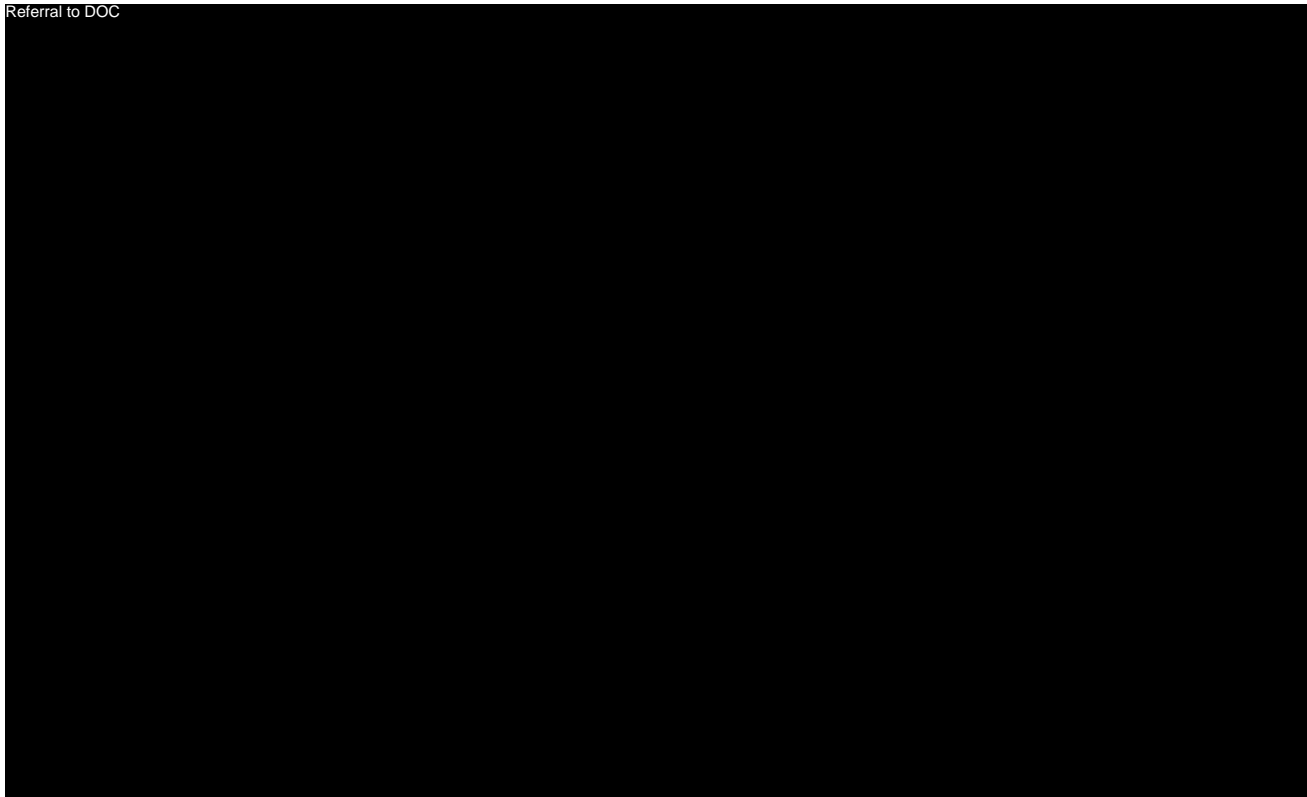
From: Deborah J. Bortot
Sent: Sunday, January 8, 2017 9:48 AM
To: Walter M. Shaub; David J. Apol; Heather A. Jones; Keith Labeledz
Subject: RE: Call tomorrow

I'm available.

From: Walter M. Shaub
Sent: Sunday, January 08, 2017 8:05 AM
To: David J. Apol; Deborah J. Bortot; Heather A. Jones; Keith Labeledz
Subject: Fw: Call tomorrow

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

Referral to DOC



On Jan 7, 2017, at 11:31 PM, Kassinger, Theodore W. <tkassinger@omm.com> wrote:

Mr. Ross requests another direct call tomorrow, as early as possible, and he would like to have OGE on the line. I don't think Keith will be able to answer his question. Whom should we get?

Specifically, he wants to walk through the issues on disposition of his interests in the one or two (b)(3), (6) that may be at issue. One is (b)(3), (4), (6)

Question is how to do this in a way that is agreeable to OGE and Commerce. (b)(3), (4), (6)

Separately, he wants to understand your reference to disposing of all (b)(3), (5), (6)

I can talk as early as you available in the morning about this. It is critical to have a call, with OGE. (b)(5), (6)

thanks,

Ted

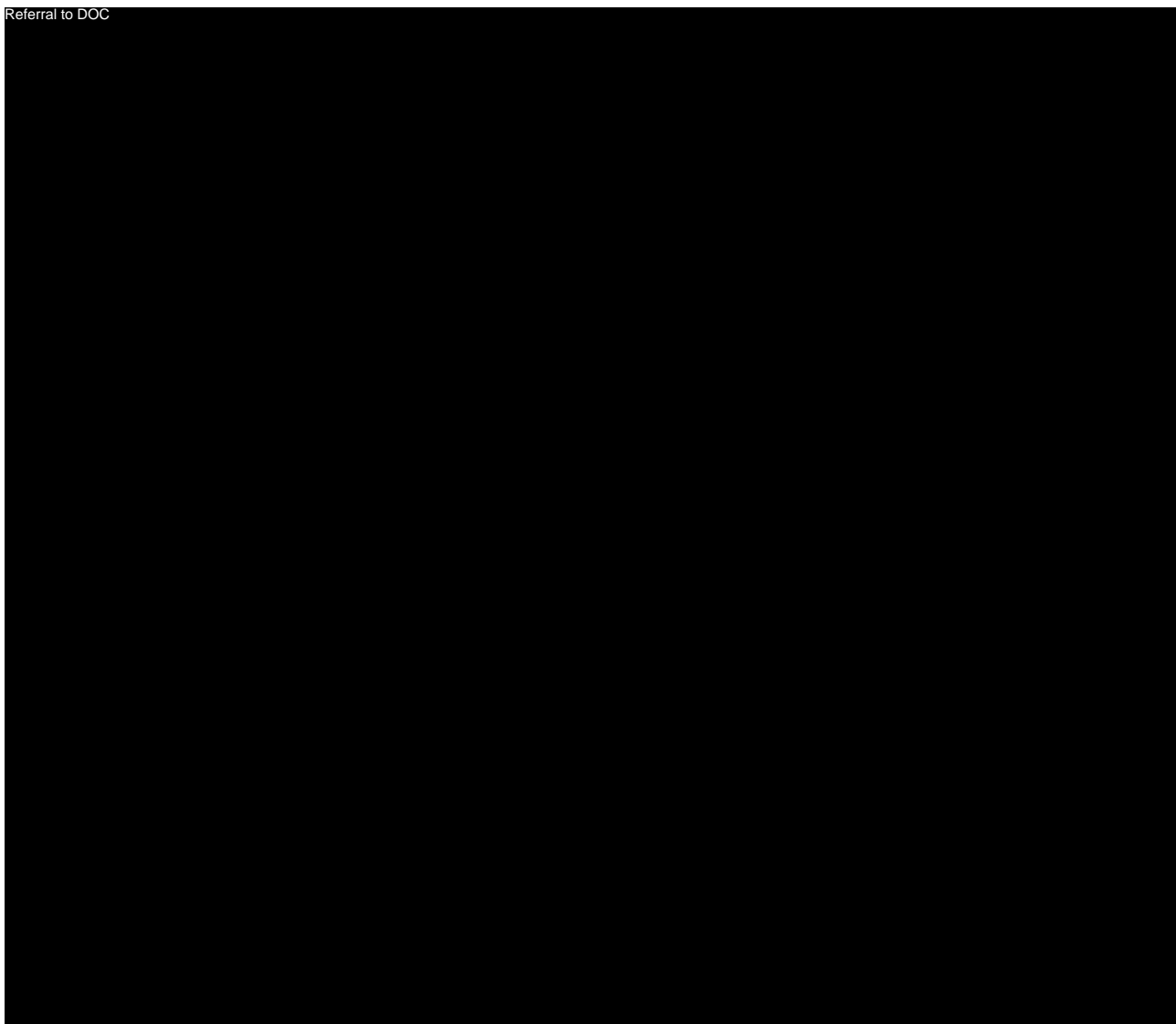
From: [Heather A. Jones](#)
To: [Walter M. Shaub](#); [David J. Apol](#); [Deborah J. Bortot](#); [Keith Labeledz](#)
Subject: RE: Call tomorrow
Date: Sunday, January 08, 2017 9:21:40 AM

We are headed to ^{(b) (6)} [REDACTED]. I should be free after 11.

From: Walter M. Shaub
Sent: Sunday, January 08, 2017 8:05 AM
To: David J. Apol; Deborah J. Bortot; Heather A. Jones; Keith Labeledz
Subject: Fw: Call tomorrow

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

Referral to DOC



On Jan 7, 2017, at 11:31 PM, Kassinger, Theodore W. <tkassinger@omm.com> wrote:

Mr. Ross requests another direct call tomorrow, as early as possible, and he would like to have OGE on the line. I don't think Keith will be able to answer his question. Whom should we get?

Specifically, he wants to walk through the issues on disposition of his interests in the one or two (b)(3), (b)(6) that may be at issue. (b)(3), (b)(6)

(b)(3), (b)(6)
The question is how to do this in a way that is agreeable to OGE and Commerce. (b)(3), (b)(6)

Separately, (b)(5), (b)(6)

I can talk as early as you available in the morning about this. It is critical to have a call, with OGE. (b)(5), (b)(6)

thanks,

Ted

From: [Schlom, Evan N.](#)
To: [Keith Labeledz](#); [Kassinger, Theodore W.](#); "[Maggi, David \(Federal\)](#)"
Cc: [Dorey, David R.](#); "[Jacobi, Will \(Federal\)](#)"; "[Williams, Gaye \(Federal\)](#)"; "[Warren, Arthur \(Federal\)](#)"; "[Jacob, Dana \(Federal\)](#)"; [Deborah J. Bortot](#); [Heather A. Jones](#)
Subject: [GRAYMAIL] RE: Revised WLR 278
Date: Saturday, January 07, 2017 10:27:52 PM

Thank you very much for the quick response, Keith.

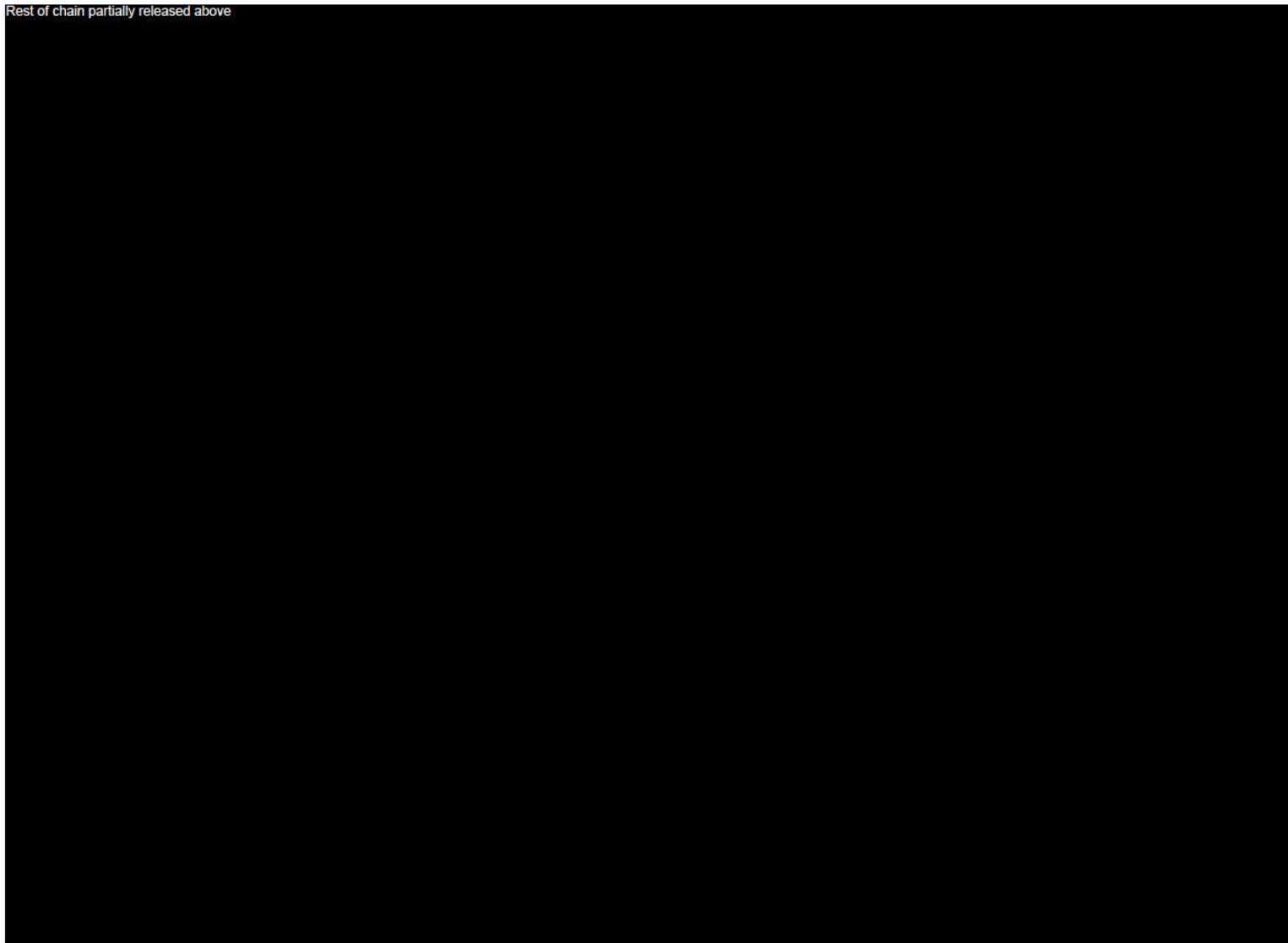
From: Keith Labeledz [mailto:klabeledz@oge.gov]
Sent: Saturday, January 07, 2017 10:25 PM
To: Schlom, Evan N.; Kassinger, Theodore W.; 'Maggi, David (Federal)'
Cc: Dorey, David R.; 'Jacobi, Will (Federal)'; 'Williams, Gaye (Federal)'; 'Warren, Arthur (Federal)'; 'Jacob, Dana (Federal)'; Deborah J. Bortot; Heather A. Jones
Subject: RE: Revised WLR 278

Please see my responses in red below.

Thank you.

Keith

Rest of chain partially released above



From: [Keith Labeledz](#)
To: [Deborah J. Bortot](#); [Heather A. Jones](#)
Subject: RE: Updated Ethics Agreement Attachments
Date: Saturday, January 07, 2017 6:00:31 PM

Ok. I think we may have a third draft by Monday based on the response from Kassinger. (b) (5)
I'll see how that shapes up tomorrow. Thanks.

From: Deborah J. Bortot
Sent: Saturday, January 07, 2017 5:55 PM
To: Keith Labeledz; Heather A. Jones
Subject: Re: Updated Ethics Agreement Attachments

Keith,

Heather and I will show Walt the draft EA on Monday. We will probably make some changes and then send a revised version to Commerce. I know it will not be the final draft, but it is probably a good idea to get Walt involved in reviewing an early draft.

Thank you for all your work on this last night and today.

Thanks,
Deb

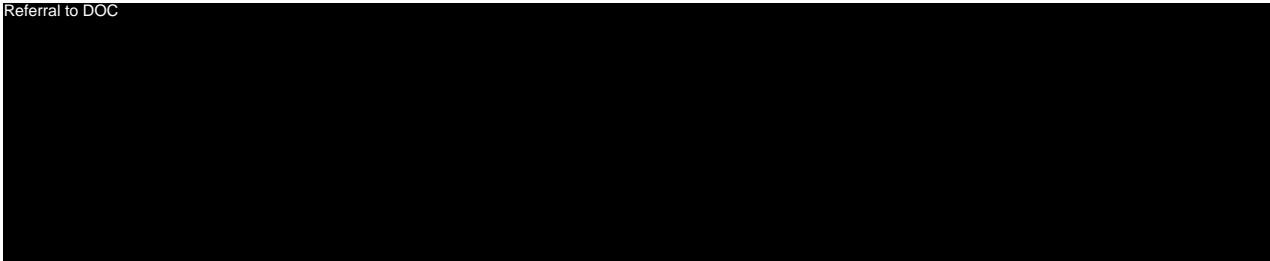
Sent from my BlackBerry 10 smartphone on the Verizon Wireless 4G LTE network.

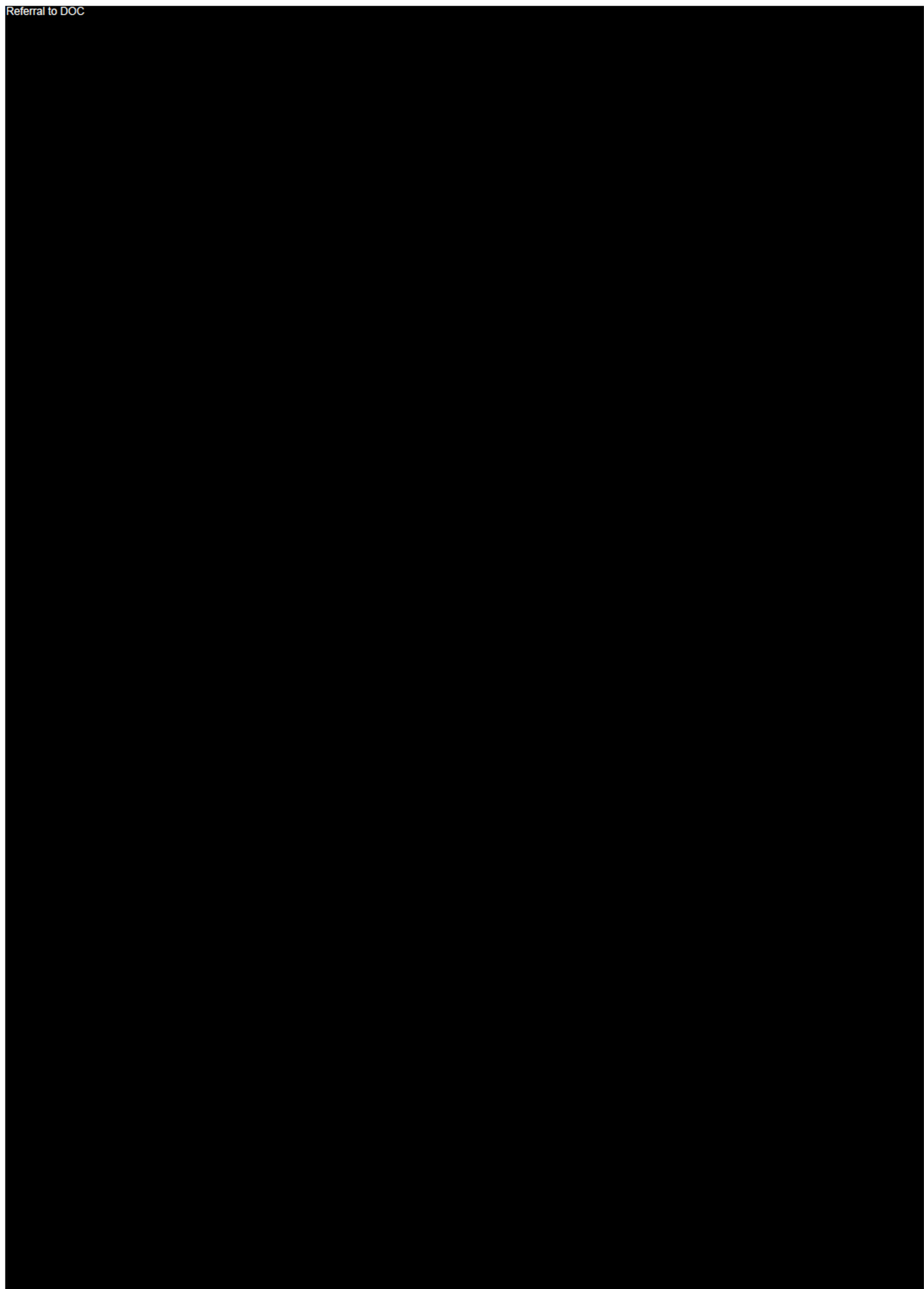
From: Keith Labeledz
Sent: Saturday, January 7, 2017 5:44 PM
To: Deborah J. Bortot; Heather A. Jones
Subject: FW: Updated Ethics Agreement Attachments

I think we may want to discuss this and talk with Commerce again before getting too into the details. (b) (5)

(I have saved copies to the shared drive. Accessing the files from the email requires creating an account with Commerce.)

