

**From:** [Kassinger, Theodore W.](#)  
**To:** [Keith Labeledz](#); [Maggi, David \(Federal\)](#)  
**Cc:** [Schlom, Evan N.](#); [Dorey, David R.](#); [Sheehan, Matthew J.](#); [Jacob, Dana \(Federal\)](#); [Warren, Arthur \(Federal\)](#); [Williams, Gaye \(Federal\)](#); [Jacobi, Will \(Federal\)](#); [Culvahouse Jr., Arthur B.](#); [Deborah J. Bortot](#); [Jacobi, Will \(Federal\)](#)  
**Subject:** [GRAYMAIL] RE: ethics agreement and call  
**Date:** Thursday, January 12, 2017 9:47:10 PM

---

thanks, Keith.

**From:** Keith Labeledz [mailto:klabeledz@oge.gov]  
**Sent:** Thursday, January 12, 2017 9:45 PM  
**To:** Kassinger, Theodore W.; Maggi, David (Federal)  
**Cc:** Schlom, Evan N.; Dorey, David R.; Sheehan, Matthew J.; Jacob, Dana (Federal); Warren, Arthur (Federal); Williams, Gaye (Federal); Jacobi, Will (Federal); Culvahouse Jr., Arthur B.; Deborah J. Bortot; Jacobi, Will (Federal)  
**Subject:** RE: ethics agreement and call

The Part 3 items that Commerce identified might also require an update to Part 1 of the report.

Thank you.

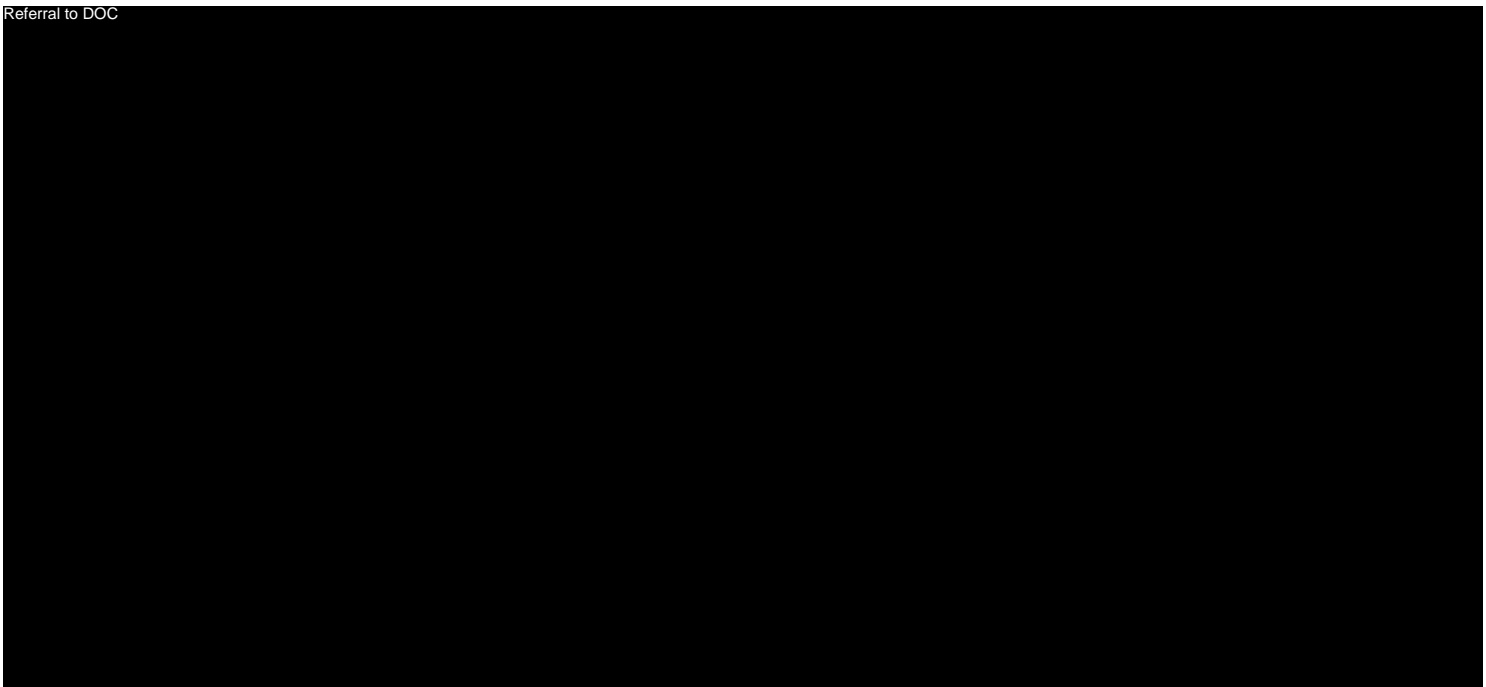
Keith

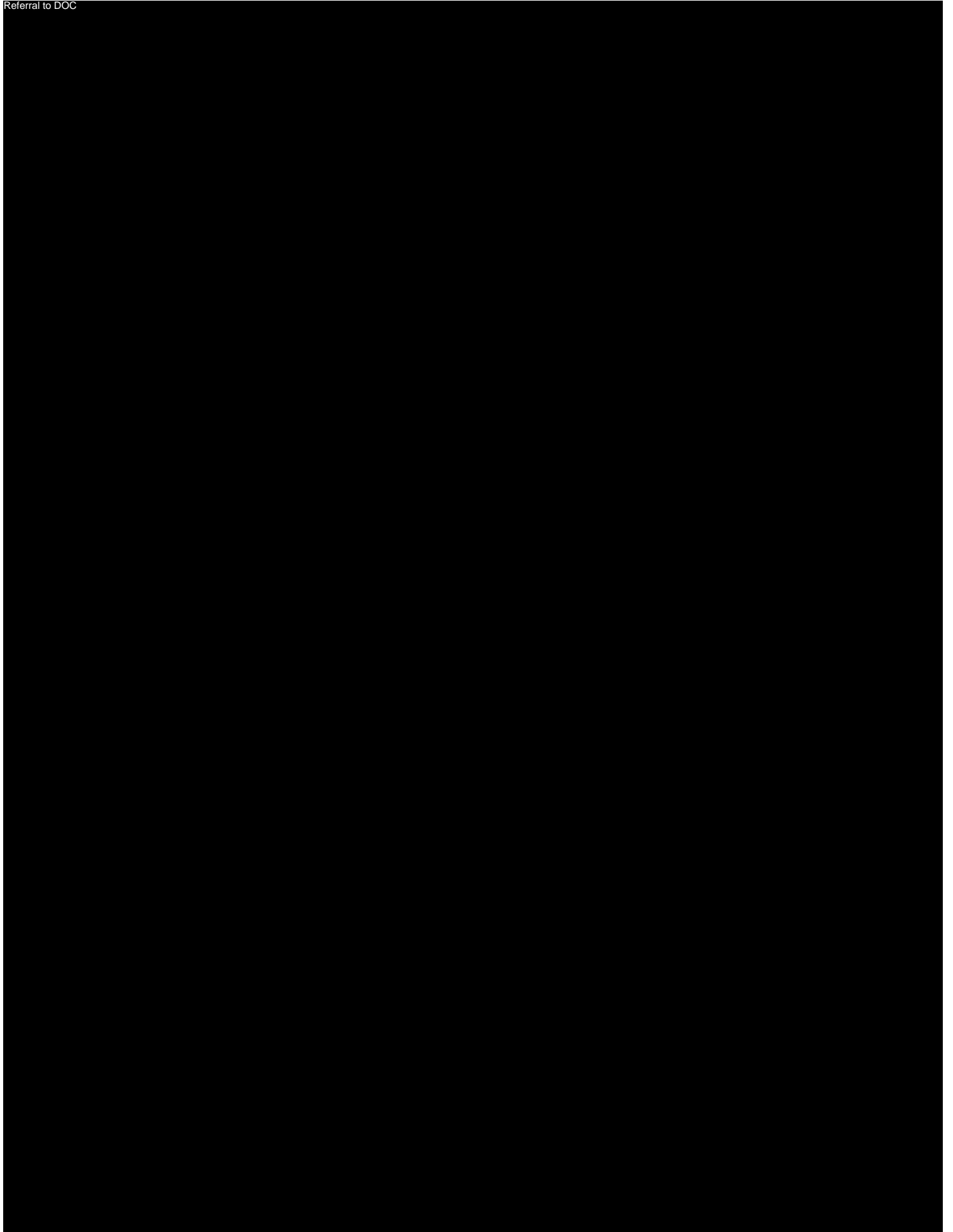
**From:** Kassinger, Theodore W. [mailto:tkassinger@omm.com]  
**Sent:** Thursday, January 12, 2017 8:10 PM  
**To:** Maggi, David (Federal)  
**Cc:** Schlom, Evan N.; Dorey, David R.; Keith Labeledz; Sheehan, Matthew J.; Jacob, Dana (Federal); Warren, Arthur (Federal); Williams, Gaye (Federal); Jacobi, Will (Federal); Culvahouse Jr., Arthur B.; Deborah J. Bortot; Jacobi, Will (Federal)  
**Subject:** [GRAYMAIL] RE: ethics agreement and call

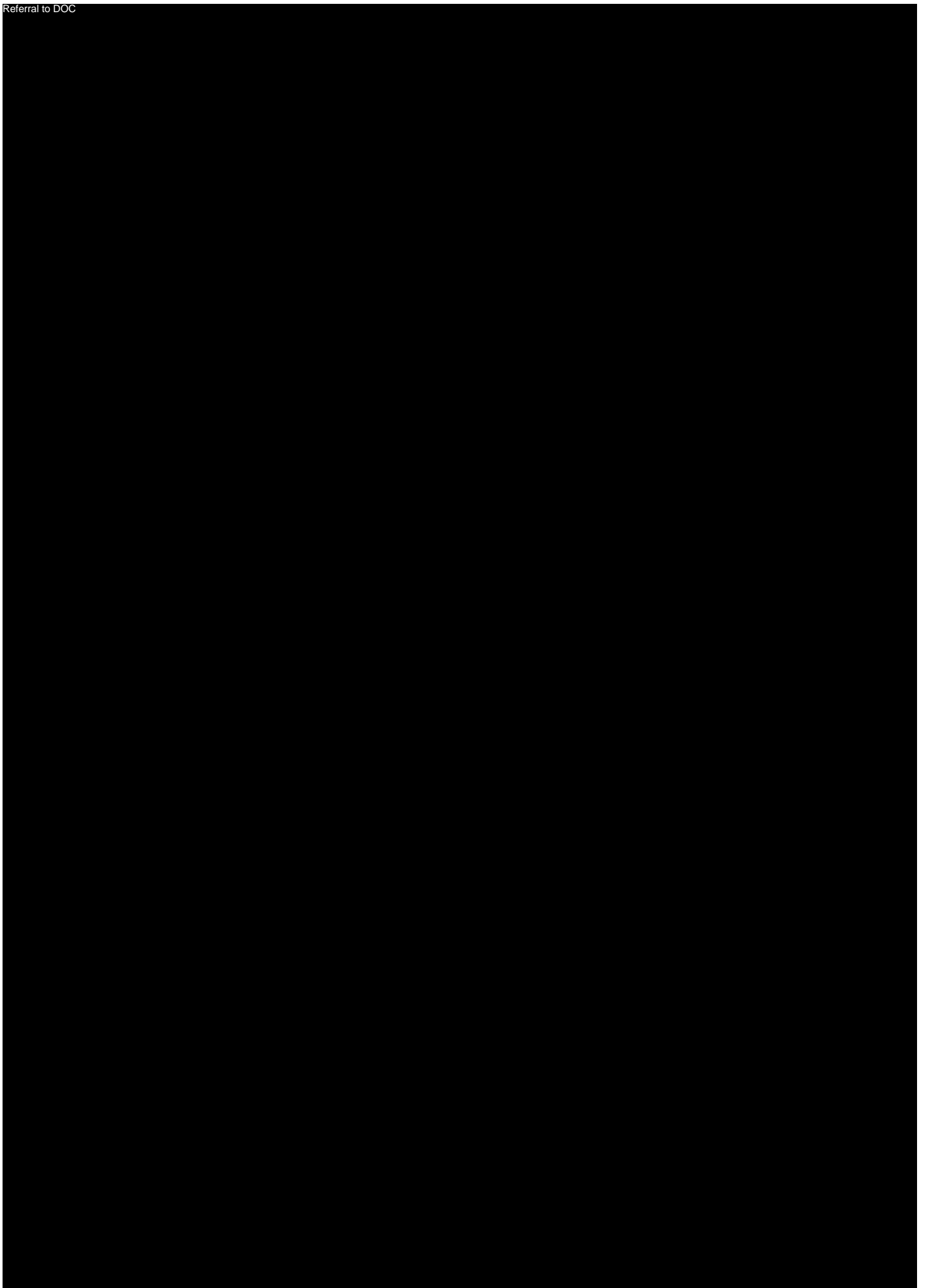
Thanks, very helpful David. We'll review and revert asap.

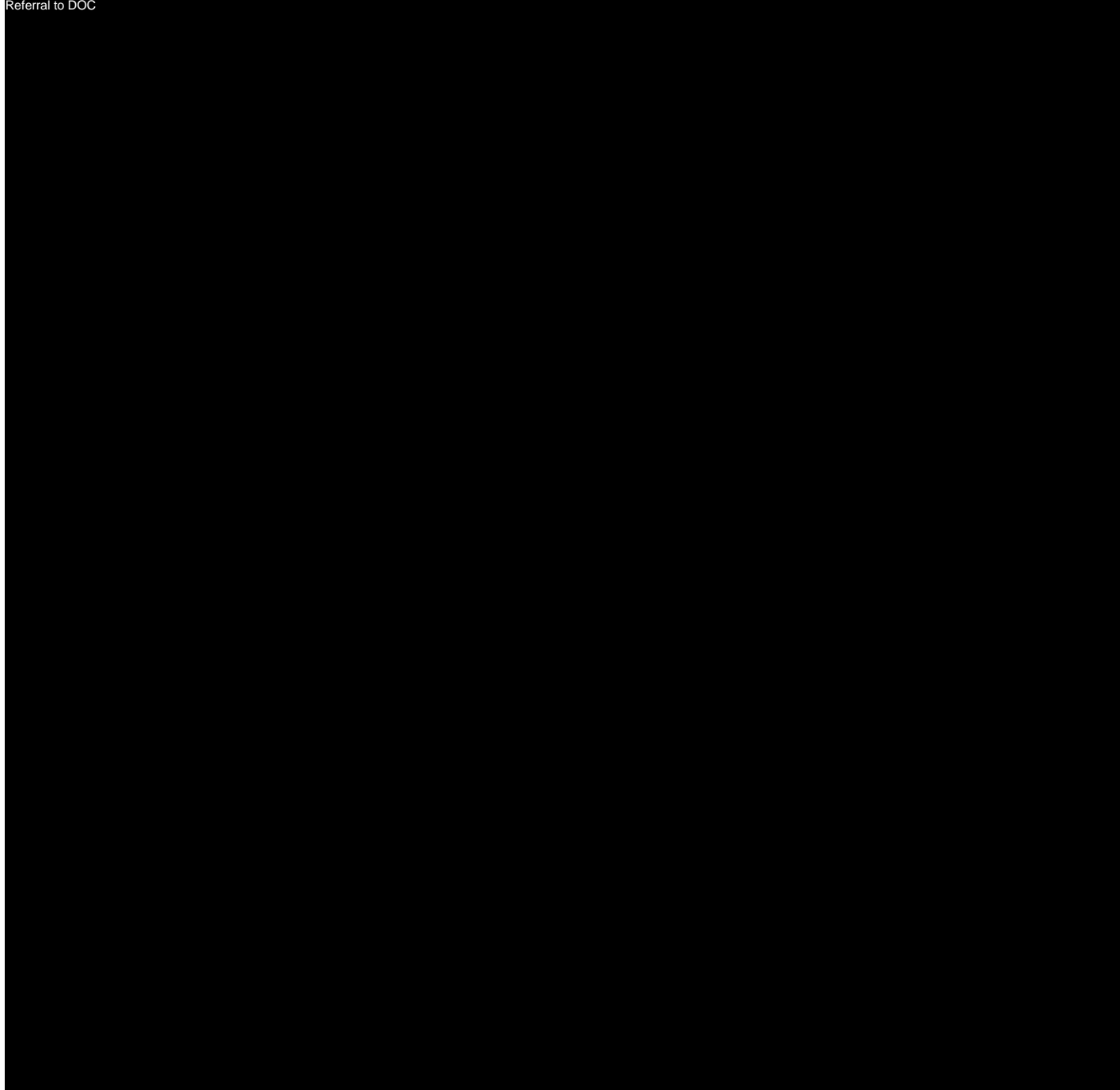
Ted

Referral to DOC









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

**Sent:** Thursday, January 12, 2017 7:23 PM

**To:** Walter M. Shaub <[wshaub@oge.gov](mailto:wshaub@oge.gov)>; Director of OGE <[director@oge.gov](mailto:director@oge.gov)>; Heather A. Jones <[hajones@oge.gov](mailto:hajones@oge.gov)>; Keith Labedz <[klabedz@oge.gov](mailto:klabedz@oge.gov)>; Maggi, David (Federal) <[dMaggi@doc.gov](mailto:dMaggi@doc.gov)>; Deborah J. Bortot <[djbortot@oge.gov](mailto:djbortot@oge.gov)>; Jacobi, Will (Federal) <[wjacobi@doc.gov](mailto:wjacobi@doc.gov)>; Jacob, Dana (Federal) <[DJacob@doc.gov](mailto:DJacob@doc.gov)>; Williams, Gaye (Federal) <[gWilliams@doc.gov](mailto:gWilliams@doc.gov)>; Warren, Arthur (Federal) <[AWarren@doc.gov](mailto:AWarren@doc.gov)>; David J. Apol <[djapol@oge.gov](mailto:djapol@oge.gov)>

**Cc:** Culvahouse Jr., Arthur B. <[aculvahouse@omm.com](mailto:aculvahouse@omm.com)>; Schlom, Evan N. <[eschlom@omm.com](mailto:eschlom@omm.com)>; Dorey, David R. <[ddorey@omm.com](mailto:ddorey@omm.com)>; Sheehan, Matthew J. <[msheehan@omm.com](mailto:msheehan@omm.com)>

**Subject:** RE: ethics agreement and call

10 page attachment withheld in full - (b)(3), (4), (5), (6)

A small black rectangular redaction box covers the text of the attachment, which is partially visible above it.

All-

Attached is a redline of the draft. It incorporates the exchanges below.

Two main edits:

- We learned that three of the (b)(3), (4), (6) . We distinguished those three from the (b)(3), (6) and added language that I trust will appropriately address the difference.

- The right place for the three (b)(3), (4), (6), we believe, is section 9, with the other retained assets. We added a paragraph and moved the entities there instead of to section 6.

We learned this afternoon of some additional entities in the (b)(3), (6) that relate to the (b)(3), (4), (6). These entities do not change the asset ownership picture, but require updating the 278. We regret this discovery so late in the process, and hope that the changes do not cause Keith much difficulty in his additional review. We are addressing his comments and making a few more minor edits as well to the 278 (e.g., adding the (b)(3), (6) to the positions list ( (b)(3), (6) ).

I am available to discuss any questions. Thanks again for your work.

Ted

**From:** Walter M. Shaub [<mailto:wmschaub@oge.gov>]

**Sent:** Thursday, January 12, 2017 3:39 PM

**To:** Kassinger, Theodore W.; Director of OGE; Heather A. Jones; Keith Labeledz; David Maggi; Deborah J. Bortot; 'wjacobi@doc.gov'; 'DJacob@doc.gov'; 'gWilliams@doc.gov'; 'AWarren@doc.gov'; David J. Apol

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

**Subject:** RE: ethics agreement and call

The answer to all of these questions is “Yes”

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

**Sent:** Thursday, January 12, 2017 3:35 PM

**To:** Walter M. Shaub; Director of OGE; Heather A. Jones; Keith Labeledz; David Maggi; Deborah J. Bortot; 'wjacobi@doc.gov'; 'DJacob@doc.gov'; 'gWilliams@doc.gov'; 'AWarren@doc.gov'; David J. Apol

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

**Subject:** RE: ethics agreement and call

thanks.

A few quick questions:

- p.3section 5 list:

- o 6,7 - move to section 6, b/c these are the entities related to (potentially (b)(3), (4), (6) Ok?

- o 15,16. These are (b)(3), (6) entities, he has financial interests in (b)(3), (6) ( (b)(3), (4), (6) ).

We propose to move to Section 7. Ok?

· p.3: “do not hold any financial interest in” (b)(3), (6). Each of these entities (b)(3), (4), (6), but that is a “financial interest.” We propose to move to Section 6. Similar to the (b)(3), (6) situation. Ok?

· p. 4, section 7:

o (b)(3), (6) needs to go in (b)(3), (4), (6). Ok?

Ted

**From:** Walter M. Shaub [<mailto:wmschaub@oge.gov>]

**Sent:** Thursday, January 12, 2017 3:04 PM

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

Thanks. Use this version instead, then. This version provides for the complete divestiture of

(b)(3), (6)

Walter M. Shaub, Jr.

10 page attachment withheld in full - (b)(3), (4), (5), (6)

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](mailto:walter.schaub@oge.gov)

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

**Sent:** Thursday, January 12, 2017 2:56 PM

**To:** Walter M. Shaub; Director of OGE; Heather A. Jones; Keith Labeledz; David Maggi; 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

He is planning to divest (b)(3), (6) (b)(3), (4), (6)

**From:** Walter M. Shaub [<mailto:wmschaub@oge.gov>]

**Sent:** Thursday, January 12, 2017 2:49 PM

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

Here's a new version. A few highlights:

· We've taken your lists and dropped them into this version.

· We moved Attachment B into the body of the agreement. (b)(5), (6)

[Redacted]

[Redacted]

· We weren't clear on whether he's divesting all of (b)(3), (6). If he is, we'll need to change the language in that section.

We need to go over this draft more closely on this end, so we may have some changes to make. But I thought it would be helpful to send this over for discussion purposes, with the understanding that we may follow up with some revisions if we catch anything we missed.

Also, if further items are added to the report, they'll need to be added to the ethics agreement.

Thanks

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](mailto:walter.schaub@oge.gov)

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

**Sent:** Wednesday, January 11, 2017 1:04 PM

**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

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

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), (6)

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



(b)(5), (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](mailto:walter.shaub@oge.gov)

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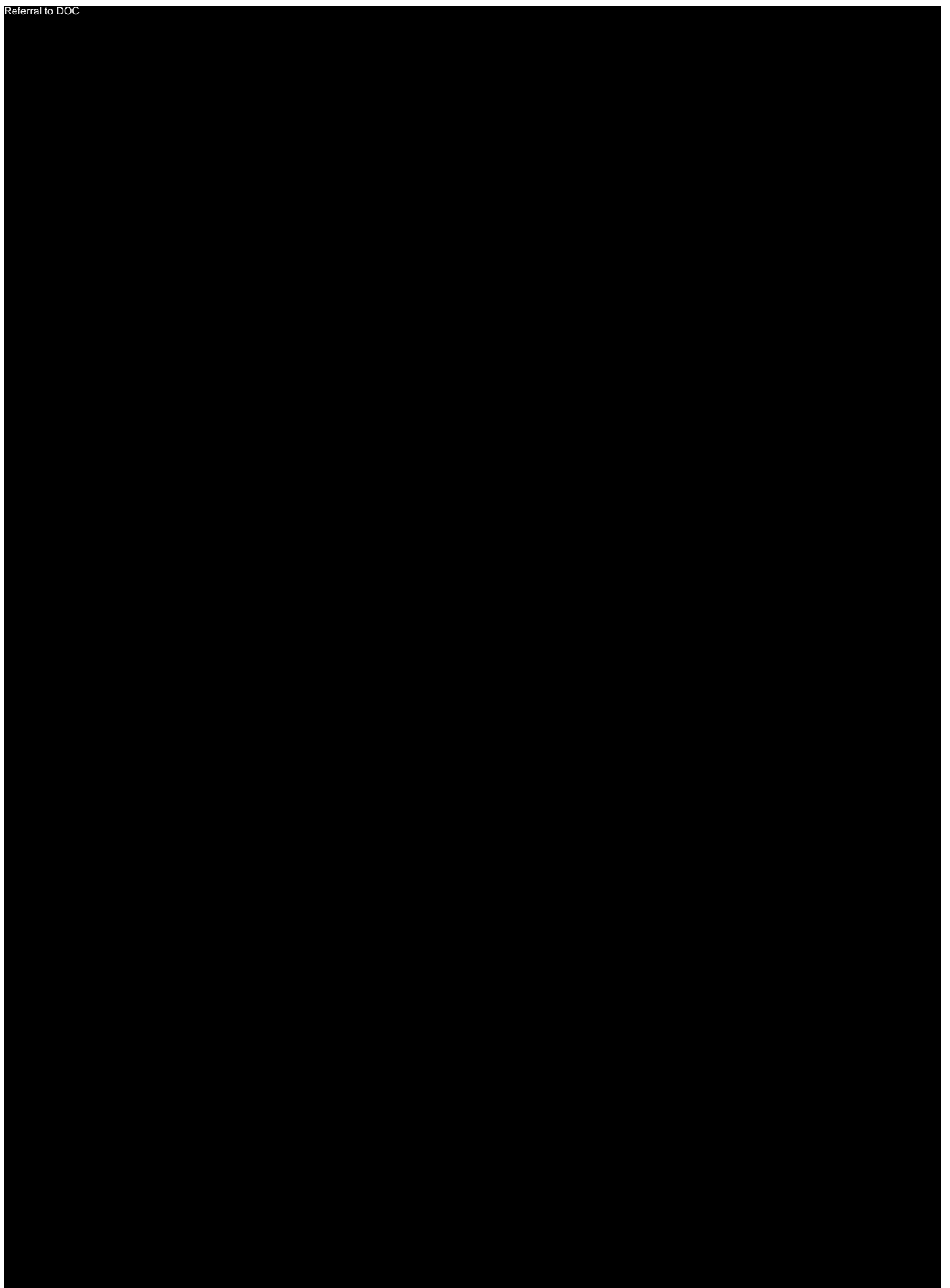
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OGE Confidential Notice: This email, including all attachments, may constitute a Federal record or other Government property that is intended only for the use of the individual or entity to which it is addressed. This email also may contain information 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. [mailto:tkassinger@omm.com]  
**Sent:** Thursday, January 12, 2017 7:23 PM  
**To:** Walter M. Shaub ; Director of OGE ; Heather A. Jones ; Keith Labeledz ; Maggi, David (Federal)

; Deborah J. Bortot ; Jacobi, Will (Federal) ; Jacob, Dana (Federal) ; Williams, Gaye (Federal) ; Warren, Arthur (Federal) ; David J. Apol

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

**Subject:** RE: ethics agreement and call

All-

Attached is a redline of the draft. It incorporates the exchanges below.

Two main edits:

10 page attachment withheld in full - (b) (3), (4), (5), (6)

- We learned that three of the (b)(3), (4), (6) . We distinguished those three from the (b)(3), (6) and added language that I trust will appropriately address the difference.
- The right place for the three (b)(3), (4), (6) , we believe, is section 9, with the other retained assets. We added a paragraph and moved the entities there instead of to section 6.

We learned this afternoon of some additional entities in the (b)(3), (6) that relate to the (b)(3), (4), (6) . These entities do not change the asset ownership picture, but require updating the 278. We regret this discovery so late in the process, and hope that the changes do not cause Keith much difficulty in his additional review. We are addressing his comments and making a few more minor edits as well to the 278 (e.g., adding the (b)(3), (6) to the positions list ( (b)(3), (6) ).

I am available to discuss any questions. Thanks again for your work.

Ted

Rest of chain partially released above

**From:** [Walter M. Shaub](#)  
**To:** "Kassinger, Theodore W."; Director of OGE; Heather A. Jones; Keith Labedz; David Maggi; Deborah J. Bortot; "wjacobi@doc.gov"; "DJacob@doc.gov"; "gWilliams@doc.gov"; "AWarren@doc.gov"; David J. Apol; Donald F McGahn; "adonaldson@jonesday.com"; Shelley K. Finlayson  
**Cc:** [Culvahouse Jr., Arthur B.](#); [Schlom, Evan N.](#); [Dorey, David R.](#); [Sheehan, Matthew J.](#)  
**Subject:** RE: ethics agreement and call  
**Date:** Thursday, January 12, 2017 7:35:41 PM

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Thanks, these changes look pretty good to me. Unfortunately, I just received a summons from Chairman Chaffetz and am going to have to turn my attention to addressing that summons. I will see if someone else here is available to work on this report and ethics agreement until I am able to turn my attention back to this nomination. A number of members of my staff will have to assist me in preparing to respond to Mr. Chaffetz, so we may have a lean team available for the next few weeks.

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](mailto:walter.schaub@oge.gov)

---

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

**Sent:** Thursday, January 12, 2017 7:23 PM

**To:** Walter M. Shaub; Director of OGE; Heather A. Jones; Keith Labedz; David Maggi; Deborah J. Bortot; 'wjacobi@doc.gov'; 'DJacob@doc.gov'; 'gWilliams@doc.gov'; 'AWarren@doc.gov'; David J. Apol

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

**Subject:** RE: ethics agreement and call

All-

Attached is a redline of the draft. It incorporates the exchanges below.

Two main edits:

· We learned that three of the (b)(3), (4), (6) [redacted]. We distinguished those three from the (b)(3), (6) [redacted] and added language that I trust will appropriately address the difference.

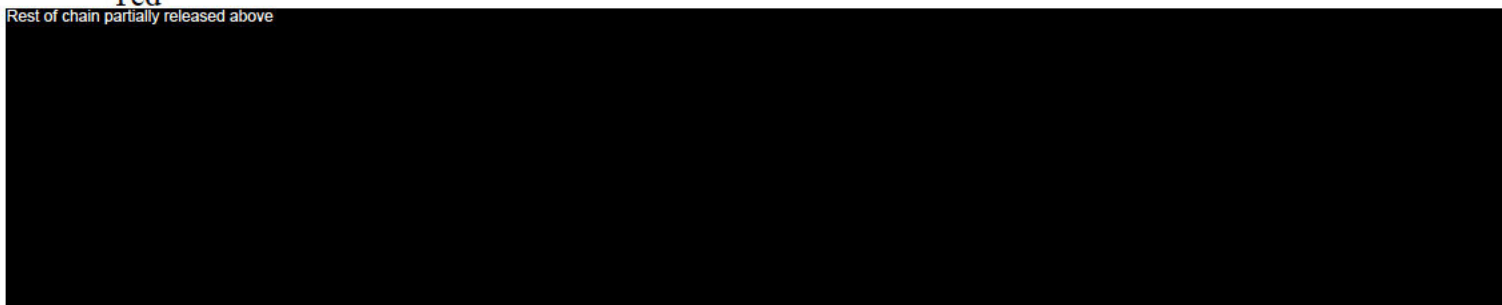
· The right place for the three (b)(3), (4), (6) [redacted], we believe, is section 9, with the other retained assets. We added a paragraph and moved the entities there instead of to section 6.

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I am available to discuss any questions. Thanks again for your work.

Ted

Rest of chain partially released above



10 page attachment withheld in full - (b)(3), (4), (5), (6)

**From:** [Kassinger, Theodore W.](mailto:Kassinger, Theodore W.)  
**To:** [Keith Labeledz](mailto:Keith Labeledz)  
**Cc:** [Culvahouse Jr., Arthur B.](mailto:Culvahouse Jr., Arthur B.); [Schlom, Evan N.](mailto:Schlom, Evan N.); [Dorey, David R.](mailto:Dorey, David R.); [Sheehan, Matthew J.](mailto:Sheehan, Matthew J.); [Walter M. Shaub; Director of OGE; Heather A. Jones; David Maggi; Deborah J. Bortot; 'wjacobi@doc.gov'; 'DJacob@doc.gov'; 'gWilliams@doc.gov'; 'AWarren@doc.gov'; David J. Apol](mailto:Walter M. Shaub; Director of OGE; Heather A. Jones; David Maggi; Deborah J. Bortot; 'wjacobi@doc.gov'; 'DJacob@doc.gov'; 'gWilliams@doc.gov'; 'AWarren@doc.gov'; David J. Apol)  
**Subject:** RE: ethics agreement and call  
**Date:** Thursday, January 12, 2017 5:25:06 PM

---

thanks, great eye, as always. we will check.

**From:** Keith Labeledz [<mailto:klabeledz@oge.gov>]  
**Sent:** Thursday, January 12, 2017 4:30 PM  
**To:** Kassinger, Theodore W.  
**Cc:** Culvahouse Jr., Arthur B.; Schlom, Evan N.; Dorey, David R.; Sheehan, Matthew J.; Walter M. Shaub; Director of OGE; Heather A. Jones; David Maggi; Deborah J. Bortot; 'wjacobi@doc.gov'; 'DJacob@doc.gov'; 'gWilliams@doc.gov'; 'AWarren@doc.gov'; David J. Apol  
**Subject:** RE: ethics agreement and call

1 page attachment withheld in full - (b)(3), (4), (5), (6)

Hello,

Having reviewed the divestiture list at the end of the ethics agreement, I noticed a few items that might not be held or conflicting. I was asked to forward for your review. The items are listed in the attachment to this email.

Category 1: Certain (b)(3), (6) are listed on the most recent version of the report with a value of (b)(3), (6). It is possible the (b)(3), (6) are still held, but we wished to confirm. Note that three of the (b)(3), (6) seemed to have (b)(3), (6) (highlighted in red).

Category 2: One (b)(3), (6) is listed. This (b)(3), (6) may have also (b)(3), (6)

Category 3: There is one item that I cannot locate on the most recent version of the report.

Thank you.

Keith

**From:** Kassinger, Theodore W. [<mailto:tkassinger@omm.com>]  
**Sent:** Thursday, January 12, 2017 3:40 PM  
**To:** Walter M. Shaub; Director of OGE; Heather A. Jones; Keith Labeledz; David Maggi; Deborah J. Bortot; 'wjacobi@doc.gov'; 'DJacob@doc.gov'; 'gWilliams@doc.gov'; 'AWarren@doc.gov'; David J. Apol  
**Cc:** Culvahouse Jr., Arthur B.; Schlom, Evan N.; Dorey, David R.; Sheehan, Matthew J.  
**Subject:** RE: ethics agreement and call

thx.

continuing to review.

**From:** Walter M. Shaub [<mailto:wmschaub@oge.gov>]  
**Sent:** Thursday, January 12, 2017 3:39 PM  
**To:** Kassinger, Theodore W.; Director of OGE; Heather A. Jones; Keith Labeledz; David

Maggi; Deborah J. Bortot; 'wjacobi@doc.gov'; 'DJacob@doc.gov'; 'gWilliams@doc.gov';  
'AWarren@doc.gov'; David J. Apol  
**Cc:** Culvahouse Jr., Arthur B.; Schlom, Evan N.; Dorey, David R.; Sheehan, Matthew J.  
**Subject:** RE: ethics agreement and call

The answer to all of these questions is “Yes”

Rest of chain partially released above





**From:** [Kassinger, Theodore W.](#)  
**To:** [Walter M. Shaub](#); [Director of OGE](#); [Heather A. Jones](#); [Keith Labeledz](#); ["David Maggi"](#); [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:** Thursday, January 12, 2017 2:54:15 PM

---

great, thanks

**From:** Walter M. Shaub [mailto:wmshaub@oge.gov]  
**Sent:** Thursday, January 12, 2017 2:50 PM  
**To:** Kassinger, Theodore W.; Director of OGE; Heather A. Jones; Keith Labeledz; 'David Maggi'; 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

9 page attachment withheld in full - (b)(3), (4), (5), (6)

Sorry, I forgot to add the attachment. Re-sending with the attachment:

**From:** Walter M. Shaub  
**Sent:** Thursday, January 12, 2017 2:49 PM  
**To:** 'Kassinger, Theodore W.'; Director of OGE; Heather A. Jones; Keith Labeledz; David Maggi; 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

Here's a new version. A few highlights:

- We've taken your lists and dropped them into this version.

- We moved Attachment B into the body of the agreement. (b)(5), (6)

**From:** [Kassinger, Theodore W.](mailto:Kassinger.Theodore.W)  
**To:** [Keith Labedz](mailto:Keith.Labedz); [Schlom, Evan N.](mailto:Schlom.Evan.N); "Maggi, David (Federal)"  
**Cc:** [Dorey, David R.](mailto:Dorey.David.R); "Jacobi, Will (Federal)"; "Williams, Gaye (Federal)"; "Warren, Arthur (Federal)"; "Jacob, Dana (Federal)"; [Deborah J. Bortot](mailto:Deborah.J.Bortot); [Heather A. Jones](mailto:Heather.A.Jones)  
**Subject:** [GRAYMAIL] RE: Revised WLR 278  
**Date:** Thursday, January 12, 2017 9:36:39 AM

---

Thanks, Keith.

**From:** Keith Labedz [mailto:klabedz@oge.gov]  
**Sent:** Thursday, January 12, 2017 9:26 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:** [WARNING : MESSAGE ENCRYPTED]RE: Revised WLR 278

Hello,

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

Attached are my notes on the most recent version of the draft.

Thank you.

Keith

**From:** Schlom, Evan N. [mailto:eschlom@omm.com]  
**Sent:** Wednesday, January 11, 2017 6:04 PM  
**To:** Keith Labedz; 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,

I have just edited the following items on the form to reflect a slight change in structure. There is no change to any of the underlying holdings of the (b)(3), (6)

Part 2: 10.15, 10.16, 11.1, 14.5, 19.1

Part 3: 23, 24

I apologize for any confusion.

Thanks,

Evan

**From:** Keith Labedz [mailto:klabedz@oge.gov]  
**Sent:** Wednesday, January 11, 2017 2:10 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

Thank you.

**From:** Schlom, Evan N. [<mailto:eschlom@omm.com>]  
**Sent:** Wednesday, January 11, 2017 2:00 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

(b)(3), (6)

**From:** Keith Labeledz [<mailto:klabeledz@oge.gov>]  
**Sent:** Wednesday, January 11, 2017 1:54 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

Can itemize those four (b)(3), (6)

**From:** Schlom, Evan N. [<mailto:eschlom@omm.com>]  
**Sent:** Wednesday, January 11, 2017 1:51 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,

All of our changes have been completed, so please go ahead and review. Most are immaterial (like fixing typos and descriptions). We also determined that four of the (b)(3), (6) listed in Part 6 were in fact (b)(3), (6) so (b)(3), (6).

Evan

**From:** Keith Labeledz [<mailto:klabeledz@oge.gov>]  
**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) so we have removed that position from Part 1 and will keep (b)(3), (6) 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.

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

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

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

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.

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

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

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) [redacted]

- o Based on the name, it would appear that the (b)(3), (5), (6) [redacted].
  - I am assuming that the placement is correct given that the interests have not moved in draft 3 (i.e., (b)(5), (6) [redacted]). If that is not correct, please clarify. (b)(4), (6) [redacted]. Ok.

2. line 63 (b)(3), (6) [redacted] and underlying. (b)(3), (6) [redacted]. Does this mean that 63 (b)(5) [redacted] (b)(3), (6) [redacted]?

This is also the case for (b)(3), (6) [redacted]. Please let us know if you want us to report this in a different manner. (b)(5), (6) [redacted].

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)

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

(b)(5), (6)

(b)(5), (6)

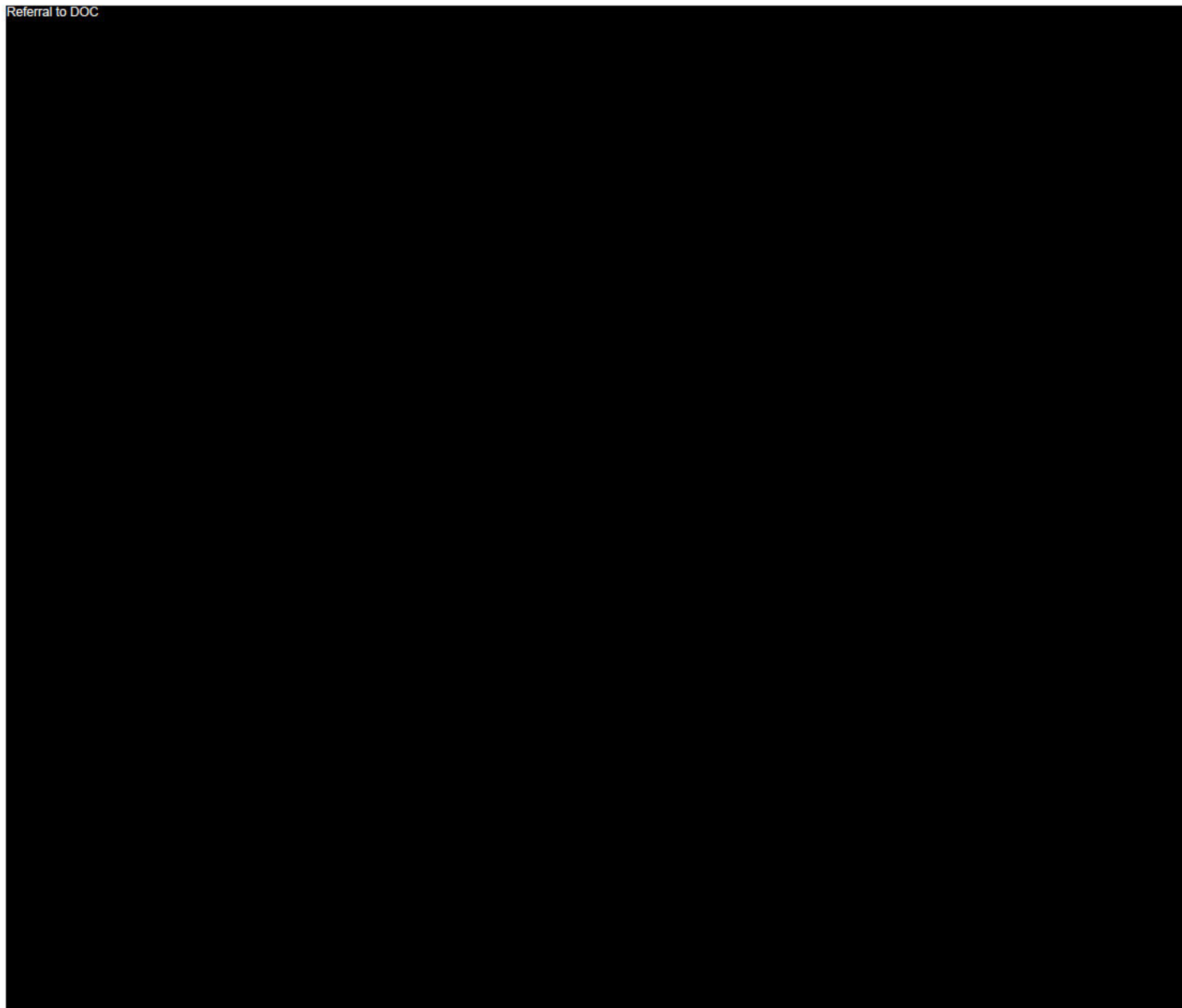
A large black rectangular redaction box covers the top portion of the page, obscuring several lines of text.

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

A very large black rectangular redaction box covers the majority of the page, starting below the signature and extending to the bottom of the page. The text 'Referral to DOC' is visible in the top left corner of this redacted area.

**From:** Keith Labedz [<mailto:klabedz@oge.gov>]



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

Keith,

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

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), (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](mailto:wjacobi@doc.gov)'; [gwilliams@doc.gov](mailto: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](mailto:wjacobi@doc.gov)'; [gwilliams@doc.gov](mailto: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](mailto:wjacobi@doc.gov)'; [gwilliams@doc.gov](mailto: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)

[REDACTED]

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](mailto:wjacobi@doc.gov)'; [gwilliams@doc.gov](mailto: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](mailto:wjacobi@doc.gov)'; [gwilliams@doc.gov](mailto: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](mailto:wjacobi@doc.gov)'; [gwilliams@doc.gov](mailto: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](mailto:eschlom@omm.com)

O: +1-202-383-5512  
O'Melveny & Myers LLP

1625 Eye Street, NW

Washington, DC 20006

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

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**From:** [Keith Labeledz](#)  
**To:** "[Schlom, Evan N.](#)"  
**Subject:** RE: Revised WLR 278  
**Date:** Thursday, January 12, 2017 1:54:17 PM

---

I have time now. Alternatively, we can schedule a time for 2:15.

202-482-9218

Keith

---

**From:** Schlom, Evan N. [mailto:[eschlom@omm.com](mailto:eschlom@omm.com)]  
**Sent:** Thursday, January 12, 2017 1:47 PM  
**To:** Keith Labeledz  
**Subject:** [GRAYMAIL] RE: Revised WLR 278

Keith,

Please let me know if you have a few minutes to discuss on the phone a few clarification questions I have about your comments. Thanks very much.

Evan

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

**Sent:** Thursday, January 12, 2017 9:26 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:** [WARNING : MESSAGE ENCRYPTED]RE: Revised WLR 278

Hello,

Attached are my notes on the most recent version of the draft.

Thank you.

Keith

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

Rest of email chain partially disclosed above



**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:** Friday, January 13, 2017 9:17:58 AM

---

Keith,

I've added the (b)(3), (b)(6) position to Part 1 (line 68).

Regarding the discrepancies, if you could please call me at your convenience, I'd appreciate it. I have a few questions as to what specifically you're looking at. My direct line is (b)(3), (b)(6).

Thanks,

Evan

**From:** Keith Labeledz [mailto:klabeledz@oge.gov]  
**Sent:** Friday, January 13, 2017 9:09 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

Also -- An email last night on the ethics agreement indicated that a position with (b)(3), (b)(6) was being added. I do not see that position.

Thank you.

**From:** Keith Labeledz  
**Sent:** Friday, January 13, 2017 8:41 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,

Does this draft address the Part 1 / Part 3 discrepancies identified by Commerce?

Thank you.

Keith

**From:** Schlom, Evan N. [mailto:eschlom@omm.com]  
**Sent:** Friday, January 13, 2017 1:05 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] [WARNING : MESSAGE ENCRYPTED]RE: Revised WLR 278

Keith,

Attached are responses to your comments. There are four unanswered comments, all relating to value/income. We are tracking those answers down.

I wanted to note three changes we made to the form since the last draft:

· 10.6.1.2; 10.16.1 (b)(3), (6) ) --  
We learned of a (b)(3), (4), (6)

If you have questions regarding the endnotes, please feel free to call me to discuss.

· 10.13 -- We were able to ascertain the (b)(3), (6) for (b)(3), (6), so we added that to the form. This is limited to 10.13.

· 10.17 -- We discovered a (b)(3), (6) which is listed at 10.17. (b)(3), (6)

Evan

**From:** Keith Labeledz [<mailto:klabeledz@oge.gov>]  
**Sent:** Thursday, January 12, 2017 9:26 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:** [WARNING : MESSAGE ENCRYPTED]RE: Revised WLR 278

Hello,

Attached are my notes on the most recent version of the draft.

Thank you.

Keith

**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:** Friday, January 13, 2017 3:19:17 PM

---

Thanks very much, Keith. I was just now reviewing the endnotes on the form, so I will incorporate these comments before sending back to you.

**From:** Keith Labeledz [mailto:klabeledz@oge.gov]  
**Sent:** Friday, January 13, 2017 3:16 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

2 page attachment withheld in full - (b)(3), (5), (6)

Hello,

I know that some value/income responses are pending as are potentially some updates to Part 1/3 and assets that are no longer held. However, given the interest in moving forward as quickly as possible, I am providing the attached comments on the version of the report exported at approximately 9:00 this morning. Most of the questions are related to the consistency between Part 2 entries and endnotes. If the line numbering of Part 2 entries will change, you may wish to hold on responding/addressing until the structure is finalized. However, we will need to have all the endnotes settled before I move the report forward for preclearance review here at OGE.

Thank you.

Keith

**From:** Schlom, Evan N. [mailto:eschlom@omm.com]  
**Sent:** Friday, January 13, 2017 1:05 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] [WARNING : MESSAGE ENCRYPTED]RE: Revised WLR 278

3 page attachment withheld in full - (b)(3), (4), (5), (6)

Keith,

Attached are responses to your comments. There are four unanswered comments, all relating to value/income. We are tracking those answers down.

I wanted to note three changes we made to the form since the last draft:

· 10.6.1.2; 10.16.1 (b)(3), (6)  
We learned of a (b)(3), (4), (6)

If you have questions

**From:** Keith Labedz [<mailto:klabedz@oge.gov>]  
**Sent:** Saturday, January 14, 2017 10:35 AM  
**To:** Maggi, David (Federal) <[dMaggi@doc.gov](mailto:dMaggi@doc.gov)>  
**Cc:** Heather A. Jones <[hajones@oge.gov](mailto:hajones@oge.gov)>  
**Subject:** RE: Revised WLR 278

David,

Do these documents need to go through this portal? It seems odd to have OMM and OGE sending documents back and forth via email and your comments through a separate portal (i.e., it is the same information). Anything you send through this portal, I will need to export and transfer for the Director's review, which is going to slow things down, especially if my review for the day ends

before he starts his review.

Thanks.

Referral to DOC

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**Sent:** Saturday, January 14, 2017 9:32 AM

**To:** 'Schlom, Evan N.' <[eschlom@omm.com](mailto:eschlom@omm.com)>; Kassinger, Theodore W. <[tkassinger@omm.com](mailto:tkassinger@omm.com)>; Maggi, David (Federal) <[dMaggi@doc.gov](mailto:dMaggi@doc.gov)>

**Cc:** Dorey, David R. <[ddorey@omm.com](mailto:ddorey@omm.com)>; Jacobi, Will (Federal) <[wjacobi@doc.gov](mailto:wjacobi@doc.gov)>; Williams, Gaye (Federal) <[gWilliams@doc.gov](mailto:gWilliams@doc.gov)>; Warren, Arthur (Federal) <[AWarren@doc.gov](mailto:AWarren@doc.gov)>; Jacob, Dana (Federal) <[DJacob@doc.gov](mailto:DJacob@doc.gov)>; Deborah J. Bortot <[djbortot@oge.gov](mailto:djbortot@oge.gov)>; Heather A. Jones <[hajones@oge.gov](mailto:hajones@oge.gov)>

**Subject:** RE: Revised WLR 278

Hello,

I will continue reviewing the report today, but I wanted to pass along the following from my check of Part 1 v. Part 3:

- Part 3, line 13 mentions a (b)(3), (6) position with (b)(3), (6). This position does not appear in Part 1.
- Part 3, line 17 mentions a (b)(3), (6) position with (b)(3), (6). This

position does not appear in Part 1.

- Part 3, line 18 mentions a (b)(3), (6) position with (b)(3), (6). This position does not appear in Part 1.
- Part 3, line 19 mentions a (b)(3), (6) position with (b)(3), (6). This position does not appear in Part 1.
- Part 3, line 21 mentions a (b)(3), (6) position with (b)(3), (6). This position does not appear in Part 1. Note, though, that Part 2 references a (b)(3), (6). If there is a position, would it be (b)(3), (6)?
- Part 3, line 22 mentions a (b)(3), (6) position with (b)(3), (6). This position does not appear in Part 1.
- Part 3, line 29 mentions a (b)(3), (6) position with (b)(3), (6). This position does not appear in Part 1.

Thank you.  
Keith

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

**Sent:** Friday, January 13, 2017 5:07 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

Yes, they have.

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

**Sent:** Friday, January 13, 2017 4:32 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

Have all the Part 1 v. Part 3 issues raised by Commerce (in relation to the ethics agreement) been checked and addressed?

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

**Sent:** Friday, January 13, 2017 4:30 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,

I have addressed your comments, including those relating to endnotes. We determined that the "missing" values and incomes from the previous draft (b)(3), (6).

If you have any questions, please let me know.

Thanks,

Evan

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

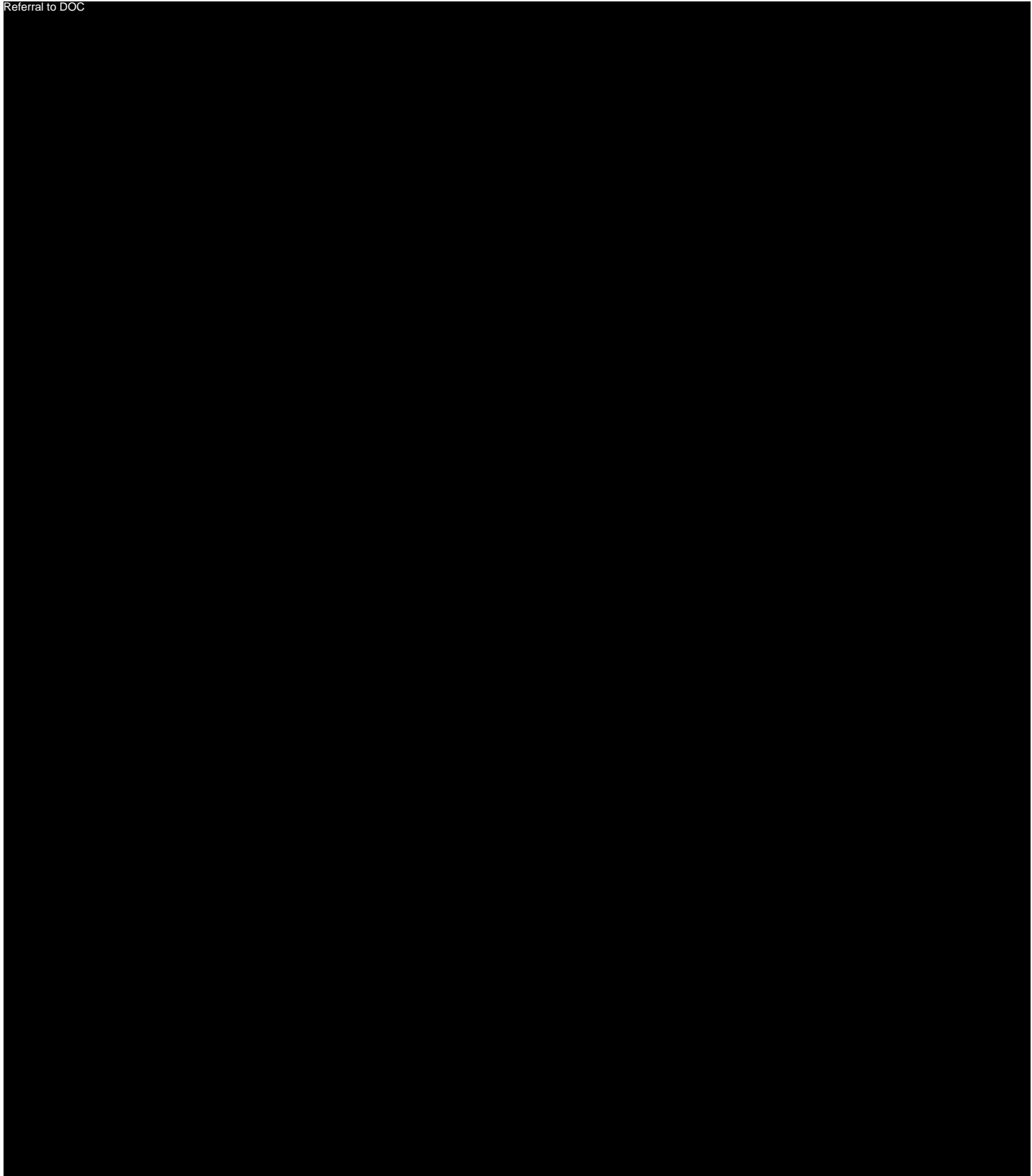
**Sent:** Friday, January 13, 2017 3:16 PM

**From:** [Kassinger, Theodore W.](#)  
**To:** [Maggi, David \(Federal\)](#); [Keith Labedz](#); [Schlom, Evan N.](#)  
**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 14, 2017 11:01:32 AM

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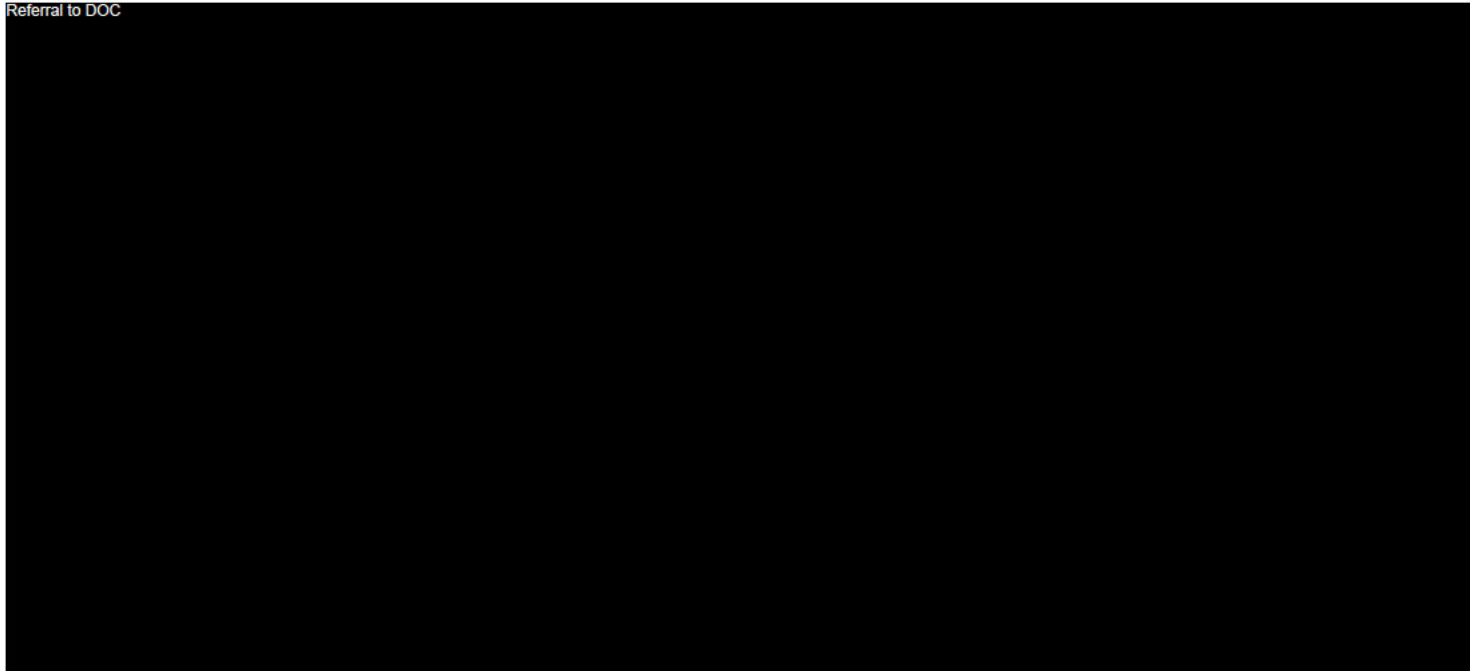
Thanks, David. We will respond to comments soon.

Referral to DOC









**From:** Keith Labeledz [<mailto:klabeledz@oge.gov>]  
**Sent:** Saturday, January 14, 2017 9:32 AM  
**To:** 'Schlom, Evan N.' <[eschlom@omm.com](mailto:eschlom@omm.com)>; Kassinger, Theodore W. <[tkassinger@omm.com](mailto:tkassinger@omm.com)>; Maggi, David (Federal) <[dMaggi@doc.gov](mailto:dMaggi@doc.gov)>  
**Cc:** Dorey, David R. <[ddorey@omm.com](mailto:ddorey@omm.com)>; Jacobi, Will (Federal) <[wjacobi@doc.gov](mailto:wjacobi@doc.gov)>; Williams, Gaye (Federal) <[gWilliams@doc.gov](mailto:gWilliams@doc.gov)>; Warren, Arthur (Federal) <[AWarren@doc.gov](mailto:AWarren@doc.gov)>; Jacob, Dana (Federal) <[DJacob@doc.gov](mailto:DJacob@doc.gov)>; Deborah J. Bortot <[djbortot@oge.gov](mailto:djbortot@oge.gov)>; Heather A. Jones <[hajones@oge.gov](mailto:hajones@oge.gov)>  
**Subject:** RE: Revised WLR 278

Hello,

I will continue reviewing the report today, but I wanted to pass along the following from my check of Part 1 v. Part 3:

· Part 3, line 13 mentions a (b)(3), (6) position with (b)(3), (6) This position does not appear in Part 1.

· Part 3, line 17 mentions a (b)(3), (6) position with (b)(3), (6) . This position does not appear in Part 1.

· Part 3, line 18 mentions a (b)(3), (6) position with (b)(3), (6) This position does not appear in Part 1.

· Part 3, line 19 mentions a (b)(3), (6) position with (b)(3), (6) This position does not appear in Part 1.

· Part 3, line 21 mentions a (b)(3), (6) position with (b)(3), (6) . This position does not appear in Part 1. Note, though, that Part 2 references a (b)(3), (6) . If there is a position, would it be (b)(3), (6) ?

· Part 3, line 22 mentions a (b)(3), (6) position with (b)(3), (6) This position does not appear in Part 1.

· Part 3, line 29 mentions a (b)(3), (6) position with (b)(3), (6)  
This position does not appear in Part 1.

Thank you.

Keith

Rest of email chain partially disclosed above



**From:** [Kassinger, Theodore W.](mailto:Kassinger.Theodore.W)  
**To:** [Keith Labedz](mailto:Keith.Labedz); [Schlom, Evan N.](mailto:Schlom.Evan.N); "Maggi, David (Federal)"  
**Cc:** [Dorey, David R.](mailto:Dorey.David.R); "Jacobi, Will (Federal)"; "Williams, Gaye (Federal)"; "Warren, Arthur (Federal)"; "Jacob, Dana (Federal)"; [Deborah J. Bortot](mailto:Deborah.J.Bortot); [Heather A. Jones](mailto:Heather.A.Jones)  
**Subject:** [GRAYMAIL] RE: Revised WLR 278  
**Date:** Saturday, January 14, 2017 12:49:53 PM

---

will do

**From:** Keith Labedz [<mailto:klabedz@oge.gov>]  
**Sent:** Saturday, January 14, 2017 12:49 PM  
**To:** Kassinger, Theodore W.; 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:** RE: Revised WLR 278

I would go ahead and circulate the revised document. I anticipate my draft 7 comments will be resolved shortly so that we will all be on the same versions of the report and ethics agreement.

Thank you.

**From:** Kassinger, Theodore W. [<mailto:tkassinger@omm.com>]  
**Sent:** Saturday, January 14, 2017 12:13 PM  
**To:** Keith Labedz; 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

thanks very much.

We are addressing David Maggi's comments in a new draft EA. Should we await any comments that you will have on the EA before circulating the revised document, or would you prefer to work from it? It should be ready shortly.

**From:** Keith Labedz [<mailto:klabedz@oge.gov>]  
**Sent:** Saturday, January 14, 2017 12:08 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

2 page attachment withheld in full - (b)(3), (5), (6)

Attached are my notes on the most recent draft. In the interests of time, I made technical corrections myself (as itemized in the document). I still need to compare against the revised ethics agreement; however, I wanted to send along the two pending value questions so we keep moving.

Thank you.

**From:** Schlom, Evan N. [<mailto:eschlom@omm.com>]  
**Sent:** Saturday, January 14, 2017 10:34 AM  
**To:** Keith Labedz; 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

It has been added to Part 1. Thanks.

**From:** Keith Labeledz [<mailto:klabeledz@oge.gov>]  
**Sent:** Saturday, January 14, 2017 10:30 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:** RE: Revised WLR 278

Ok. Regarding (b)(3), (6) should there also be a position added to Part 1?

Thank you.

**From:** Schlom, Evan N. [<mailto:eschlom@omm.com>]  
**Sent:** Saturday, January 14, 2017 10:08 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,

I have made the following changes:

- Part 3, line 13 mentions a (b)(3), (6) position with (b)(3), (6). This position does not appear in Part 1. Added the position to Part 1
- Part 3, line 17 mentions a (b)(3), (6) position with (b)(3), (6). This position does not appear in Part 1. Edited Part 3 line 17 (now Part 3 line 16)
- Part 3, line 18 mentions a (b)(3), (6) position with (b)(3), (6). This position does not appear in Part 1. Edited Part 3 line 18 (now Part 3 line 17)
- Part 3, line 19 mentions a (b)(3), (6) position with (b)(3), (6). This position does not appear in Part 1. Edited Part 3 line 19 (now Part 3 line 18)
- Part 3, line 21 mentions a (b)(3), (6) position with (b)(3), (6). This position does not appear in Part 1. Note, though, that Part 2 references a (b)(3), (6). If there is a position, would it be (b)(3), (6). Edited Part 3 line 21 (now Part 3 line 20)
- Part 3, line 22 mentions a (b)(3), (6) position with (b)(3), (6). This position does not appear in Part 1. Edited Part 3 line 22 (now Part 3 line 21)
- Part 3, line 29 mentions a (b)(3), (6) position with (b)(3), (6). This position does not appear in Part 1. Added the position to Part 1.

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

**Sent:** Saturday, January 14, 2017 9:32 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,

I will continue reviewing the report today, but I wanted to pass along the following from my check of Part 1 v. Part 3:

· Part 3, line 13 mentions a (b)(3), (6) position with (b)(3), (6). This position does not appear in Part 1.