Referral to DOC







From: [Heather A. Jones](#)
To: "[Dorey, David R.](#)"; [Keith Labeledz](#); [Kassinger, Theodore W.](#); "[Maggi, David \(Federal\)](#)"
Cc: [Schlom, Evan N.](#); "[Jacobi, Will \(Federal\)](#)"; "[Williams, Gaye \(Federal\)](#)"; "[Warren, Arthur \(Federal\)](#)"; "[Jacob, Dana \(Federal\)](#)"; [Deborah J. Bortot](#)
Subject: RE: Revised WLR 278
Date: Saturday, January 07, 2017 5:34:08 PM

Dave-

(b)(3), (5)

Best,
Heather

From: Dorey, David R. [<mailto:ddorey@omm.com>]
Sent: Saturday, January 07, 2017 4:23 PM
To: Keith Labeledz; Kassinger, Theodore W.; 'Maggi, David (Federal)'
Cc: Schlom, Evan N.; 'Jacobi, Will (Federal)'; 'Williams, Gaye (Federal)'; 'Warren, Arthur (Federal)'; 'Jacob, Dana (Federal)'; Deborah J. Bortot; Heather A. Jones
Subject: [GRAYMAIL] RE: Revised WLR 278

Keith,

Regarding your comments about (b)(3), (5)

(b)(3), (5)
Is there

some other fashion in which this information must be reported?

Thanks very much.

Dave

From: Keith Labeledz [<mailto:klabeledz@oge.gov>]
Sent: Saturday, January 07, 2017 4:08 PM
To: Kassinger, Theodore W.; 'Maggi, David (Federal)'
Cc: Schlom, Evan N.; Dorey, David R.; 'Jacobi, Will (Federal)'; 'Williams, Gaye (Federal)'; 'Warren, Arthur (Federal)'; 'Jacob, Dana (Federal)'; Deborah J. Bortot; Heather A. Jones
Subject: [WARNING : MESSAGE ENCRYPTED]RE: Revised WLR 278

Attachment - 9 pages withheld in full
- (b)(3), (4), (5), (6)

Hello,

Attached are my technical notes on draft 3, including a few follow-up questions based on the responses to my please-confirm questions. These notes reflect the report as saved at approximately 10:00 am this morning.

Thank you.

Keith

Rest of chain partially released above

From: [Keith Labeledz](#)
To: "[Dorey, David R.](#)"; [Kassinger, Theodore W.](#); "[Maggi, David \(Federal\)](#)"
Cc: [Schlom, Evan N.](#); "[Jacobi, Will \(Federal\)](#)"; "[Williams, Gaye \(Federal\)](#)"; "[Warren, Arthur \(Federal\)](#)"; "[Jacob, Dana \(Federal\)](#)"; [Deborah J. Bortot](#); [Heather A. Jones](#)
Subject: RE: Revised WLR 278
Date: Saturday, January 07, 2017 4:33:10 PM

Ok. It appears that, for at least one comment, (b)(3), (5)

Thank you.

Keith

From: Dorey, David R. [mailto:ddorey@omm.com]
Sent: Saturday, January 07, 2017 4:23 PM
To: Keith Labeledz; Kassinger, Theodore W.; 'Maggi, David (Federal)'
Cc: Schlom, Evan N.; 'Jacobi, Will (Federal)'; 'Williams, Gaye (Federal)'; 'Warren, Arthur (Federal)'; 'Jacob, Dana (Federal)'; Deborah J. Bortot; Heather A. Jones
Subject: [GRAYMAIL] RE: Revised WLR 278

Keith,

Regarding your comments about (b)(3), (5)

Is there

some other fashion in which this information must be reported?

Thanks very much.

Dave

From: Keith Labeledz [mailto:klabeledz@oge.gov]

Sent: Saturday, January 07, 2017 4:08 PM

To: Kassinger, Theodore W.; 'Maggi, David (Federal)'

Cc: Schlom, Evan N.; Dorey, David R.; 'Jacobi, Will (Federal)'; 'Williams, Gaye (Federal)'; 'Warren, Arthur (Federal)'; 'Jacob, Dana (Federal)'; Deborah J. Bortot; Heather A. Jones

Subject: [WARNING : MESSAGE ENCRYPTED]RE: Revised WLR 278

Attachment - 9 pages withheld in full - (b)(3), (4), (5), (6)

Hello,

Attached are my technical notes on draft 3, including a few follow-up questions based on the responses to my please-confirm questions. These notes reflect the report as saved at approximately 10:00 am this morning.

Thank you.

Keith

Rest of chain partially released above

From: [Kassinger, Theodore W.](#)
To: [Keith Labeledz](#); "[Maggi, David \(Federal\)](#)"
Cc: [Schlom, Evan N.](#); [Dorey, David R.](#); "[Jacobi, Will \(Federal\)](#)"; "[Williams, Gaye \(Federal\)](#)"; "[Warren, Arthur \(Federal\)](#)"; "[Jacob, Dana \(Federal\)](#)"; [Deborah J. Bortot](#); [Heather A. Jones](#)
Subject: [GRAYMAIL] RE: Revised WLR 278
Date: Saturday, January 07, 2017 4:20:49 PM

Keith,

Thanks very much.

Ted

From: Keith Labeledz [mailto:klabeledz@oge.gov]
Sent: Saturday, January 07, 2017 4:08 PM
To: Kassinger, Theodore W.; 'Maggi, David (Federal)'
Cc: Schlom, Evan N.; Dorey, David R.; 'Jacobi, Will (Federal)'; 'Williams, Gaye (Federal)'; 'Warren, Arthur (Federal)'; 'Jacob, Dana (Federal)'; Deborah J. Bortot; Heather A. Jones
Subject: [WARNING : MESSAGE ENCRYPTED]RE: Revised WLR 278

Attachment - 9 pages withheld in full - (b)(3), (4), (5), (6)

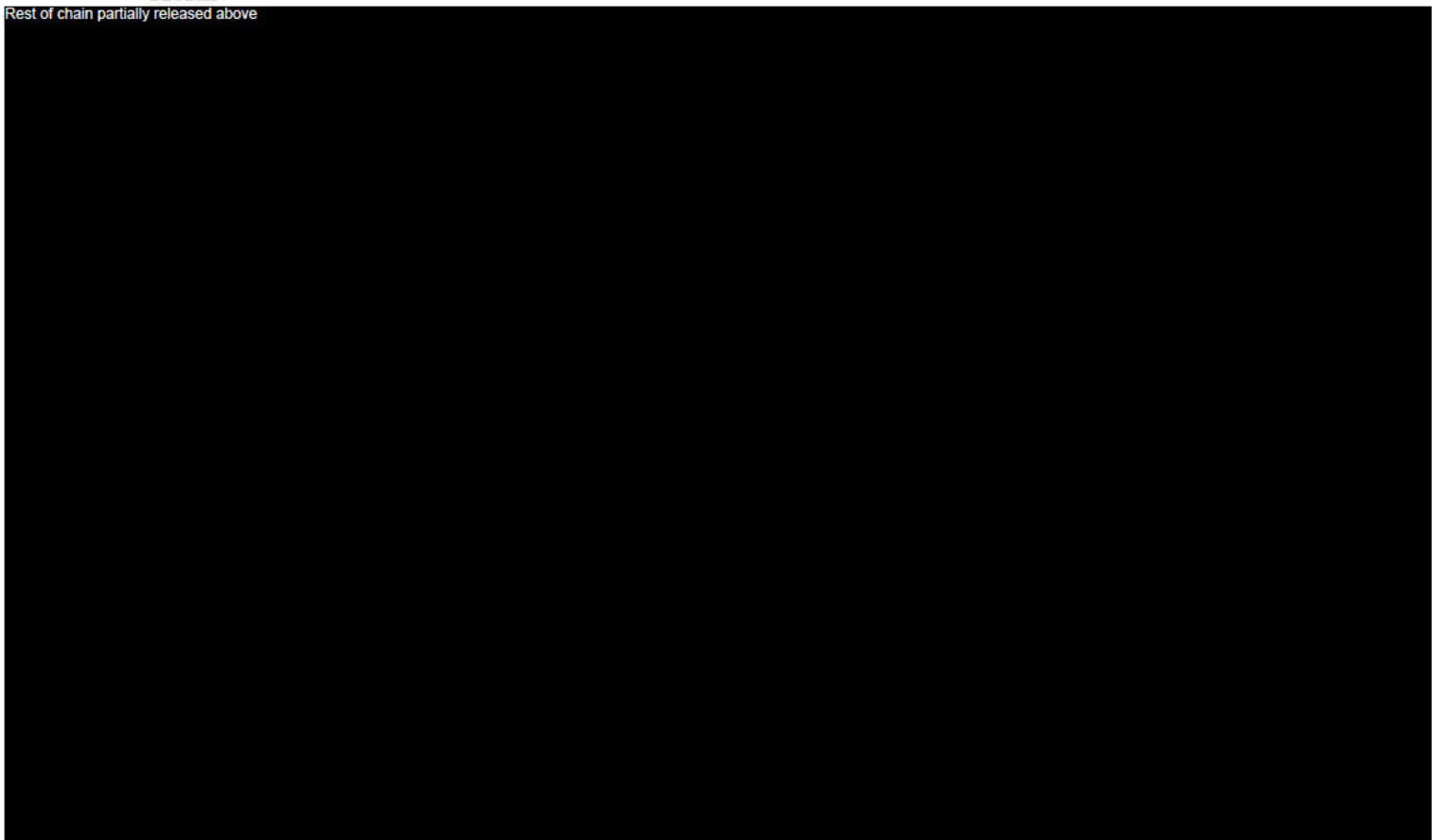
Hello,

Attached are my technical notes on draft 3, including a few follow-up questions based on the responses to my please-confirm questions. These notes reflect the report as saved at approximately 10:00 am this morning.

Thank you.

Keith

Rest of chain partially released above



From: [Keith Labeledz](#)
To: [Deborah J. Bortot](#); [Heather A. Jones](#); [David J. Apol](#)
Subject: RE: Answer to your question
Date: Saturday, January 07, 2017 3:57:01 PM

I am finished checking my round 3 notes against their responses to my prior rounds. I will send to OMM and Commerce today (after maybe one last double-check).

From: Deborah J. Bortot
Sent: Saturday, January 07, 2017 2:27 PM
To: Keith Labeledz; Heather A. Jones; David J. Apol
Subject: Re: Answer to your question

Keith,

Dave is calling David Maggi.

Deb

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

From: Deborah J. Bortot
Sent: Saturday, January 7, 2017 2:13 PM
To: Keith Labeledz; Heather A. Jones; David J. Apol
Subject: Re: Answer to your question

Dave,

I agree with Keith on the strategy for a preliminary call.

Deb

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

From: Keith Labeledz
Sent: Saturday, January 7, 2017 2:10 PM
To: Heather A. Jones; David J. Apol; Deborah J. Bortot
Subject: RE: Answer to your question

I finished a first pass through draft 3. I need to go through their responses to my please-confirm questions more fully (in light of draft 3) and see where we stand in terms of a consolidate round 3 set of notes. A working copy is on the shared drive folder for the filer now. I think it might be helpful for you to scan the outstanding items before speaking with OMM. Commerce has not provided an ethics agreement so the initial draft is on the shared drive. A cursory glance should demonstrate how far we have to go.

(b) (5)
[Redacted text block]

From: Heather A. Jones
Sent: Saturday, January 07, 2017 1:43 PM

To: David J. Apol; Deborah J. Bortot; Keith Labeledz

Subject: Re: Answer to your question

No I think we are all in the same boat.

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

From: David J. Apol

Sent: Saturday, January 7, 2017 1:41 PM

To: Heather A. Jones; Deborah J. Bortot; Keith Labeledz

Subject: RE: Answer to your question

Great. Heather or Keith, is Heather more familiar with the report that me or Deb?

From: Heather A. Jones

Sent: Saturday, January 07, 2017 1:12 PM

To: Deborah J. Bortot; Keith Labeledz; David J. Apol

Subject: Re: Answer to your question

If you need me to join just let me know. I also have my conference call info if you need me to set up a call

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

From: Deborah J. Bortot

Sent: Saturday, January 7, 2017 12:53 PM

To: Keith Labeledz; Heather A. Jones; David J. Apol

Subject: Re: Answer to your question

Keith,

I just got off the phone with Dave Apol. Would it be helpful if Dave Apol and I call OMM at this point or should we maybe set up a call on Monday between OGE, OMM and Commerce? Let me know what would be most helpful to you.

Thanks,

Deb

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

From: Keith Labeledz

Sent: Saturday, January 7, 2017 11:16 AM

To: Deborah J. Bortot; Heather A. Jones

Subject: RE: Answer to your question

(b)(3), (5), (6)

From: Deborah J. Bortot

Sent: Saturday, January 07, 2017 11:14 AM

To: Keith Labeledz; Heather A. Jones

Subject: Re: Answer to your question

(b)(3), (5), (6)

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

From: Keith Labeledz

Sent: Saturday, January 7, 2017 11:02 AM

To: Heather A. Jones; Deborah J. Bortot

Subject: RE: Answer to your question

(b) (5)

(b) (5)
[Redacted]
[Redacted]
[Redacted]
[Redacted] (b)(3), (b)(5)
[Redacted]
[Redacted] (b) (5)
[Redacted]
[Redacted]

From: Heather A. Jones
Sent: Saturday, January 07, 2017 10:55 AM
To: Keith Labeledz; Deborah J. Bortot
Subject: Re: Answer to your question

Very interesting. (b) (5) [Redacted]

Keith can I help with anything?
Sent from my BlackBerry 10 smartphone on the Verizon Wireless 4G LTE network.

From: Keith Labeledz
Sent: Saturday, January 7, 2017 10:46 AM
To: Deborah J. Bortot; Heather A. Jones
Subject: FW: Answer to your question

From: Walter M. Shaub
Sent: Saturday, January 07, 2017 10:16 AM
To: David J. Apol; Keith Labeledz
Subject: FW: Answer to your question
Walter M. Shaub, Jr.
Director
U.S. Office of Government Ethics
1201 New York Avenue, NW, Suite 500
Washington, DC 20005-3917
Telephone: 202.482.9292
Email: walter.shaub@oge.gov

From: Brown, Reginald [<mailto:Reginald.Brown@wilmerhale.com>]
Sent: Saturday, January 07, 2017 10:03 AM
To: Walter M. Shaub
Subject: Re: Answer to your question
Thanks.

Sent from my iPhone

On Jan 7, 2017, at 9:48 AM, Walter M. Shaub <wmschaub@oge.gov> wrote:

Sure. (b) (5)
[Redacted]

(b) (5)

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

From: Brown, Reginald

Sent: Saturday, January 7, 2017 9:21 AM

To: Walter M. Shaub

Subject: Re: Answer to your question

(b) (5)

. We do represent (b)(3), (6) and (b) (5). Awaiting some more info from OMelveny re details on OGE/Commerce views re divestment vs recusals on the range of (b) (3), (2). Require different responses of course. Understanding at present is that (b) (5).

Sent from my iPhone

Non-responsive records

Sent from my iPhone

Non-responsive



Non-responsive

OGE Confidential Notice: This email, including all attachments, may constitute a Federal record or other Government property that is intended only for the use of the individual or entity to which it is addressed. This email also may contain information that is privileged, confidential, or otherwise protected from disclosure under applicable law. If you are not the intended recipient or the employee or agent responsible for delivering the transmission to the intended recipient, you are hereby notified that any dissemination, distribution, copying or use of this email or its contents is strictly prohibited. If you have received this email in error, please notify the sender by responding to the email and then immediately delete the email.

OGE Confidential Notice: This email, including all attachments, may constitute a Federal record or other Government property that is intended only for the use of the individual or entity to which it is addressed. This email also may contain information that is privileged, confidential, or otherwise protected from disclosure under applicable law. If you are not the intended recipient or the employee or agent responsible for delivering the transmission to the intended recipient, you are hereby notified that any dissemination, distribution, copying or use of this email or its contents is strictly prohibited. If you have received this email in error, please notify the sender by responding to the email and then immediately delete the email.

OGE Confidential Notice: This email, including all attachments, may constitute a Federal record or other Government property that is intended only for the use of the individual or entity to which it is addressed. This email also may contain information that is privileged, confidential, or otherwise protected from disclosure under applicable law. If you are not the intended recipient or the employee or agent responsible for delivering the transmission to the intended recipient, you are hereby notified that any dissemination, distribution, copying or use of this email or its contents is strictly prohibited. If you have received this email in error, please notify the sender by responding to the email and then immediately delete the email.

From: [Heather A. Jones](#)
To: [Keith Labeledz](#); [Deborah J. Bortot](#)
Subject: Re: Answer to your question
Date: Saturday, January 07, 2017 11:18:32 AM

Then they will want him out cleanly too. (b) (5)

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

From: Keith Labeledz
Sent: Saturday, January 7, 2017 11:16 AM
To: Deborah J. Bortot; Heather A. Jones
Subject: RE: Answer to your question

(b)(3), (b)(6)

Rest of chain partially released above

From: [Deborah J. Bortot](#)
To: [Heather A. Jones](#); [Keith Labeledz](#)
Subject: Re: Answer to your question
Date: Saturday, January 07, 2017 11:10:37 AM

I was wondering the same thing

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

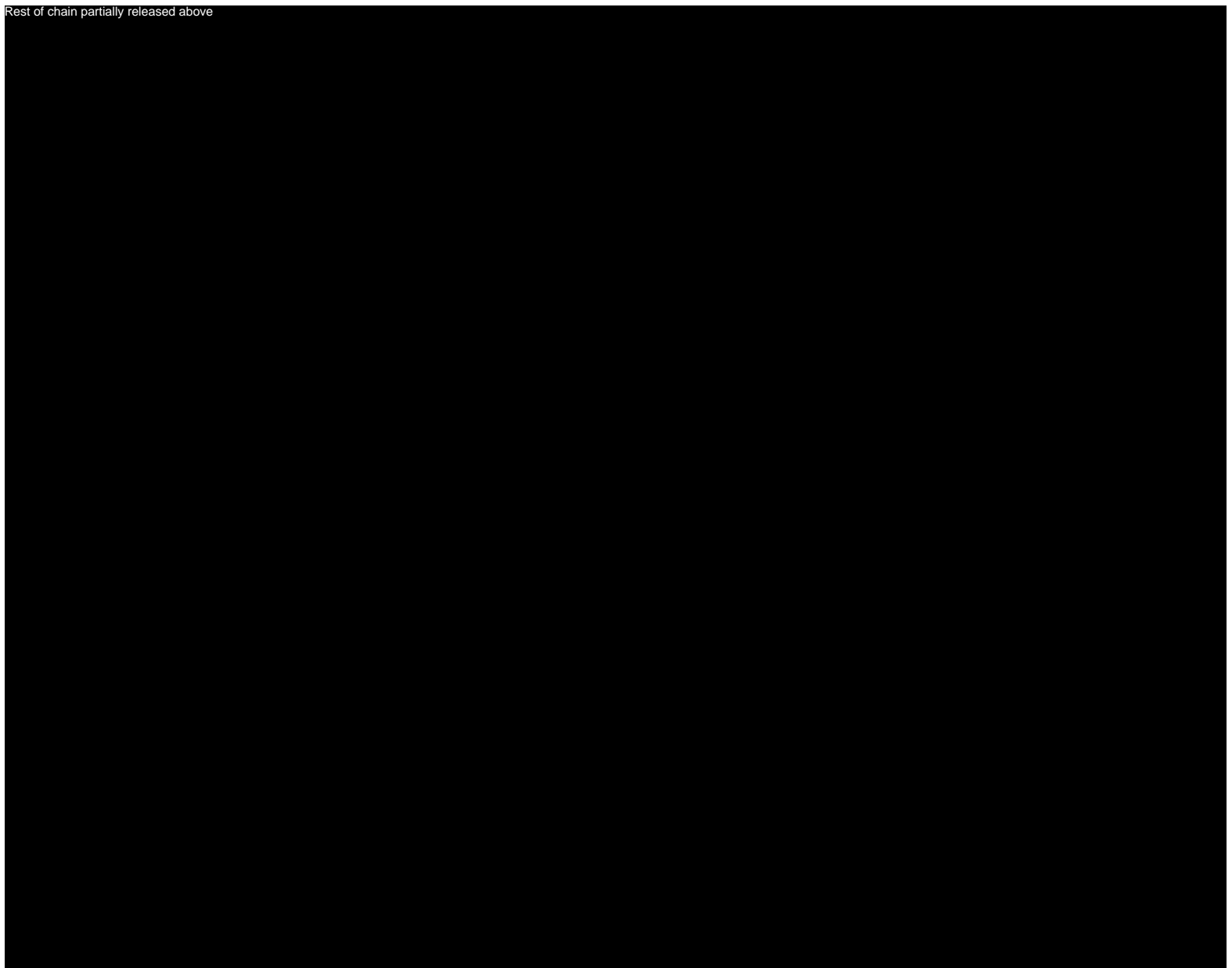
From: Heather A. Jones
Sent: Saturday, January 7, 2017 10:55 AM
To: Keith Labeledz; Deborah J. Bortot
Subject: Re: Answer to your question

Very interesting. (b) (5)

Keith can I help with anything?