· Part 3, line 17 mentions a (b)(3), (6) position with (b)(3), (6). This position does not appear in Part 1.

· Part 3, line 18 mentions a (b)(3), (6) position with (b)(3), (6). This position does not appear in Part 1.

· Part 3, line 19 mentions a (b)(3), (6) position with (b)(3), (6). This position does not appear in Part 1.

· Part 3, line 21 mentions a (b)(3), (6) position with (b)(3), (6). This position does not appear in Part 1. Note, though, that Part 2 references a (b)(3), (6). If there is a position, would it be (b)(3), (6)?

· Part 3, line 22 mentions a (b)(3), (6) position with (b)(3), (6). This position does not appear in Part 1.

· Part 3, line 29 mentions a (b)(3), (6) position with (b)(3), (6). This position does not appear in Part 1.

Thank you.

Keith

Rest of email chain partially disclosed above

**From:** [Keith Labeledz](#)  
**To:** [Heather A. Jones](#); [Director of OGE](#)  
**Subject:** RE: Revised WLR 278  
**Date:** Saturday, January 14, 2017 2:18:30 PM

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

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**From:** Heather A. Jones  
**Sent:** Saturday, January 14, 2017 2:17 PM  
**To:** Keith Labeledz; Director of OGE  
**Subject:** Re: Revised WLR 278

Please see below

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

---

**From:** Keith Labeledz  
**Sent:** Saturday, January 14, 2017 2:10 PM  
**To:** Heather A. Jones  
**Subject:** FW: Revised WLR 278

Still looking but...

---

**From:** Kassinger, Theodore W. [<mailto:tkassinger@omm.com>]  
**Sent:** Saturday, January 14, 2017 1:35 PM  
**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

2 9-page attachments withheld in full - (b)(3), (4), (5), (6)

Attached, along with comparison showing changes from prior draft.  
In response to David's comment on section 2, we --

- added a footnote explanation
- deleted the list of (b)(3), (6). This list was created before (b)(3), (6) was defined in the opening sentence of section 2. That definition is comprehensive. A (b)(3), (4), (5), (6)
- on section 6, we moved the (b)(3), (6) to eliminate confusion. This is similar to the (b)(3), (6) solution. Mr. Ross has (b)(3), (4), (6), which are captured on the 278 under the (b)(3), (6)
- Only (b)(3), (6) needs to be on Exhibit A. The other (b)(3), (6)

(b)(3), (6)

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

The other comments are also addressed.

Ted

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

**Sent:** Saturday, January 14, 2017 12:49 PM

**To:** Kassinger, Theodore W.; 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:** RE: Revised WLR 278

I would go ahead and circulate the revised document. I anticipate my draft 7 comments will be resolved shortly so that we will all be on the same versions of the report and ethics agreement.

Thank you

Rest of email chain partially disclosed above



**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 14, 2017 2:27:57 PM

---

Keith,

I have made the applicable changes to 10.15/11.1 and 10.16/24.1.

Thanks,

Evan

**From:** Keith Labeledz [<mailto:klabeledz@oge.gov>]  
**Sent:** Saturday, January 14, 2017 12:48 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

You need not attribute between the two but the figure should be the combined amount without double-counting.

So, if the combined value of 10.15 and 11.1 is X and the combined income is Y, then you can report X and Y as the value/income at 10.15 or 11.1, leaving the value/income fields for the other entry blank. Let's say you pick 10.15, so X is recorded as the value and Y is recorded as the income. Then, the endnote for 10.15 would say that the value/income reflect the combined income for 10.15 and 11.1. Entry 11.1 would have blank value/income fields and an endnote indicating that its value/income is reflected in 10.15.

**From:** Schlom, Evan N. [<mailto:eschlom@omm.com>]  
**Sent:** Saturday, January 14, 2017 12:17 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

Thanks Keith.

I think there's some confusion about how best to represent the values and incomes. For (b)(3), (6), the values and incomes shown in 10.15 and 11.1 reflect the values and incomes of (b)(3), (4), (6). Similarly, for (b)(3), (6), the values and incomes shown in 10.16 and 24.1 reflect the values and incomes of (b)(3), (4), (6).

Please let me know the best way to show this on the report and I will make the appropriate change.



Thanks,

Evan

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

**Sent:** Saturday, January 14, 2017 12:08 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

2 page attachment withheld in full - (b) (3), (5), (6)

Attached are my notes on the most recent draft. In the interests of time, I made technical corrections myself (as itemized in the document). I still need to compare against the revised ethics agreement; however, I wanted to send along the two pending value questions so we keep moving.

Thank you.

Rest of email chain partially disclosed above

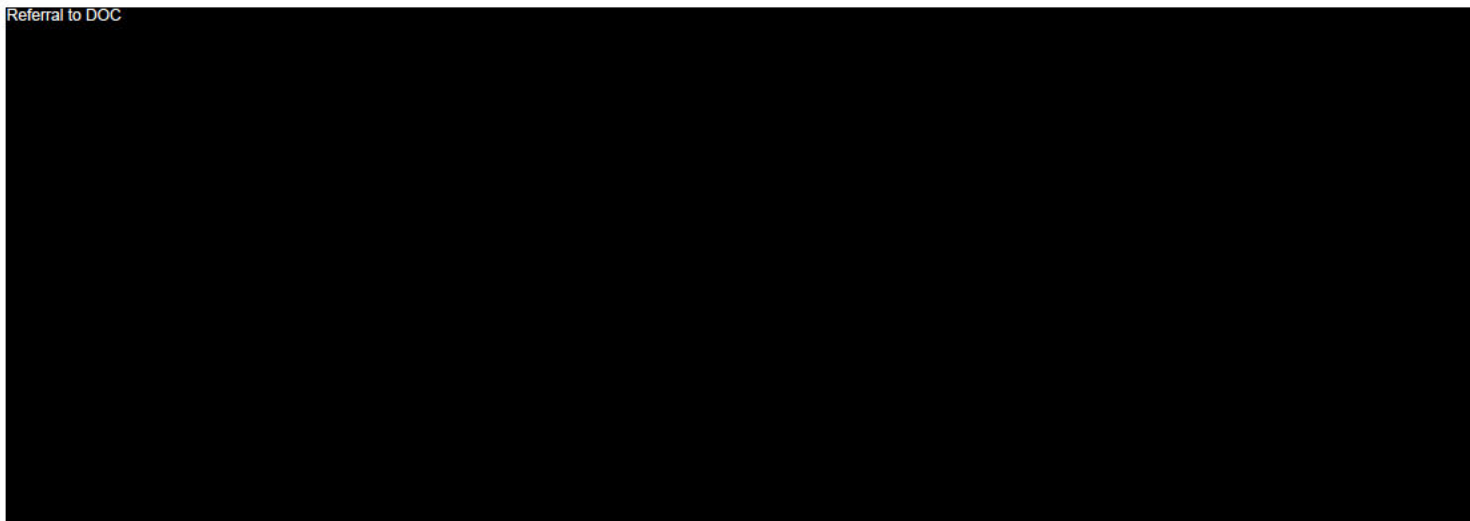


**From:** [Kassinger, Theodore W.](#)  
**To:** [Maqqi, David \(Federal\)](#); [Keith Labeledz](#)  
**Cc:** [Schlom, Evan N.](#); [Dorey, David R.](#); [Jacobi, Will \(Federal\)](#); [Williams, Gaye \(Federal\)](#); [Warren, Arthur \(Federal\)](#); [Jacob, Dana \(Federal\)](#); [Deborah J. Bortot](#); [Heather A. Jones](#)  
**Subject:** [GRAYMAIL] RE: Revised WLR 278  
**Date:** Saturday, January 14, 2017 2:59:54 PM

---

Correct, thanks Keith. I also have two other conforming changes along the same line. I will circulate an update in a moment.


Referral to DOC



On Jan 14, 2017, at 2:28 PM, Keith Labeledz <[klabeledz@oge.gov](mailto:klabeledz@oge.gov)> wrote:

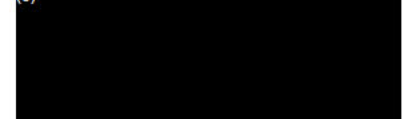
I also have a question about dropping the list in Section 2. I have been mostly focused on the report itself so far (therefore, I may be missing something) but does the section 2 90-day divestiture requirement apply to each previously-listed (b)(3), (6) from which the filer is resigning? It seems some of the (b)(3), (6) being retained.

Referral to DOC



On Jan 14, 2017, at 1:35 PM, Kassinger, Theodore W. <[tkassinger@omm.com](mailto:tkassinger@omm.com)> wrote:

2 9-page attachments withheld in full - (b)(3), (4), (5), (6)



Attached, along with comparison showing changes from prior draft.

In response to David's comment on section 2, we --

- added a footnote explanation

- deleted the list of (b)(3), (6). This list was created before (b)(3), (6) was defined in the opening sentence of section 2. That definition is comprehensive. A (b)(3), (4), (5), (6)

- on section 6, we moved the (b)(3), (6) to eliminate confusion. This is similar to the (b)(3), (6) solution. Mr. Ross has (b)(3), (4), (6), which are captured on the 278 under the (b)(3), (6).

- Only (b)(3), (6) needs to be on Exhibit A. The other (b)(3), (6) (b)(3), (4), (6).

The other comments are also addressed.

Ted

**From:** Keith Labeledz [<mailto:klabeledz@oge.gov>]  
**Sent:** Saturday, January 14, 2017 12:49 PM  
**To:** Kassinger, Theodore W.; 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:** RE: Revised WLR 278

I would go ahead and circulate the revised document. I anticipate my draft 7 comments will be resolved shortly so that we will all be on the same versions of the report and ethics agreement.

Thank you.

Rest of email chain partially disclosed above

**From:** [Heather A. Jones](#)  
**To:** [Keith Labeledz](#)  
**Subject:** RE: Revised WLR 278  
**Date:** Saturday, January 14, 2017 3:40:18 PM

---

I have a few edits to the EA I'm working on.

---

**From:** Keith Labeledz  
**Sent:** Saturday, January 14, 2017 3:39 PM  
**To:** Heather A. Jones  
**Subject:** FW: Revised WLR 278

Also, draft 8 of the report seems to be ready. At this point, I'm not planning another review apart from a check against the (semi)final version of the ethics agreement.

---

**From:** Keith Labeledz  
**Sent:** Saturday, January 14, 2017 3:20 PM  
**To:** Heather A. Jones  
**Subject:** RE: Revised WLR 278

Take a look at the document labeled "KSL edit..." Not sure if I am on the wrong track or not but this seems clearer (to me).

---

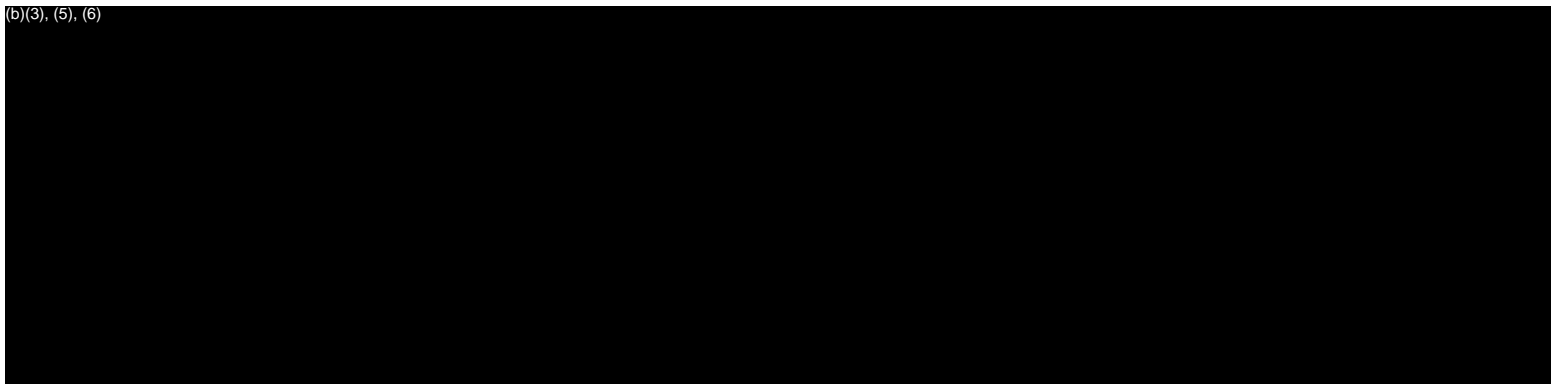
**From:** Heather A. Jones  
**Sent:** Saturday, January 14, 2017 3:08 PM  
**To:** Keith Labeledz  
**Subject:** RE: Revised WLR 278

I agree. We will have to see what Walt says

---

**From:** Keith Labeledz  
**Sent:** Saturday, January 14, 2017 2:11 PM  
**To:** Heather A. Jones

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



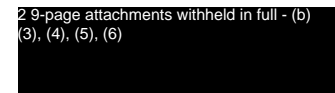
**From:** Kassinger, Theodore W. [<mailto:tkassinger@omm.com>]  
**Sent:** Saturday, January 14, 2017 1:35 PM  
**To:** Keith Labeledz; Schlom, Evan N.; 'Maggi, David (Federal)'  
**Cc:** Dorey, David R.; 'Jacobi, Will (Federal)'; 'Williams, Gaye (Federal)'; 'Warren, Arthur (Federal)'; 'Jacob, Dana (Federal)'; Deborah J. Bortot; Heather A. Jones  
**Subject:** [GRAYMAIL] RE: Revised WLR 278

Attached, along with comparison showing changes from prior draft.

In response to David's comment on section 2, we --

· added a footnote explanation

2 9-page attachments withheld in full - (b) (3), (4), (5), (6)



Rest of email chain partially disclosed above



**From:** [Heather A. Jones](#)  
**To:** [Director of OGE](#)  
**Subject:** FW: Revised WLR 278  
**Date:** Saturday, January 14, 2017 5:26:46 PM

---

Referral to DOC

On Jan 14, 2017, at 4:47 PM, Kassinger, Theodore W. <[tkassinger@omm.com](mailto:tkassinger@omm.com)> wrote:

Attached is an updated draft to address comments of David and Keith. Also attached is a comparison showing changes to the last draft.

On questions raised and changes:

2 9-page attachments withheld in full - (b)(3), (4), (5), (6)

- Section 2

- New wording to clarify that the (b) (5), (b) (6) would apply to (b)(3), (6) entities on Attachment A, except for the retained interests permitted under Section 9.
- Delete last sentence. With the comprehensive definition of (b)(3), (6) that starts the section, there is no apparent purpose for listing the specific (b)(3), (6) entities in Parts 1 and 2 of the 278. To the contrary, it seems rife with the potential for being misleading and perhaps, despite multiple pair of eyes reviewing the list, not concordant. Section 2 is unambiguously comprehensive: Mr. Ross (b)(3), (5), (6)
- added footnote 1, along lines of David's suggestion.

- Section 7

- conformed section 7 list to Annex A. Discrepancies generally reflected differences in specific (b)(3), (6) in which Mr. Ross has a position, and the (b)(3), (6) list in the divestitures in A. We added all from 7 not specifically listed.

- Sections 8, 11

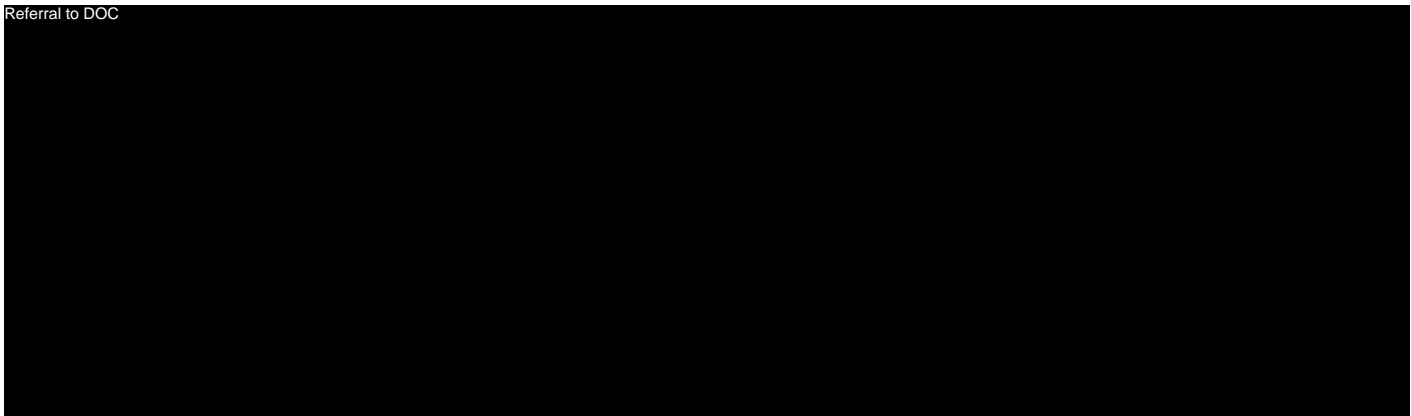
- Retitled 11 to be “ADDITIONAL ACTIONS, ETHICS BRIEFING”
- moved the CD paragraph from 8 to 11, where it fits better as applying to all divestitures (not just those in 8)
- added a sentence to make clear that (b) (5), (b) (6)

[Redacted text block]

Thanks for your patience.

Ted

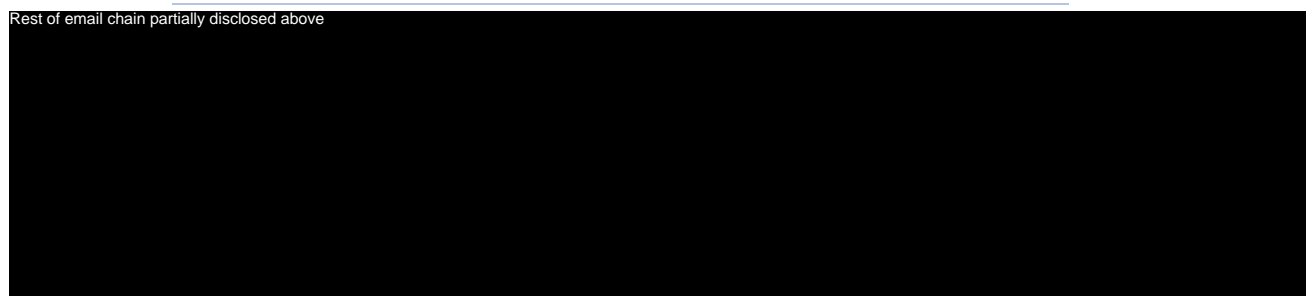
Referral to DOC



On Jan 14, 2017, at 2:28 PM, Keith Labeledz <[klabeledz@oge.gov](mailto:klabeledz@oge.gov)> wrote:

I also have a question about dropping the list in Section 2. I have been mostly focused on the report itself so far (therefore, I may be missing something) but does the section 2 90-day divestiture requirement apply to each previously-listed (b)(3), (6) from which the filer is resigning? It seems some of the (b)(3), (6) being retained.

Rest of email chain partially disclosed 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 14, 2017 5:33:40 PM

---

We will not make any changes on the 278 until we hear from you.

Ted

**From:** Keith Labeledz [mailto:klabeledz@oge.gov]  
**Sent:** Saturday, January 14, 2017 5:27 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:** RE: Revised WLR 278

Thank you. As we review and discuss, I have one suggestion: Please check with us before making any further changes to the 278 itself. That way, we are all working on the same versions as we proceed through finalizing the ethics agreement.

Keith

**From:** Kassinger, Theodore W. [mailto:tkassinger@omm.com]  
**Sent:** Saturday, January 14, 2017 4:46 PM  
**To:** Maggi, David (Federal); Keith Labeledz  
**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

Attached is an updated draft to address comments of David and Keith. Also attached is a comparison showing changes to the last draft.

2 9-page attachments withheld in full - (b)(3), (4), (5), (6)

On questions raised and changes:

· Section 2

Rest of email chain partially disclosed above



**From:** [Kassinger, Theodore W.](mailto:Kassinger.Theodore.W)  
**To:** [Heather A. Jones](mailto:Heather.A.Jones); [Keith Labedz](mailto:Keith.Labedz); [Maggi, David \(Federal\)](mailto:Maggi.David.Federal); Director of OGE  
**Cc:** [Schlom, Evan N.](mailto:Schlom.Evan.N.); [Dorey, David R.](mailto:Dorey.David.R.); [Jacobi, Will \(Federal\)](mailto:Jacobi.Will.Federal); [Williams, Gaye \(Federal\)](mailto:Williams.Gaye.Federal); [Warren, Arthur \(Federal\)](mailto:Warren.Arthur.Federal); [Jacob, Dana \(Federal\)](mailto:Jacob.Dana.Federal); [Deborah J. Bortot](mailto:Deborah.J.Bortot)  
**Subject:** [GRAYMAIL] RE: Revised WLR 278  
**Date:** Saturday, January 14, 2017 6:00:50 PM

---

will get it to you shortly.

**From:** Heather A. Jones [mailto:hajones@oge.gov]  
**Sent:** Saturday, January 14, 2017 5:57 PM  
**To:** Kassinger, Theodore W.; Keith Labedz; Maggi, David (Federal); Director of OGE  
**Cc:** Schlom, Evan N.; Dorey, David R.; Jacobi, Will (Federal); Williams, Gaye (Federal); Warren, Arthur (Federal); Jacob, Dana (Federal); Deborah J. Bortot  
**Subject:** RE: Revised WLR 278

Ted-

Before OGE can preclear the report, we will need a copy of the written request to remove his name from the businesses.

Thanks,

Heather

**From:** Kassinger, Theodore W. [mailto:tkassinger@omm.com]  
**Sent:** Saturday, January 14, 2017 5:35 PM  
**To:** Heather A. Jones; Keith Labedz; Maggi, David (Federal); Director of OGE  
**Cc:** Schlom, Evan N.; Dorey, David R.; Jacobi, Will (Federal); Williams, Gaye (Federal); Warren, Arthur (Federal); Jacob, Dana (Federal); Deborah J. Bortot  
**Subject:** [GRAYMAIL] RE: Revised WLR 278

We will not make any changes to the 278 until we hear from you.

We agree with David Maggi's two suggestions for edits to the EA that he provided in a separate response, but also will withhold further edits until we get other feedback.

Ted

**From:** Heather A. Jones [mailto:hajones@oge.gov]  
**Sent:** Saturday, January 14, 2017 5:29 PM  
**To:** Keith Labedz; Kassinger, Theodore W.; Maggi, David (Federal); Director of OGE  
**Cc:** Schlom, Evan N.; Dorey, David R.; Jacobi, Will (Federal); Williams, Gaye (Federal); Warren, Arthur (Federal); Jacob, Dana (Federal); Deborah J. Bortot  
**Subject:** RE: Revised WLR 278

I want to loop Walt into the discussion at this point. Please use this e-mail to reply.

**From:** Keith Labedz  
**Sent:** Saturday, January 14, 2017 5:27 PM  
**To:** 'Kassinger, Theodore W.'; Maggi, David (Federal)

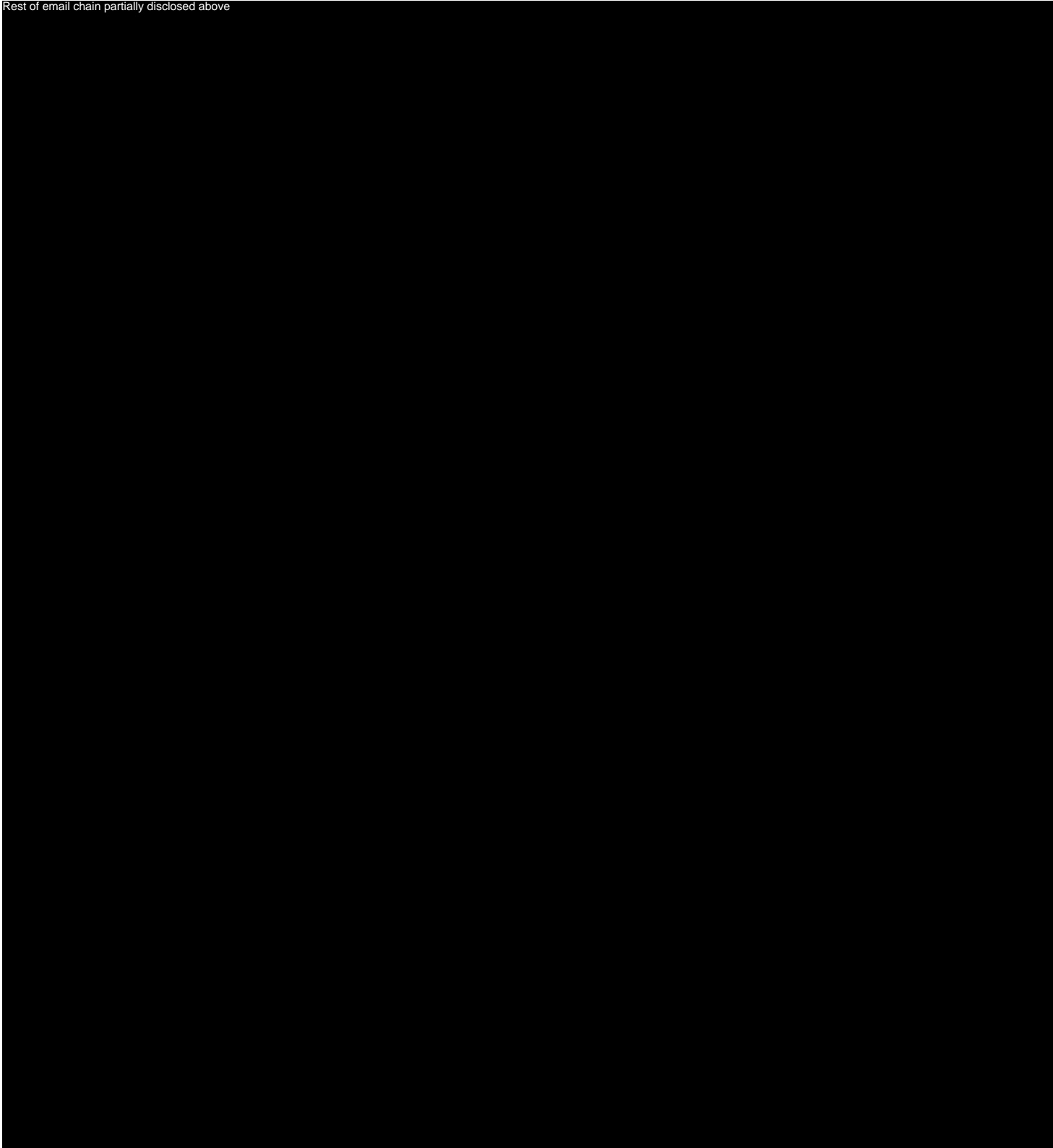


**Cc:** Schlom, Evan N.; Dorey, David R.; Jacobi, Will (Federal); Williams, Gaye (Federal); Warren, Arthur (Federal); Jacob, Dana (Federal); Deborah J. Bortot; Heather A. Jones  
**Subject:** RE: Revised WLR 278

Thank you. As we review and discuss, I have one suggestion: Please check with us before making any further changes to the 278 itself. That way, we are all working on the same versions as we proceed through finalizing the ethics agreement.

Keith

Rest of email chain partially disclosed above



**From:** [Heather A. Jones](#)  
**To:** [Keith Labeledz](#); [Director of OGE](#)  
**Subject:** RE: Revised WLR 278  
**Date:** Saturday, January 14, 2017 6:04:04 PM

---

Understood. I will take a look as well.

**From:** Keith Labeledz  
**Sent:** Saturday, January 14, 2017 6:02 PM  
**To:** Heather A. Jones; Director of OGE  
**Subject:** RE: Revised WLR 278

Unfortunately, no. (b)(5) [Redacted]  
[Redacted]  
[Redacted]  
[Redacted]

**From:** Heather A. Jones  
**Sent:** Saturday, January 14, 2017 5:51 PM  
**To:** Keith Labeledz; Director of OGE  
**Subject:** RE: Revised WLR 278

Keith –  
Can you send a list of those before 6? I working on edits to the EA.  
Heather

**From:** Keith Labeledz  
**Sent:** Saturday, January 14, 2017 5:50 PM  
**To:** Heather A. Jones; Director of OGE  
**Subject:** RE: Revised WLR 278

With respect to the (b)(5) [Redacted]  
[Redacted]  
[Redacted]  
[Redacted]  
[Redacted]

Referral to DOC

[Large redacted area]

On Jan 14, 2017, at 4:47 PM, Kassinger, Theodore W. <[tkassinger@omm.com](mailto:tkassinger@omm.com)> wrote:

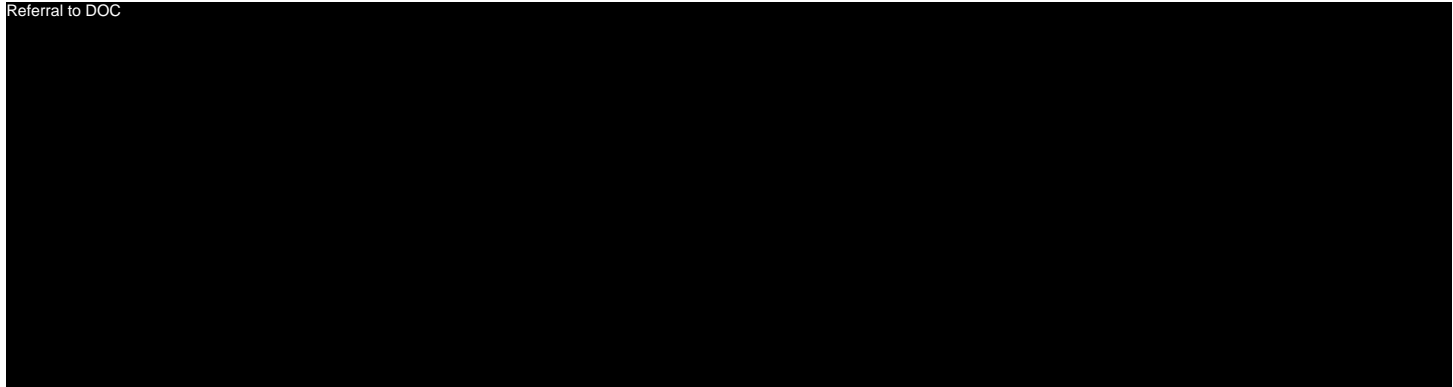
Attached is an updated draft to address comments of David and Keith. Also attached is a comparison showing changes to the last draft.

On questions raised and changes:

2 9-page attachments  
withheld in full - (b)(3), (4),  
(5), (6)

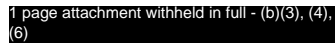
Rest of email chain partially disclosed above

Referral to DOC



On Jan 14, 2017, at 7:00 PM, Kassinger, Theodore W. <[tkassinger@omm.com](mailto:tkassinger@omm.com)> wrote:

1 page attachment withheld in full - (b)(3), (4), (6)



Letter attached.

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

**Sent:** Saturday, January 14, 2017 5:57 PM

**To:** Kassinger, Theodore W.; Keith Labeledz; Maggi, David (Federal); Director of OGE

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

**Subject:** RE: Revised WLR 278

Ted-

Before OGE can preclear the report, we will need a copy of the written request to remove his name from the businesses.

Thanks,

Rest of email chain partially disclosed above



**From:** [Kassinger, Theodore W.](#)  
**To:** [Heather A. Jones](#); [Keith Labedz](#); [Maggi, David \(Federal\)](#); [Director of OGE](#)  
**Cc:** [Schlom, Evan N.](#); [Dorey, David R.](#); [Jacobi, Will \(Federal\)](#); [Williams, Gaye \(Federal\)](#); [Warren, Arthur \(Federal\)](#); [Jacob, Dana \(Federal\)](#); [Deborah J. Bortot](#)  
**Subject:** [GRAYMAIL] RE: Couple of notes on Part 1  
**Date:** Saturday, January 14, 2017 7:36:46 PM

---

Got it.

**From:** Heather A. Jones [mailto:hajones@oge.gov]  
**Sent:** Saturday, January 14, 2017 7:35 PM  
**To:** Kassinger, Theodore W.; Keith Labedz; Maggi, David (Federal); Director of OGE  
**Cc:** Schlom, Evan N.; Dorey, David R.; Jacobi, Will (Federal); Williams, Gaye (Federal); Warren, Arthur (Federal); Jacob, Dana (Federal); Deborah J. Bortot  
**Subject:** Couple of notes on Part 1

I think (b)(3), (5), (6) [REDACTED]:

(b)(3), (6) [REDACTED]

[REDACTED]

Please don't make the change until Keith gives the go-ahead.

**From:** Kassinger, Theodore W. [mailto:tkassinger@omm.com]  
**Sent:** Saturday, January 14, 2017 7:00 PM  
**To:** Heather A. Jones; Keith Labedz; Maggi, David (Federal); Director of OGE  
**Cc:** Schlom, Evan N.; Dorey, David R.; Jacobi, Will (Federal); Williams, Gaye (Federal); Warren, Arthur (Federal); Jacob, Dana (Federal); Deborah J. Bortot  
**Subject:** [GRAYMAIL] RE: Revised WLR 278

1 page attachment withheld in full - (b)(3), (4), (6)

Letter attached.

Rest of email chain partially disclosed above

[REDACTED]

Referral to DOC

On Jan 14, 2017, at 7:35 PM, Heather A. Jones <[hajones@oge.gov](mailto:hajones@oge.gov)> wrote:

I think

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

(b)(3), (6)

Rest of email chain partially disclosed above

**From:** [Heather A. Jones](#)  
**To:** [David J. Apol](#)  
**Subject:** For your review  
**Date:** Saturday, January 14, 2017 7:38:52 PM  
**Attachments:** [WLR Letter to \(b\)\(3\), \(6\) 01142017.PDF](#)

1 page attachment withheld in full - (b)(3), (4), (6)

---

Dave-

Are you ok with this as a sufficient request to remove a name? I think it is fine since there is really nothing more he can do.

Heather

---

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

**Sent:** Saturday, January 14, 2017 7:00 PM

**To:** Heather A. Jones; Keith Labedz; Maggi, David (Federal); Director of OGE

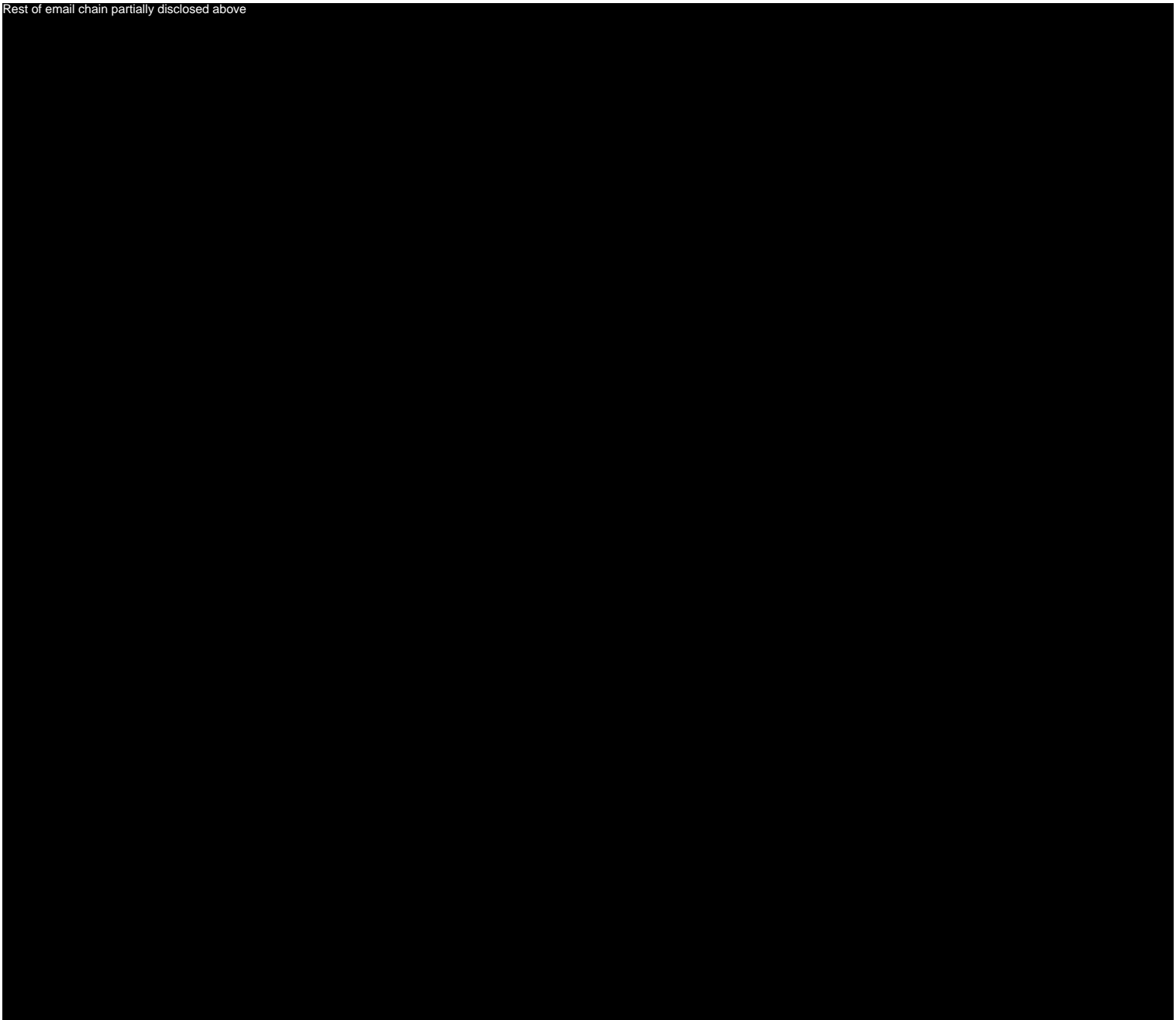
**Cc:** Schlom, Evan N.; Dorey, David R.; Jacobi, Will (Federal); Williams, Gaye (Federal); Warren, Arthur (Federal); Jacob, Dana (Federal); Deborah J. Bortot

**Subject:** [GRAYMAIL] RE: Revised WLR 278

1 page attachment withheld in full - (b)(3), (4), (6)

Letter attached.

Rest of email chain partially disclosed above



**From:** [Kassinger, Theodore W.](mailto:Kassinger.Theodore.W.)  
**To:** [Keith Labeledz](mailto:Keith.Labeledz); [Heather A. Jones](mailto:Heather.A.Jones); [Maggi, David \(Federal\)](mailto:Maggi.David.Federal); [Director of OGE](mailto:Director.of.OGE)  
**Cc:** [Schlom, Evan N.](mailto:Schlom.Evan.N.); [Dorey, David R.](mailto:Dorey.David.R.); [Jacobi, Will \(Federal\)](mailto:Jacobi.Will.Federal); [Williams, Gaye \(Federal\)](mailto:Williams.Gaye.Federal); [Warren, Arthur \(Federal\)](mailto:Warren.Arthur.Federal); [Jacob, Dana \(Federal\)](mailto:Jacob.Dana.Federal); [Deborah J. Bortot](mailto:Deborah.J.Bortot)  
**Subject:** [GRAYMAIL] RE: Couple of notes on Part 1  
**Date:** Saturday, January 14, 2017 7:53:12 PM

---

We are cross-checking whether there is a position.

**From:** Keith Labeledz [<mailto:klabeledz@oge.gov>]  
**Sent:** Saturday, January 14, 2017 7:51 PM  
**To:** Heather A. Jones; Kassinger, Theodore W.; Maggi, David (Federal); Director of OGE  
**Cc:** Schlom, Evan N.; Dorey, David R.; Jacobi, Will (Federal); Williams, Gaye (Federal); Warren, Arthur (Federal); Jacob, Dana (Federal); Deborah J. Bortot  
**Subject:** RE: Couple of notes on Part 1

There is (b)(3), (6). If 278 is correct, it should appear in the attachment but not section 7.

**From:** Heather A. Jones  
**Sent:** Saturday, January 14, 2017 7:49 PM  
**To:** 'Kassinger, Theodore W.'; Keith Labeledz; Maggi, David (Federal); Director of OGE  
**Cc:** Schlom, Evan N.; Dorey, David R.; Jacobi, Will (Federal); Williams, Gaye (Federal); Warren, Arthur (Federal); Jacob, Dana (Federal); Deborah J. Bortot  
**Subject:** RE: Couple of notes on Part 1

This item is in the EA but not listed in Part 1:

1. (b)(3), (6)

Should it stay in the EA?

**From:** Kassinger, Theodore W. [<mailto:tkassinger@omm.com>]  
**Sent:** Saturday, January 14, 2017 7:42 PM  
**To:** Keith Labeledz; Heather A. Jones; Maggi, David (Federal); Director of OGE  
**Cc:** Schlom, Evan N.; Dorey, David R.; Jacobi, Will (Federal); Williams, Gaye (Federal); Warren, Arthur (Federal); Jacob, Dana (Federal); Deborah J. Bortot  
**Subject:** [GRAYMAIL] RE: Couple of notes on Part 1

thanks

**From:** Keith Labeledz [<mailto:klabeledz@oge.gov>]  
**Sent:** Saturday, January 14, 2017 7:39 PM  
**To:** Heather A. Jones; Kassinger, Theodore W.; Maggi, David (Federal); Director of OGE  
**Cc:** Schlom, Evan N.; Dorey, David R.; Jacobi, Will (Federal); Williams, Gaye (Federal); Warren, Arthur (Federal); Jacob, Dana (Federal); Deborah J. Bortot  
**Subject:** RE: Couple of notes on Part 1

I think that those two changes make sense and would not require a new round of review. I'll just make them. Thank you.



**From:** Heather A. Jones

**Sent:** Saturday, January 14, 2017 7:35 PM

**To:** 'Kassinger, Theodore W.'; Keith Labedz; Maggi, David (Federal); Director of OGE

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

**Subject:** Couple of notes on Part 1

I think (b)(3), (5), (6) [REDACTED]:

(b)(3), (6) [REDACTED]

[REDACTED]

Please don't make the change until Keith gives the go-ahead.

Rest of email chain partially disclosed above

[REDACTED]

**From:** [Heather A. Jones](#)  
**To:** [Deborah J. Bortot](#)  
**Subject:** RE: See Below  
**Date:** Saturday, January 14, 2017 7:55:41 PM

---

Yes, I think so since Walt is MIA. Though I don't see how we clear without Walt giving the go ahead.

---

**From:** Deborah J. Bortot  
**Sent:** Saturday, January 14, 2017 7:47 PM  
**To:** Heather A. Jones  
**Subject:** RE: See Below  
[Do you and I need to talk to Dave?](#)

---

**From:** Heather A. Jones  
**Sent:** Saturday, January 14, 2017 7:45 PM  
**To:** Deborah J. Bortot  
**Subject:** See Below

---

**From:** Kassinger, Theodore W. [<mailto:tkassinger@omm.com>]  
**Sent:** Saturday, January 14, 2017 7:43 PM  
**To:** Heather A. Jones  
**Subject:** [GRAYMAIL] RE: Revised WLR 278

David Maggi must deliver the cleared and signed documents to the Committee tomorrow, because of the hearing date on Wednesday morning. Whatever we can do to make that happen, let me know.

thanks for all the work, especially on a Saturday night.

**From:** Heather A. Jones [<mailto:hajones@oge.gov>]  
**Sent:** Saturday, January 14, 2017 7:38 PM  
**To:** Kassinger, Theodore W.  
**Subject:** RE: Revised WLR 278

Keith and I are working on reconciling everything. Walt will also need to work through everything. I'm thinking Monday if there aren't major changes and if Walt is happy with it.

**From:** Kassinger, Theodore W. [<mailto:tkassinger@omm.com>]  
**Sent:** Saturday, January 14, 2017 7:32 PM  
**To:** Heather A. Jones  
**Subject:** [GRAYMAIL] RE: Revised WLR 278

any sense of timing on pre-clearance?

**From:** Heather A. Jones [<mailto:hajones@oge.gov>]  
**Sent:** Saturday, January 14, 2017 7:30 PM  
**To:** Kassinger, Theodore W.  
**Subject:** RE: Revised WLR 278

Thanks

**From:** Kassinger, Theodore W. [<mailto:tkassinger@omm.com>]  
**Sent:** Saturday, January 14, 2017 7:00 PM  
**To:** Heather A. Jones; Keith Labeledz; Maggi, David (Federal); Director of OGE  
**Cc:** Schlom, Evan N.; Dorey, David R.; Jacobi, Will (Federal); Williams, Gaye (Federal); Warren, Arthur (Federal); Jacob, Dana (Federal); Deborah J. Bortot

**Subject:** [GRAYMAIL] RE: Revised WLR 278

Letter attached

1 page attachment withheld in full - (b)(3), (4), (6)

Rest of email chain partially disclosed above

**From:** [Heather A. Jones](#)  
**To:** "[Schlom, Evan N.](#)"; [Keith Labeledz](#)  
**Cc:** [Kassinger, Theodore W.](#); [Maggi, David \(Federal\)](#); [Director of OGE](#); [Dorey, David R.](#); [Jacobi, Will \(Federal\)](#); [Williams, Gaye \(Federal\)](#); [Warren, Arthur \(Federal\)](#); [Jacob, Dana \(Federal\)](#); [Deborah J. Bortot](#)  
**Subject:** RE: Couple of notes on Part 1  
**Date:** Saturday, January 14, 2017 7:58:35 PM

---

Ok, I will remove it from the EA

---

**From:** Schlom, Evan N. [mailto:[eschlom@omm.com](mailto:eschlom@omm.com)]  
**Sent:** Saturday, January 14, 2017 7:57 PM  
**To:** Keith Labeledz  
**Cc:** Heather A. Jones; Kassinger, Theodore W.; Maggi, David (Federal); Director of OGE; Dorey, David R.; Jacobi, Will (Federal); Williams, Gaye (Federal); Warren, Arthur (Federal); Jacob, Dana (Federal); Deborah J. Bortot  
**Subject:** [GRAYMAIL] Re: Couple of notes on Part 1  
The 278 is correct. Mr. Ross holds no position with (b)(3), (6)

On Jan 14, 2017, at 7:52 PM, Keith Labeledz <[klabeledz@oge.gov](mailto:klabeledz@oge.gov)> wrote:

There is (b)(3), (6) reported. If 278 is correct, it should appear in the attachment but not section 7.

**From:** Heather A. Jones  
**Sent:** Saturday, January 14, 2017 7:49 PM  
**To:** 'Kassinger, Theodore W.'; Keith Labeledz; Maggi, David (Federal); Director of OGE  
**Cc:** Schlom, Evan N.; Dorey, David R.; Jacobi, Will (Federal); Williams, Gaye (Federal); Warren, Arthur (Federal); Jacob, Dana (Federal); Deborah J. Bortot  
**Subject:** RE: Couple of notes on Part 1  
This item is in the EA but not listed in Part 1:

1. (b)(3), (6)

Should it stay in the EA?

**From:** Kassinger, Theodore W. [mailto:[tkassinger@omm.com](mailto:tkassinger@omm.com)]  
**Sent:** Saturday, January 14, 2017 7:42 PM  
**To:** Keith Labeledz; Heather A. Jones; Maggi, David (Federal); Director of OGE  
**Cc:** Schlom, Evan N.; Dorey, David R.; Jacobi, Will (Federal); Williams, Gaye (Federal); Warren, Arthur (Federal); Jacob, Dana (Federal); Deborah J. Bortot  
**Subject:** [GRAYMAIL] RE: Couple of notes on Part 1  
thanks

**From:** Keith Labeledz [mailto:[klabeledz@oge.gov](mailto:klabeledz@oge.gov)]  
**Sent:** Saturday, January 14, 2017 7:39 PM  
**To:** Heather A. Jones; Kassinger, Theodore W.; Maggi, David (Federal); Director of OGE  
**Cc:** Schlom, Evan N.; Dorey, David R.; Jacobi, Will (Federal); Williams, Gaye (Federal); Warren, Arthur (Federal); Jacob, Dana (Federal); Deborah J. Bortot  
**Subject:** RE: Couple of notes on Part 1

I think that those two changes make sense and would not require a new round of review. I'll just make them. Thank you.

Rest of email chain partially disclosed above

**From:** [Heather A. Jones](#)  
**To:** [Keith Labeledz](#); [Director of OGE](#)  
**Subject:** RE: Revised WLR 278  
**Date:** Saturday, January 14, 2017 7:59:28 PM

---

I agree with Keith.

---

**From:** Keith Labeledz  
**Sent:** Saturday, January 14, 2017 7:53 PM  
**To:** Heather A. Jones; Director of OGE  
**Subject:** RE: Revised WLR 278

In theory that could occur but (b)(6)

---

**From:** Heather A. Jones  
**Sent:** Saturday, January 14, 2017 7:44 PM  
**To:** Director of OGE; Keith Labeledz  
**Subject:** FW: Revised WLR 278

FYI

---

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

**Sent:** Saturday, January 14, 2017 7:43 PM

**To:** Heather A. Jones

**Subject:** [GRAYMAIL] RE: Revised WLR 278

David Maggi must deliver the cleared and signed documents to the Committee tomorrow, because of the hearing date on Wednesday morning. Whatever we can do to make that happen, let me know.

thanks for all the work, especially on a Saturday night.

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

**Sent:** Saturday, January 14, 2017 7:38 PM

**To:** Kassinger, Theodore W.

**Subject:** RE: Revised WLR 278

Keith and I are working on reconciling everything. Walt will also need to work through everything. I'm thinking Monday if there aren't major changes and if Walt is happy with it.

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

**Sent:** Saturday, January 14, 2017 7:32 PM

**To:** Heather A. Jones

**Subject:** [GRAYMAIL] RE: Revised WLR 278

any sense of timing on pre-clearance?

Rest of email chain partially disclosed above



**From:** [Heather A. Jones](#)  
**To:** [Keith Labeledz](#)  
**Subject:** RE: Revised WLR 278  
**Date:** Saturday, January 14, 2017 8:35:04 PM

---

I removed the duplicate from the EA.

---

**From:** Keith Labeledz  
**Sent:** Saturday, January 14, 2017 8:32 PM  
**To:** Heather A. Jones  
**Subject:** FW: Revised WLR 278

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

---

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

**Sent:** Saturday, January 14, 2017 7:15 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); Deborah J. Bortot; Heather A. Jones; Walter M. Shaub

**Subject:** [GRAYMAIL] RE: Revised WLR 278

Further notes on David's questions regarding Attachment A as you review the documents:

The following appear on Attachment A but are not listed as (b)(3), (6) on the 278:

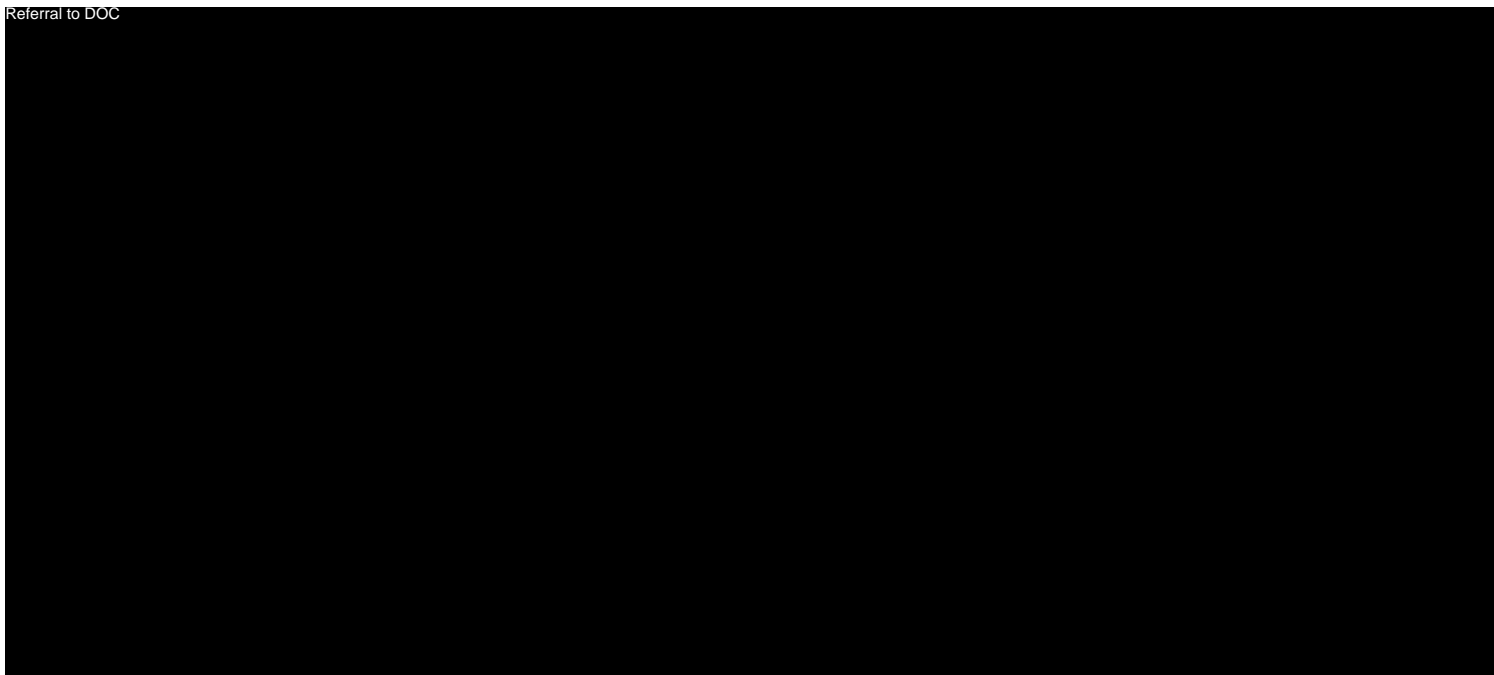
(b)(3), (6)

The first four are not listed as (b)(3), (6) on the 278 because the (b)(3), (4), (6) . We propose to keep them on Attachment A, however. Mr. Ross needs to resign his position in (b)(3), (6) , so that resignation will need to stay in section 7.

Mr. Ross (b)(3), (4), (6) in (b)(3), (6) and thus it is not included in either part 2 or part 6 of the 278. It is listed in Section 7 of the EA because he is (b)(3), (6) , as reported on the 278. It could be moved to Part 5 (b)(3), (4), (6) . It seems out of place there because all other entities listed in section 5 are (b)(3), (4), (6) . It does no harm to have it in section 7 and on Attachment A.

We hope this helps.

Referral to DOC



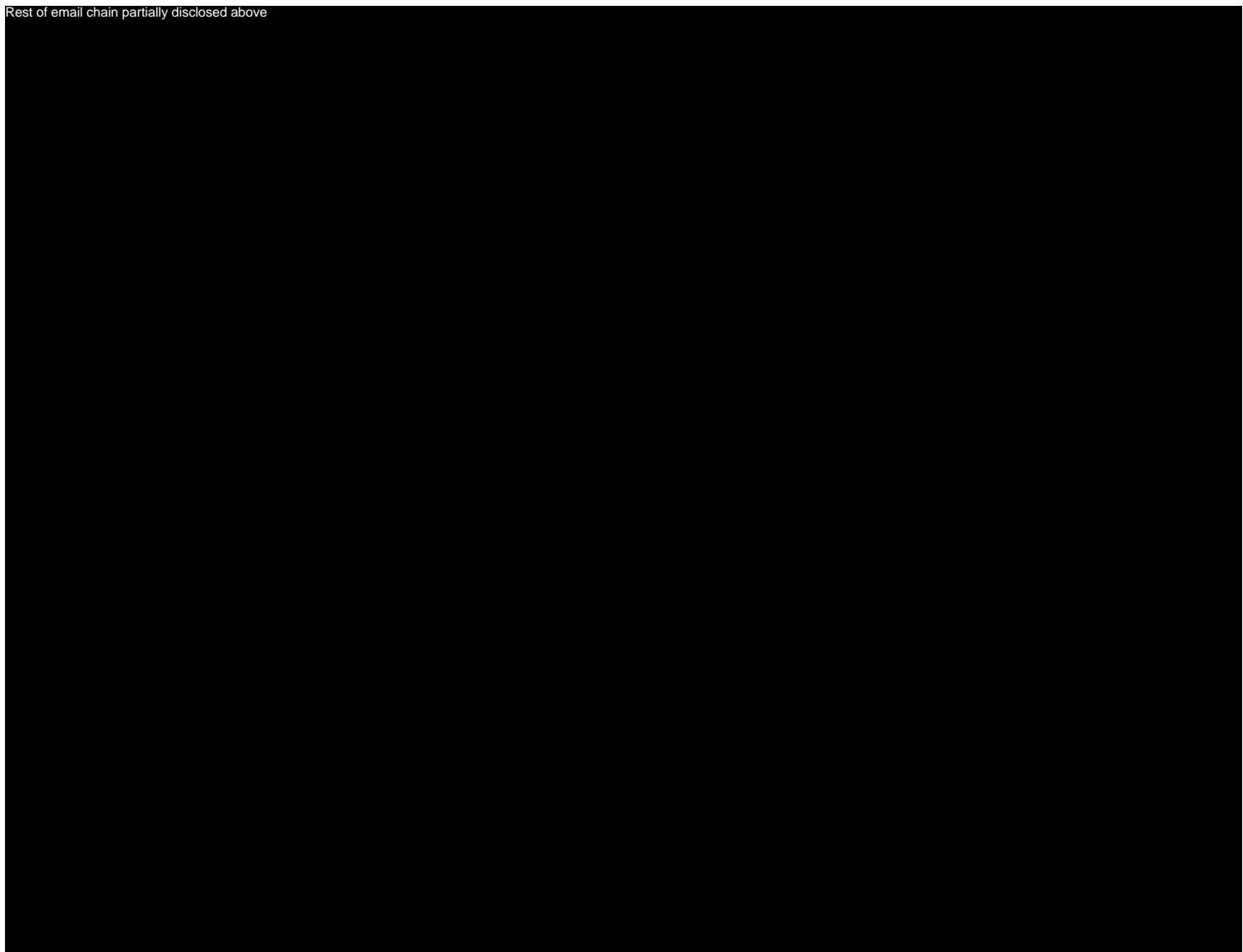
On Jan 14, 2017, at 4:47 PM, Kassinger, Theodore W. <[tkassinger@omm.com](mailto:tkassinger@omm.com)> wrote:

Attached is an updated draft to address comments of David and Keith. Also attached is a comparison showing changes to the last draft.

On questions raised and changes:

2 9-page attachments withheld in full - (b) (3), (4), (5), (6)

Rest of email chain partially disclosed above



**From:** [Kassinger, Theodore W.](#)  
**To:** [Walter M. Shaub](#)  
**Cc:** [Maggi, David \(Federal\)](#); [Keith Labedz](#); [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:** Sunday, January 15, 2017 8:14:13 AM

---

Sounds good. Thanks to you all.

We'll review promptly after receiving the draft, and will be ready to go from there.

Very much appreciate all of your hard, late-night work.

On Jan 15, 2017, at 12:48 AM, Walter M. Shaub <[wmschaub@oge.gov](mailto:wmschaub@oge.gov)> wrote:

Ted & David (and all),

Keith, Heather, and I have now gone through the report, the ethics agreement, and the letter regarding the use of his name.

The letter regarding his name looks good.

The 278 looks good to me and, I think, Heather and Keith. I don't think Heather and Keith have any further comments on it, but I'll double check in the morning with them to confirm that there's not any last outstanding item. (I am, however, sure that there are no significant items that would take more than a few minutes to fix.)

We have made some edits to the ethics agreement. I don't believe there's any changes that would trouble you, as they are drafting changes and not substantive changes. I just want to be sure all three of us have made all of our changes correctly, so we'll go through it once more in the morning. The biggest change is that we've added back in the <sup>(b)(3), (6)</sup> names because the OGE branch that does the compliance tracking will really need that level of detail to do their work and because we'll likely get calls from the committee staff asking for clarifications if we don't spell things out clearly enough.

We will have a revised draft to you before noon, probably earlier.

All of this is to say, that I now have a high level of confidence that we should be able to meet the deadline of getting the paperwork up to the Senate tomorrow, provided that you're available to review the edits to the ethics agreement.

Once we have come to final agreement, OGE will preclear. At that time, we'll give you detailed instructions for getting the final paperwork up to us in the right sequence. (David, you can start working on your cover letter to OGE if you have not done that already.) Ted, at that time, we'll need your client available to certify his report one final time in Integrity and to sign the final ethics agreement –but don't have him do that until we give the green light.

Thanks for all the hard work on this nomination everyone. The end is in sight. Let's just stay focused through tomorrow morning and into the early afternoon if

need be.

Walter M. Shaub, Jr.

Director

U.S. Office of Government Ethics

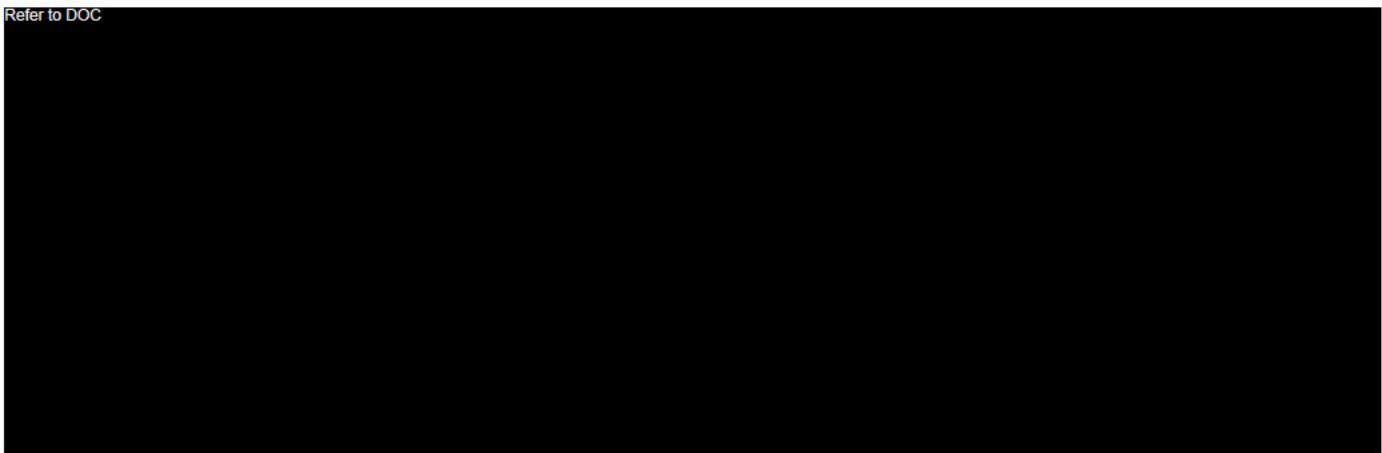
1201 New York Avenue, NW, Suite 500

Washington, DC 20005-3917

Telephone: 202.482.9292

Email: [walter.shaub@oge.gov](mailto:walter.shaub@oge.gov)

Refer to DOC



On Jan 14, 2017, at 7:15 PM, Kassinger, Theodore W. <[tkassinger@omm.com](mailto:tkassinger@omm.com)> wrote:

Further notes on David's questions regarding Attachment A as you review the documents:

The following appear on Attachment A but are not listed as (b)(3), (6) on the 278:

(b)(3), (6)

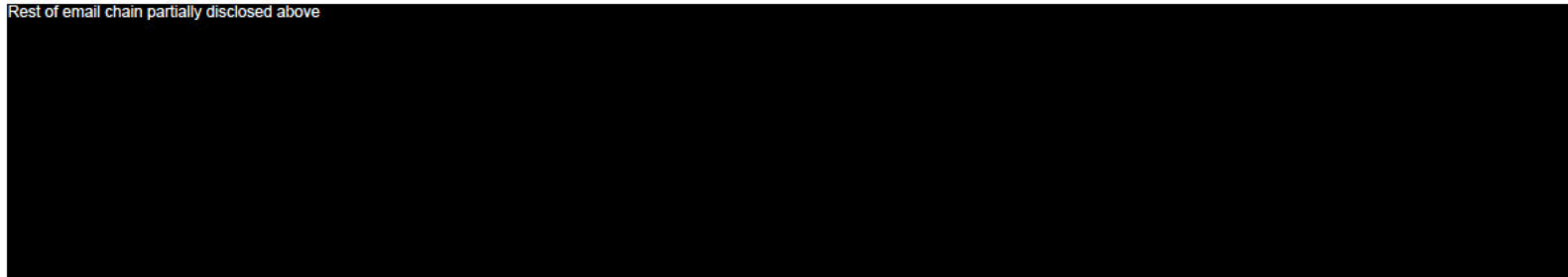
[Redacted]

[Redacted]

(b)(3), (6)

[Redacted]

Rest of email chain partially disclosed above





**From:** [Heather A. Jones](#)  
**To:** [Keith Labeledz](#); [Director of OGE](#)  
**Subject:** Re: Revised WLR 278  
**Date:** Sunday, January 15, 2017 11:16:10 AM

---

(b) (5)

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

---

**From:** Keith Labeledz  
**Sent:** Sunday, January 15, 2017 11:15 AM  
**To:** Director of OGE; Heather A. Jones  
**Subject:** FW: Revised WLR 278

---

(b) (5)

**From:** Kassinger, Theodore W. [mailto:tkassinger@omm.com]  
**Sent:** Sunday, January 15, 2017 11:11 AM  
**To:** Walter M. Shaub  
**Cc:** Maggi, David (Federal); Keith Labeledz; 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  
Thanks very much, Walt. We will revert adapt.