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

Rest of chain partially released above



From: [Keith Labeledz](#)
To: [David J. Apol](#)
Cc: [Deborah J. Bortot](#); [Heather A. Jones](#)
Subject: FW: Revised WLR 278
Date: Saturday, January 07, 2017 10:23:46 AM

I wasn't sure if I should bring you in the email chain directly but, at this point, I needed to bring in Deb and Heather.

(b) (5)
[Redacted]

I will continue working on my notes over the weekend.
Thank you.
Keith

From: Keith Labeledz
Sent: Saturday, January 07, 2017 10:16 AM
To: 'Kassinger, Theodore W.'; Maggi, David (Federal)
Cc: Schlom, Evan N.; Dorey, David R.; Jacobi, Will (Federal); Williams, Gaye (Federal); Warren, Arthur (Federal); Jacob, Dana (Federal); Deborah J. Bortot; Heather A. Jones
Subject: RE: Revised WLR 278

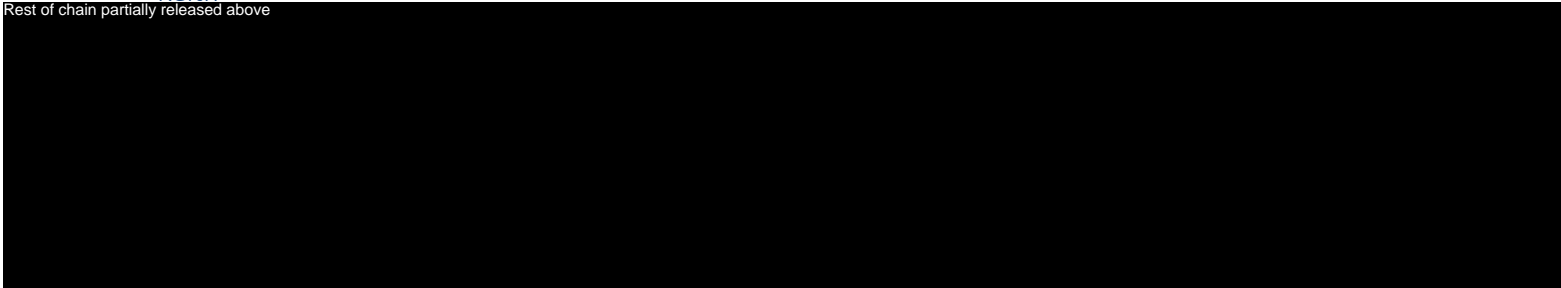
Hello,
I am continuing my review (including of the changes made yesterday evening). It does appear that I will still have a number of questions for round 3 (including a number of clean-up items on the positions that have been pending since round 1). I do not think all items will be resolved Monday from a technical perspective.

In terms of a discussion of the ethics agreement, I agree with David's analysis that the (b)(3), (b)(5), (b)(6)

[Redacted]

[Redacted] In addition, ethics agreements typically treat the filer's agreements/arrangements, particularly exit arrangements from firms, and the details on many arrangements have just been added in round 3. I am copying Deborah Bortot, Chief of the Presidential Nominations Branch, and Heather Jones, Senior Counsel for Financial Disclosure, as they will be involved in the ultimate review and preclearance of the report and ethics agreement. I think they would need to participate in any discussion from OGE's perspective on the next draft ethics agreement.

Thank you.
Keith



(b)(3), (b)(4), (b)(6)

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

(b)(3), (b)(4), (b)(6)

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

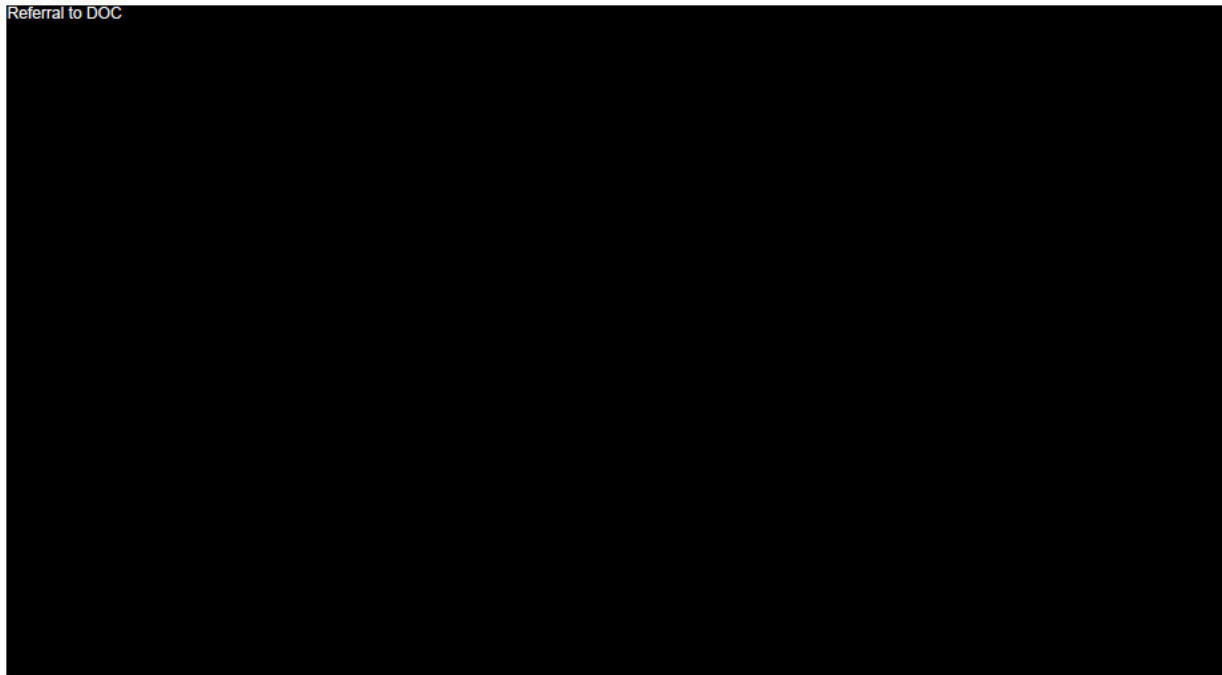
[Redacted]

[Redacted]

Referral to DOC

[Redacted]

Referral to DOC

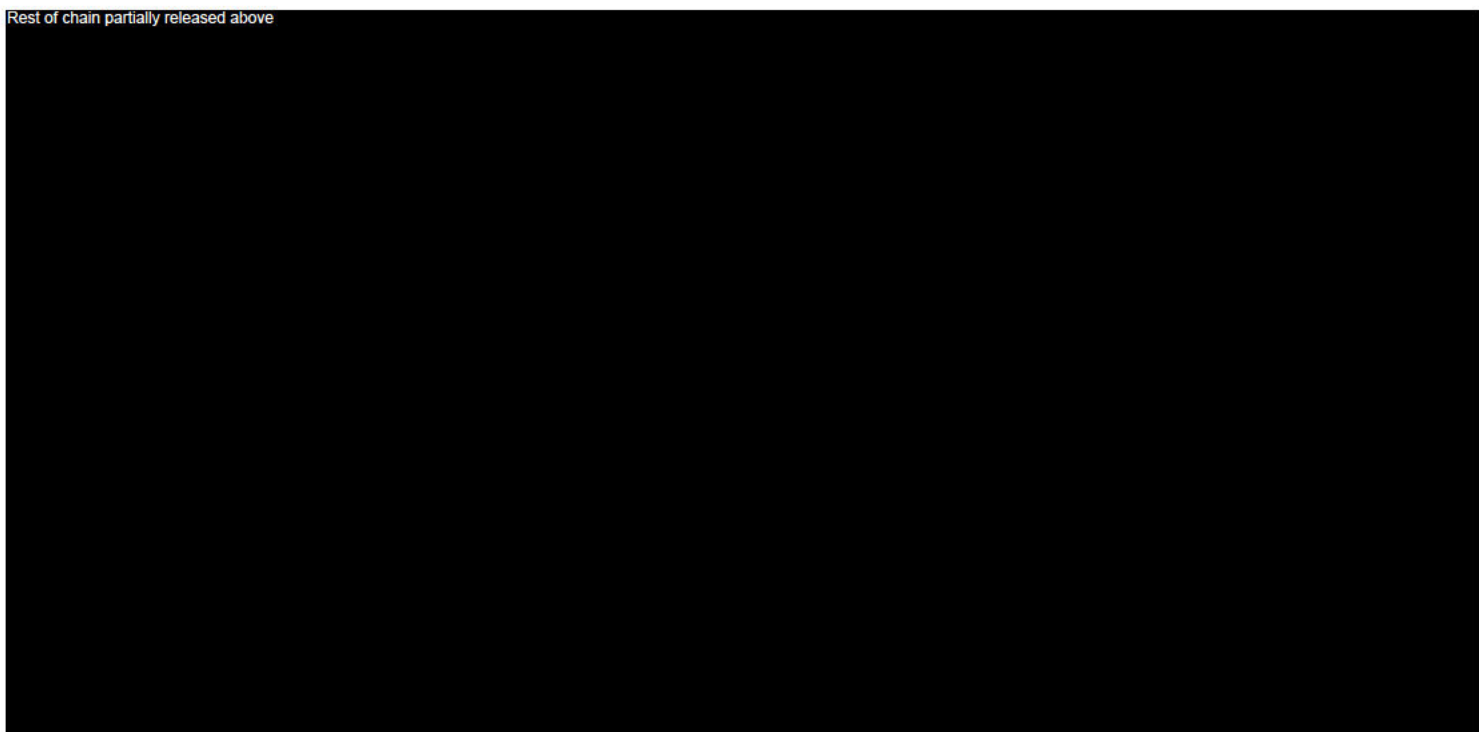


From: Keith Labeledz [<mailto:klabeledz@oge.gov>]
Sent: Friday, January 06, 2017 7:34 PM
To: 'Schlom, Evan N.' <eschlom@omm.com>; Kassinger, Theodore W. <tkassinger@omm.com>; Maggi, David (Federal) <dMaggi@doc.gov>; Jacobi, Will (Federal) <wjacobi@doc.gov>; Williams, Gaye (Federal) <gWilliams@doc.gov>
Cc: Dorey, David R. <ddorey@omm.com>
Subject: RE: Revised WLR 278

Thank you. I will review and incorporate any clarifying questions that I might have into the round 3 comments.

Keith

Rest of chain partially released above



From: [Kassinger, Theodore W.](#)
To: [Maggi, David \(Federal\)](#)
Cc: [Keith Labedz](#); [Schlom, Evan N.](#); [Dorey, David R.](#); [Jacobi, Will \(Federal\)](#); [Williams, Gaye \(Federal\)](#); [Warren, Arthur \(Federal\)](#); [Jacob, Dana \(Federal\)](#)
Subject: [GRAYMAIL] Re: Revised WLR 278
Date: Friday, January 06, 2017 10:37:00 PM

Also, most of the new entries are simply (b)(3), (4), (6)

Referral to DOC

From: Keith Labeledz [<mailto:klabeledz@oge.gov>]
Sent: Friday, January 06, 2017 7:34 PM
To: 'Schlom, Evan N.' <eschlom@omm.com>; Kassinger, Theodore W. <tkassinger@omm.com>; Maggi, David (Federal) <dMaggi@doc.gov>; Jacobi, Will (Federal) <wjacobi@doc.gov>; Williams, Gaye (Federal) <gWilliams@doc.gov>
Cc: Dorey, David R. <ddorey@omm.com>
Subject: RE: Revised WLR 278

Thank you. I will review and incorporate any clarifying questions that I might have into the round 3 comments.

Keith

From: [Deborah J. Bortot](#)
To: [Keith Labeledz](#)
Subject: RE: your report
Date: Friday, January 06, 2017 6:49:19 PM

Let me and Heather know if you have any questions. (b) (6)

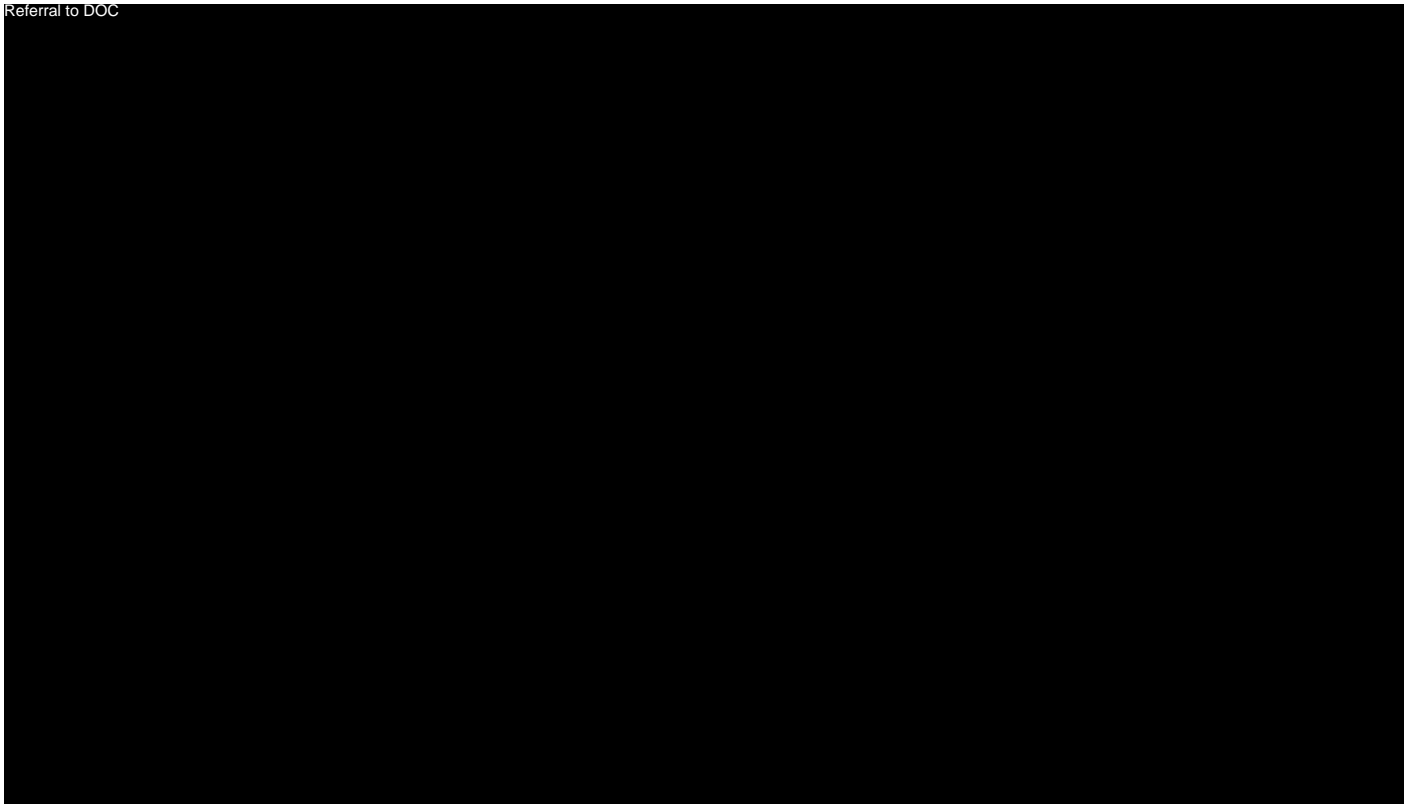
From: Keith Labeledz
Sent: Friday, January 06, 2017 6:47 PM
To: Deborah J. Bortot
Subject: RE: your report

Ok, still working. (b) (5)

From: Deborah J. Bortot
Sent: Friday, January 06, 2017 6:41 PM
To: Keith Labeledz
Subject: your report

Dave Apol and I talked to David. I'll fill you in. (b) (5)

Referral to DOC



From: Walter M. Shaub [mailto:wmshaub@oge.gov]

Sent: Friday, January 06, 2017 4:00 PM

To: Maggi, David (Federal) <dMaggi@doc.gov>

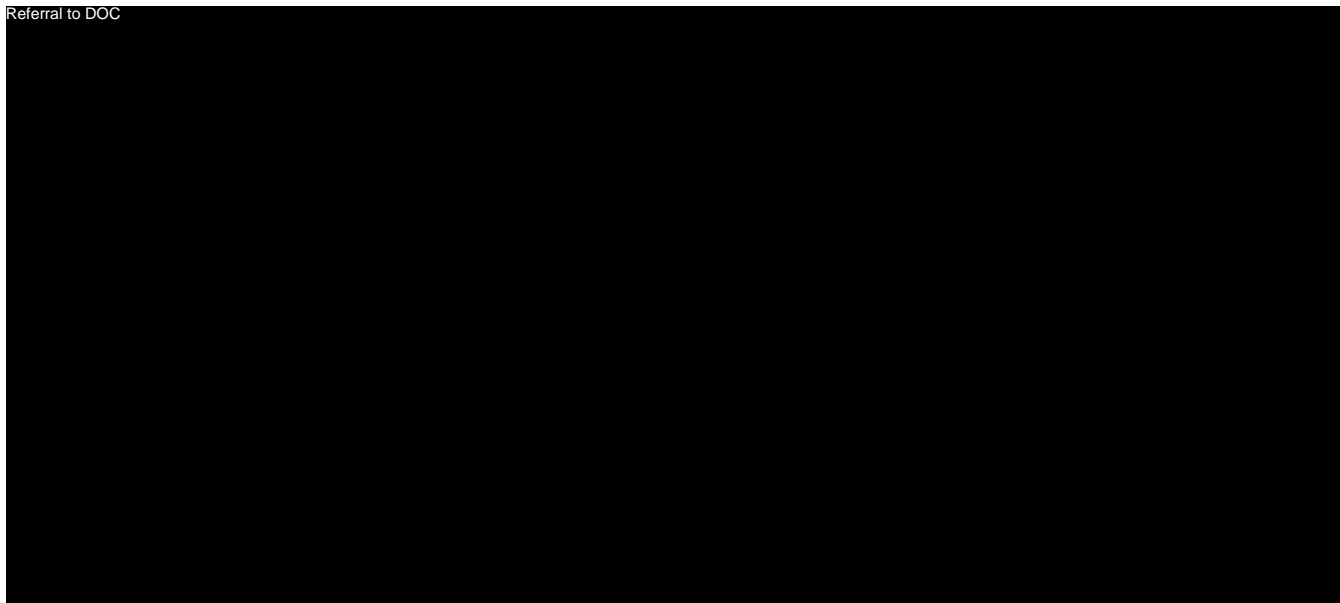
Cc: Keith Labeledz <klabeledz@oge.gov>

Subject: RE: Ross Nomination (Commerce)