On Jan 15, 2017, at 11:08 AM, Walter M. Shaub <[wmschaub@oge.gov](mailto:wmschaub@oge.gov)> wrote:

11 page attachment withheld in full - (b) (3), (5), (6)

Ted,  
Attached is the revised ethics agreement. I've spoken with Heather and Keith this morning. We would be willing to preclear him with this ethics agreement as now drafted.  
If your client can live with these changes, we can issue the preclearance as soon as we hear back from you and move to the stage where we all start working on getting the paperwork up to the Senate. We'll reach out to the transition team immediately for clearance to send the package up to the Senate.  
If you have any concerns about this language, we can schedule a conference call instead to discuss them and try to come to resolution 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](mailto:walter.shaub@oge.gov)

Refer to DOC

On Jan 15, 2017, at 12:48 AM, Walter M. Shaub <[wshaub@oge.gov](mailto:wshaub@oge.gov)> wrote:

Ted & David (and all),

Keith, Heather, and I have now gone through the report, the ethics agreement, and the letter regarding the use of his name.

The letter regarding his name looks good.

The 278 looks good to me and, I think, Heather and Keith. I don't think Heather and Keith have any further comments on it, but I'll double check in the morning with them to confirm that there's not any last outstanding item. (I am, however, sure that there are no significant items that would take more than a few minutes to fix.)

We have made some edits to the ethics agreement. I don't believe there's any changes that would trouble you, as they are drafting changes and not substantive changes. I just want to be sure all three of us have made all of our changes correctly, so we'll go through it once more in the morning. The biggest change is that we've added back in the <sup>(b)(3), (6)</sup> names because the OGE branch that does the compliance tracking will really need that level of detail to do their work and because we'll likely get calls from the committee staff asking for clarifications if we don't spell things out clearly enough. We will have a revised draft to you before noon, probably earlier.

All of this is to say, that I now have a high level of confidence that we should be able to meet the deadline of getting the paperwork up to the Senate tomorrow, provided that you're available to review the edits to the ethics agreement.

Once we have come to final agreement, OGE will preclear. At that time, we'll give you detailed instructions for getting the final paperwork up to us in the right sequence. (David, you can start working on your cover letter to OGE if you have not done that already.) Ted, at that time, we'll need your client available to certify his report one final time in Integrity and to sign the final ethics agreement –but don't have him do that until we give the green light. Thanks for all the hard work on this nomination everyone. The end is in sight. Let's just stay focused through tomorrow morning and into the early afternoon if need be.

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

**From:** [Kassinger, Theodore W.](#)  
**To:** [Walter M. Shaub](#)  
**Cc:** [Maggi, David \(Federal\)](#); [Keith Labeledz](#); [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:** Sunday, January 15, 2017 11:20:01 AM

---

“asap” instead of “adapt”.... auto-correct strikes again

**From:** Kassinger, Theodore W.  
**Sent:** Sunday, January 15, 2017 11:11 AM  
**To:** Walter M. Shaub  
**Cc:** Maggi, David (Federal); Keith Labeledz; 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

Thanks very much, Walt. We will revert adapt.

Rest of email chain partially disclosed above



**From:** [Director of OGE](#)  
**To:** [Keith Labedz](#)  
**Subject:** RE: Revised WLR 278  
**Date:** Sunday, January 15, 2017 11:25:16 AM

---

He and I traded emails. He clarified that he just meant they will move fast.

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](mailto:walter.shaub@oge.gov)

---

**From:** Keith Labedz  
**Sent:** Sunday, January 15, 2017 11:15 AM  
**To:** Director of OGE; Heather A. Jones  
**Subject:** FW: Revised WLR 278

(b) (5)



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**From:** Kassinger, Theodore W. [<mailto:tkassinger@omm.com>]  
**Sent:** Sunday, January 15, 2017 11:11 AM  
**To:** Walter M. Shaub  
**Cc:** Maggi, David (Federal); Keith Labedz; 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  
Thanks very much, Walt. We will revert adapt.

Rest of email chain partially disclosed above



**From:** [Kassinger, Theodore W.](#)  
**To:** [Walter M. Shaub; "Maggi, David \(Federal\)"](#)  
**Cc:** [Keith Labeledz; 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:** Sunday, January 15, 2017 12:00:35 PM

---

Two questions on initial read:

1) Section 5: <sup>(b)(3), (4), (5), (6)</sup>  
[Redacted]

[Redacted]

[Redacted]

2) Section 12: <sup>(b)(3), (4), (5), (6)</sup>  
[Redacted]

[Redacted]

[Redacted]

Ted

**From:** Walter M. Shaub [mailto:wmshaub@oge.gov]  
**Sent:** Sunday, January 15, 2017 11:07 AM  
**To:** 'Maggi, David (Federal)'; Kassinger, Theodore W.  
**Cc:** Keith Labeledz; 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

11 page attachment withheld in full - (b)(3), (5), (6)

Ted,

Attached is the revised ethics agreement. I've spoken with Heather and Keith this morning. We would be willing to preclear him with this ethics agreement as now drafted.

If your client can live with these changes, we can issue the preclearance as soon as we hear back from you and move to the stage where we all start working on getting the paperwork up to the Senate. We'll reach out to the transition team immediately for clearance to send the package up to the Senate.

If you have any concerns about this language, we can schedule a conference call instead to discuss them and try to come to resolution 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](mailto:walter.shaub@oge.gov)

Rest of email chain partially disclosed above



**From:** [Director of OGE](#)  
**To:** [Heather A. Jones](#)  
**Subject:** RE: Revised WLR 278  
**Date:** Sunday, January 15, 2017 12:31:27 PM

---

No. I think there're still reviewing

---

**From:** Heather A. Jones  
**Sent:** Sunday, January 15, 2017 12:31 PM  
**To:** 'Kassinger, Theodore W.'; Director of OGE; 'Maggi, David (Federal)'  
**Cc:** Keith Labeledz; Schlom, Evan N.; Dorey, David R.; Jacobi, Will (Federal); Williams, Gaye (Federal); Warren, Arthur (Federal); Jacob, Dana (Federal); Deborah J. Bortot  
**Subject:** RE: Revised WLR 278  
I just want to confirm with everyone that all sides are ready for me to preclear with these changes.

---

**From:** Kassinger, Theodore W. [<mailto:tkassinger@omm.com>]  
**Sent:** Sunday, January 15, 2017 12:26 PM  
**To:** Walter M. Shaub; 'Maggi, David (Federal)'  
**Cc:** Keith Labeledz; 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

both good. thanks

**From:** Walter M. Shaub [<mailto:wmschaub@oge.gov>]  
**Sent:** Sunday, January 15, 2017 12:25 PM  
**To:** Kassinger, Theodore W.; 'Maggi, David (Federal)'  
**Cc:** Keith Labeledz; 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

Ted, my response below are in red text:

**From:** Kassinger, Theodore W. [<mailto:tkassinger@omm.com>]  
**Sent:** Sunday, January 15, 2017 12:00 PM  
**To:** Walter M. Shaub; 'Maggi, David (Federal)'  
**Cc:** Keith Labeledz; 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

Two questions on initial read:

1) Section 5: <sup>(b)(3), (4), (5), (6)</sup>

[REDACTED]

[REDACTED]

[REDACTED]

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

[Redacted]

[Redacted]

[Redacted]

2) Section 12: (b)(3), (4), (5), (6)

[Redacted]

[Redacted]

[Redacted]

[Redacted]

Ted

Rest of email chain partially disclosed above

[Redacted]



Refer to DOC

On Jan 15, 2017, at 12:31 PM, Heather A. Jones <[hajones@oge.gov](mailto:hajones@oge.gov)> wrote:

I just want to confirm with everyone that all sides are ready for me to preclear with these changes.

Rest of email chain partially disclosed above

**From:** [Heather A. Jones](#)  
**To:** [Director of OGE](#); [Keith Labeledz](#)  
**Subject:** RE: Revised WLR 278  
**Date:** Sunday, January 15, 2017 1:36:23 PM

---

Yes

---

**From:** Director of OGE  
**Sent:** Sunday, January 15, 2017 1:36 PM  
**To:** Heather A. Jones; Keith Labeledz  
**Subject:** RE: Revised WLR 278

Heather & Keith,

Can you make all necessary changes to the EA and then recirculate. Be sure to include this email address ([Director@oge.gov](mailto:Director@oge.gov)) so that it goes through.


Then, go ahead and ask whether all parties are in agreement.

---

**From:** Heather A. Jones  
**Sent:** Sunday, January 15, 2017 1:30 PM  
**To:** 'Schlom, Evan N.'; Maggi, David (Federal); Walter M. Shaub  
**Cc:** Kassinger, Theodore W.; Keith Labeledz; Dorey, David R.; Jacobi, Will (Federal); Williams, Gaye (Federal); Warren, Arthur (Federal); Jacob, Dana (Federal); Deborah J. Bortot; Director of OGE  
**Subject:** RE: Revised WLR 278

I just spoke with Keith. I will make the change to the 278 and I fixed the typo in the EA.

Rest of email chain partially disclosed above

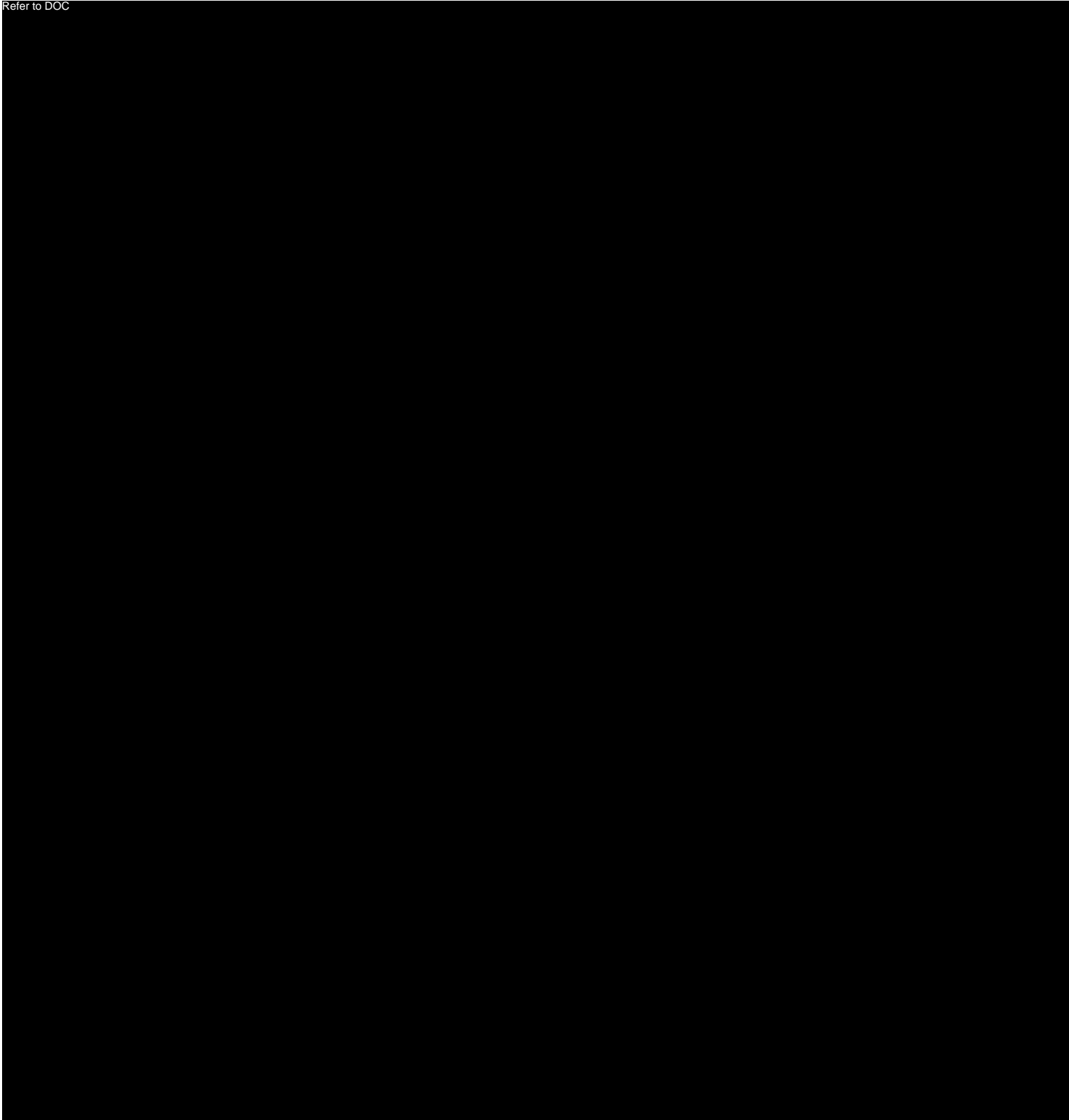


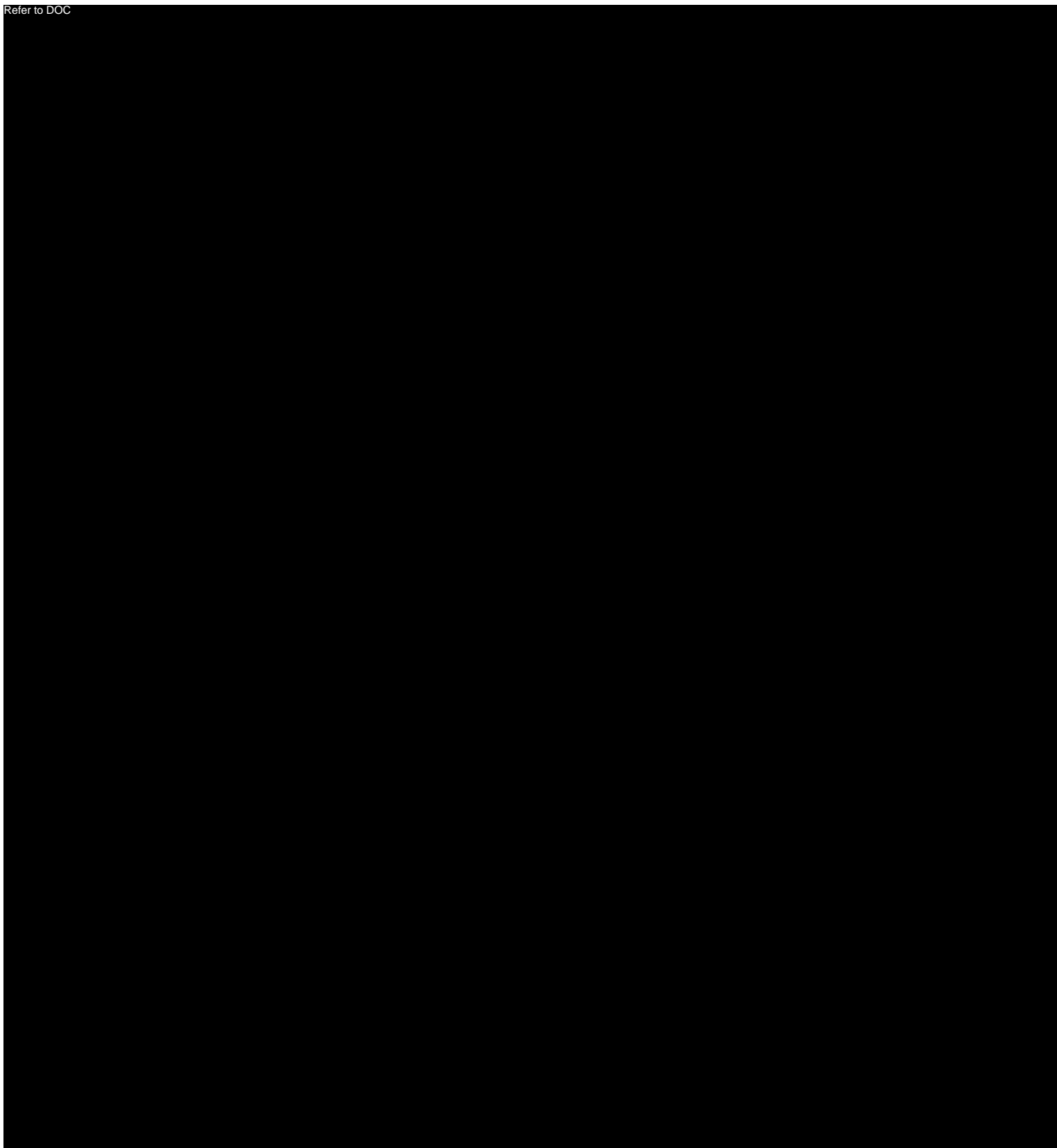
**From:** [Kassinger, Theodore W.](#)  
**To:** [Jacobi, Will \(Federal\)](#)  
**Cc:** [Heather A. Jones](#); [Schlom, Evan N.](#); [Maggi, David \(Federal\)](#); [Walter M. Shaub](#); [Keith Labeledz](#); [Dorey, David R.](#); [Williams, Gaye \(Federal\)](#); [Warren, Arthur \(Federal\)](#); [Jacob, Dana \(Federal\)](#); [Deborah J. Bortot](#); [Director of OGE](#)  
**Subject:** [GRAYMAIL] Re: Revised WLR 278  
**Date:** Sunday, January 15, 2017 1:42:36 PM

---

I do not believe that he has a position with any of these entities.

Refer to DOC





---

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

**Sent:** Sunday, January 15, 2017 1:29 PM

**To:** 'Schlom, Evan N.'; Maggi, David (Federal); Walter M. Shaub

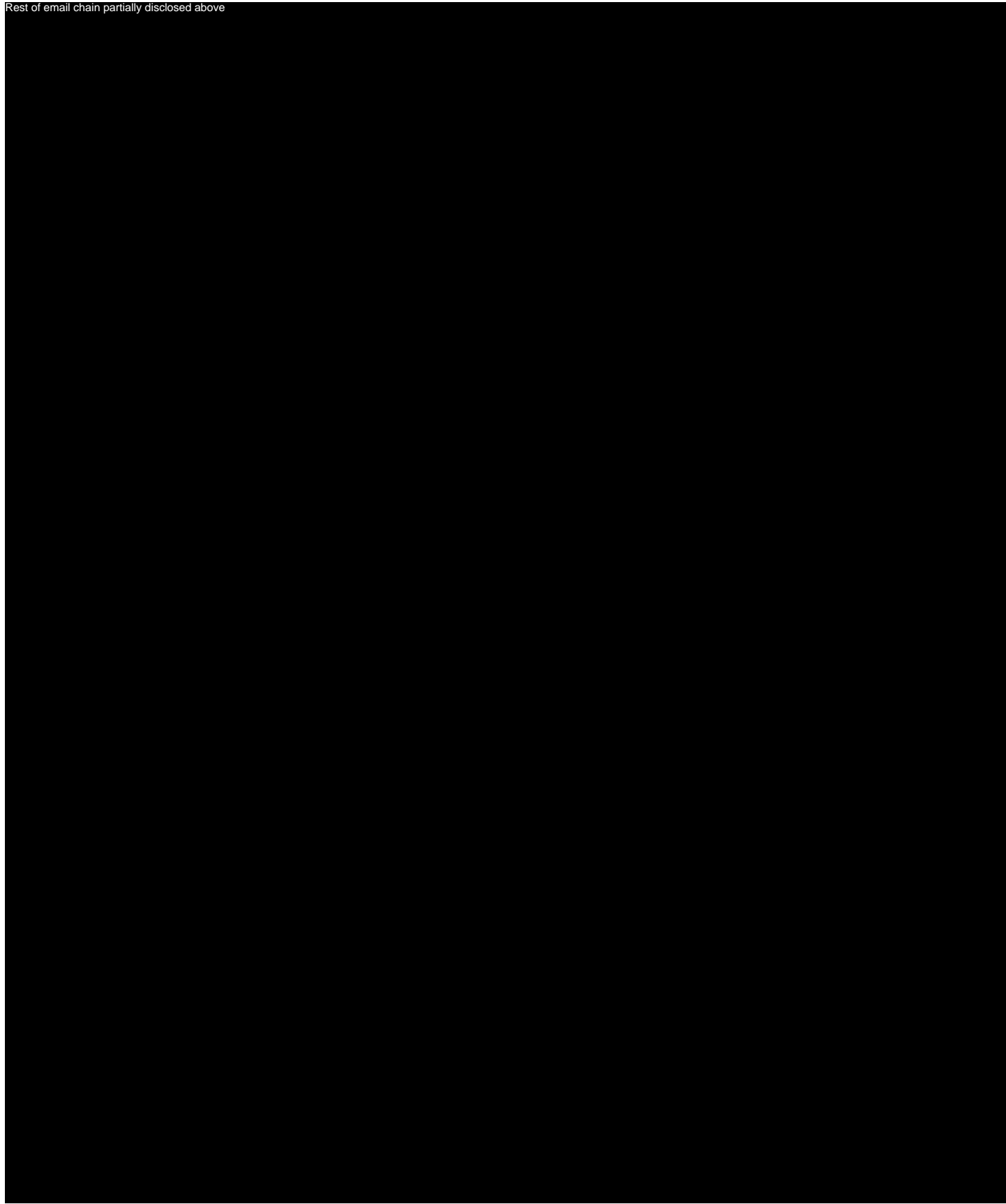
**Cc:** Kassinger, Theodore W.; Keith Labedz; Dorey, David R.; Jacobi, Will (Federal);

Williams, Gaye (Federal); Warren, Arthur (Federal); Jacob, Dana (Federal);  
Deborah J. Bortot; Director of OGE

**Subject:** RE: Revised WLR 278

I just spoke with Keith. I will make the change to the 278 and I fixed the typo in the EA.

Rest of email chain partially disclosed above



**From:** [Heather A. Jones](#)  
**To:** ["Schlom, Evan N."](#); [Jacobi, Will \(Federal\)](#); [Maggi, David \(Federal\)](#); [Walter M. Shaub](#)  
**Cc:** [Kassinger, Theodore W.](#); [Keith Labeledz](#); [Dorey, David R.](#); [Williams, Gaye \(Federal\)](#); [Warren, Arthur \(Federal\)](#); [Jacob, Dana \(Federal\)](#); [Deborah J. Bortot](#); [Director of OGE](#)  
**Subject:** RE: Revised WLR 278  
**Date:** Sunday, January 15, 2017 1:46:28 PM

---

I just want to confirm. He has positions with the (b)(3), (6) But is divesting the (b)(3), (6)

EA Section 8

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



---

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

**Sent:** Sunday, January 15, 2017 1:42 PM


**To:** Jacobi, Will (Federal); Heather A. Jones; Maggi, David (Federal); Walter M. Shaub

**Cc:** Kassinger, Theodore W.; Keith Labeledz; Dorey, David R.; Williams, Gaye (Federal); Warren, Arthur (Federal); Jacob, Dana (Federal); Deborah J. Bortot; Director of OGE

**Subject:** [GRAYMAIL] RE: Revised WLR 278


EA Section 2

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



EA Section 4

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

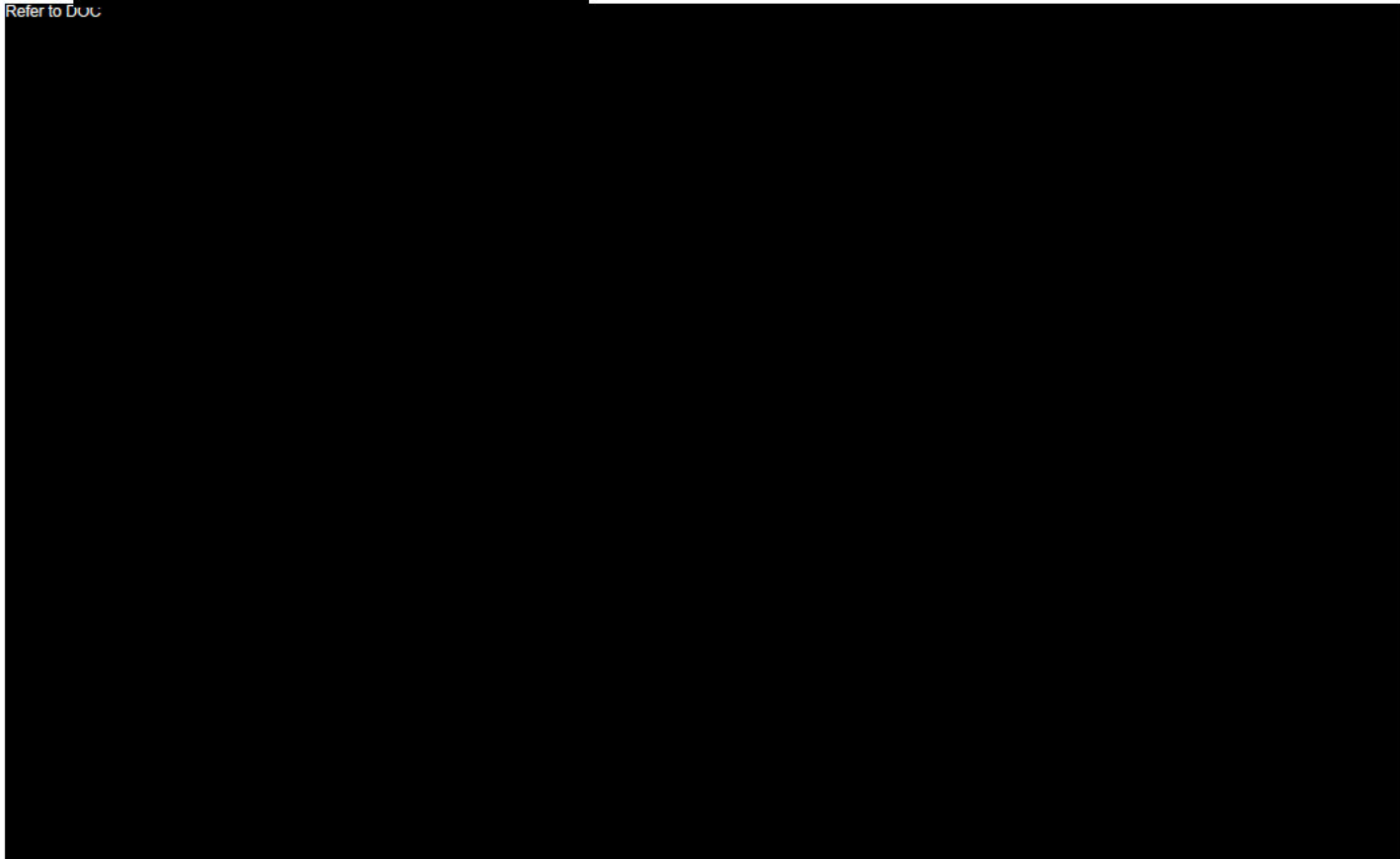


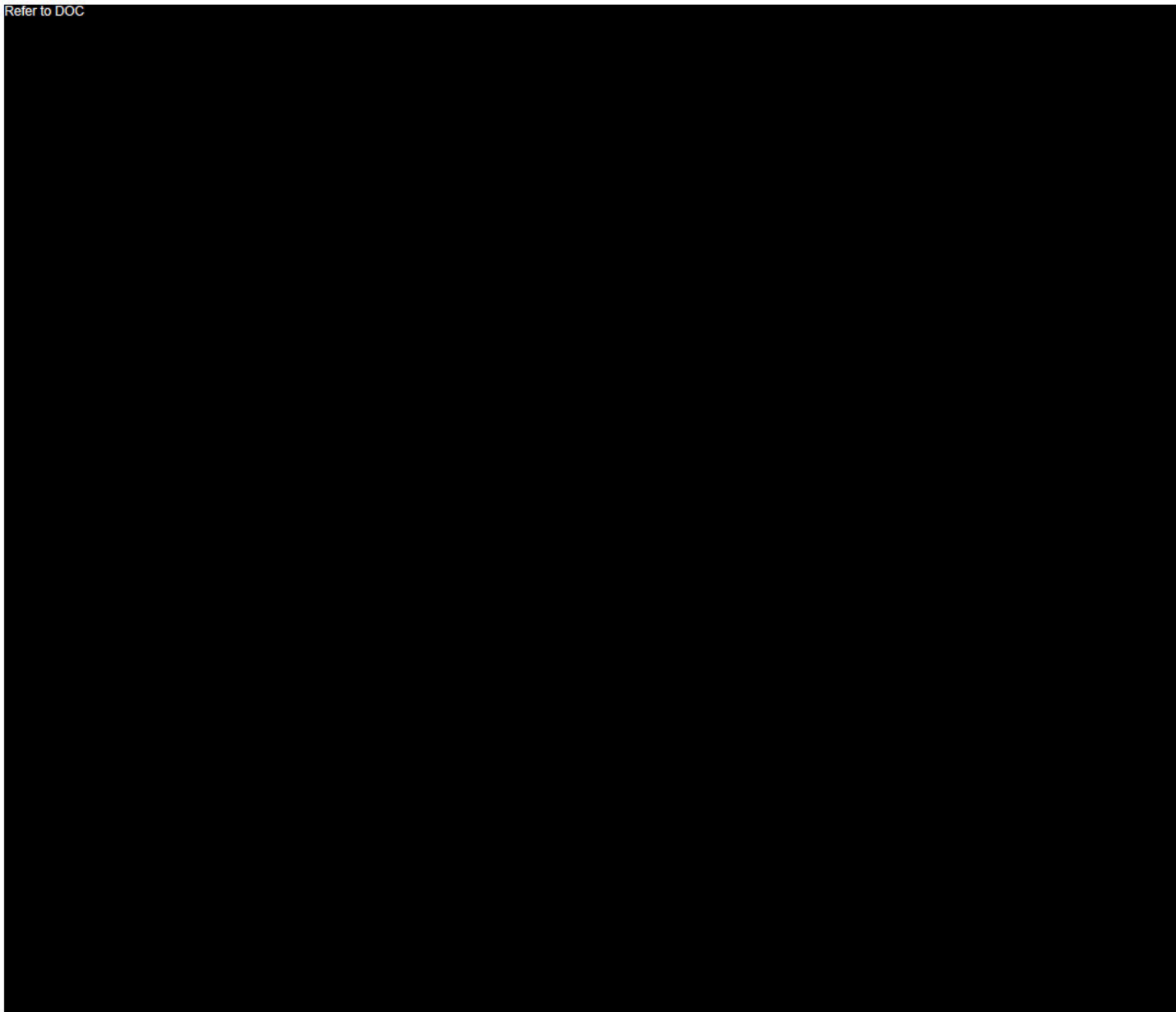
EA Section 8

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



Refer to Doc:





---

**From:** Heather A. Jones <[hajones@oge.gov](mailto:hajones@oge.gov)>  
**Sent:** Sunday, January 15, 2017 1:29 PM  
**To:** 'Schlom, Evan N.'; Maggi, David (Federal); Walter M. Shaub  
**Cc:** Kassinger, Theodore W.; Keith Labeledz; Dorey, David R.; Jacobi, Will (Federal); Williams, Gaye (Federal); Warren, Arthur (Federal); Jacob, Dana (Federal); Deborah J. Bortot; Director of OGE  
**Subject:** RE: Revised WLR 278

I just spoke with Keith. I will make the change to the 278 and I fixed the typo in the EA.

**From:** Schlom, Evan N. [<mailto:eschlom@omm.com>]  
**Sent:** Sunday, January 15, 2017 1:26 PM  
**To:** Maggi, David (Federal); Walter M. Shaub  
**Cc:** Kassinger, Theodore W.; Keith Labeledz; Dorey, David R.; Jacobi, Will (Federal); Williams, Gaye (Federal); Warren, Arthur (Federal); Jacob, Dana (Federal); Deborah J. Bortot; Heather A. Jones; Director of OGE  
**Subject:** [GRAYMAIL] RE: Revised WLR 278

10.1.10 on the report shows as (b)(3), (6) That should read, (b)(3), (6)

10.1.11 on the report shows as (b)(3), (6) That should

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

Those are separate entities. (b)(3), (6)

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

I have not edited the report to make those changes, per last night's instructions. Please let me know if you will make the changes, or if you would like me to do so.

Refer to DOC

On Jan 15, 2017, at 12:35 PM, Walter M. Shaub <[wmschaub@oge.gov](mailto:wmschaub@oge.gov)> wrote:

Keith, can you look at 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.schaub@oge.gov](mailto:walter.schaub@oge.gov)

Refer to DOC

On Jan 15, 2017, at 12:00 PM, Kassinger, Theodore W. <[tkassinger@omm.com](mailto:tkassinger@omm.com)> wrote:

Two questions on initial read:

1) Section 5: (b)(3), (4), (5), (6)



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

[Redacted]

[Redacted]

[Redacted]

2) Section 12: (b)(3), (4), (5), (6)

[Redacted]

[Redacted]

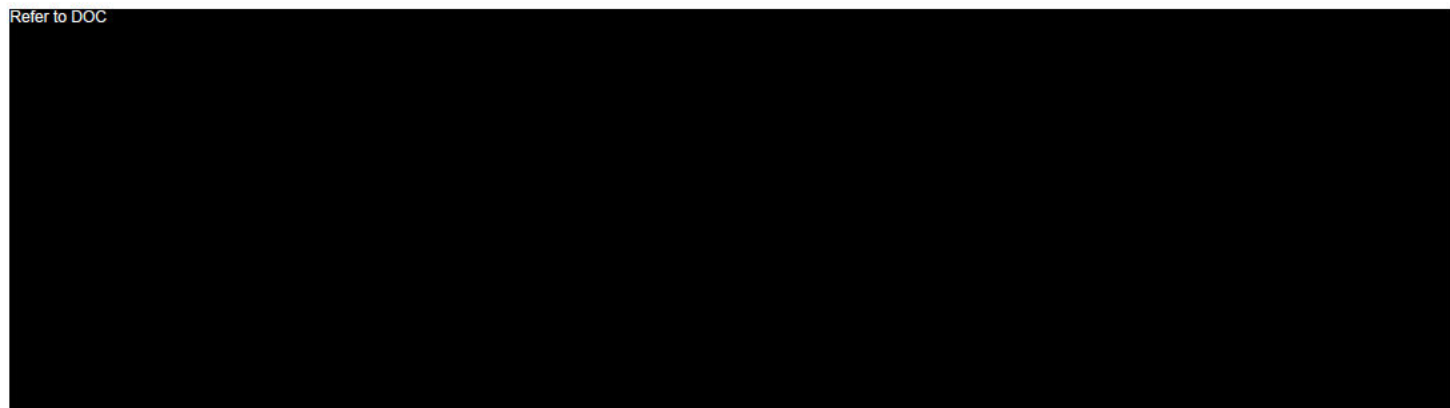
[Redacted]

Ted

Rest of email chain partially disclosed above

[Redacted]

Refer to DOC



On Jan 15, 2017, at 1:43 PM, Schlom, Evan N. <[eschlom@omm.com](mailto:eschlom@omm.com)> wrote:

EA Section 2

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



EA Section 4

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

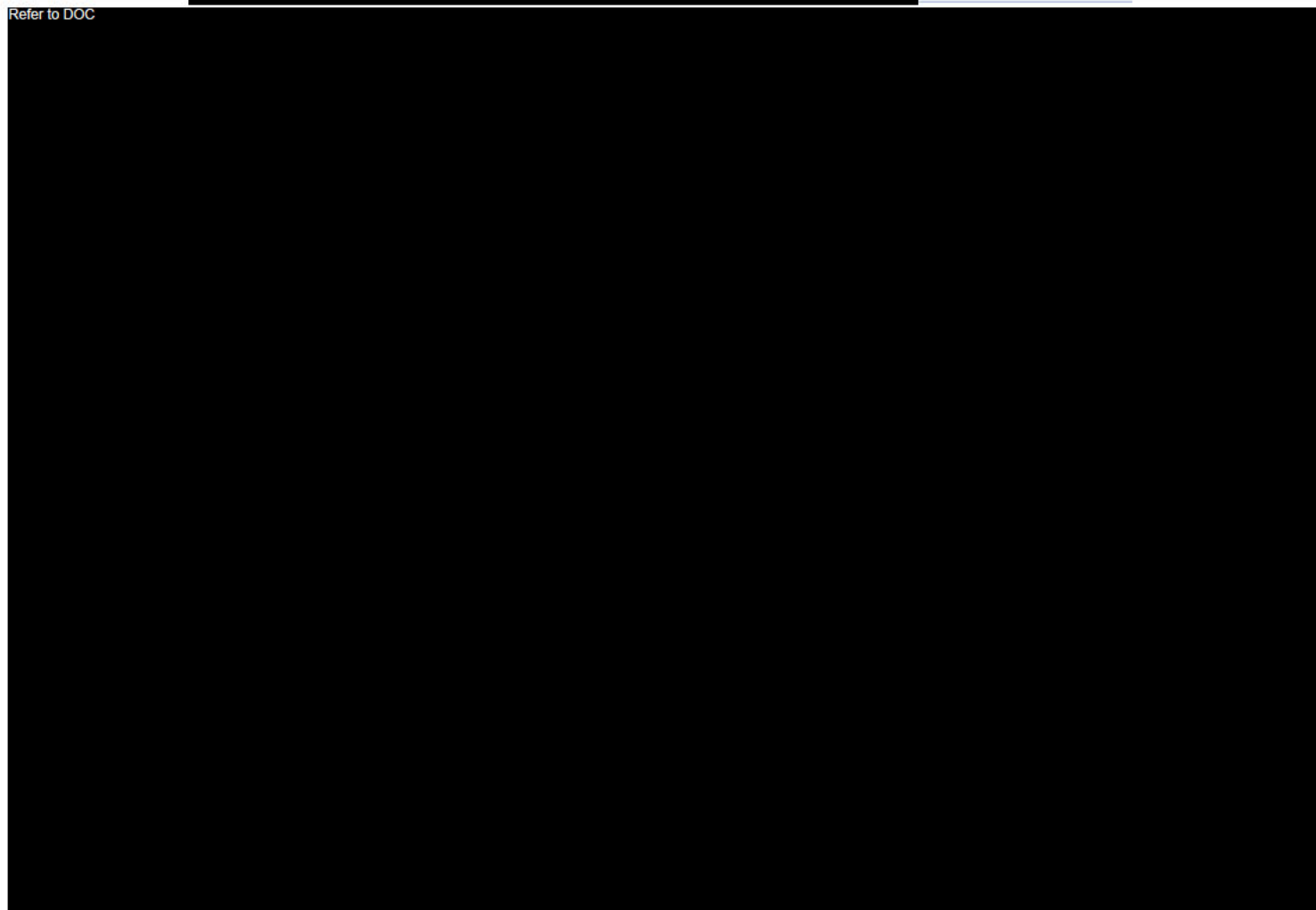


EA Section 8

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



Refer to DOC



---

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

**Sent:** Sunday, January 15, 2017 1:29 PM

**To:** 'Schlom, Evan N.'; Maggi, David (Federal); Walter M. Shaub

**Cc:** Kassinger, Theodore W.; Keith Labedz; Dorey, David R.; Jacobi, Will (Federal); Williams, Gaye (Federal); Warren, Arthur (Federal); Jacob, Dana (Federal); Deborah J. Bortot; Director of OGE

**Subject:** RE: Revised WLR 278

I just spoke with Keith. I will make the change to the 278 and I fixed the typo in the

EA

Rest of chain released in part above

**From:** [Heather A. Jones](#)  
**To:** ["Schlom, Evan N."](#); [Jacobi, Will \(Federal\)](#); [Maggi, David \(Federal\)](#); [Walter M. Shaub](#)  
**Cc:** [Kassinger, Theodore W.](#); [Keith Labeledz](#); [Dorey, David R.](#); [Williams, Gaye \(Federal\)](#); [Warren, Arthur \(Federal\)](#); [Jacob, Dana \(Federal\)](#); [Deborah J. Bortot](#); [Director of OGE](#)  
**Subject:** RE: Revised WLR 278  
**Date:** Sunday, January 15, 2017 1:55:45 PM

---

Regarding the item below, I changed the (b)(3), (6)

EA Section 4

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

---

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

**Sent:** Sunday, January 15, 2017 1:42 PM

**To:** Jacobi, Will (Federal); Heather A. Jones; Maggi, David (Federal); Walter M. Shaub

**Cc:** Kassinger, Theodore W.; Keith Labeledz; Dorey, David R.; Williams, Gaye (Federal); Warren, Arthur (Federal); Jacob, Dana (Federal); Deborah J. Bortot; Director of OGE

**Subject:** [GRAYMAIL] RE: Revised WLR 278

EA Section 2

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

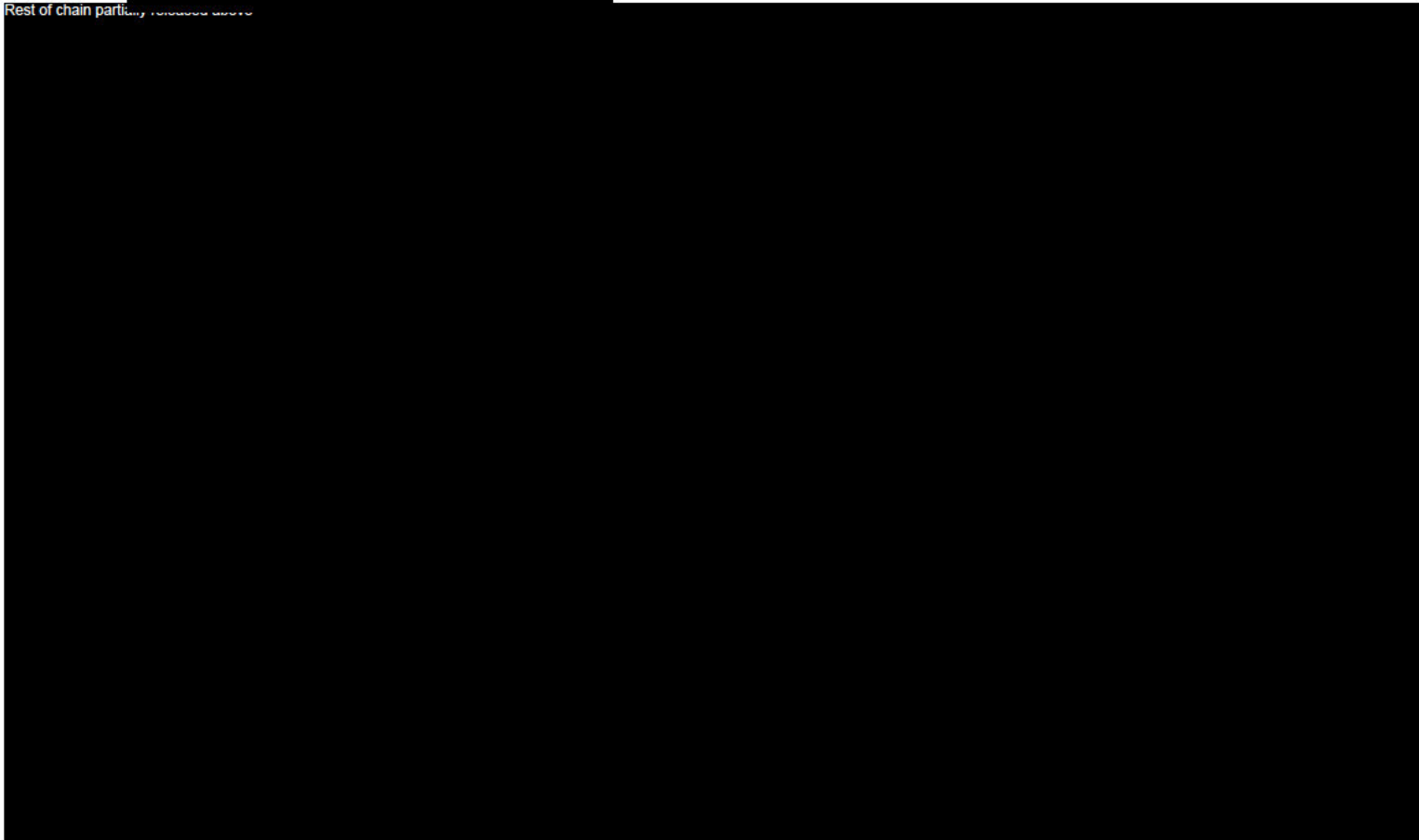
EA Section 4

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

EA Section 8

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

Rest of chain partially redacted above



**From:** [Heather A. Jones](#)  
**To:** "[Schlom, Evan N.](#)"; "[Jacobi, Will \(Federal\)](#)"; [Maggi, David \(Federal\)](#); Director of OGE  
**Cc:** [Kassinger, Theodore W.](#); [Keith Labeledz](#); [Dorey, David R.](#); [Williams, Gaye \(Federal\)](#); [Warren, Arthur \(Federal\)](#); [Jacob, Dana \(Federal\)](#); [Deborah J. Bortot](#); Director of OGE  
**Subject:** RE: Revised WLR 278  
**Date:** Sunday, January 15, 2017 2:18:39 PM  
**Attachments:** [OGE Revised Ethics Agreement 1-15-17 at 2 pm.docx](#)

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

All-

Here is the revised agreement. If you are ok, with it I will preclear and send a clean version around.

Heather

---

**From:** Schlom, Evan N. [mailto:[eschlom@omm.com](mailto:eschlom@omm.com)]  
**Sent:** Sunday, January 15, 2017 2:05 PM  
**To:** Heather A. Jones; 'Jacobi, Will (Federal)'; Maggi, David (Federal); Director of OGE  
**Cc:** Kassinger, Theodore W.; Keith Labeledz; Dorey, David R.; Williams, Gaye (Federal); Warren, Arthur (Federal); Jacob, Dana (Federal); Deborah J. Bortot; Director of OGE  
**Subject:** [GRAYMAIL] RE: Revised WLR 278

If you are asking for confirmation on EA Section 8 (the (b)(3), (6)), I can confirm: he has positions with the (b)(3), (6), but is divesting the (b)(3), (6)

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

**Sent:** Sunday, January 15, 2017 2:00 PM

**To:** 'Jacobi, Will (Federal)'; Schlom, Evan N.; Maggi, David (Federal); Director of OGE

**Cc:** Kassinger, Theodore W.; Keith Labeledz; Dorey, David R.; Williams, Gaye (Federal); Warren, Arthur (Federal); Jacob, Dana (Federal); Deborah J. Bortot; Director of OGE

**Subject:** RE: Revised WLR 278

Regarding this item, I think it is important they be listed twice since one paragraph focuses on the position and on focuses on managing the conflicts.

EA Section 10 (assets to be retained)

(b)(3), (6)

The above assets are already stated as being retained in EA, Section 7.

Once I have confirmation on this item I can send the revised EA around. I have made all the changes to the report.

I just want to confirm. He has positions with the (b)(3), (6) But is divesting the (b)(3), (6)

EA Section 8

There is no typo. The (b)(3), (6) entities and the (b)(3), (6) entities are separate. The (b)(3), (6) entities were

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

Rest of chain part



On Jan 15, 2017, at 2:43 PM, Director of OGE <[director@oge.gov](mailto:director@oge.gov)> wrote:

As soon as Ted responds with a thumbs up, we'll 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\\_schaub@oge.gov](mailto:walter_schaub@oge.gov)



All-  
Here is the revised agreement. If you are ok, with it I will preclear and send a clean version around.

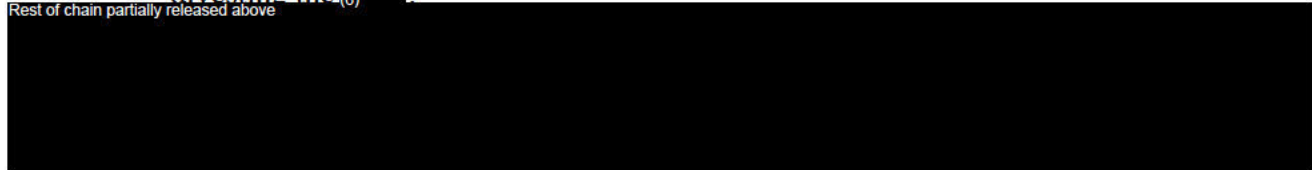
11 pages withheld in full - (b)(3), (5), (6)

Heather

---

**From:** Schlom, Evan N. [<mailto:eschlom@omm.com>]  
**Sent:** Sunday, January 15, 2017 2:05 PM  
**To:** Heather A. Jones; 'Jacobi, Will (Federal)'; Maggi, David (Federal); Director of OGE  
**Cc:** Kassinger, Theodore W.; Keith Labeledz; Dorey, David R.; Williams, Gaye (Federal); Warren, Arthur (Federal); Jacob, Dana (Federal); Deborah J. Bortot; Director of OGE  
**Subject:** [GRAYMAIL] RE: Revised WLR 278

If you are asking for confirmation on EA Section 8 (the (b)(3), (6) [redacted]), I can confirm: he has positions with the (b)(3), (6) [redacted] but is divesting the (b)(3), (6) [redacted].



**From:** [Heather A. Jones](#)  
**To:** "[Kassinger, Theodore W.](#)"; [Director of OGE](#); "[Maggi, David \(Federal\)](#)"  
**Cc:** [Schlom, Evan N.](#); [Jacobi, Will \(Federal\)](#); [Keith Labeledz](#); [Dorey, David R.](#); [Williams, Gaye \(Federal\)](#); [Warren, Arthur \(Federal\)](#); [Jacob, Dana \(Federal\)](#); [Deborah J. Bortot](#)  
**Subject:** RE: Revised WLR 278  
**Date:** Sunday, January 15, 2017 2:48:33 PM

---

[Ok, we will wait to hear from you that he approves.](#)

---

**From:** Kassinger, Theodore W. [mailto:[tkassinger@omm.com](mailto:tkassinger@omm.com)]  
**Sent:** Sunday, January 15, 2017 2:46 PM  
**To:** Director of OGE; 'Maggi, David (Federal)'; Heather A. Jones  
**Cc:** Schlom, Evan N.; Jacobi, Will (Federal); Keith Labeledz; Dorey, David R.; Williams, Gaye (Federal); Warren, Arthur (Federal); Jacob, Dana (Federal); Deborah J. Bortot  
**Subject:** [GRAYMAIL] RE: Revised WLR 278

thanks. looks good. need to clear with Mr. Ross, but I expect he will approve.

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

**Sent:** Sunday, January 15, 2017 2:43 PM

**To:** 'Maggi, David (Federal)'; Heather A. Jones

**Cc:** Schlom, Evan N.; Jacobi, Will (Federal); Director of OGE; Kassinger, Theodore W.; Keith Labeledz; Dorey, David R.; Williams, Gaye (Federal); Warren, Arthur (Federal); Jacob, Dana (Federal); Deborah J. Bortot

**Subject:** RE: Revised WLR 278

As soon as Ted responds with a thumbs up, we'll 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](mailto:walter.shaub@oge.gov)

Rest of email chain partially disclosed above



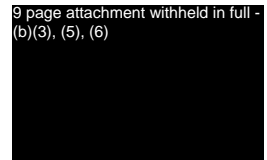
**From:** [Director of OGE](#)  
**To:** ["Kassinger, Theodore W."; Director of OGE; "Maggi, David \(Federal\)"; Heather A. Jones](#)  
**Cc:** [Schlom, Evan N.; Jacobi, Will \(Federal\); Keith Labedz; Dorey, David R.; Williams, Gaye \(Federal\); Warren, Arthur \(Federal\); Jacob, Dana \(Federal\); Deborah J. Bortot](#)  
**Subject:** RE: Revised WLR 278  
**Date:** Sunday, January 15, 2017 2:51:19 PM  
**Attachments:** [CLEAN COPY EA.docx](#)

---

Great. Here's a clean copy, in case you haven't already cleaned it up. The deletions created some problems with numbering and page breaks. You can disregard this email if you've already done the clean-up yourself, but it's attached for you convenience. As soon as we hear he's ok, we'll preclear and then ask the transition team to authorize us sending it up to the Senate.

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](mailto:walter.shaub@oge.gov)

9 page attachment withheld in full -  
(b)(3), (5), (6)



---

**From:** Kassinger, Theodore W. [mailto:[tkassinger@omm.com](mailto:tkassinger@omm.com)]  
**Sent:** Sunday, January 15, 2017 2:46 PM  
**To:** Director of OGE; 'Maggi, David (Federal)'; Heather A. Jones  
**Cc:** Schlom, Evan N.; Jacobi, Will (Federal); Keith Labedz; Dorey, David R.; Williams, Gaye (Federal); Warren, Arthur (Federal); Jacob, Dana (Federal); Deborah J. Bortot  
**Subject:** [GRAYMAIL] RE: Revised WLR 278

thanks. looks good. need to clear with Mr. Ross, but I expect he will approve.

Rest of email chain partially disclosed above





**From:** [Keith Labeledz](#)  
**To:** [Director of OGE](#); ["Kassinger, Theodore W."](#); ["Maggi, David \(Federal\)"](#); [Heather A. Jones](#)  
**Cc:** [Schlom, Evan N.](#); [Jacobi, Will \(Federal\)](#); [Dorey, David R.](#); [Williams, Gaye \(Federal\)](#); [Warren, Arthur \(Federal\)](#); [Jacob, Dana \(Federal\)](#); [Deborah J. Bortot](#)  
**Subject:** RE: Revised WLR 278  
**Date:** Sunday, January 15, 2017 2:59:32 PM

---

Looking again, I noticed one other item: Is it (b)(3), (6) (as in EA) or (b)(3), (6) (as in the 278 at line 63)?

---

**From:** Director of OGE  
**Sent:** Sunday, January 15, 2017 2:51 PM  
**To:** 'Kassinger, Theodore W.'; Director of OGE; 'Maggi, David (Federal)'; Heather A. Jones  
**Cc:** Schlom, Evan N.; Jacobi, Will (Federal); Keith Labeledz; Dorey, David R.; Williams, Gaye (Federal); Warren, Arthur (Federal); Jacob, Dana (Federal); Deborah J. Bortot  
**Subject:** RE: Revised WLR 278

Great. Here's a clean copy, in case you haven't already cleaned it up. The deletions created some problems with numbering and page breaks. You can disregard this email if you've already done the clean-up yourself, but it's attached for your convenience. As soon as we hear he's ok, we'll preclear and then ask the transition team to authorize us sending it up to the Senate.

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](mailto:walter_schaub@oge.gov)

9 page attachment withheld in full  
- (b)(3), (5), (6)

Rest of email chain partially disclosed above

**From:** [Heather A. Jones](#)  
**To:** ["Kassinger, Theodore W."; Director of OGE; "Maggi, David \(Federal\)"](#)  
**Cc:** [Schlom, Evan N.](#); [Jacobi, Will \(Federal\)](#); [Keith Labeledz](#); [Dorey, David R.](#); [Williams, Gaye \(Federal\)](#); [Warren, Arthur \(Federal\)](#); [Jacob, Dana \(Federal\)](#); [Deborah J. Bortot](#)  
**Subject:** RE: Revised WLR 278  
**Date:** Sunday, January 15, 2017 3:14:36 PM  
**Attachments:** [Ethics Agreement for Preclearance - Ross, Wilbur L.docx](#)

9 page attachment withheld in full - (b)(3), (5), (6)

Here is the draft with the typo that Keith found changed.

**From:** Kassinger, Theodore W. [mailto:tkassinger@omm.com]  
**Sent:** Sunday, January 15, 2017 2:54 PM  
**To:** Director of OGE; 'Maggi, David (Federal)'; Heather A. Jones  
**Cc:** Schlom, Evan N.; Jacobi, Will (Federal); Keith Labeledz; Dorey, David R.; Williams, Gaye (Federal); Warren, Arthur (Federal); Jacob, Dana (Federal); Deborah J. Bortot  
**Subject:** [GRAYMAIL] RE: Revised WLR 278

thanks

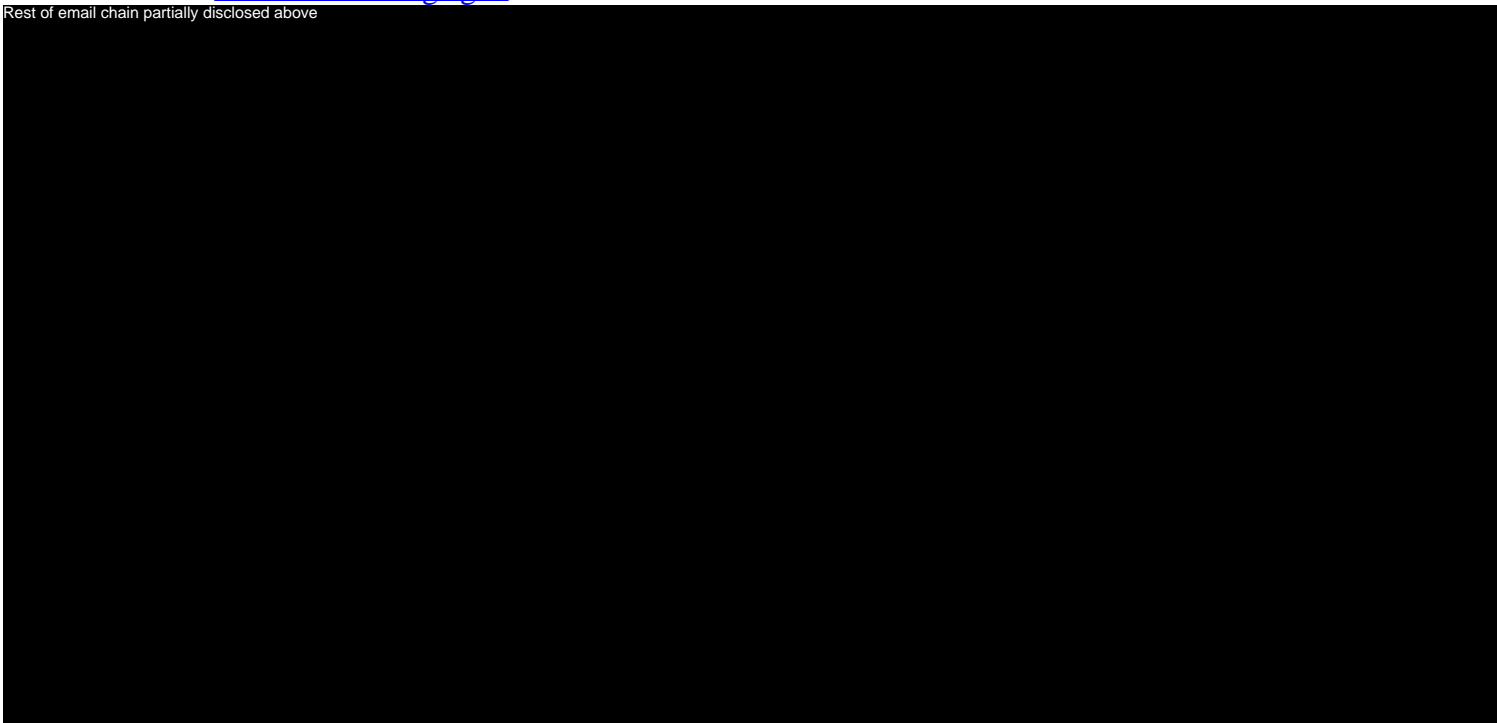
**From:** Director of OGE [<mailto:director@oge.gov>]  
**Sent:** Sunday, January 15, 2017 2:51 PM  
**To:** Kassinger, Theodore W.; Director of OGE; 'Maggi, David (Federal)'; Heather A. Jones  
**Cc:** Schlom, Evan N.; Jacobi, Will (Federal); Keith Labeledz; Dorey, David R.; Williams, Gaye (Federal); Warren, Arthur (Federal); Jacob, Dana (Federal); Deborah J. Bortot  
**Subject:** RE: Revised WLR 278

9 page attachment withheld in full - (b)(3), (5), (6)

Great. Here's a clean copy, in case you haven't already cleaned it up. The deletions created some problems with numbering and page breaks. You can disregard this email if you've already done the clean-up yourself, but it's attached for your convenience. As soon as we hear he's ok, we'll preclear and then ask the transition team to authorize us sending it up to the Senate.

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](mailto:walter.shaub@oge.gov)

Rest of email chain partially disclosed above



**From:** [Heather A. Jones](#)  
**To:** ["Kassinger, Theodore W."; Director of OGE; "Maggi, David \(Federal\)"](#)  
**Cc:** ["Schlom, Evan N."; "Jacobi, Will \(Federal\)"; Keith Labeledz; "Dorey, David R."; "Williams, Gaye \(Federal\)"; "Warren, Arthur \(Federal\)"; "Jacob, Dana \(Federal\)"; Deborah J. Bortot](#)  
**Subject:** RE: Revised WLR 278  
**Date:** Sunday, January 15, 2017 5:19:54 PM  
**Attachments:** [Ethics Agreement for Preclearance - Ross, Wilbur L 5pm.docx](#)

---

Attached is the revised EA. I will be preclearing momentarily.

9 page attachment withheld in full - (b) (3), (5), (6)

**From:** Heather A. Jones  
**Sent:** Sunday, January 15, 2017 3:15 PM  
**To:** 'Kassinger, Theodore W.'; Director of OGE; 'Maggi, David (Federal)'  
**Cc:** Schlom, Evan N.; Jacobi, Will (Federal); Keith Labeledz; Dorey, David R.; Williams, Gaye (Federal); Warren, Arthur (Federal); Jacob, Dana (Federal); Deborah J. Bortot  
**Subject:** RE: Revised WLR 278

9 page attachment withheld in full - (b)(3), (5), (6)

[Here is the draft with the typo that Keith found changed.](#)

Rest of email chain partially disclosed above



**From:** [Schlom, Evan N.](#)  
**To:** [Kassinger, Theodore W.](#); [Heather A. Jones](#); [Director of OGE](#); "[Maggi, David \(Federal\)](#)"  
**Cc:** "[Jacobi, Will \(Federal\)](#)"; [Keith Labeledz](#); [Dorey, David R.](#); "[Williams, Gaye \(Federal\)](#)"; "[Warren, Arthur \(Federal\)](#)"; "[Jacob, Dana \(Federal\)](#)"; [Deborah J. Bortot](#)  
**Subject:** [GRAYMAIL] RE: Revised WLR 278  
**Date:** Sunday, January 15, 2017 6:30:33 PM  
**Attachments:** [Signed Ethics Agreement - Ross, Wilbur L.pdf](#)

---

9 page attachment withheld in full - (b)(3), (5), (6)

All,

Attached is the signed EA. The 278 has been signed electronically in Integrity.gov.

Thanks,

Evan

**From:** Kassinger, Theodore W.  
**Sent:** Sunday, January 15, 2017 5:28 PM  
**To:** 'Heather A. Jones'; Director of OGE; 'Maggi, David (Federal)'  
**Cc:** Schlom, Evan N.; 'Jacobi, Will (Federal)'; Keith Labeledz; Dorey, David R.; 'Williams, Gaye (Federal)'; 'Warren, Arthur (Federal)'; 'Jacob, Dana (Federal)'; Deborah J. Bortot  
**Subject:** RE: Revised WLR 278

thanks

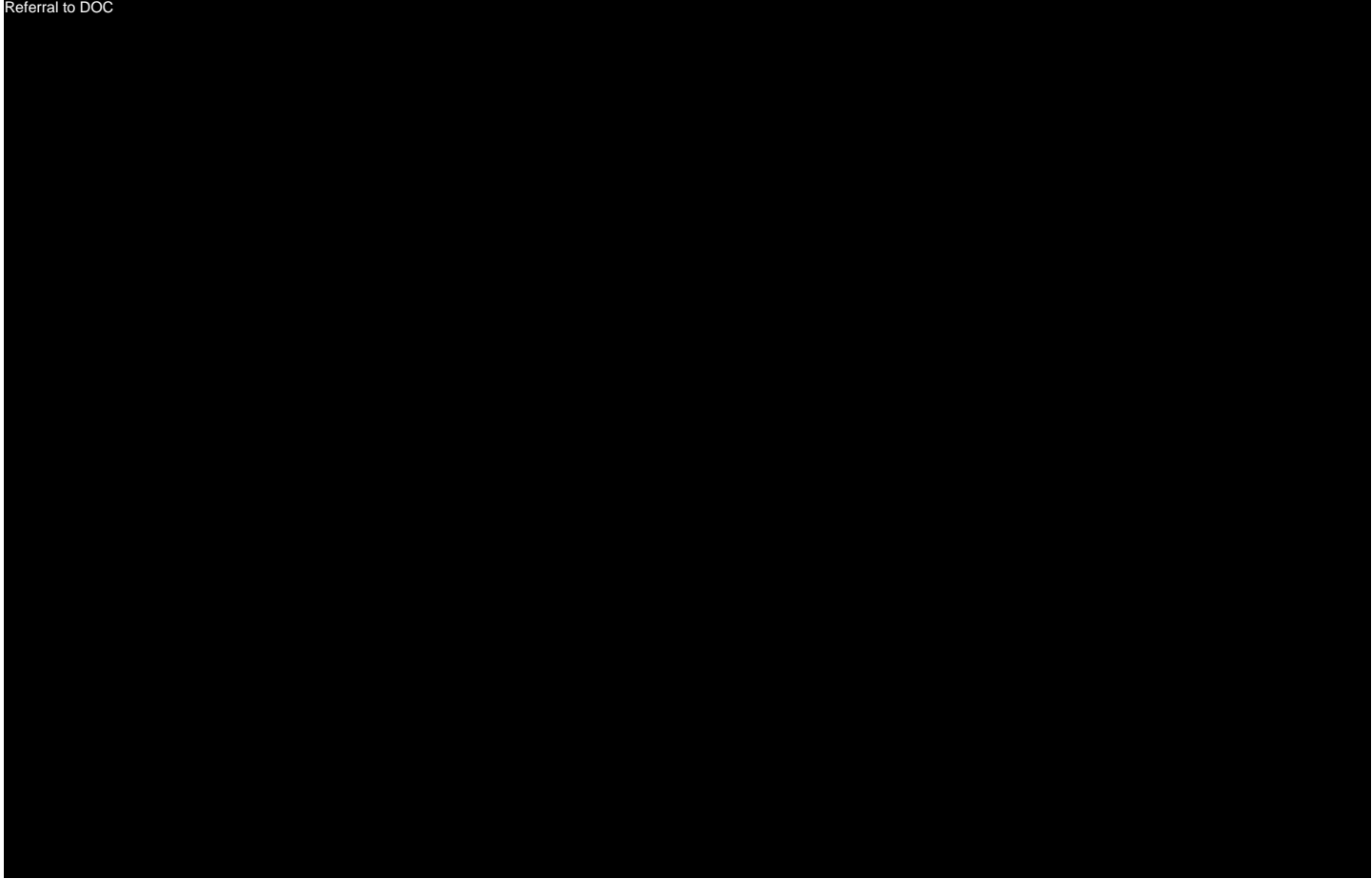
**From:** Heather A. Jones [<mailto:hajones@oge.gov>]  
**Sent:** Sunday, January 15, 2017 5:20 PM  
**To:** Kassinger, Theodore W.; Director of OGE; 'Maggi, David (Federal)'  
**Cc:** Schlom, Evan N.; 'Jacobi, Will (Federal)'; Keith Labeledz; Dorey, David R.; 'Williams, Gaye (Federal)'; 'Warren, Arthur (Federal)'; 'Jacob, Dana (Federal)'; Deborah J. Bortot  
**Subject:** RE: Revised WLR 278

9 page attachment withheld in full - (b)(3), (5), (6)

Attached is the revised EA. I will be preclearing momentarily.