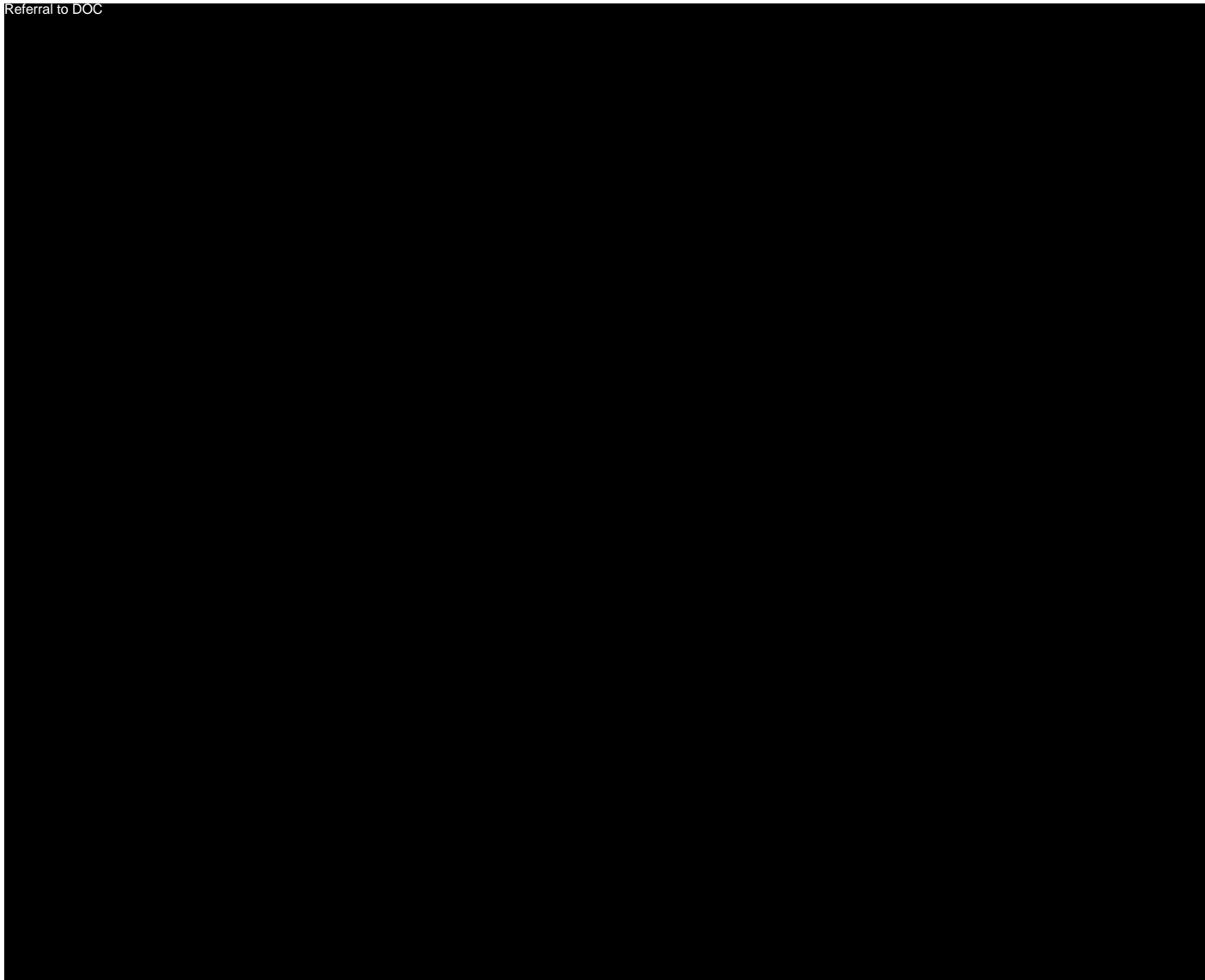
(b) (5)



Referral to DOC



OGE Confidential Notice: This email, including all attachments, may constitute a Federal record or other Government property that is intended only for the use of the individual or entity to which it is addressed. This email also may contain information that is privileged, confidential, or otherwise protected from disclosure under applicable law. If you are not the intended recipient or the employee or agent responsible for delivering the transmission to the intended recipient, you are hereby notified that any dissemination, distribution, copying or use of this email or its contents is strictly prohibited. If you have received this email in error, please notify the sender by responding to the email and then immediately delete the email.



From: Keith Labeledz [mailto:klabeledz@oge.gov]
Sent: Friday, January 06, 2017 4:43 PM
To: Maggi, David (Federal) <dMaggi@doc.gov>
Cc: Deborah J. Bortot <djbortot@oge.gov>; Heather A. Jones <hajones@oge.gov>
Subject: FW: Ross Nomination (Commerce)

David,

As I mentioned in my reply to OMM, (b) (5) [redacted]
[redacted]
[redacted]
[redacted]

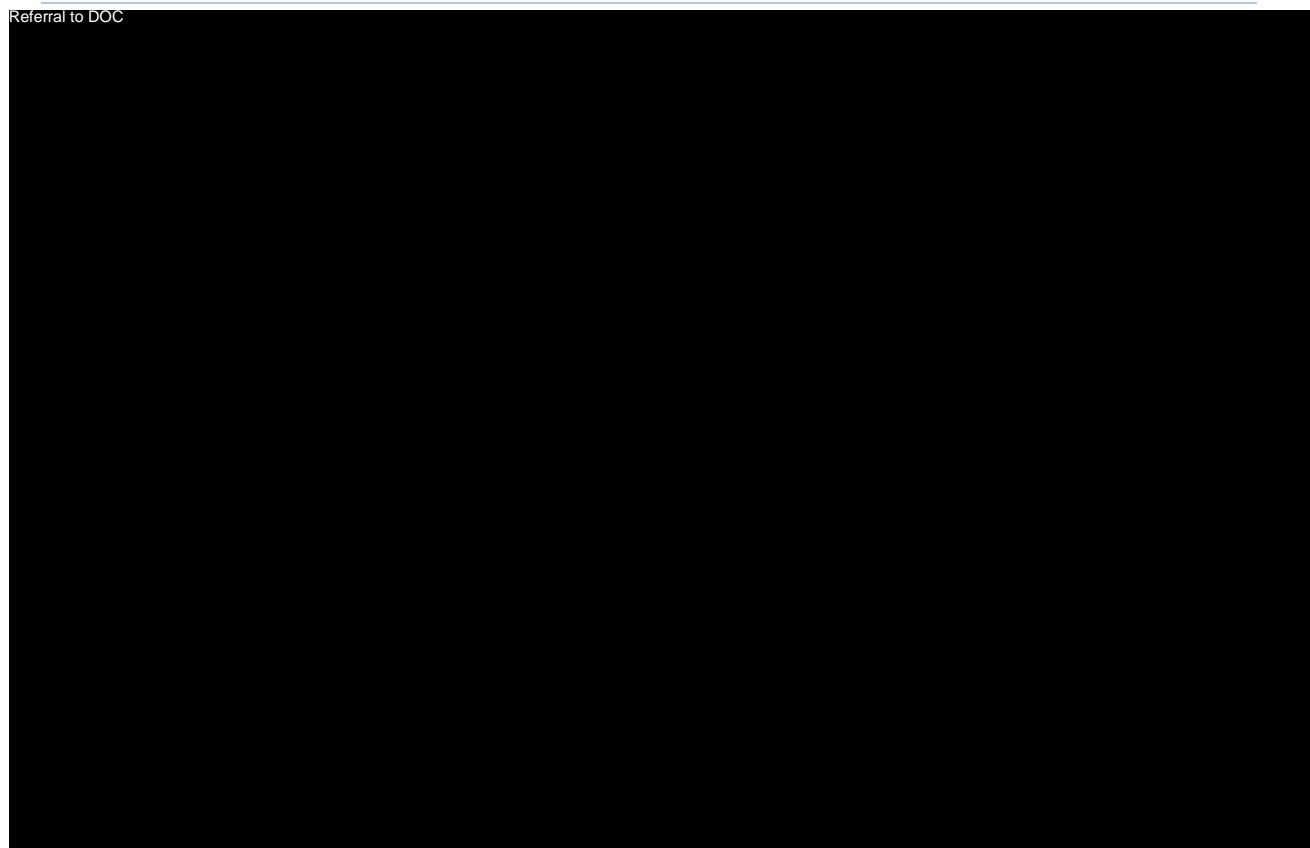
I have started cross-checking the first draft ethics agreement against the report and I will have some questions. In particular, (b) (5), (b) (6) [redacted]
[redacted]

(b) (5), (b) (6) I suspect the (b)(3), (b)(6) questions are a reflection of the fact that the report continues to evolve. That can be resolved but may take some time. I will know more once I can review the new draft in detail and receive the answers to my original confirmation questions.

Thank you.
Keith

Keith Labeledz
Senior Program Analyst
Presidential Nominations Branch
U.S. Office of Government Ethics
Telephone: (202) 482-9218

Referral to DOC



OGE Confidential Notice: This email, including all attachments, may constitute a Federal record or other Government property that is intended only for the use of the individual or entity to which it is addressed. This email also may contain information that is privileged, confidential, or otherwise protected from disclosure under applicable law. If you are not the intended recipient or the employee or agent responsible for delivering the transmission to the intended recipient, you are hereby notified that any dissemination, distribution, copying or use of this email or its contents is strictly prohibited. If you have received this email in error, please notify the sender by responding to the email and then immediately delete the email.

From: [Keith Labeledz](#)
To: [Deborah J. Bortot](#); [Heather A. Jones](#)
Subject: FW: Revised WLR 278
Date: Friday, January 06, 2017 4:29:35 PM

Did not know whether you wanted to be copied directly on future communications with Commerce/OMM or not...

From: Keith Labeledz
Sent: Friday, January 06, 2017 4:28 PM
To: 'Schlom, Evan N.'; David Maggi; 'wjacobi@doc.gov'; gwilliams@doc.gov
Cc: Kassinger, Theodore W.
Subject: RE: Revised WLR 278

Hello,

Does this new draft answer all of the outstanding questions from the two rounds of written comments or are there items outstanding? In addition, the original round of comments included a number of "please-confirm" questions. I will need a response to those items as a precondition for completing my review, so I want to make sure we do not lose sight of them.

Thank you.
Keith

Keith Labeledz
Senior Program Analyst
Presidential Nominations Branch
U.S. Office of Government Ethics
Telephone: (202) 482-9218

From: Schlom, Evan N. [<mailto:eschlom@omm.com>]
Sent: Friday, January 06, 2017 3:30 PM
To: David Maggi; Keith Labeledz; 'wjacobi@doc.gov'; gwilliams@doc.gov
Cc: Kassinger, Theodore W.
Subject: Revised WLR 278

Hello all,

We have made a number of changes to the 278 in response to our conversations with you and your comments on the previous draft, so please go ahead and review the current update.

Thanks,
Evan

O'Melveny
Evan N. Schlom
eschlom@omm.com
O: +1-202-383-5512
O'Melveny & Myers LLP

1625 Eye Street, NW
Washington, DC 20006

[Website](#) | [LinkedIn](#) | [Twitter](#) | [Bio](#)

This message and any attached documents contain information from the law firm of O'Melveny & Myers LLP that may be confidential and/or privileged. If you are not the intended recipient, you may not read, copy, distribute, or use this information. If you have received this transmission in error, please notify the sender immediately by reply e-mail and then delete this message.

From: Schlom, Evan N. [mailto:eschlom@omm.com]
Sent: Friday, January 06, 2017 3:30 PM
To: Maggi, David (Federal) <dMaggi@doc.gov>; Keith Labeledz <klabeledz@oge.gov>; Jacobi, Will (Federal) <wjacobi@doc.gov>; Williams, Gaye (Federal) <gWilliams@doc.gov>
Cc: Kassinger, Theodore W. <tkassinger@omm.com>
Subject: Revised WLR 278

Hello all,

We have made a number of changes to the 278 in response to our conversations with you and your comments on the previous draft, so please go ahead and review the current update.

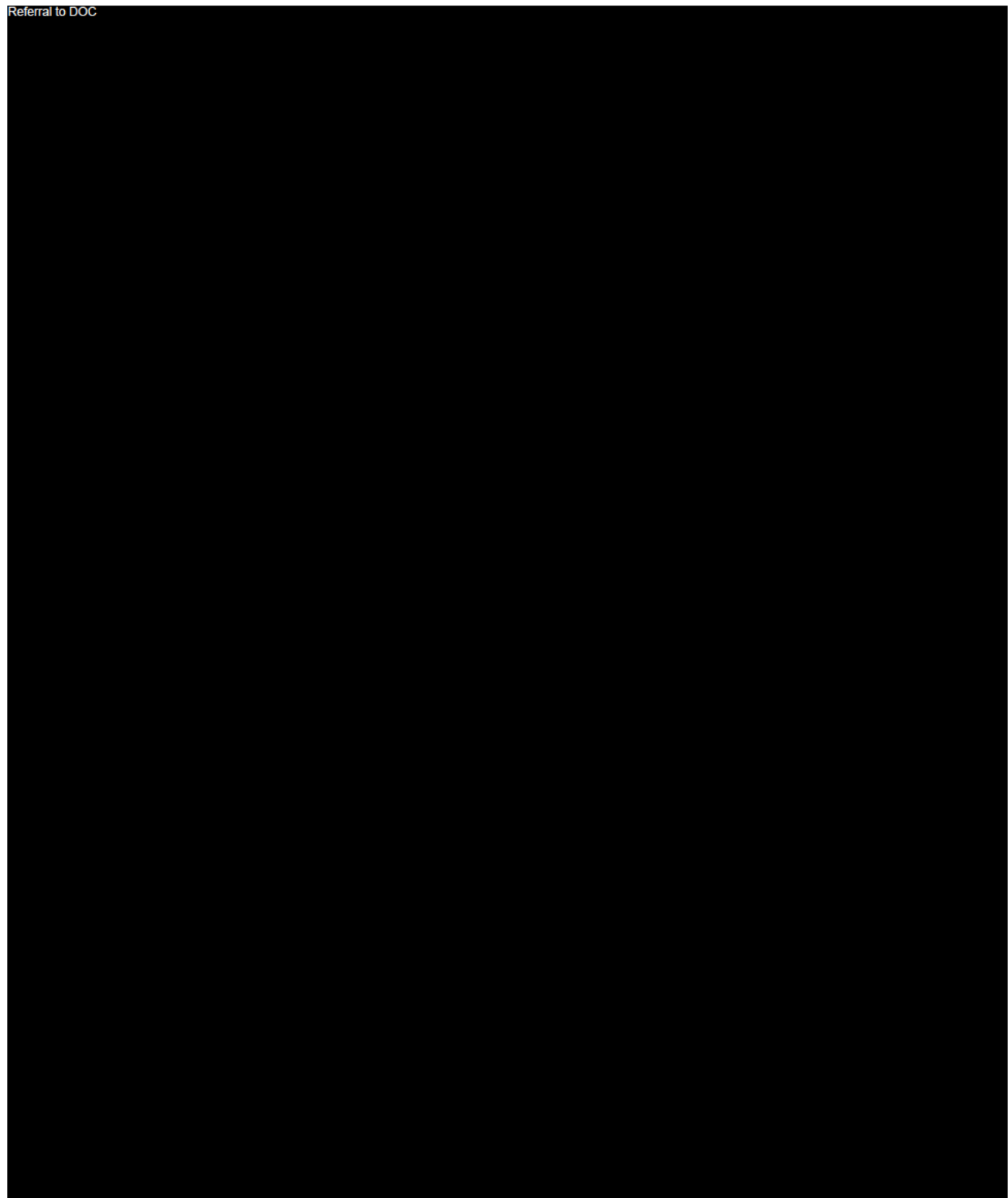
Thanks,
Evan

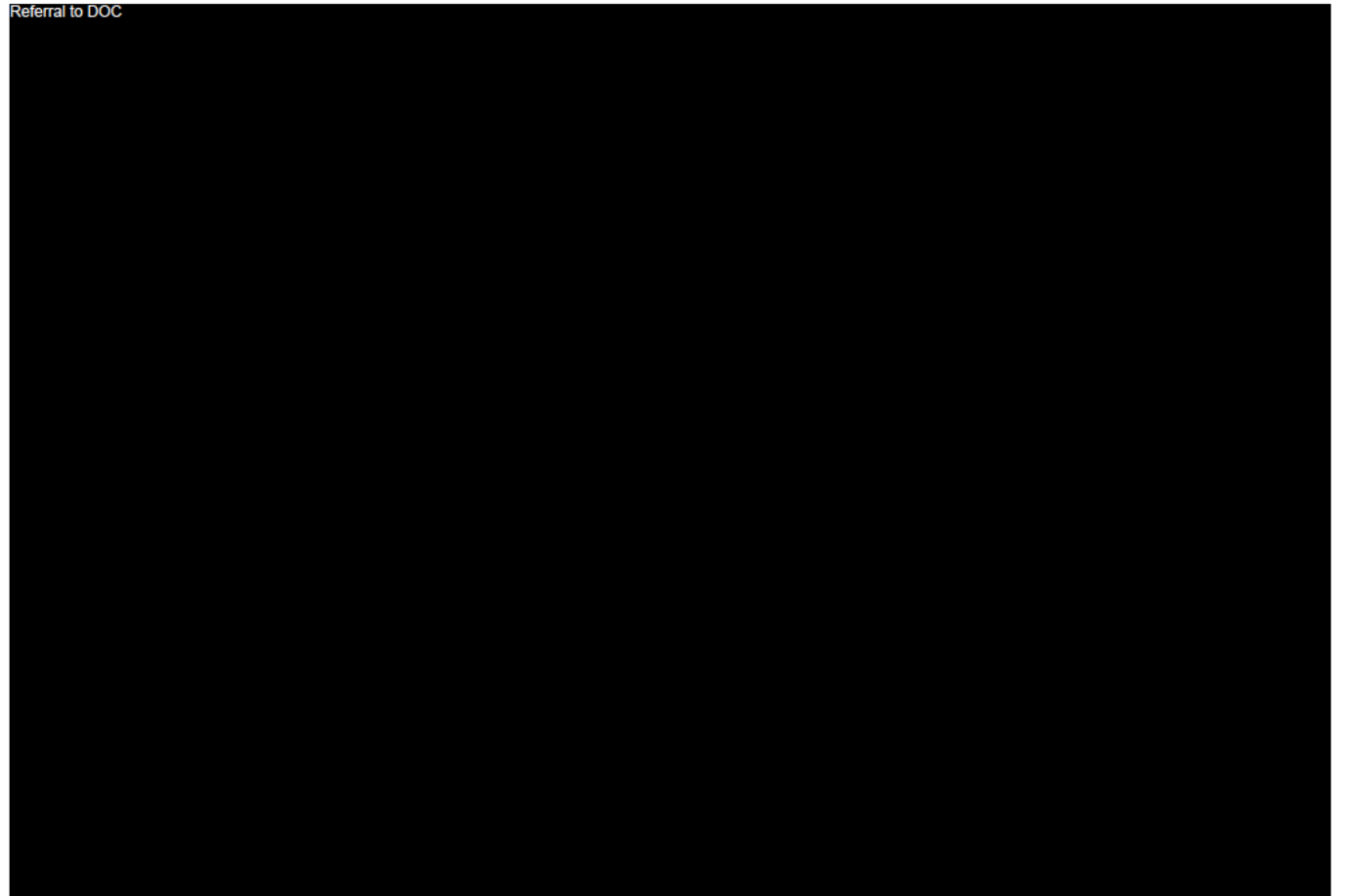
O'Melveny

Evan N. Schlom
eschlom@omm.com
O: +1-202-383-5512

O'Melveny & Myers LLP
1625 Eye Street, NW
Washington, DC 20006
[Website](#) | [LinkedIn](#) | [Twitter](#) | [Bio](#)

This message and any attached documents contain information from the law firm of O'Melveny & Myers LLP that may be confidential and/or privileged. If you are not the intended recipient, you may not read, copy, distribute, or use this information. If you have received this transmission in error, please notify the sender immediately by reply e-mail and then delete this message.