Rest of email chain partially disclosed above

Referral to DOC



---

**From:** Kassinger, Theodore W.

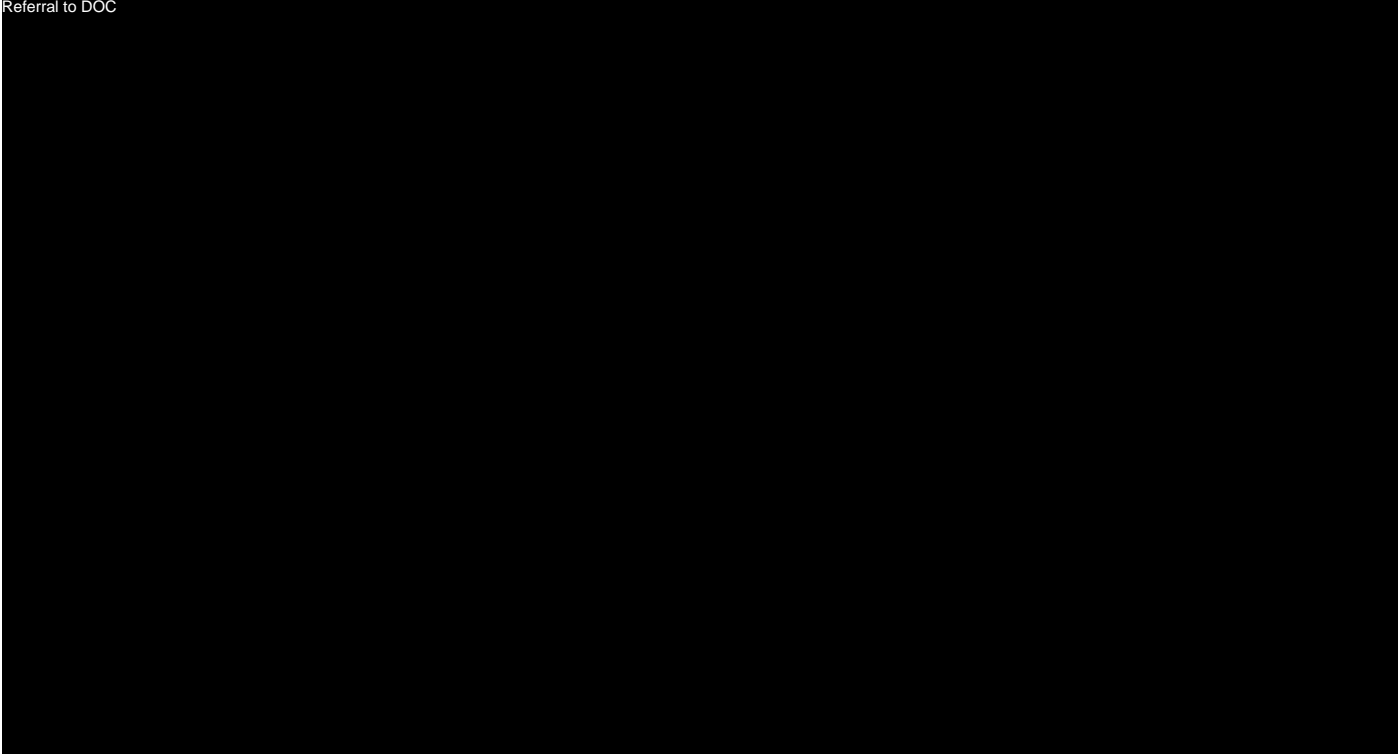
**Sent:** Sunday, January 15, 2017 7:00 PM

**To:** Jacobi, Will (Federal); Maggi, David (Federal); Schlom, Evan N.

**Subject:** RE: Revised WLR 278

please hold the agreement if it has not been sent on. I just spotted a question and raised with Walt.

Referral to DOC



**From:** "Kassinger, Theodore W." <[tkassinger@omm.com](mailto:tkassinger@omm.com)>  
**Date:** January 15, 2017 at 6:37:11 PM EST  
**To:** "Maggi, David (Federal)" <[dMaggi@doc.gov](mailto:dMaggi@doc.gov)>  
**Subject:** FW: Revised WLR 278

can you reprint the signature page without the fax numbers etc at top? I've asked Evan to resend a clean one just in case

---

**From:** Schlom, Evan N.  
**Sent:** Sunday, January 15, 2017 6:30 PM  
**To:** Kassinger, Theodore W.; 'Heather A. Jones'; Director of OGE; 'Maggi, David (Federal)'  
**Cc:** 'Jacobi, Will (Federal)'; Keith Labeledz; Dorey, David R.; 'Williams, Gaye (Federal)'; 'Warren, Arthur (Federal)'; 'Jacob, Dana (Federal)'; Deborah J. Bortot  
**Subject:** RE: Revised WLR 278

9 page attachment withheld in full - (b)(3), (5), (6)

All,  
Attached is the signed EA. The 278 has been signed electronically in [Integrity.gov](http://Integrity.gov).  
Thanks,  
Evan

---

**From:** Kassinger, Theodore W.  
**Sent:** Sunday, January 15, 2017 5:28 PM  
**To:** 'Heather A. Jones'; Director of OGE; 'Maggi, David (Federal)'  
**Cc:** Schlom, Evan N.; 'Jacobi, Will (Federal)'; Keith Labeledz; Dorey, David R.; 'Williams, Gaye (Federal)'; 'Warren, Arthur (Federal)'; 'Jacob, Dana (Federal)'; Deborah J. Bortot  
**Subject:** RE: Revised WLR 278  
thanks

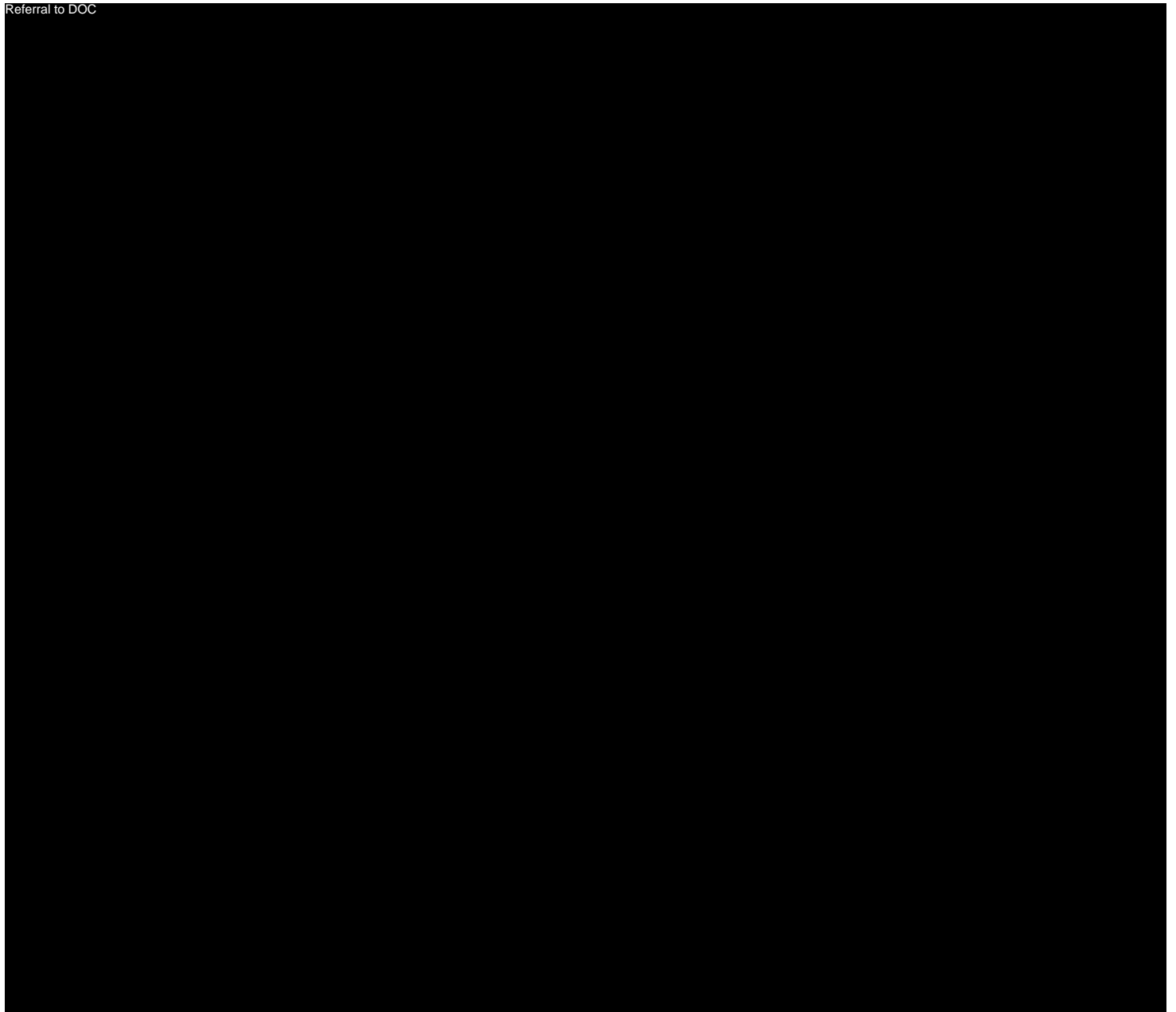
---

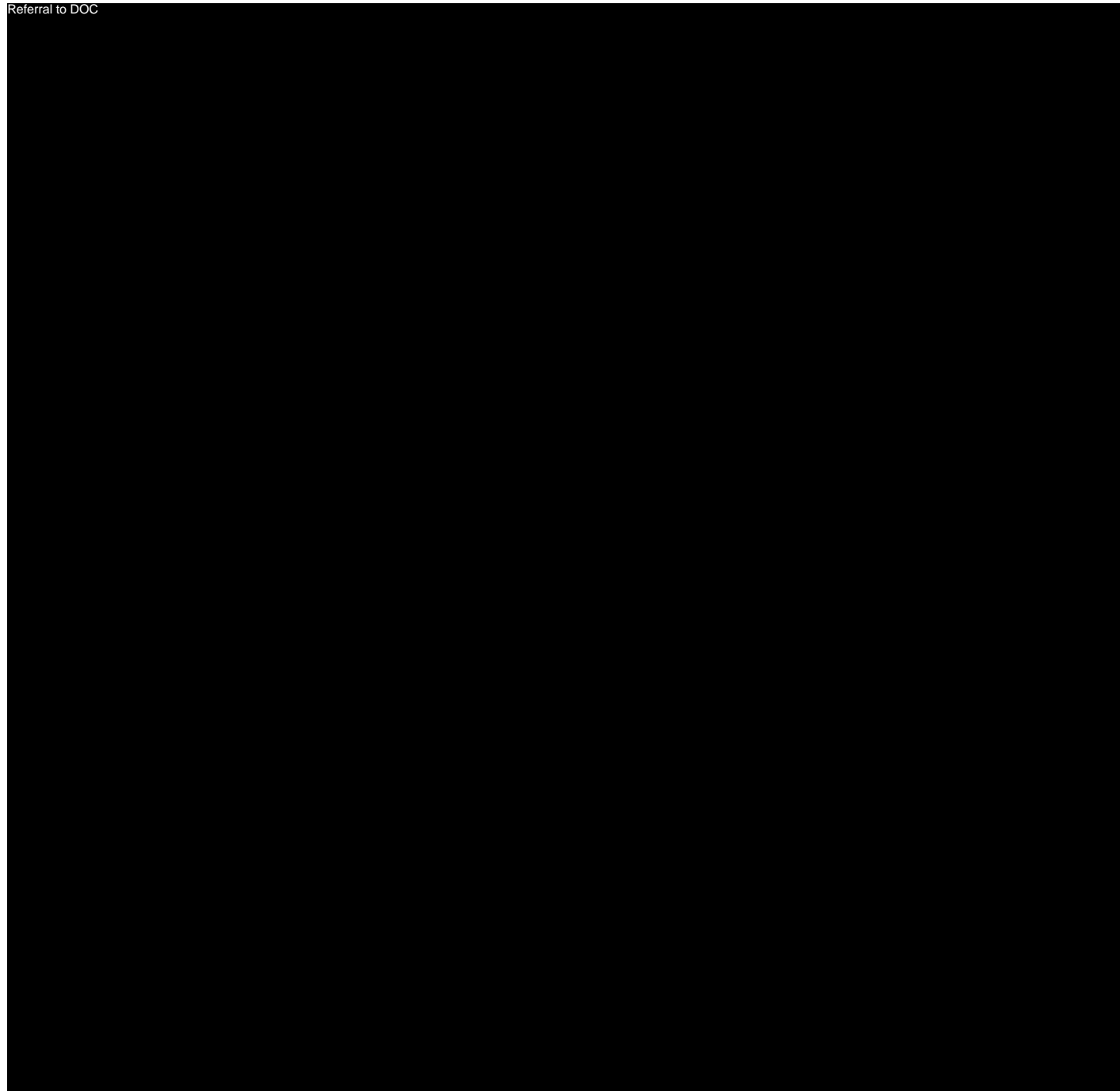
**From:** Heather A. Jones [<mailto:hajones@oge.gov>]  
**Sent:** Sunday, January 15, 2017 5:20 PM  
**To:** Kassinger, Theodore W.; Director of OGE; 'Maggi, David (Federal)'  
**Cc:** Schlom, Evan N.; 'Jacobi, Will (Federal)'; Keith Labeledz; Dorey, David R.; 'Williams, Gaye (Federal)'; 'Warren, Arthur (Federal)'; 'Jacob, Dana (Federal)'; Deborah J. Bortot  
**Subject:** RE: Revised WLR 278

9 page attachment withheld in full - (b)(3), (5), (6)

Attached is the revised EA. I will be preclearing momentarily.

Rest of email chain partially disclosed above







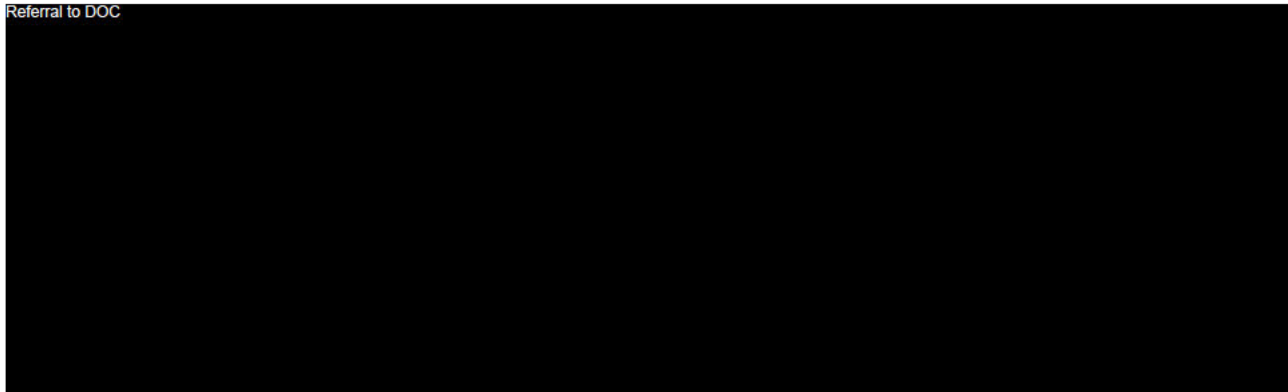


**From:** [Kassinger, Theodore W.](#)  
**To:** [Maggi, David \(Federal\)](#)  
**Cc:** [Walter M. Shaub](#); [Keith Labeledz](#); [Deborah J. Bortot](#); [Heather A. Jones](#); [David J. Apol](#); [Dorey, David R.](#); [Williams, Gaye \(Federal\)](#); [Warren, Arthur \(Federal\)](#); [Jacobi, Will \(Federal\)](#); [Jacob, Dana \(Federal\)](#); [Schlom, Evan N.](#)  
**Subject:** [GRAYMAIL] Re: Ross-Completion of Comparison of 278 and EA-All Issues Resolved  
**Date:** Friday, January 13, 2017 9:17:00 PM

---

Yes. For those of you using Word, the easiest way to read the document is to choose the "review" button from the menu, and either save all changes to review a clean document or toggle between "final" and "final showing changes."

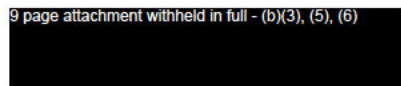
Referral to DOC



On Jan 13, 2017, at 7:42 PM, Kassinger, Theodore W. <[tkassinger@omm.com](mailto:tkassinger@omm.com)> wrote:

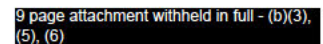
Just in case our firewall removed the redlines:

9 page attachment withheld in full - (b)(3), (5), (6)



**From:** Kassinger, Theodore W.  
**Sent:** Friday, January 13, 2017 7:41 PM  
**To:** 'Walter M. Shaub'; 'Maggi, David (Federal)'; Keith Labeledz  
**Cc:** Deborah J. Bortot; Heather A. Jones; David J. Apol; Dorey, David R.; Williams, Gaye (Federal); Warren, Arthur (Federal); Jacobi, Will (Federal); Jacob, Dana (Federal); Evan Schlom  
**Subject:** RE: Ross-Completion of Comparison of 278 and EA-All Issues Resolved

9 page attachment withheld in full - (b)(3), (5), (6)



All-

We realized that we inadvertently omitted two edits to the revised draft EA circulated earlier. These edits are captured in the attached version. They are:

1) <sup>(b)(3), (6)</sup> is deleted from section 7, consistent with our proposed treatment of <sup>(b)(3), (6)</sup> in Section 9.

2) We consolidated references to <sup>(b)(3), (6)</sup> and <sup>(b)(3), (6)</sup>, to eliminate confusion. At David Maggi's suggestion, we list these as one item where referenced: <sup>(b)(3), (6)</sup>.

Thanks,

Ted

**From:** Walter M. Shaub [<mailto:wmschaub@oge.gov>]

**Sent:** Friday, January 13, 2017 6:35 PM

**To:** 'Maggi, David (Federal)'; Keith Labeledz

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

**Subject:** RE: Ross-Completion of Comparison of 278 and EA-All Issues Resolved

Folks, looks like we're closing in on this one. Keith is reviewing it now, then Heather and I will take over. We'll look at it as soon as Keith is done tonight or tomorrow. (David, thanks for your phone number.) We're going to make this one a high priority to wrap up as soon as we can.

Walter M. Shaub, Jr.

Director

U.S. Office of Government Ethics

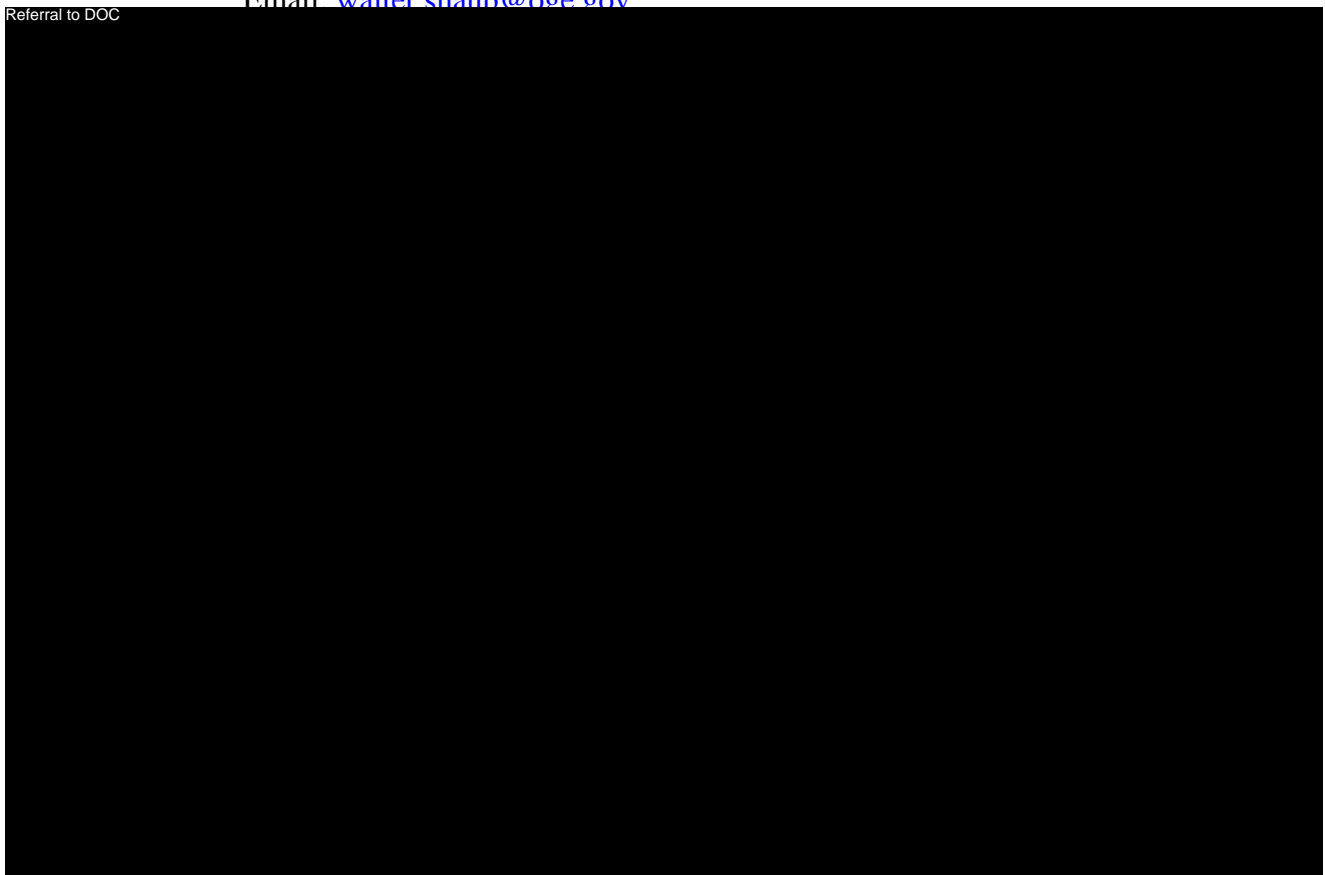
1201 New York Avenue, NW, Suite 500

Washington, DC 20005-3917

Telephone: 202.482.9292

Email: [walter.schaub@oge.gov](mailto:walter.schaub@oge.gov)

Referral to DOC



**From:** Keith Labeledz [<mailto:klabeledz@oge.gov>]  
**Sent:** Friday, January 13, 2017 12:47 PM  
**To:** Maggi, David (Federal) <[dMaggi@doc.gov](mailto:dMaggi@doc.gov)>  
**Cc:** Deborah J. Bortot <[djbortot@oge.gov](mailto:djbortot@oge.gov)>; Heather A. Jones <[hajones@oge.gov](mailto:hajones@oge.gov)>; Walter M. Shaub <[wmschaub@oge.gov](mailto:wmschaub@oge.gov)>; David J. Apol <[djapol@oge.gov](mailto:djapol@oge.gov)>; Kassinger, Theodore W. <[tkassinger@omm.com](mailto:tkassinger@omm.com)>; Dorey, David R. <[ddorey@omm.com](mailto:ddorey@omm.com)>; Williams, Gaye (Federal) <[gWilliams@doc.gov](mailto:gWilliams@doc.gov)>; Warren, Arthur (Federal) <[AWarren@doc.gov](mailto:AWarren@doc.gov)>; Jacobi, Will (Federal) <[wjacobi@doc.gov](mailto:wjacobi@doc.gov)>; Jacob, Dana (Federal) <[DJacob@doc.gov](mailto:DJacob@doc.gov)>  
**Subject:** RE: Ross-Completion of Comparison of 278 and EA-All Issues Resolved

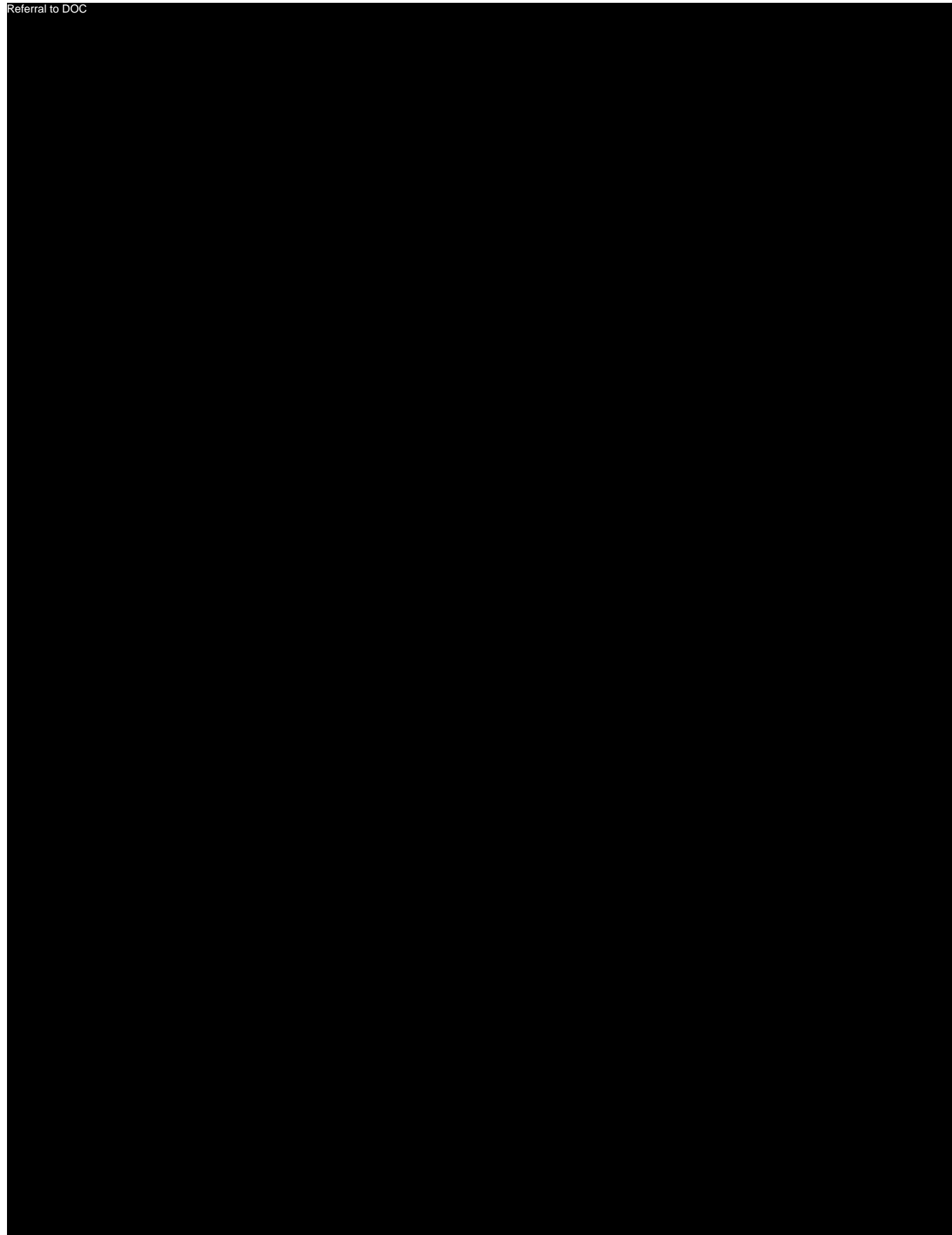
David,

I have several questions outstanding from my round 5 questions. My review this morning has also noted some issues, and I believe the representatives are double-checking the Part 1 and Part 3 references to ensure that no <sup>(b)(3), (6)</sup> positions are disclosed in Part 3 that do not appear in Part 1. Whether I get my new questions out before a new draft or not, there will still need to be at least one more round of review at my level before Heather can examine the report. Given all the rounds of edits, I certainly may have missed something.

Once I have a handle on the report and am sure it is stable, I can conduct my own review of the ethics agreement to be sure it matches the finalized report. These steps will take some time (each structural change can add hours to my review as I re-check the endnotes and Parts for consistency). Only then can I send for preclearance review.

Thank you.

Keith



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**From:** [Kassinger, Theodore W.](#)  
**To:** [Walter M. Shaub](#); "[Maggi, David \(Federal\)](#)"; [Keith Labeledz](#)  
**Cc:** [Deborah J. Bortot](#); [Heather A. Jones](#); [David J. Apol](#); [Dorey, David R.](#); [Williams, Gaye \(Federal\)](#); [Warren, Arthur \(Federal\)](#); [Jacobi, Will \(Federal\)](#); [Jacob, Dana \(Federal\)](#)  
**Subject:** [GRAYMAIL] RE: Ross-Completion of Comparison of 278 and EA-All Issues Resolved  
**Date:** Friday, January 13, 2017 7:06:30 PM

---

Thank you.

**From:** Walter M. Shaub [mailto:wmshaub@oge.gov]  
**Sent:** Friday, January 13, 2017 6:35 PM  
**To:** 'Maggi, David (Federal)'; Keith Labeledz  
**Cc:** Deborah J. Bortot; Heather A. Jones; David J. Apol; Kassinger, Theodore W.; Dorey, David R.; Williams, Gaye (Federal); Warren, Arthur (Federal); Jacobi, Will (Federal); Jacob, Dana (Federal)  
**Subject:** RE: Ross-Completion of Comparison of 278 and EA-All Issues Resolved

Folks, looks like we're closing in on this one. Keith is reviewing it now, then Heather and I will take over. We'll look at it as soon as Keith is done tonight or tomorrow. (David, thanks for your phone number.) We're going to make this one a high priority to wrap up as soon as we can.

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](mailto:walter.shaub@oge.gov)

Rest of email chain partially disclosed above



On Jan 13, 2017, at 6:35 PM, Walter M. Shaub <[wmschaub@oge.gov](mailto:wmschaub@oge.gov)> wrote:

Folks, looks like we're closing in on this one. Keith is reviewing it now, then Heather and I will take over. We'll look at it as soon as Keith is done tonight or tomorrow. (David, thanks for your phone number.) We're going to make this one a high priority to wrap up as soon as we can.