From: [Keith Labeledz](#)
To: [Deborah J. Bortot](#); [Heather A. Jones](#)
Subject: FW: Ross Draft Ethics Agreement
Date: Friday, January 06, 2017 9:20:29 AM
Attachments: [image001.png](#)

Note: Will and Dana are out today. However, I think David has been handling the ethics agreement.

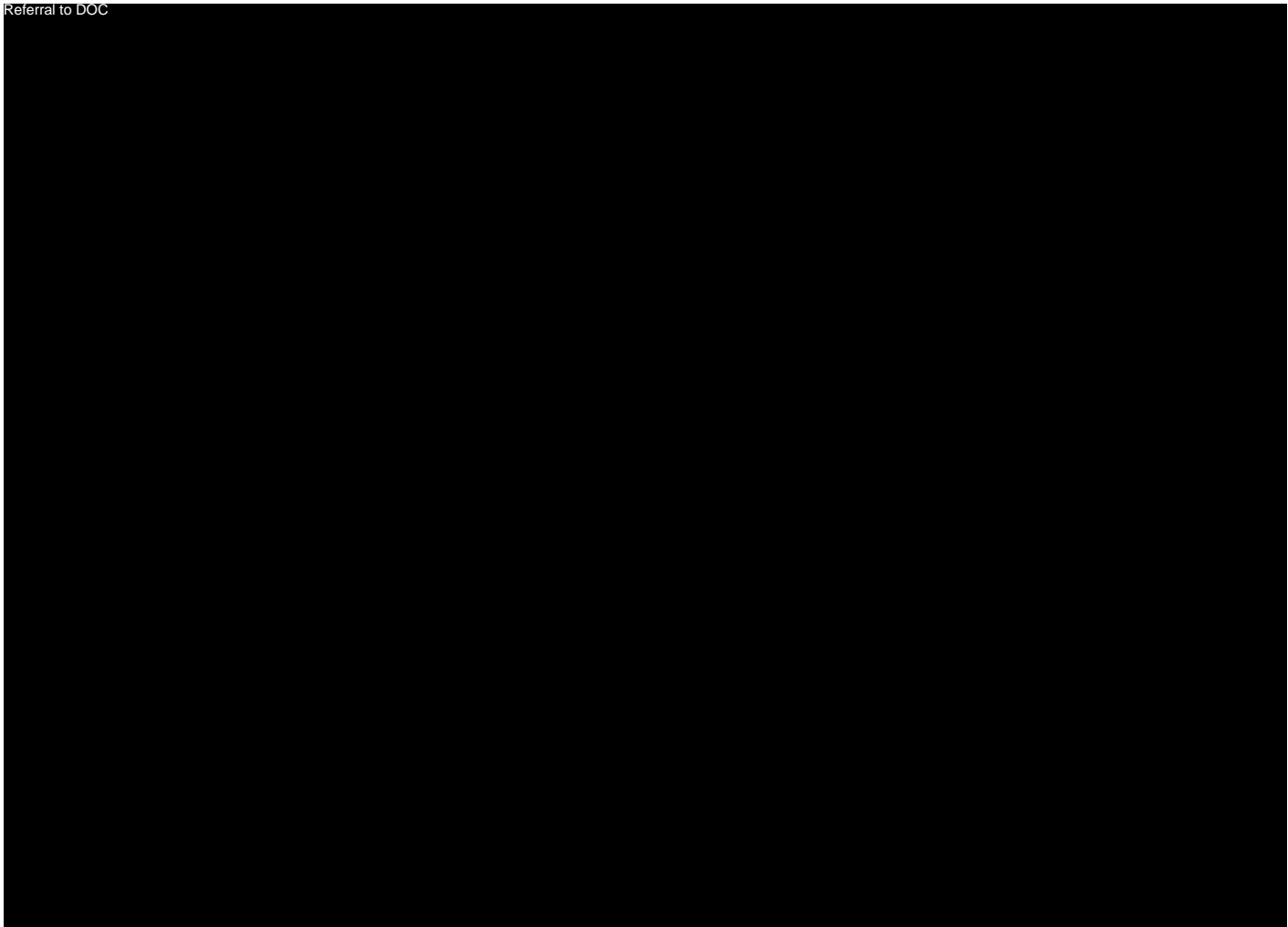
From: Keith Labeledz
Sent: Friday, January 06, 2017 9:19 AM
To: 'Maggi, David (Federal)'
Cc: Warren, Arthur (Federal); Williams, Gaye (Federal); Jacobi, Will (Federal); Jacob, Dana (Federal)
Subject: RE: Ross Draft Ethics Agreement

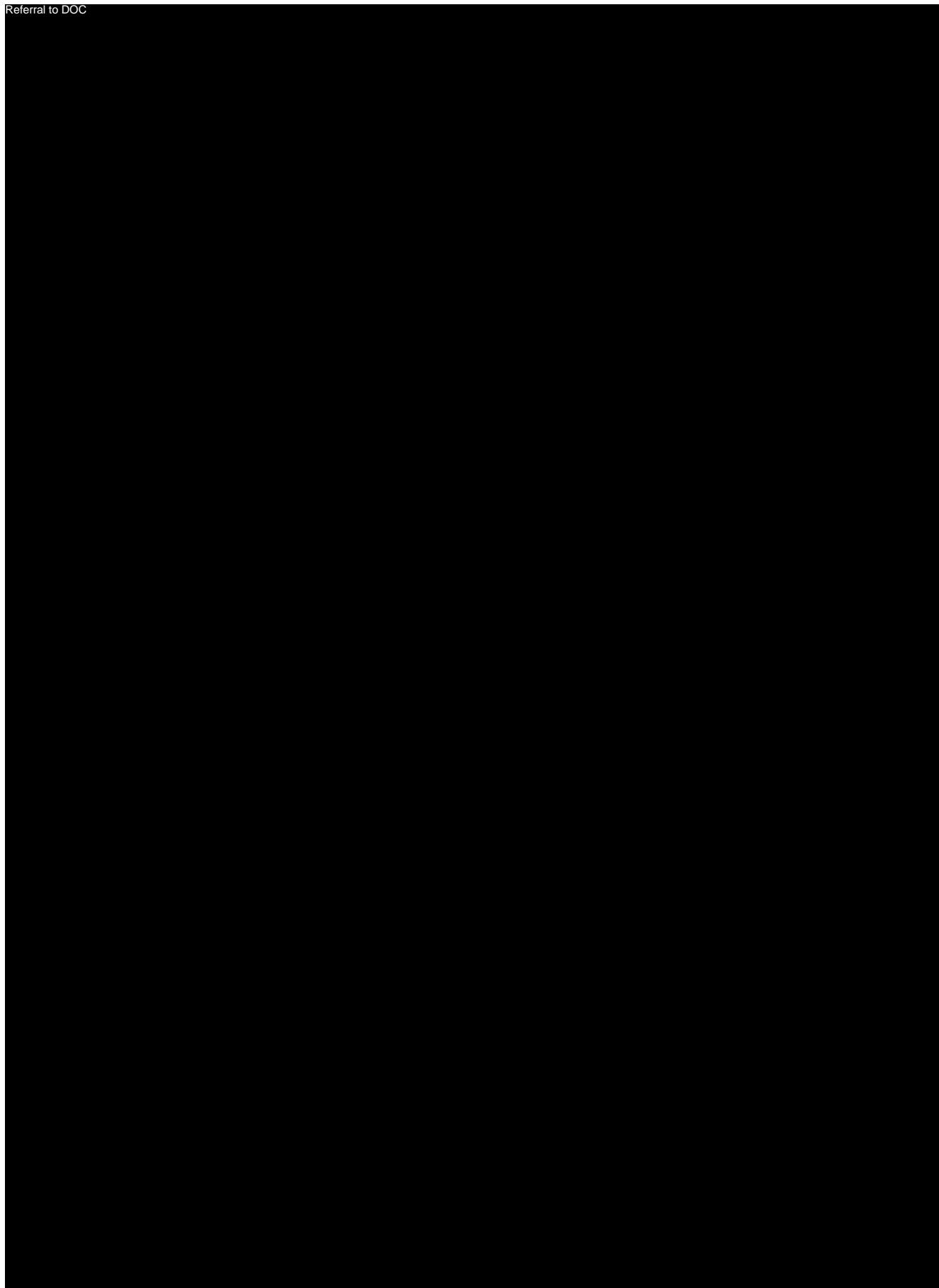
David,

I cannot open the links in the email below. In terms of a call, I think, at this point, I will need to bring in others. Once I have and share the documents, I can see what time works for Deb, Heather et al.

Thank you.
Keith

Referral to DOC





From: [Heather A. Jones](#)
To: [Keith Labeledz](#); [Deborah J. Bortot](#)
Subject: Re: Ross
Date: Thursday, January 05, 2017 10:38:55 PM

I heard this from minority staff.

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

From: Keith Labeledz
Sent: Thursday, January 5, 2017 9:43 PM
To: Heather A. Jones; Deborah J. Bortot
Subject: RE: Ross

I can let DOC know tomorrow morning. Did we hear this from the committee directly? Maggi may ask, (b) (5) .

From: Heather A. Jones
Sent: Thursday, January 05, 2017 8:22 PM
To: Keith Labeledz; Deborah J. Bortot
Subject: Ross

(b) (5), (b) (6)

Heather Jones
(202) 482-9316
Office of Government Ethics

Visit OGE's website: www.oge.gov
Follow OGE on Twitter: @OfficeGovEthics

From: [Schlom, Evan N.](#)
To: [Keith Labeledz](#); [Kassinger, Theodore W.](#)
Cc: [David Maggi](#); "wjacobi@doc.gov"
Subject: RE: Ross 278
Date: Thursday, January 05, 2017 2:05:19 PM

That works for me. Will dial in now.

From: Keith Labeledz [<mailto:klabeledz@oge.gov>]
Sent: Thursday, January 05, 2017 2:04 PM
To: Kassinger, Theodore W.; Schlom, Evan N.
Cc: David Maggi; 'wjacobi@doc.gov'
Subject: RE: Ross 278

I am available. Will try dialing the number at 2:05. If that does not work, just let me know a new time.

Thank you.

Keith

From: Kassinger, Theodore W. [<mailto:tkassinger@omm.com>]
Sent: Thursday, January 05, 2017 2:01 PM
To: Keith Labeledz
Cc: David Maggi; Schlom, Evan N.
Subject: RE: Ross 278

Keith,

I'm on a call with Mr. Ross now. Evan, if you and Keith can connect, that would be great. Otherwise, we'll try later.

Ted

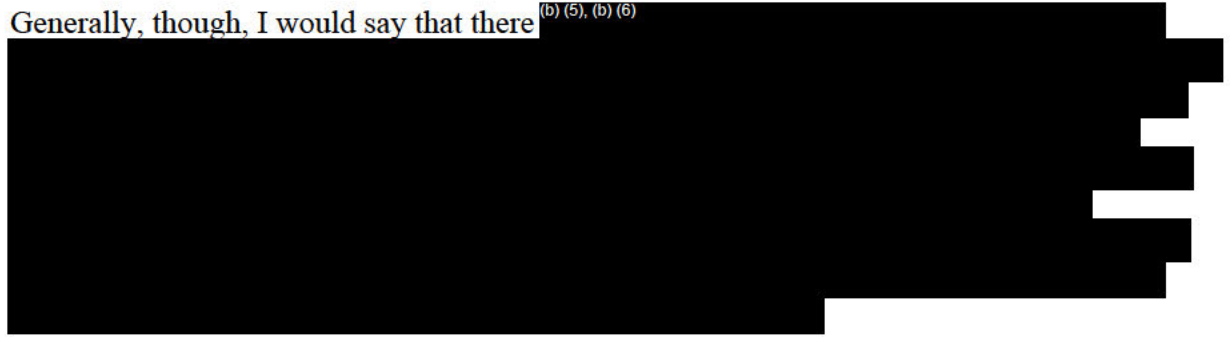
From: Keith Labeledz [<mailto:klabeledz@oge.gov>]
Sent: Thursday, January 05, 2017 12:41 PM
To: Kassinger, Theodore W.
Cc: David Maggi; Schlom, Evan N.

Subject: RE: Ross 278

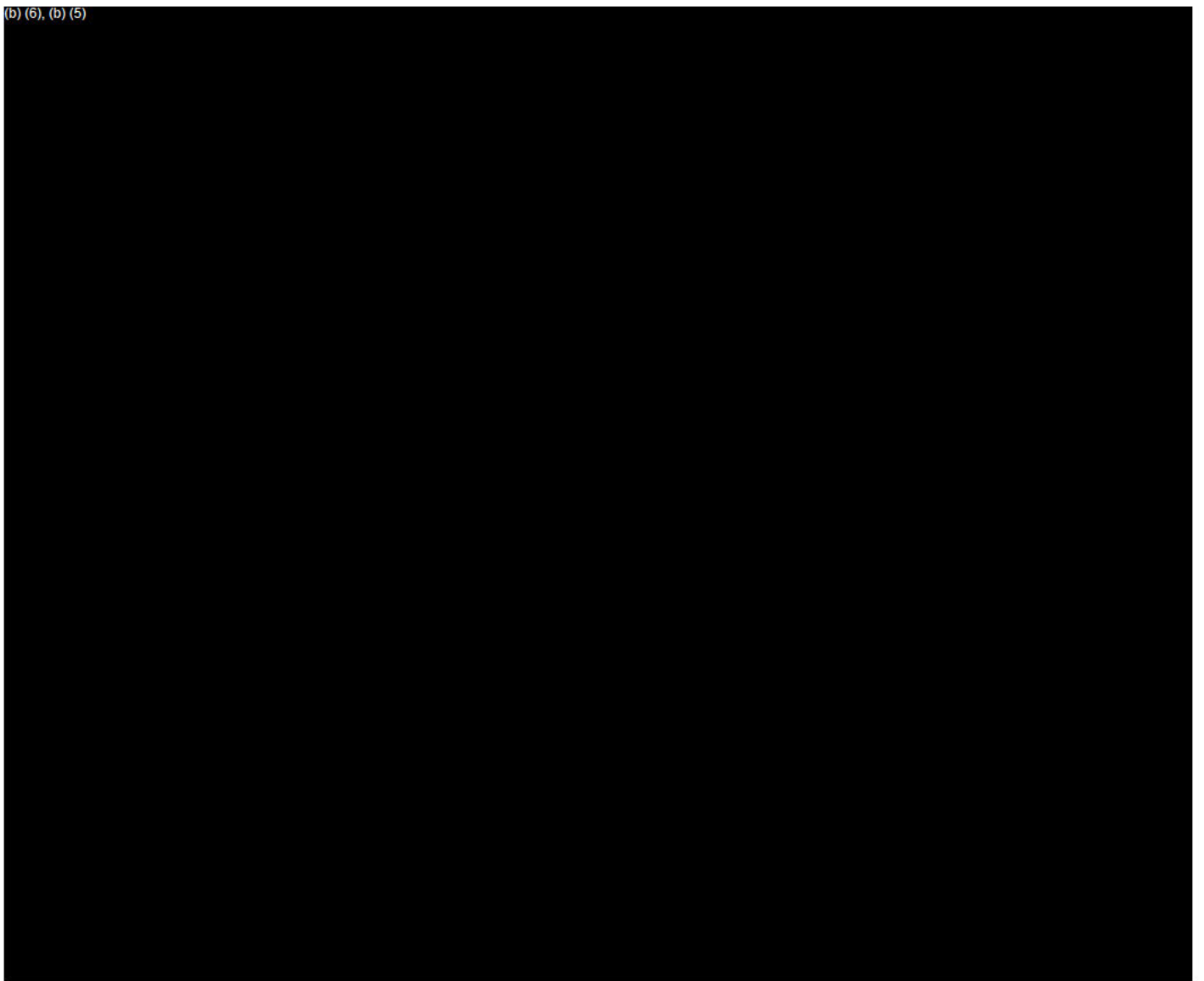
I am available after 1:30 today. Whatever time after that works for Commerce is fine with me as well.

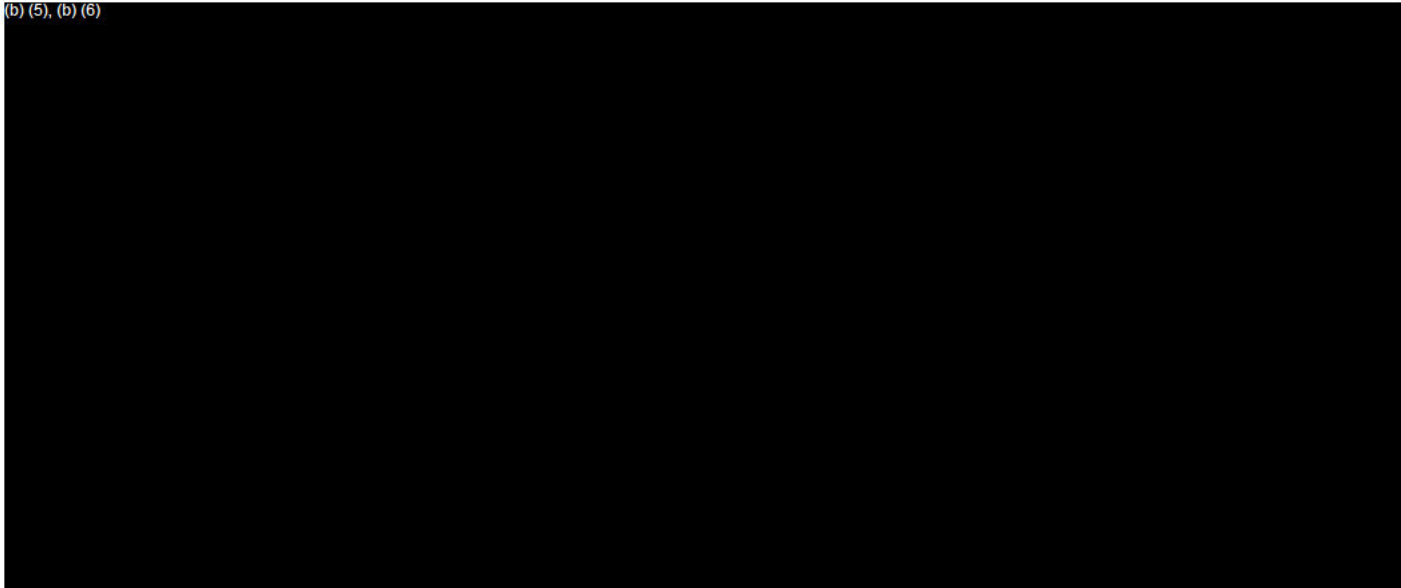
Generally, though, I would say that there

(b) (5), (b) (6)

A large rectangular area of the document is completely redacted with a solid black fill. The redaction covers the majority of the page's content.

(b) (6), (b) (5)

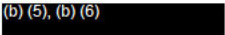
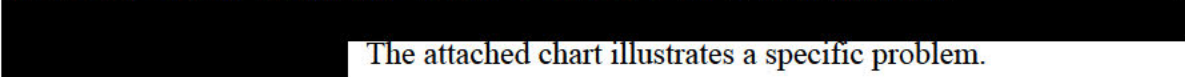
A very large rectangular area of the document is completely redacted with a solid black fill, covering almost the entire lower half of the page.



From: Kassinger, Theodore W. [<mailto:tkassinger@omm.com>]
Sent: Thursday, January 05, 2017 12:19 PM
To: Keith Labedz
Cc: David Maggi; Schlom, Evan N.
Subject: Ross 278

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

Keith,

We need your help in figuring out how to address a few remaining issues. 
 The attached chart illustrates a specific problem.

Are you available this afternoon for a call? David, you are welcome to join as well.

We are nearly finished updating data other than this issue.

Thanks,

Ted

**O'Melveny
Theodore W. Kassinger**

Partner

tkassinger@omm.com

O: +1-202-383-5170

M: (b) (6)

O'Melveny & Myers LLP

1625 Eye Street, NW

Washington, DC 20006

[Website](#) | [LinkedIn](#) | [Twitter](#)

This message and any attached documents contain information from the law firm of O'Melveny & Myers LLP that may be confidential and/or privileged. If you are not the intended recipient, you may not read, copy, distribute, or use this information. If you have received this transmission in error, please notify the sender immediately by reply e-mail and then delete this message.

OGE Confidential Notice: This email, including all attachments, may constitute a Federal record or other Government property that is intended only for the use of the individual or entity to which it is addressed. This email also may contain information that is privileged, confidential, or otherwise protected from disclosure under applicable law. If you are not the intended recipient or the employee or agent responsible for delivering the transmission to the intended recipient, you are hereby notified that any dissemination, distribution, copying or use of this email or its contents is strictly prohibited. If you have received this email in error, please notify the sender by responding to the email and then immediately delete the email.

OGE Confidential Notice: This email, including all attachments, may constitute a Federal record or other Government property that is intended only for the use of the individual or entity to which it is addressed. This email also may contain information that is privileged, confidential, or otherwise protected from disclosure under applicable law. If you are not the intended recipient or the employee or agent responsible for delivering the transmission to the intended recipient, you are hereby notified that any dissemination, distribution, copying or use of this email or its contents is strictly prohibited. If you have received this email in error, please notify the sender by responding to the email and then immediately delete the email.

From: [Keith Labeledz](#)
To: "wjacobi@doc.gov"
Subject: FW: Ross 278
Date: Thursday, January 05, 2017 1:42:36 PM

From: Kassinger, Theodore W. [mailto:tkassinger@omm.com]
Sent: Thursday, January 05, 2017 12:59 PM
To: Keith Labeledz
Cc: David Maggi; Schlom, Evan N.
Subject: RE: Ross 278

Thanks. How about 2:00pmET?
we can use this dial in:

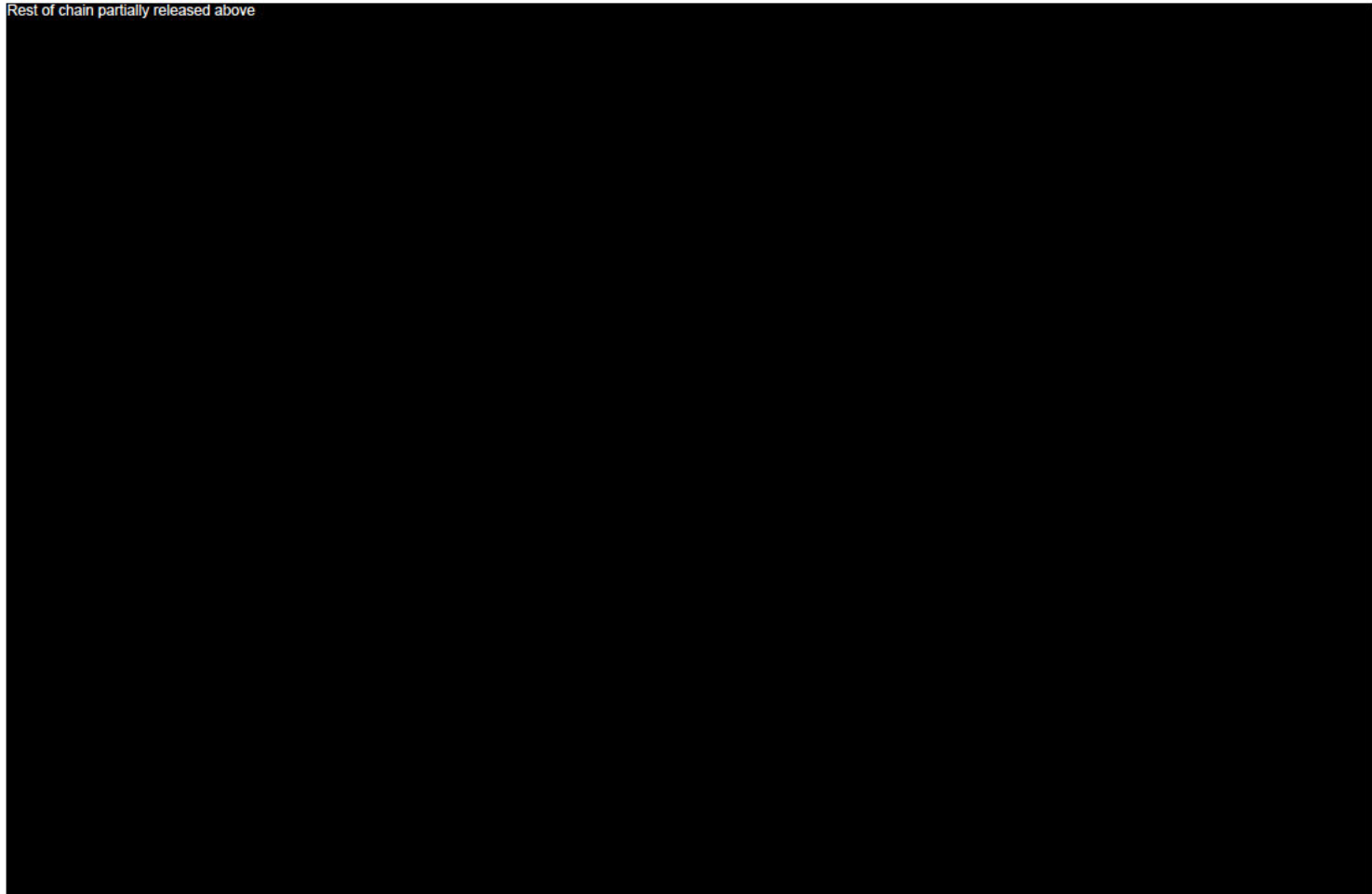
(b) (6)



From: Keith Labeledz [mailto:klabeledz@oge.gov]
Sent: Thursday, January 05, 2017 12:41 PM
To: Kassinger, Theodore W.
Cc: David Maggi; Schlom, Evan N.
Subject: RE: Ross 278

I am available after 1:30 today. Whatever time after that works for Commerce is fine with me as well.

Rest of chain partially released above



From: [Teresa L. Williamson](#)
To: [Stephanie Nonluecha](#); [Jack MacDonald](#); [Steven Corbally](#); [Brandon L. Bunderson](#); [Emory A. Rounds III](#); [Jim Robertson](#); [Elizabeth D. Horton](#); [Vincent Salamone](#); [Rachel K. Dowell](#)
Cc: [LEGTEAM](#); [Lorna A. Syme](#); [Megan V. Khaner](#); [Sandra S. Mabry](#); [Keith Labedz](#); [Leigh J. Francis](#); [Grace A. Clark](#); [Cheryl L. Kane-Piasecki](#); [Deborah J. Bortot](#); [Wendy G. Pond](#); [Dale A. Christopher](#); [Nicole Stein](#); [Daniel L. Skalla](#); [Diana Veilleux](#); [Seth Jaffe](#); [David A. Meyers](#); [Ciara M. Guzman](#); [Patrick Shepherd](#); [Patrick J. Lightfoot](#); [Rodrick T. Johnson](#); [Kimberley H. Kaplan](#); [Kimberly L. Sikora Panza](#); [Elaine Newton](#); [Heather A. Jones](#); [Monica M. G. Ashar](#); [Christopher J. Swartz](#); [Jaideep Mathai](#)
Subject: NEW NOMINATION - January 4, 2017
Date: Thursday, January 05, 2017 9:31:04 AM
Importance: High

The following nomination has been posted on THOMAS. Please contact the agency if you do not have the final package.

Please remember to add the applicable Senate Transmittal Letter Template to FDTS before forwarding. Thanks!!

NOMINATION - OGE Reviewer: Jack MacDonald (*INTEGRITY*) RENOMINATION – NO NEW PAPERWORK REQUIRED FROM AGENCY – TERESA WILL PROCESS

[PN10](#) — 115th Congress (2017-2018) — Robert P. Storch — Department of Defense

Robert P. Storch, of the District of Columbia, to be Inspector General of the National Security Agency. (New Position)

Date Received from President: 01/04/2017

Committee: Intelligence

Latest Action: 01/04/2017 - Received in the Senate and referred to the Select Committee on Intelligence; when reported by the Select Committee on Intelligence, pursuant to S. Res. 470 of the 113th Congress, to be sequentially referred to the Committee on Armed Services for 30 calendar days; when reported by the Committee on Armed Services, under the authority of the order of January 7, 2009, to be sequentially referred to the Committee on Homeland Security and Governmental Affairs for 20 calendar days. ([All Actions](#))

NOMINATION - OGE Reviewer: Steve (*INTEGRITY*)

[PN9](#) — 115th Congress (2017-2018) — Elizabeth A. Field — Office of Personnel

Management

Elizabeth A. Field, of the District of Columbia, to be Inspector General, Office of Personnel Management, vice Patrick E. McFarland, resigned.

Date Received from President: 01/04/2017

Committee: Homeland Security and Governmental Affairs

Latest Action: 01/04/2017 - Received in the Senate and referred to the Committee on Homeland Security and Governmental Affairs. ([All Actions](#))

NOMINATION - OGE Reviewer: Brandon (*INTEGRITY*)

[PN8](#) — 115th Congress (2017-2018) — Carolyn N. Lerner — Office of Special Counsel

Carolyn N. Lerner, of Maryland, to be Special Counsel, Office of Special Counsel, for the term of five years. (Reappointment)

Date Received from President: 01/04/2017

Committee: Homeland Security and Governmental Affairs

Latest Action: 01/04/2017 - Received in the Senate and referred to the Committee on Homeland Security and Governmental Affairs. ([All Actions](#))

NOMINATION - OGE Reviewer: Emory (*INTEGRITY*) RENOMINATION – NO NEW PAPERWORK REQUIRED FROM AGENCY – TERESA WILL PROCESS

[PN7](#) — 115th Congress (2017-2018) — Tulinabo Salama Mushingi — Department of State

Tulinabo Salama Mushingi, of Virginia, a Career Member of the Senior Foreign Service, Class of Counselor, to be Ambassador Extraordinary and Plenipotentiary of the United States of America to the Republic of Senegal, and to serve concurrently and without additional

compensation as Ambassador Extraordinary and Plenipotentiary of the United States of America to the Republic of Guinea-Bissau.

Date Received from President: 01/04/2017

Committee: Foreign Relations

Latest Action: 01/04/2017 - Received in the Senate and referred to the Committee on Foreign Relations. ([All Actions](#))

NOMINATION - OGE Reviewer: Jim (*INTEGRITY*) RENOMINATION – NO NEW PAPERWORK REQUIRED FROM AGENCY – TERESA WILL PROCESS

[PN6](#) — 115th Congress (2017-2018) — **Michael P. Leary** — **Social Security**

Administration

Michael P. Leary, of Pennsylvania, to be Inspector General, Social Security Administration, vice Patrick P. O'Carroll, Jr., resigned.

Date Received from President: 01/04/2017

Committee: Finance

Latest Action: 01/04/2017 - Received in the Senate and referred sequentially to the Committee on Finance; when reported by the Committee on Finance, pursuant to an order of January 7, 2009, to be sequentially referred to the Committee on Homeland Security and Governmental Affairs for 20 calendar days. ([All Actions](#))

NOMINATION - OGE Reviewer: Elizabeth (*INTEGRITY*)

[PN5](#) — 115th Congress (2017-2018) — **Jessica Rosenworcel** — **Federal Communications**

Commission

Jessica Rosenworcel, of the District of Columbia, to be a Member of the Federal Communications Commission for a term of five years from July 1, 2015. (Reappointment)

Date Received from President: 01/04/2017

Committee: Commerce, Science, and Transportation

Latest Action: 01/04/2017 - Received in the Senate and referred to the Committee on Commerce, Science, and Transportation. ([All Actions](#))

NOMINATION - OGE Reviewer: Jack (*450*) RENOMINATION – NO NEW PAPERWORK REQUIRED FROM AGENCY – TERESA WILL PROCESS

[PN4](#) — 115th Congress (2017-2018) — **Brent Franklin Nelsen** — **Corporation for Public**

Broadcasting

Brent Franklin Nelsen, of South Carolina, to be a Member of the Board of Directors of the Corporation for Public Broadcasting for a term expiring January 31, 2022. (Reappointment)

Date Received from President: 01/04/2017

Committee: Commerce, Science, and Transportation

Latest Action: 01/04/2017 - Received in the Senate and referred to the Committee on Commerce, Science, and Transportation. ([All Actions](#))

NOMINATION - OGE Reviewer: Vince (*450*) RENOMINATION – NO NEW PAPERWORK REQUIRED FROM AGENCY – TERESA WILL PROCESS

[PN3](#) — 115th Congress (2017-2018) — **David J. Arroyo** — **Corporation for Public**

Broadcasting

David J. Arroyo, of New York, to be a Member of the Board of Directors of the Corporation for Public Broadcasting for a term expiring January 31, 2022. (Reappointment)

Date Received from President: 01/04/2017

Committee: Commerce, Science, and Transportation

Latest Action: 01/04/2017 - Received in the Senate and referred to the Committee on Commerce, Science, and Transportation. ([All Actions](#))

NOMINATION - OGE Reviewer: Rachel (*INTEGRITY*) RENOMINATION – NO NEW PAPERWORK REQUIRED FROM AGENCY – TERESA WILL PROCESS

[PN2](#) — 115th Congress (2017-2018) — **Glenn Fine** — **Department of Defense**

Glenn Fine, of Maryland, to be Inspector General, Department of Defense, vice Jon T. Rymer, resigned.

Date Received from President: 01/04/2017

Committee: Armed Services

Latest Action: 01/04/2017 - Received in the Senate and referred sequentially to the Committee on Armed Services; when reported by the Committee on Armed Services, pursuant to an order of January 7, 2009, to be sequentially referred to the Committee on Homeland Security and Governmental Affairs for 20 calendar days. ([All Actions](#))

NOMINATION - OGE Reviewer: Stephanie (450) RENOMINATION – NO NEW PAPERWORK REQUIRED FROM AGENCY – TERESA WILL PROCESS

[PN1](#) — 115th Congress (2017-2018) — Rebecca Emily Rapp — Legal Services Corporation

Rebecca Emily Rapp, of Wisconsin, to be a Member of the Board of Directors of the Legal Services Corporation for a term expiring July 13, 2019, vice Sharon L. Browne, resigned.

Date Received from President: 01/04/2017

Committee: (See [S. Res. 116 - 112th Congress](#))

Latest Action: 01/04/2017 - Placed on Senate Executive Calendar in the Privileged Nomination section with nominee information requested by the Committee on Health, Education, Labor, and Pensions, pursuant to S.Res. 116, 112th Congress. ([All Actions](#))

From: [Keith Labedz](#)
To: "wjacobi@doc.gov"
Subject: Questionnaire
Date: Wednesday, January 04, 2017 4:09:16 PM

Hello,

I tried to leave you a message just now, but I seem to be having a problem with my telephone (too much feedback) --

I saw that that the committee released the questionnaire submitted by the Secretary Designee. I believe you would have already seen the questionnaire; however, I wanted to flag just in case.

Keith

Keith Labedz
Senior Program Analyst
Presidential Nominations Branch
U.S. Office of Government Ethics
Telephone: (202) 482-9218

From: [Integrity.gov](https://integrity.gov)
To: [Keith Labedz](#)
Subject: Integrity.gov: Report Pending Action
Date: Wednesday, January 04, 2017 10:11:34 AM

A 2017 Nominee report for Ross, Wilbur L is pending your action as OGE Nominee Reviewer. The report has been pending for 14 days. You may access the report by logging into integrity at <https://integrity.gov>.

From: [Van Beek, Jason \(Commerce\)](#)
To: [Sandra S. Mabry](#)
Subject: RE: Chao and Ross OGE packages
Date: Tuesday, January 03, 2017 5:16:24 PM

Hi Sandy, when you get a chance tomorrow, could you give me a call at (b) (6) ?

Best,
Jason

From: Sandra S. Mabry [mailto:ssmabry@oge.gov]
Sent: Tuesday, December 20, 2016 6:53 PM
To: Van Beek, Jason (Commerce) <Jason_VanBeek@commerce.senate.gov>
Subject: RE: Chao and Ross OGE packages

Jason, just got back to my computer and saw your email. I'll call you tomorrow to discuss. Sandy

From: Van Beek, Jason (Commerce) [mailto:(b) (6)]
Sent: Tuesday, December 20, 2016 4:41 PM
To: Sandra S. Mabry; Rossi, Nick (Commerce); Arnakis, Adrian (Commerce)
Subject: Chao and Ross OGE packages

Hi Sandra, hope you're doing well. Thx again for the quick turnaround of the (b) (6) nom a few weeks ago, it was greatly appreciated! I'm just curious about when we can expect the OGE packages for (b) (6) and Wilbur Ross. - Jason

Sent from my Verizon, Samsung Galaxy smartphone

OGE Confidential Notice: This email, including all attachments, may constitute a Federal record or other Government property that is intended only for the use of the individual or entity to which it is addressed. This email also may contain information that is privileged, confidential, or otherwise protected from disclosure under applicable law. If you are not the intended recipient or the employee or agent responsible for delivering the transmission to the intended recipient, you are hereby notified that any dissemination, distribution, copying or use of this email or its contents is strictly prohibited. If you have received this email in error, please notify the sender by responding to the email and then immediately delete the email.

From: [Kassinger, Theodore W.](#)
To: [Keith Labeledz](#); "[David Maggi](#)"; "[Gaye Williams](#)"; "[Jacobi, Will \(Federal\) \(wjacobi@doc.gov\)](#)"
Subject: RE: WLR 278 (second draft notes)
Date: Monday, January 02, 2017 10:45:24 AM

Thanks, Keith.

We will address asap.

From: Keith Labeledz [mailto:klabeledz@oge.gov]
Sent: Monday, January 02, 2017 10:16 AM
To: Kassinger, Theodore W.; 'David Maggi'; 'Gaye Williams'; 'Jacobi, Will (Federal) (wjacobi@doc.gov)'
Subject: [WARNING : MESSAGE ENCRYPTED]RE: WLR 278 (second draft notes)

Attachment - 8 pages withheld in full - (b)(3), (4), (5), (6)

Good morning,

Attached are my notes on the second draft. The password is the same as the one used for the prior notes.

Thank you.

Keith

From: Keith Labeledz
Sent: Sunday, January 01, 2017 2:03 PM
To: 'Kassinger, Theodore W.'; David Maggi; Gaye Williams; Jacobi, Will (Federal) (wjacobi@doc.gov)
Subject: RE: WLR 278

Hello,

I will begin reviewing the current update. However, one thing I did notice in an initial check is that the ^{(b)(3), (b)(5)}

(b)(3), (b)
(5)

Thank you.

Keith

From: Kassinger, Theodore W. [<mailto:tkassinger@omm.com>]
Sent: Sunday, January 01, 2017 10:53 AM
To: Keith Labeledz; David Maggi; Gaye Williams; Jacobi, Will (Federal) (wjacobi@doc.gov)
Subject: WLR 278

Happy new year to all!

While we continue to get some details to enter on the 278, please go ahead and review the current update, if you haven't already started to do so. We are substantially finished with addressing the comments and questions raised by Keith in his initial run through.

thanks,

Ted

OGE Confidential Notice: This email, including all attachments, may constitute a Federal record or other Government property that is intended only for the use of the individual or entity to which it is addressed. This email also may contain information that is privileged, confidential, or otherwise protected from disclosure under applicable law. If you are not the intended recipient or the employee or agent responsible for delivering the transmission to the intended recipient, you are hereby notified that any dissemination, distribution, copying or use of this email or its contents is strictly prohibited. If you have received this email in error, please notify the sender by responding to the email and then immediately delete the email.

On Jan 1, 2017, at 2:02 PM, Keith Labeledz <klabeledz@oge.gov> wrote:

Hello,

I will begin reviewing the current update. However, one thing I did notice in an initial check is that the (b)(3), (b)(5)

[REDACTED]

Thank you.
Keith

From: Kassinger, Theodore W. [<mailto:tkassinger@omm.com>]
Sent: Sunday, January 01, 2017 10:53 AM
To: Keith Labeledz; David Maggi; Gaye Williams; Jacobi, Will (Federal) (wjacobi@doc.gov)
Subject: WLR 278

Happy new year to all!

While we continue to get some details to enter on the 278, please go ahead and review the current update, if you haven't already started to do so. We are substantially finished with addressing the comments and questions raised by Keith in his initial run through.

thanks,
Ted

OGE Confidential Notice: This email, including all attachments, may constitute a Federal record or other Government property that is intended only for the use of the individual or entity to which it is addressed. This email also may contain information that is privileged, confidential, or otherwise protected from disclosure under applicable law. If you are not the intended recipient or the employee or agent responsible for delivering the transmission to the intended recipient, you are hereby notified that any dissemination, distribution, copying or use of this email

or its contents is strictly prohibited. If you have received this email in error, please notify the sender by responding to the email and then immediately delete the email.

From: [Keith Labeledz](#)
To: ["Schlom, Evan N."](#)
Cc: ["Kassinger, Theodore W."](#); ["Sheehan, Matthew J."](#); ["Dorey, David R."](#); ["Lane, Brittney"](#); ["Murphy, Kevin"](#); ["dmaggi@doc.gov"](#); ["gwilliams@doc.gov"](#); ["wjacobi@doc.gov"](#)
Subject: RE: WLR 278
Date: Sunday, January 01, 2017 2:29:00 PM

Yes, ^{(b) (5)} [REDACTED]

Thank you.
Keith

From: Schlom, Evan N. [mailto:eschlom@omm.com]
Sent: Sunday, January 01, 2017 2:26 PM
To: Keith Labeledz
Cc: Kassinger, Theodore W.; Sheehan, Matthew J.; Dorey, David R.; Lane, Brittney; Murphy, Kevin; dmaggi@doc.gov; gwilliams@doc.gov; wjacobi@doc.gov
Subject: RE: WLR 278

Keith,

To your first point: we have most, if not all, of the ^{(b) (5), (b) (6)} [REDACTED]

Is that correct?

To your second point: yes, we are still ^{(b) (5), (b) (6)} [REDACTED]

Evan

Begin forwarded message:

From: Keith Labeledz <klabeledz@oge.gov>
Date: January 1, 2017 at 2:02:42 PM EST
To: "Kassinger, Theodore W." <tkassinger@omm.com>, David Maggi <dmaggi@doc.gov>, Gaye Williams <gwilliams@doc.gov>, "Jacobi, Will (Federal) (wjacobi@doc.gov)" <wjacobi@doc.gov>
Subject: RE: WLR 278

Hello,

I will begin reviewing the current update. However, one thing I did notice in an initial check is that the ^{(b)(3), (b)(5)} [REDACTED]

Thank you.
Keith

From: Kassinger, Theodore W. [<mailto:tkassinger@omm.com>]
Sent: Sunday, January 01, 2017 10:53 AM
To: Keith Labedz; David Maggi; Gaye Williams; Jacobi, Will (Federal) (wjacobi@doc.gov)
Subject: WLR 278

Happy new year to all!

While we continue to get some details to enter on the 278, please go ahead and review the current update, if you haven't already started to do so. We are substantially finished with addressing the comments and questions raised by Keith in his initial run through.

thanks,
Ted

OGE Confidential Notice: This email, including all attachments, may constitute a Federal record or other Government property that is intended only for the use of the individual or entity to which it is addressed. This email also may contain information that is privileged, confidential, or otherwise protected from disclosure under applicable law. If you are not the intended recipient or the employee or agent responsible for delivering the transmission to the intended recipient, you are hereby notified that any dissemination, distribution, copying or use of this email or its contents is strictly prohibited. If you have received this email in error, please notify the sender by responding to the email and then immediately delete the email.

From: [Kassinger Theodore W.](#)
To: [Keith Labeledz](#)
Cc: [Williams Gaye \(Federal\)](#); [Maggi David \(Federal\)](#); [Schlom Evan N.](#)
Subject: [GRAYMAIL] RE: Notes on draft document
Date: Thursday, December 29, 2016 7:17:36 PM

thanks, Keith. We are following the (b)(5), (6) guidance, but still have some questions about how to report (b)(3), (b)(5), (b)(6)

We are free tomorrow morning, except for 11am-noonET. Is there a good time for you?

From: Keith Labeledz [mailto:klabeledz@oge.gov]
Sent: Thursday, December 29, 2016 6:58 PM
To: Kassinger, Theodore W.
Cc: Williams, Gaye (Federal); Maggi, David (Federal); Schlom, Evan N.
Subject: RE: Notes on draft document

Hello,

I am available to discuss tonight if that works for everybody. Or we can schedule for tomorrow morning.

As a general matter, (b)(5), (6)

Keith

From: Kassinger, Theodore W. [mailto:tkassinger@omm.com]
Sent: Thursday, December 29, 2016 6:32 PM
To: Keith Labeledz
Cc: Williams, Gaye (Federal); Maggi, David (Federal); Schlom, Evan N.
Subject: [GRAYMAIL] RE: Notes on draft document

Keith,

We are continuing to work through an update of the SF 278 in response to your comments of 12/22. One of the issues we are uncertain about is the (b)(3), (4), (6)

Please let us know if you have a moment to discuss this with my colleague Evan and me. Gaye and David, we'd be glad to have the Commerce team join.

Thanks,

Ted

From: Keith Labeledz [mailto:klabeledz@oge.gov]
Sent: Wednesday, December 28, 2016 4:12 PM
To: Kassinger, Theodore W.
Cc: Williams, Gaye (Federal); Maggi, David (Federal)
Subject: RE: Notes on draft document

Hello,

I am just checking in on the status of the update process. I realize that my list of comments/questions was rather lengthy and that updating will take some time. However, I also wanted to make sure that I begin my review of the updated draft as soon as it is ready.

Thank you.

Keith

Keith Labeledz

Senior Program Analyst

Presidential Nominations Branch

U.S. Office of Government Ethics

Telephone: (202) 482-9218

From: Kassinger, Theodore W. [<mailto:tkassinger@omm.com>]

Sent: Thursday, December 22, 2016 9:25 AM

To: Keith Labeledz

Cc: Williams, Gaye (Federal); Maggi, David (Federal)

Subject: [GRAYMAIL] RE: Notes on draft document

Thanks very much, Keith. We will be updating the draft asap.

Ted

**O'Melveny
Theodore W. Kassinger**

Partner

tkassinger@omm.com

O: +1-202-383-5170

M: (b) (6)
O'Melveny & Myers LLP

1625 Eye Street, NW

Washington, DC 20006

[Website](#) | [LinkedIn](#) | [Twitter](#)

This message and any attached documents contain information from the law firm of O'Melveny & Myers LLP that may be confidential and/or privileged. If you are not the intended recipient, you may not read, copy, distribute, or use this information. If you have received this transmission in error, please notify the sender immediately by reply e-mail and then delete this message.

From: Keith Labeledz [<mailto:klabeledz@oge.gov>]

Sent: Thursday, December 22, 2016 9:17 AM

To: Kassinger, Theodore W.

Cc: Williams, Gaye (Federal); Maggi, David (Federal)

Subject: [WARNING : MESSAGE ENCRYPTED]Notes on draft document

Attachment - 18 pages withheld in full - (b)(3), (4), (5), (6)

Good Morning,

Attached to this email are some more detailed comments on the initial draft report submitted through *Integrity*. I understand that the draft will be subject to change based on our earlier conversations and additional information. My comments are likewise a working draft, so I apologize in advance for any typographical issues. Nevertheless, I thought that it would be helpful if I sent you comments as quickly as possible.

The attachment is password-protected. The password is the same password used in the documents that you sent me on Friday.

Thank you.

Keith

Keith Labedz

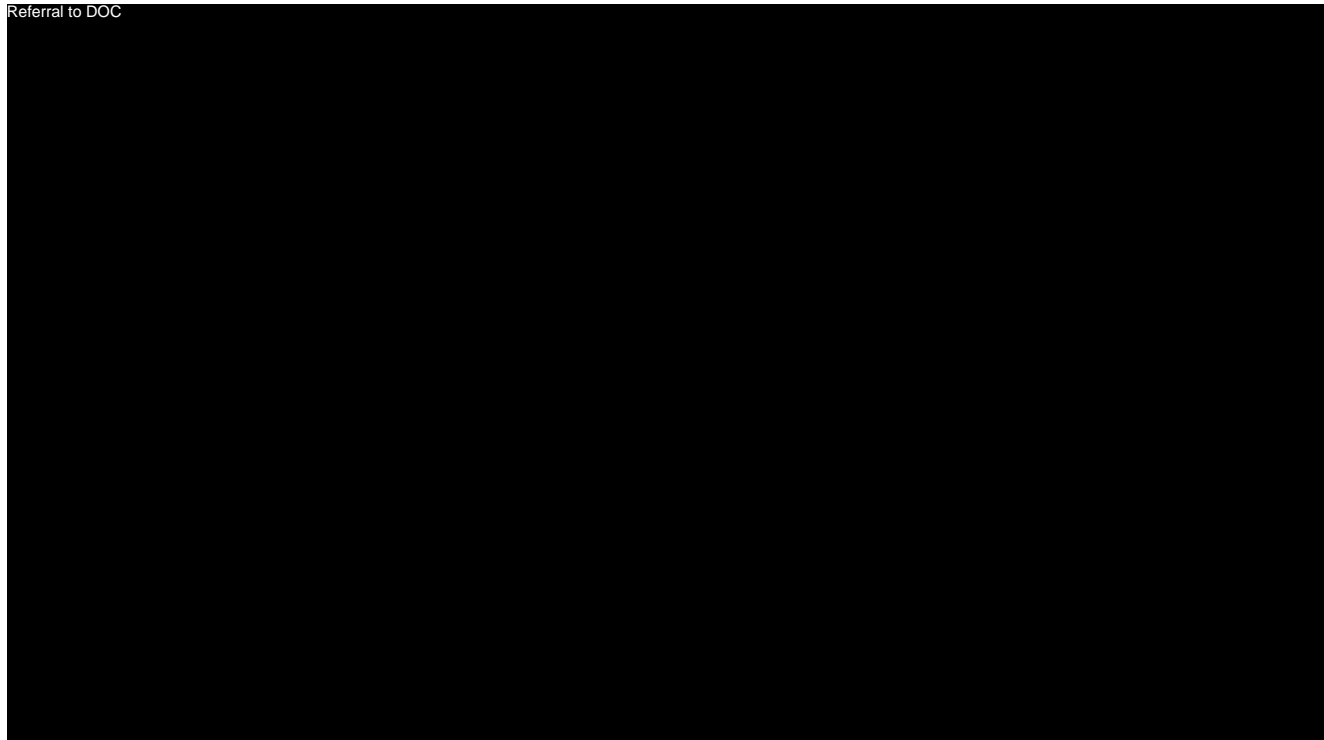
Senior Program Analyst

Presidential Nominations Branch

U.S. Office of Government Ethics

Telephone: (202) 482-9218

Referral to DOC



OGE Confidential Notice: This email, including all attachments, may constitute a Federal record or other Government property that is intended only for the use of the individual or entity to which it is addressed. This email also may contain information that is privileged, confidential, or otherwise protected from disclosure under applicable law. If you are not the intended recipient or the employee or agent responsible for delivering the transmission to the intended recipient, you are hereby notified that any dissemination, distribution, copying or use of this email or its contents is strictly prohibited. If you have received this email in error, please notify the sender by responding to the email and then immediately delete the email.

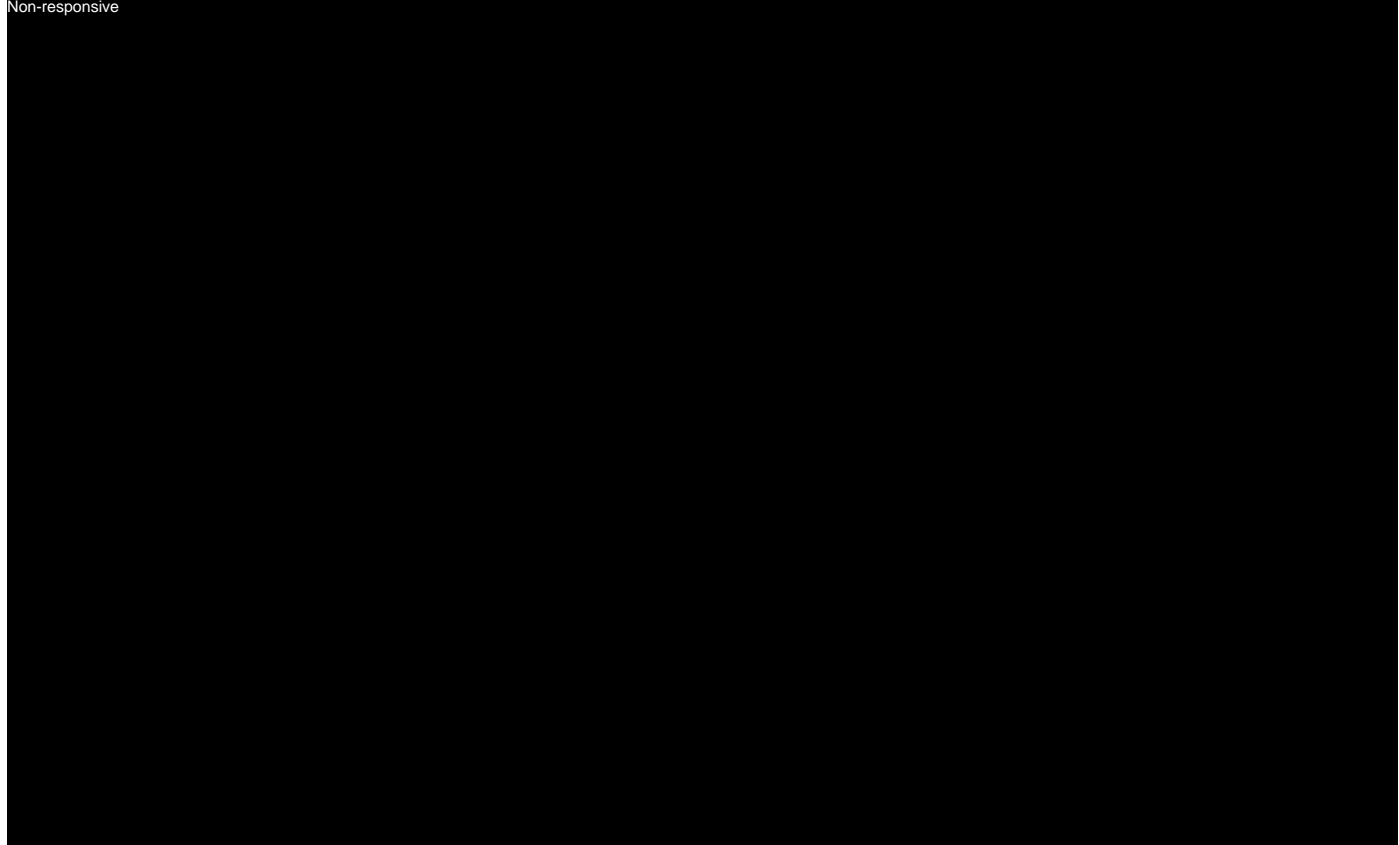
OGE Confidential Notice: This email, including all attachments, may constitute a Federal record or other Government property that is intended only for the use of the individual or entity to which it is addressed. This email also may contain information that is privileged, confidential, or otherwise protected from disclosure under applicable law. If you are not the intended recipient or the employee or agent responsible for delivering the transmission to the intended recipient, you are hereby notified that any dissemination, distribution, copying or use of this email or its contents is strictly prohibited. If you have received this email in error, please notify the sender by responding to the email and then immediately delete the email.

OGE Confidential Notice: This email, including all attachments, may constitute a Federal record or other Government property that is intended only for the use of the individual or entity to which it is addressed. This email also may contain information that is privileged, confidential, or otherwise protected from disclosure under applicable law. If you are not the intended recipient or the employee or agent responsible for delivering the transmission to the intended recipient, you are hereby notified that any dissemination, distribution, copying or use of this email or its contents is strictly prohibited. If you have received this email in error, please notify the sender by responding to the email and then immediately delete the email.

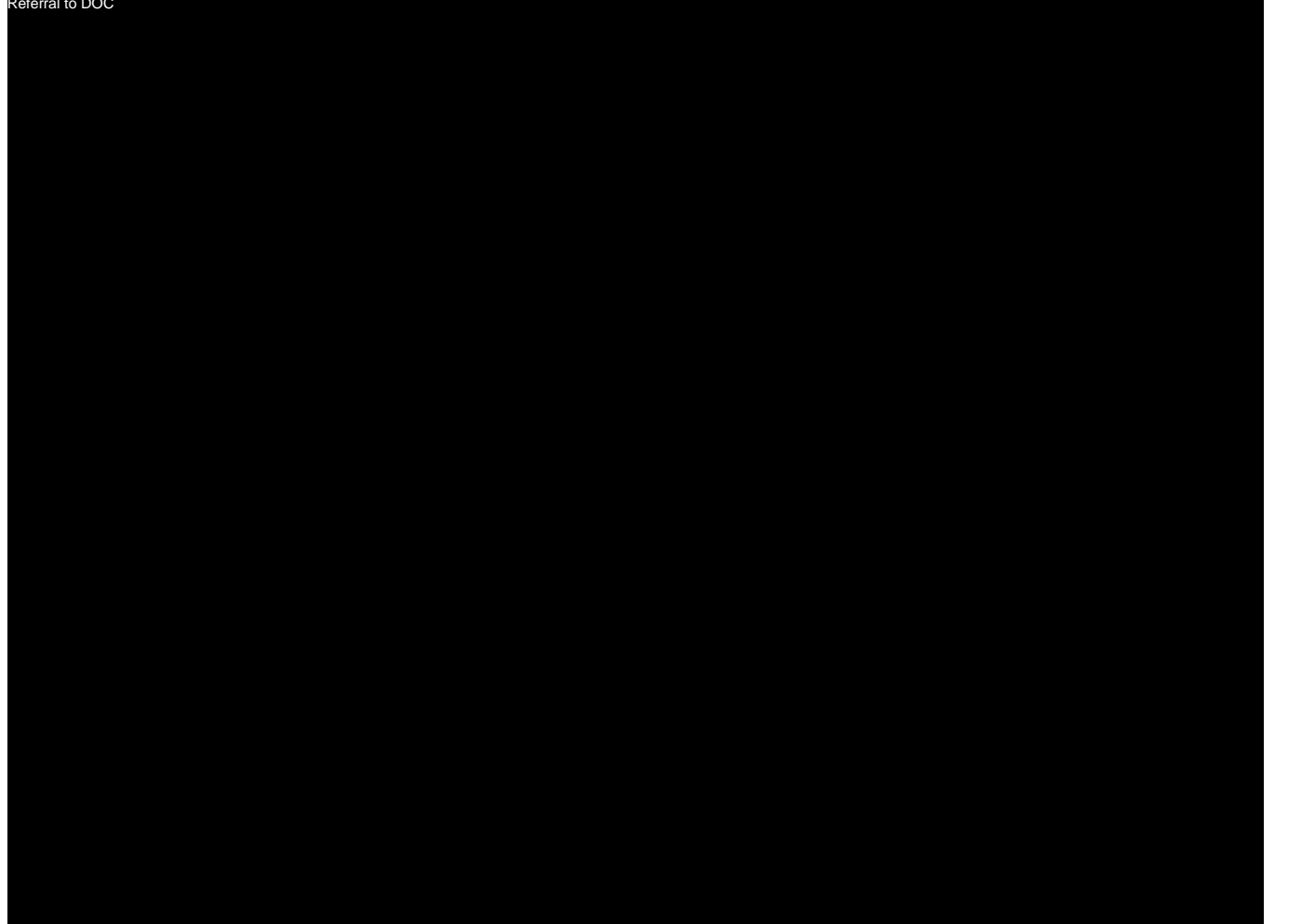
Non-responsive record




Non-responsive



Referral to DOC



Referral to DOC



From: [Kassinger, Theodore W.](#)
To: [Keith Labeledz](#)
Cc: [Williams, Gaye \(Federal\)](#); [Maggi, David \(Federal\)](#)
Subject: [GRAYMAIL] RE: Notes on draft document
Date: Wednesday, December 28, 2016 6:03:01 PM

Thanks for checking in, Keith. We have made good progress on responding to your excellent comments. By tomorrow morning, I expect we will have completed download of a significant amount of the information needed. The WLR team is still working to obtain many other details, however. I hope that we will have addressed all of your initial comments by Friday.

Ted

From: Keith Labeledz [mailto:klabeledz@oge.gov]
Sent: Wednesday, December 28, 2016 4:12 PM
To: Kassinger, Theodore W.
Cc: Williams, Gaye (Federal); Maggi, David (Federal)
Subject: RE: Notes on draft document

Hello,

I am just checking in on the status of the update process. I realize that my list of comments/questions was rather lengthy and that updating will take some time. However, I also wanted to make sure that I begin my review of the updated draft as soon as it is ready.

Thank you.

Keith

Keith Labeledz

Senior Program Analyst

Presidential Nominations Branch

U.S. Office of Government Ethics

Telephone: (202) 482-9218

From: Kassinger, Theodore W. [<mailto:tkassinger@omm.com>]
Sent: Thursday, December 22, 2016 9:25 AM
To: Keith Labedz
Cc: Williams, Gaye (Federal); Maggi, David (Federal)
Subject: [GRAYMAIL] RE: Notes on draft document

Thanks very much, Keith. We will be updating the draft asap.

Ted

**O'Melveny
Theodore W. Kassinger**

Partner

tkassinger@omm.com

O: +1-202-383-5170

M: (b) (6)
O'Melveny & Myers LLP

1625 Eye Street, NW

Washington, DC 20006

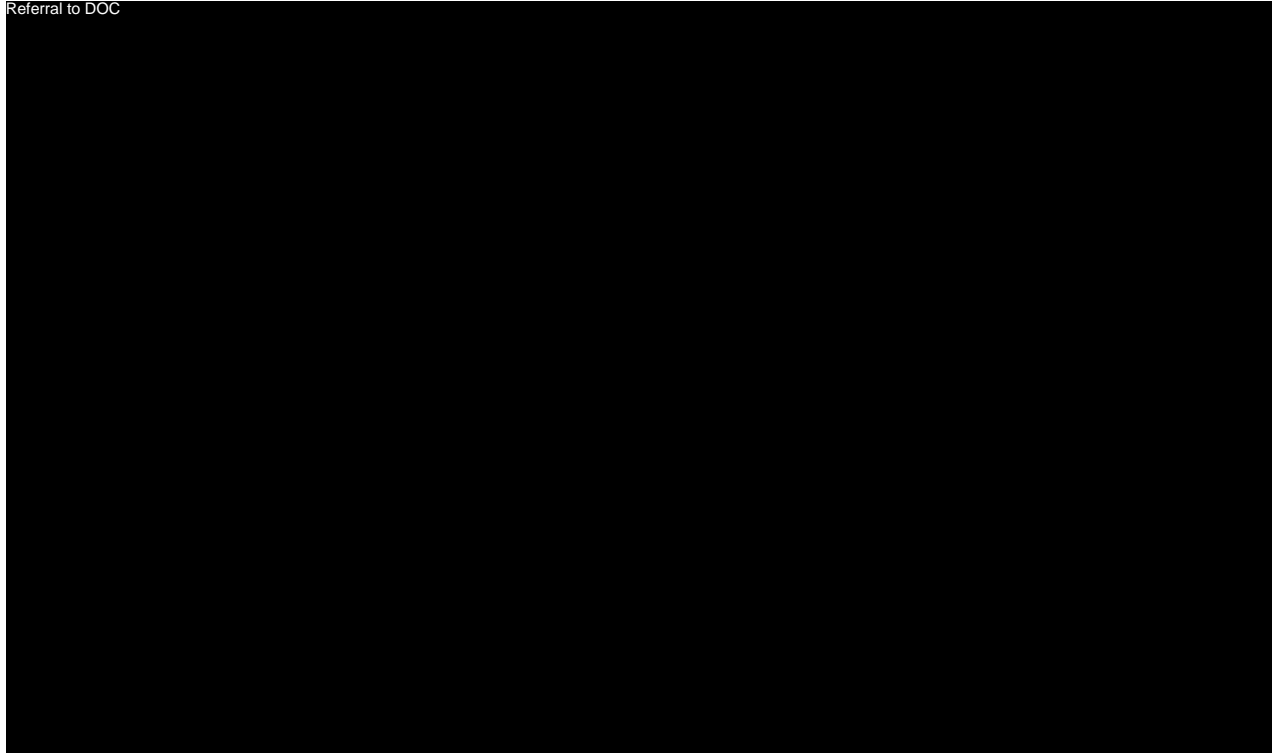
[Website](#) | [LinkedIn](#) | [Twitter](#)

This message and any attached documents contain information from the law firm of O'Melveny & Myers LLP that may be confidential and/or privileged. If you are not the intended recipient, you may not read, copy, distribute, or use this information. If you have received this transmission in error, please notify the sender immediately by reply e-mail and then delete this message.

Rest of chain partially released above



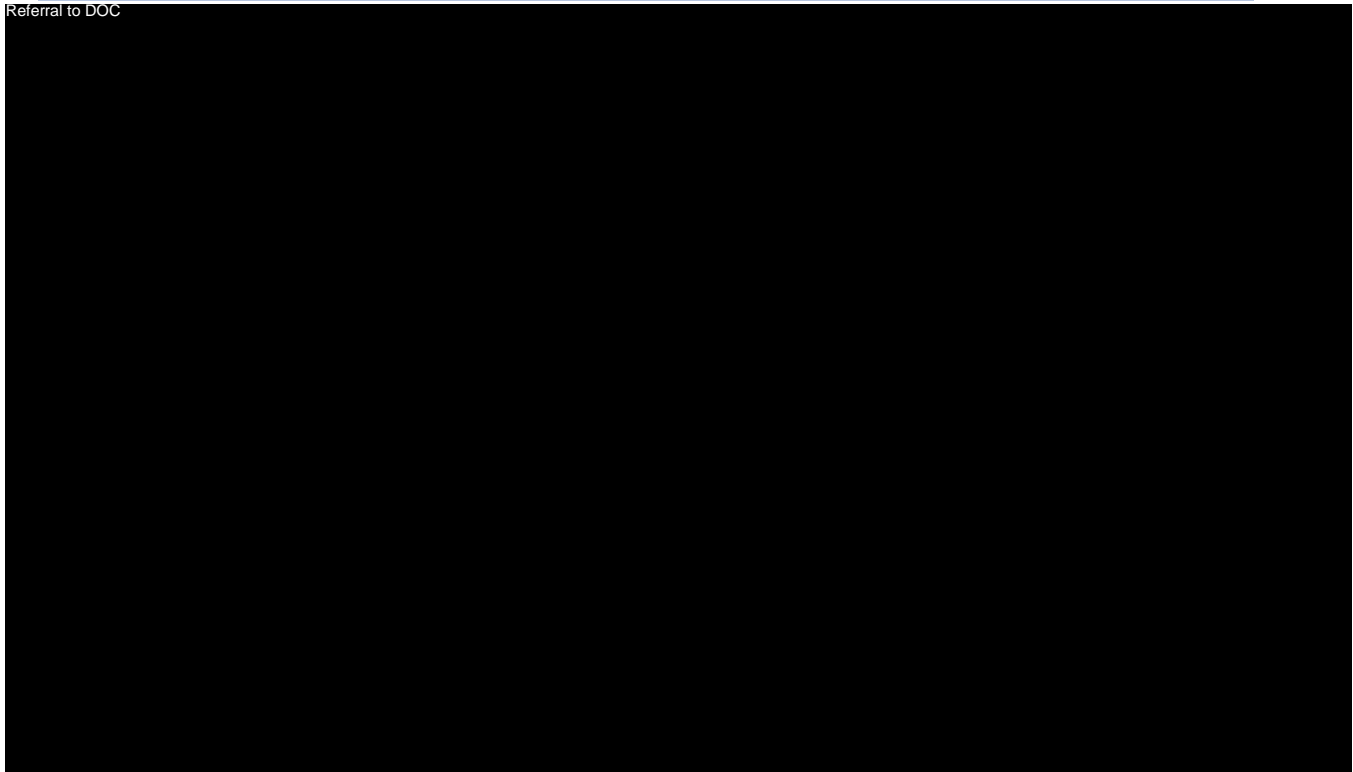
Referral to DOC



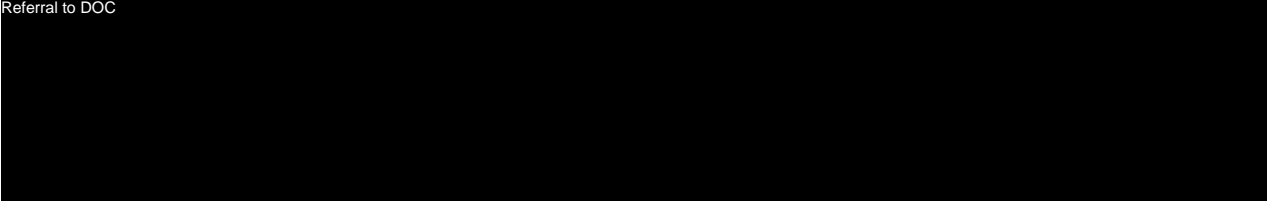
From: Kassinger, Theodore W. [mailto:tkassinger@omm.com]
Sent: Friday, December 16, 2016 5:05 PM
To: Maggi, David (Federal) <dMaggi@doc.gov>
Cc: klabeledz@oge.gov; Williams, Gaye (Federal) <gWilliams@doc.gov>
Subject: RE: I've dialed in

thanks. have a great holiday

Referral to DOC



Referral to DOC



From: Kassinger, Theodore W. [<mailto:tkassinger@omm.com>]

Sent: Friday, December 16, 2016 4:06 PM

To: Maggi, David (Federal) <dMaggi@doc.gov>

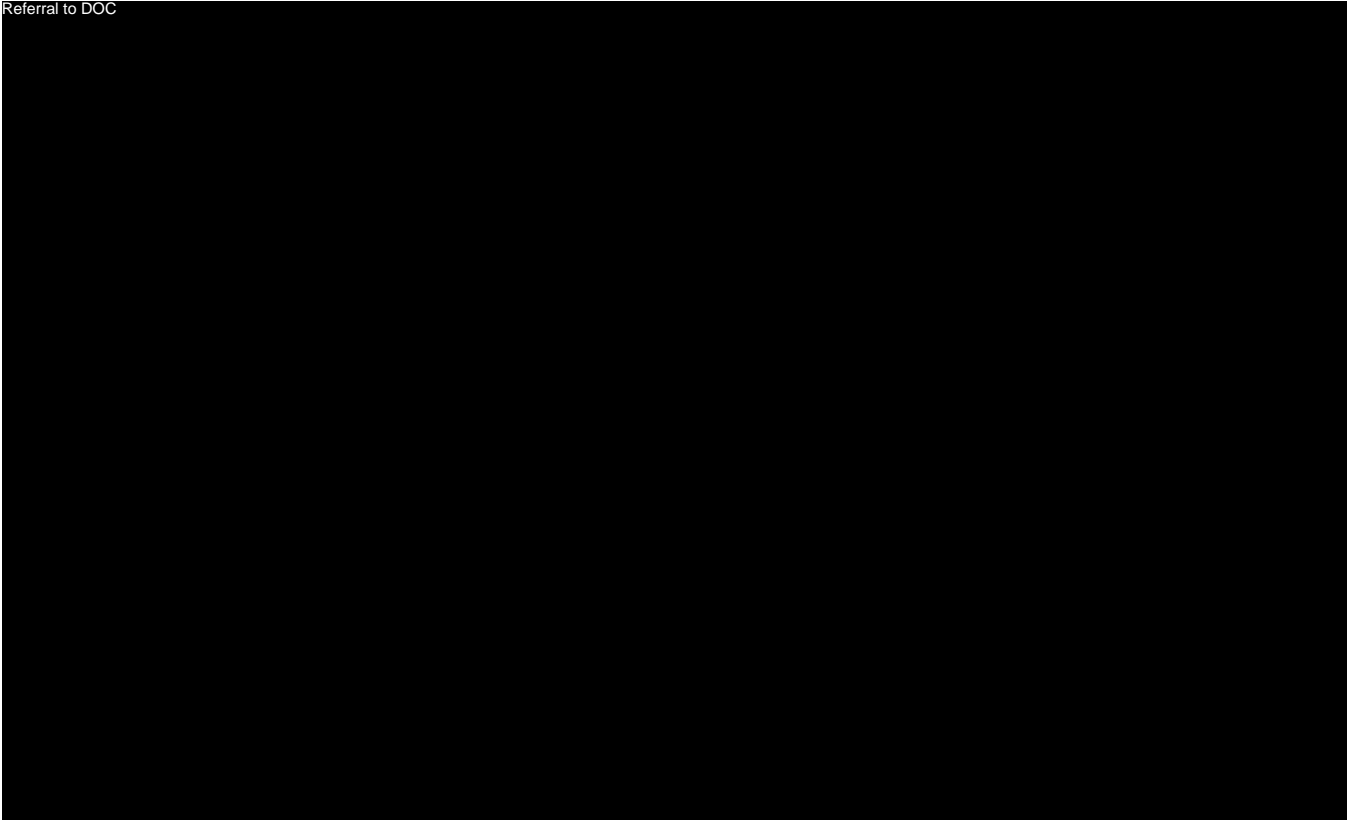
Cc: klabedz@oge.gov

Subject: RE: I've dialed in

we tracked down where the Integrity filing in Mr. Ross's office, and have taken it over. We expect to have the data input today.

Thanks for giving me the clues.

Referral to DOC



From: [Keith Labeledz](#)
To: [Deborah J. Bortot](#)
Subject: RE: Secretary of Commerce-Designate
Date: Friday, December 16, 2016 2:00:34 PM

The attorney is Theodore Kassinger. I've already had a call with him, David, and Will Jacobi. I've just received the draft Excel document. In our call, I emphasized that I will hold my full review until we get an official draft via Integrity so that they need to get a report assignment from PTT as soon as possible.

From: Deborah J. Bortot
Sent: Friday, December 16, 2016 1:54 PM
To: Keith Labeledz
Subject: FW: Secretary of Commerce-Designate

FYI

From: Walter M. Shaub
Sent: Friday, December 16, 2016 1:32 PM
To: Deborah J. Bortot; Heather A. Jones
Subject: FW: Secretary of Commerce-Designate

From: Walter M. Shaub
Sent: Friday, December 16, 2016 1:32 PM
To: (b) (6); David Maggi (dMaggi@doc.gov)
Subject: RE: Secretary of Commerce-Designate

Sorry, Annie. I meant to send this to David Maggi and copy you. It looks like I sent it only to you. Looping David in.

From: Walter M. Shaub
Sent: Friday, December 16, 2016 12:34 PM
To: (b) (6)
Subject: FW: Secretary of Commerce-Designate

David,

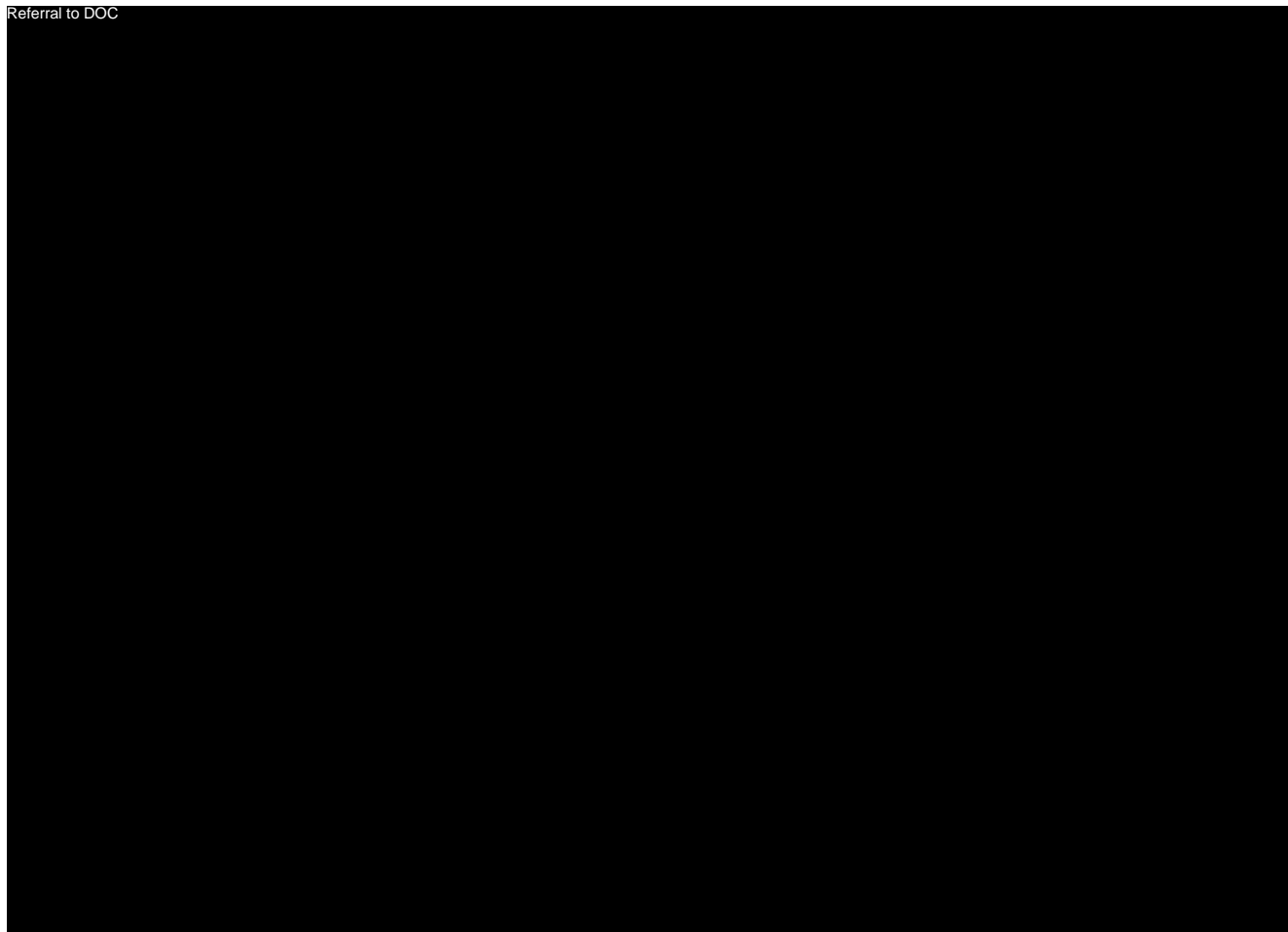
Annie Donaldson is the point of contact at the transition team. Who is the attorney, (b) (6) ?

Walt

Referral to DOC



Referral to DOC



From: [Kassinger, Theodore W.](#)
To: [Maggi, David \(Federal\)](#)
Cc: [Keith Labedz](#)
Subject: [GRAYMAIL] [WARNING : MESSAGE ENCRYPTED]RE: I've dialed in
Date: Friday, December 16, 2016 1:55:48 PM
Attachments: [WLR Draft SF278 12Dec2016.xls](#)
[WLR \(b\)\(3\), \(6\) .PPT.pdf](#)

Attachment 1 - Draft financial disclosure report withheld in full - (b)(3), (4), (5), (6); Attachment 2 - 2 pages withheld in full - (b)(3), (4), (6)

Thanks much.

I have tracked down the portal info, and we'll get the info uploaded.

Meanwhile, here's a draft, and also a chart that shows the (b)(3), (6)

Keith, my contact information is below.

We look forward to working with you.

Ted

**O'Melveny
Theodore W. Kassinger**

Partner

tkassinger@omm.com

O: +1-202-383-5170

M: (b)(6)
O'Melveny & Myers LLP

1625 Eye Street, NW

Washington, DC 20006

[Website](#) | [LinkedIn](#) | [Twitter](#)

This message and any attached documents contain information from the law firm of O'Melveny & Myers LLP that may be confidential and/or privileged. If you are not the

intended recipient, you may not read, copy, distribute, or use this information. If you have received this transmission in error, please notify the sender immediately by reply e-mail and then delete this message.

Referral to DOC