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](mailto:walter.schaub@oge.gov)



**From:** [Keith Labedz](#)  
**To:** "[dmaggi@doc.gov](mailto:dmaggi@doc.gov)"; [David J. Apol](#); [Heather A. Jones](#); [Deborah J. Bortot](#)  
**Cc:** [wjacobi@doc.gov](mailto:wjacobi@doc.gov); [djacob@doc.gov](mailto:djacob@doc.gov); [gwilliams@doc.gov](mailto:gwilliams@doc.gov); [awarren@doc.gov](mailto:awarren@doc.gov)  
**Subject:** RE: Letter re Access to Fund information  
**Date:** Friday, January 13, 2017 12:36:55 PM

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David,

I cannot access documents via the secure links (b)(3), (5), (6)

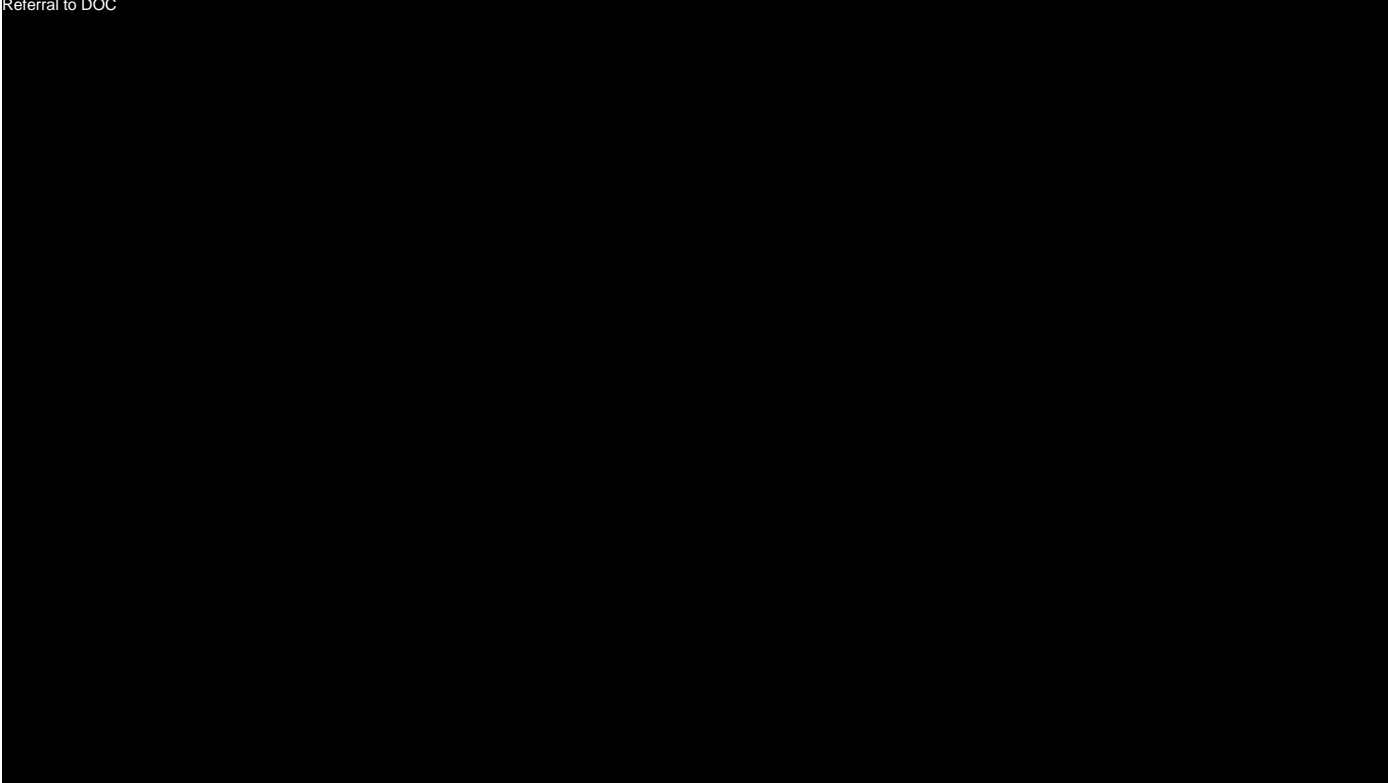
More generally, we are not going to resolve all issues today. The report is unfortunately still in a state of flux, and I cannot turn my attention to the ethics agreement again until the report is stable. Each round of structure changes adds several hours of review as I need to check for inter-Part consistency and track down the endnote references (which sometimes get out of order).

Thank you.  
Keith

Referral to DOC



Referral to DOC



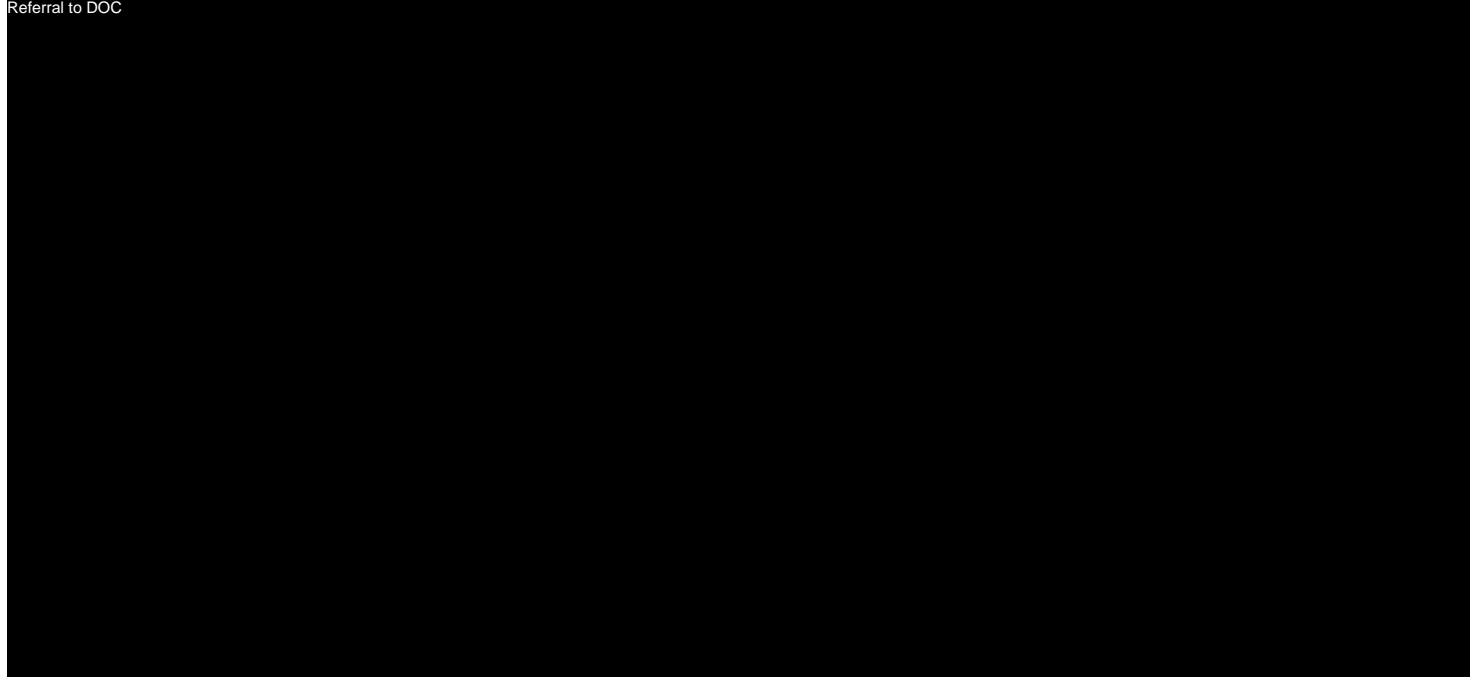
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**From:** Kassinger, Theodore W. [mailto:tkassinger@omm.com]  
**Sent:** Friday, January 13, 2017 10:45 AM  
**To:** Maggi, David (Federal) <dMaggi@doc.gov>  
**Cc:** Keith Labeledz <klabeledz@oge.gov>  
**Subject:** RE: Ross-Completion of Comparison of 278 and EA-All Issues Resolved

Thanks. will check (b)(3), (6), I fairly certain. the report would not have (b)(3), (6). I will check on (b)(3), (6) as well. This information just goes to you, David, for your use with the Committee? Or do I send it elsewhere?  
Ted

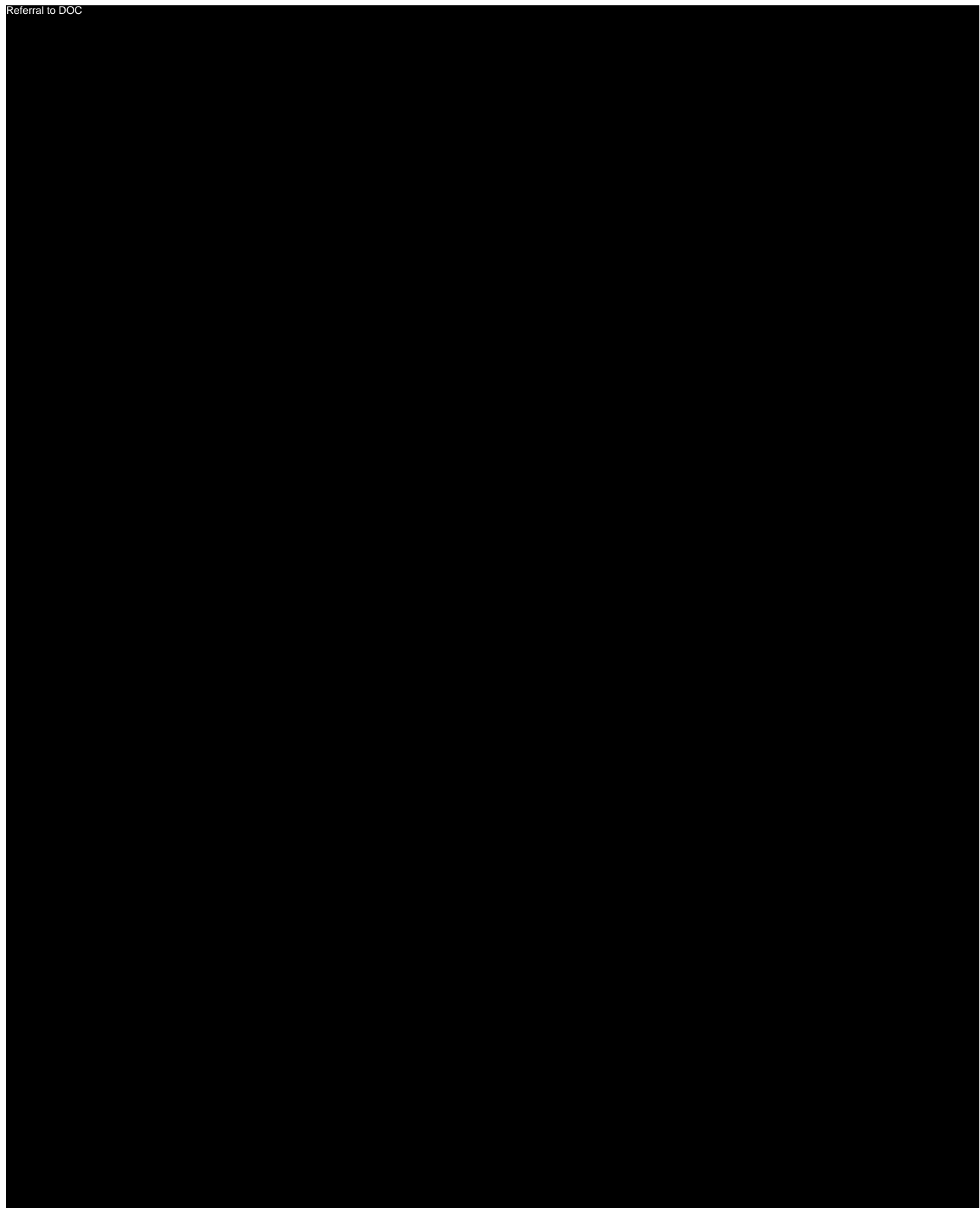
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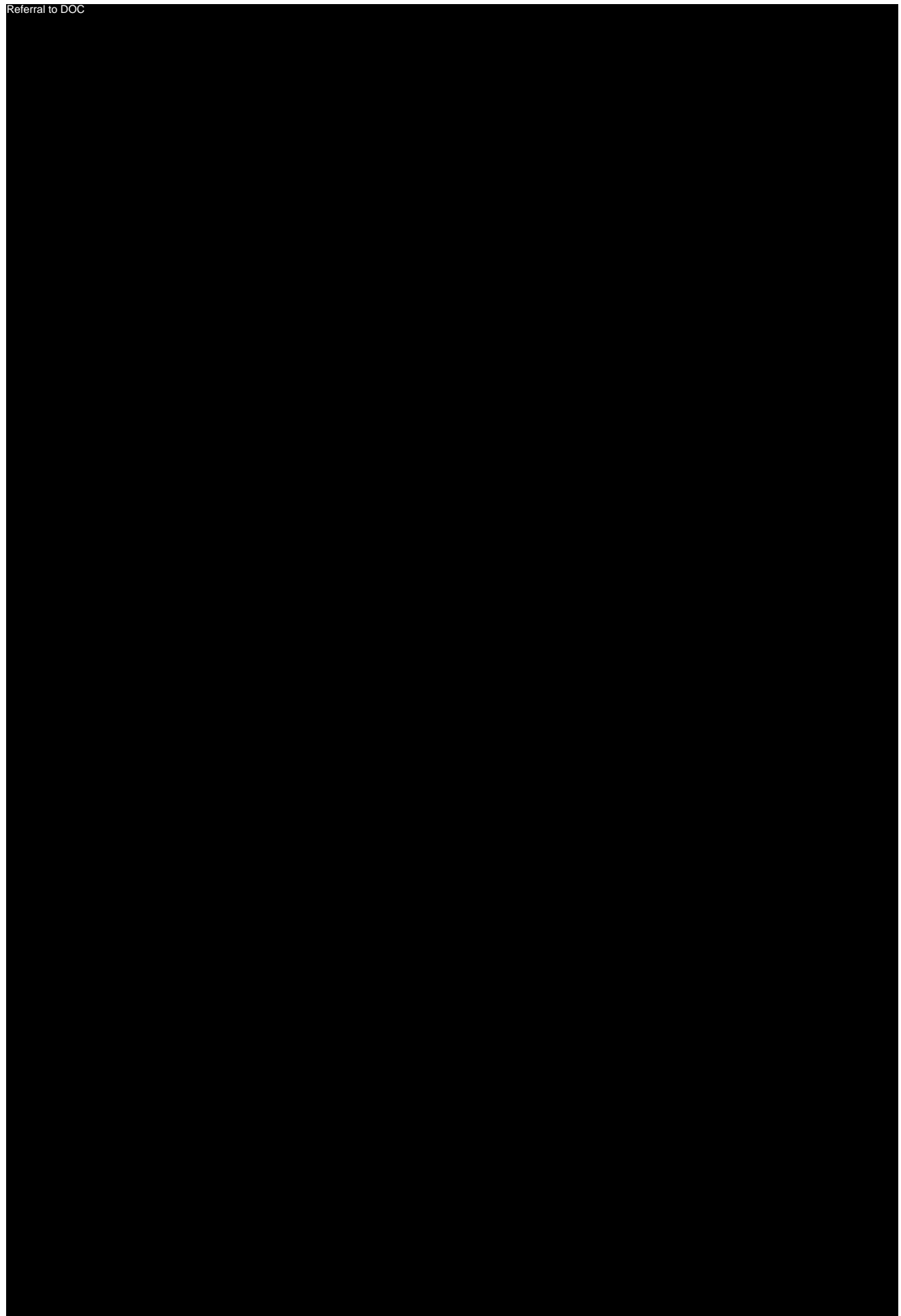
Referral to DOC

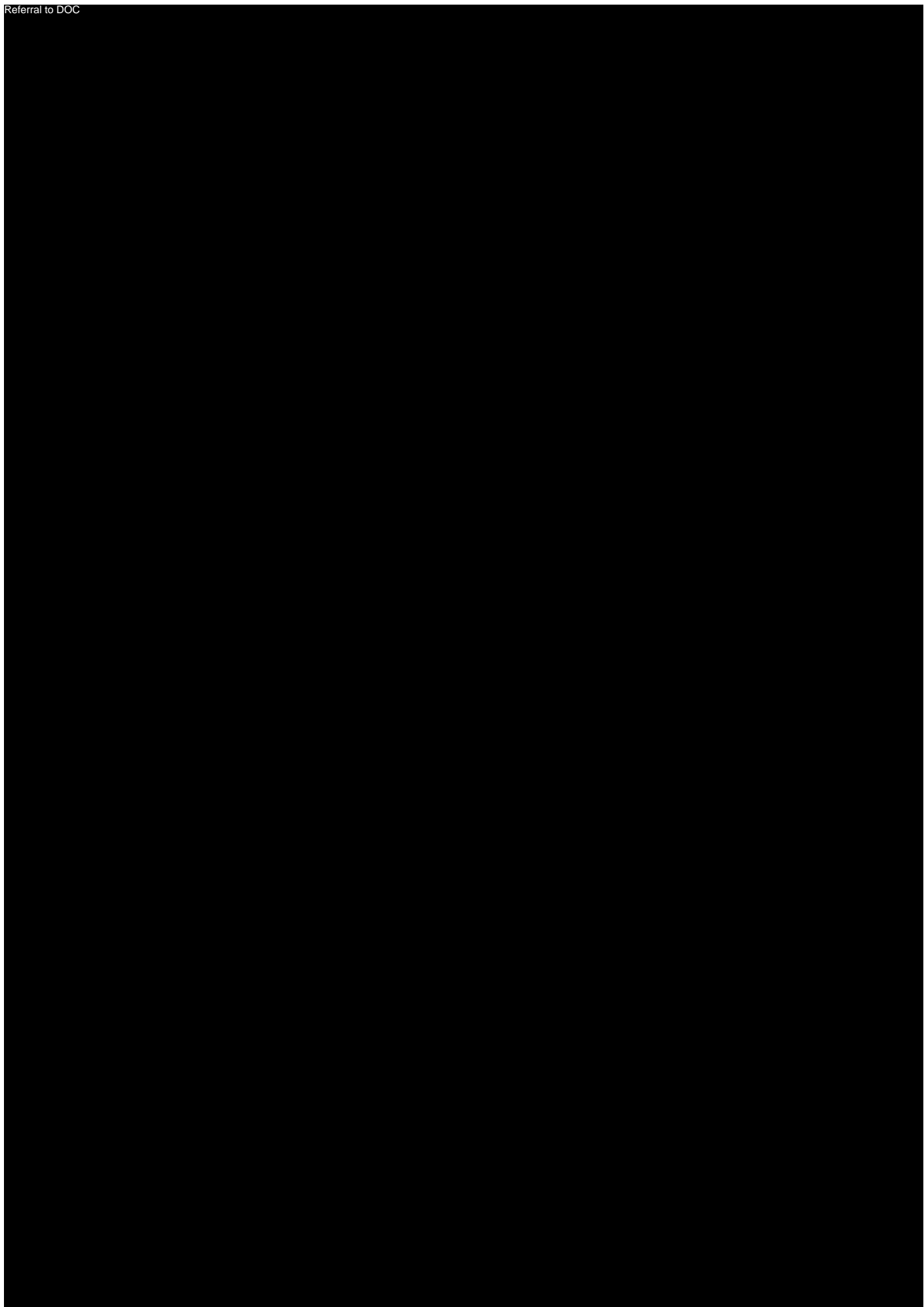




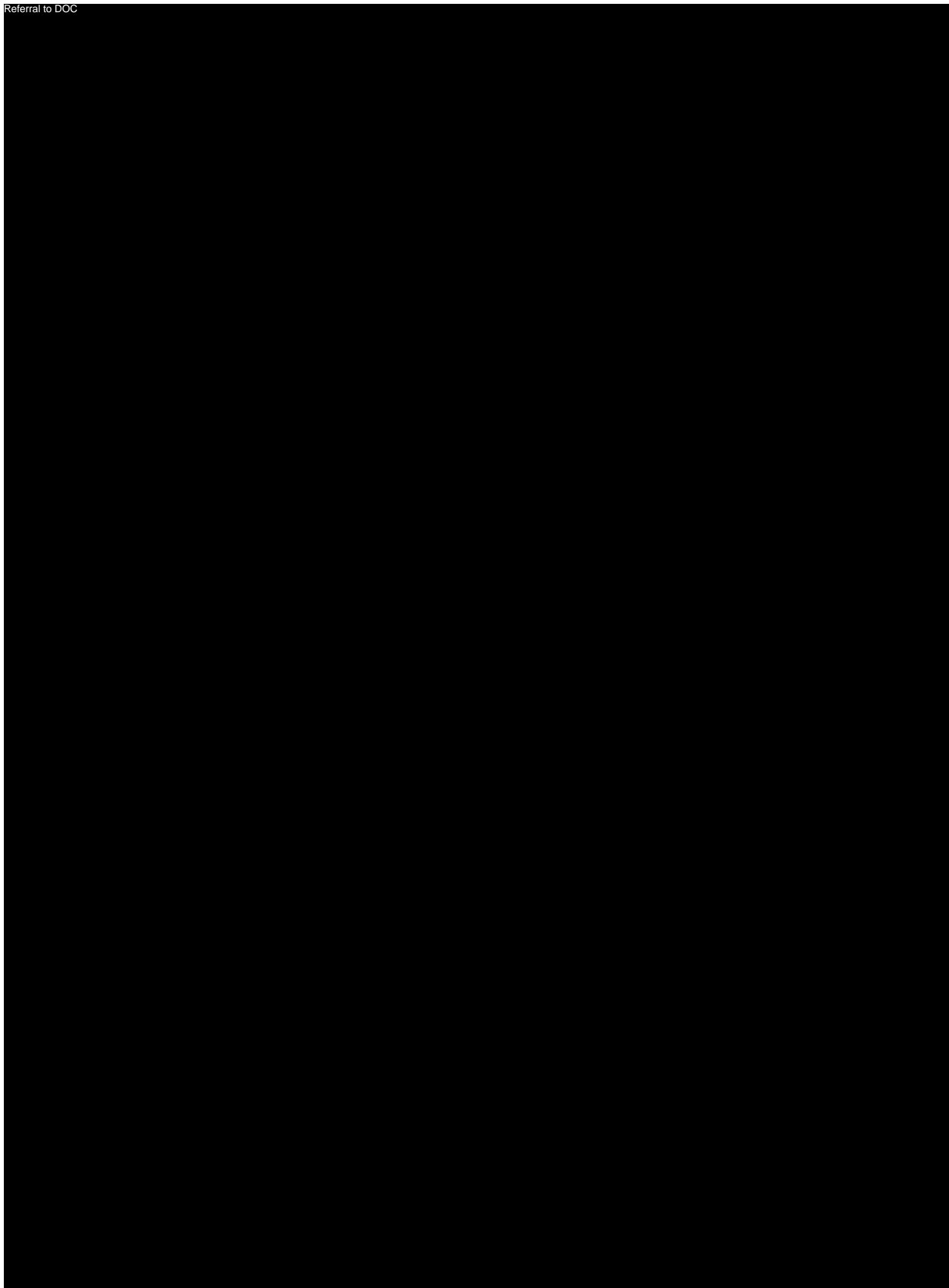


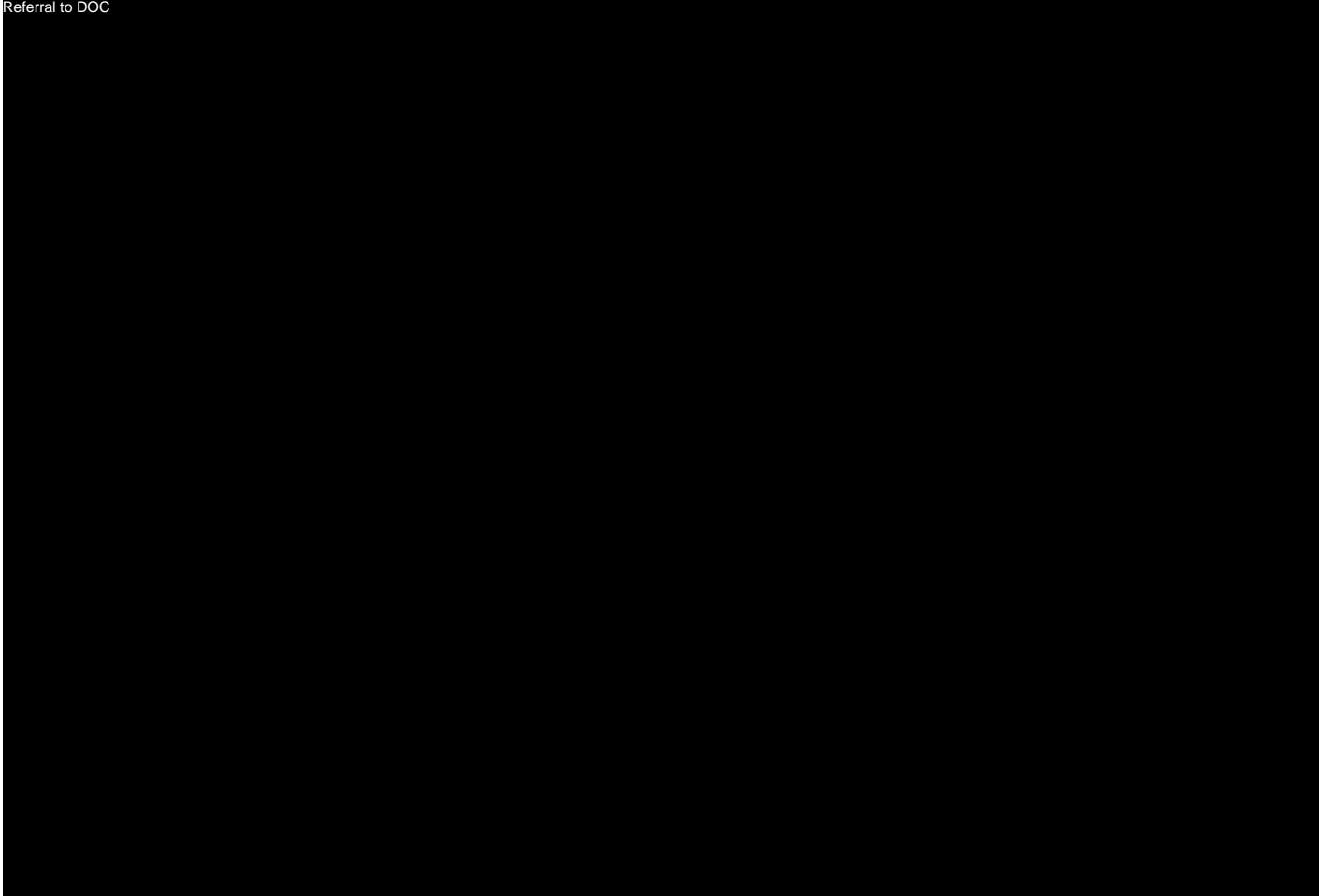












**From:** [Kassinger, Theodore W.](#)  
**To:** [Walter M. Shaub](#); [Deborah J. Bortot](#); [Heather A. Jones](#); [David Maggi](#); [Keith Labeledz](#)  
**Cc:** [Schlom, Evan N.](#); [Dorey, David R.](#)  
**Subject:** RE: Ross enclosures  
**Date:** Thursday, January 12, 2017 2:38:14 PM

---

Thanks. I'll confirm with WLR on sales.

Yes, our goal was to have only (b)(3), (6)

**From:** Walter M. Shaub [mailto:wmshaub@oge.gov]  
**Sent:** Thursday, January 12, 2017 2:30 PM  
**To:** Kassinger, Theodore W.; Deborah J. Bortot; Heather A. Jones; David Maggi; Keith Labeledz  
**Cc:** Schlom, Evan N.; Dorey, David R.  
**Subject:** RE: Ross enclosures

Well, there are some readily marketable securities in there. If you can flag those, we should go with 90 days on those.

On a separate but related question, what (b)(3), (6) do you think are remaining now? We'll take a look at it, but I want to get your take first. Here's what you wrote in the last draft, but we seem to have whittled things down since then: (b)(3), (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](mailto:walter.shaub@oge.gov)

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

**Sent:** Thursday, January 12, 2017 2:26 PM

**To:** Walter M. Shaub; Deborah J. Bortot; Heather A. Jones; David Maggi; Keith Labeledz

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

**Subject:** RE: Ross enclosures

While Mr. Ross expects, as he noted last night, to be able to move quickly on many things, he would like a simple 180 day rule covering all divestitures. He sees the effort as an integrated whole, a massive restructuring and disposition of his business and personal financial life. He came away from the discussion last night with that in mind. Can we make that work?

Thanks

Ted

**From:** Walter M. Shaub [<mailto:wmschaub@oge.gov>]

**Sent:** Thursday, January 12, 2017 2:10 PM

**To:** Kassinger, Theodore W.; Deborah J. Bortot; Heather A. Jones; David Maggi; Keith Labeledz

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

**Subject:** RE: Ross enclosures

Can you highlight the items in the divestiture for which you're seeking 180 days. (b)(3), (6), for example, is one he can divest in 90 days.

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](mailto:walter.shaub@oge.gov)

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

**Sent:** Thursday, January 12, 2017 1:41 PM

**To:** Walter M. Shaub; Deborah J. Bortot; Heather A. Jones; David Maggi; Keith Labeledz

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

**Subject:** Ross enclosures

4 page attachment withheld in full - (b)(3), (4), (5), (6)

All-

As discussed last night, attached are the proposed lists for Enclosures A and B. On B, we note in brackets for discussion purposes the (b)(3), (6) associated with each holding. In each case, (b)(3), (4), (6).

These lists remain under review, as we continue to scrub the (b)(3), (6) to ensure accuracy and completeness. We are checking (b)(3), (6) in particular, and may have a correction to the 278 regarding that entry when we update the form to respond to Keith's most recent round of comments.

Thanks,

Ted

(b)(3), (6)

**O'Melveny  
Theodore W. Kassinger**

Partner

[tkassinger@omm.com](mailto: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](#)

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**From:** [Heather A. Jones](mailto:Heather.A.Jones)  
**To:** [Director of OGE](mailto:Director.of.OGE)  
**Subject:** FW: When do expect to hear from Mr. Ross  
**Date:** Sunday, January 15, 2017 5:01:35 PM

---

Please see below

---

**From:** Kassinger, Theodore W. [<mailto:tkassinger@omm.com>]  
**Sent:** Sunday, January 15, 2017 5:00 PM  
**To:** Heather A. Jones  
**Cc:** Director of OGE  
**Subject:** RE: When do expect to hear from Mr. Ross

(b)(3), (6) appears favorably inclined to the language solution. They want to talk to you at 5pm, however. What they want to hear is (b)(5), (6)

**From:** Heather A. Jones [<mailto:hajones@oge.gov>]  
**Sent:** Sunday, January 15, 2017 3:57 PM  
**To:** Kassinger, Theodore W.  
**Cc:** Director of OGE  
**Subject:** RE: When do expect to hear from Mr. Ross

Yes, as long as Mr. Ross is ok with the EA and 278. Just so you know, (b)(5), (6)

**From:** Kassinger, Theodore W. [<mailto:tkassinger@omm.com>]  
**Sent:** Sunday, January 15, 2017 3:55 PM  
**To:** Heather A. Jones  
**Cc:** Director of OGE  
**Subject:** RE: When do expect to hear from Mr. Ross

If the call satisfies (b)(3), (6) concerns, could you clear today?

**From:** Heather A. Jones [<mailto:hajones@oge.gov>]  
**Sent:** Sunday, January 15, 2017 3:54 PM  
**To:** Kassinger, Theodore W.  
**Cc:** Director of OGE  
**Subject:** RE: When do expect to hear from Mr. Ross

Ted-

Walt is not available until 5. This development makes it unlikely that we will be able to clear today.

Thanks,  
Heather

**From:** Kassinger, Theodore W. [<mailto:tkassinger@omm.com>]  
**Sent:** Sunday, January 15, 2017 3:46 PM  
**To:** Heather A. Jones

**Cc:** Walter M. Shaub  
**Subject:** RE: When do expect to hear from Mr. Ross

Heather,  
I've alerted Walt. We've run into an issue with (b)(3), (6) (b)(5), (6) [REDACTED]  
[REDACTED] Reg Brown and WilmerHale would like a  
call at 4:45pm to discuss (b)(5), (6) [REDACTED]. They  
circulated an invite to Walt that I will forward to you.  
Apologies for the surprise.

Ted

**From:** Heather A. Jones [<mailto:hajones@oge.gov>]  
**Sent:** Sunday, January 15, 2017 3:40 PM  
**To:** Kassinger, Theodore W.  
**Subject:** When do expect to hear from Mr. Ross

Ted-  
I need to run a quick errand but I will wait if you think it will be in the next 30 minutes.

Heather

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

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Follow OGE on Twitter: @OfficeGovEthics

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**From:** [Kassinger, Theodore W.](mailto:Kassinger, Theodore W.)  
**To:** [Heather A. Jones](mailto:Heather A. Jones)  
**Cc:** [Walter M. Shaub](mailto:Walter M. Shaub)  
**Subject:** RE: When do expect to hear from Mr. Ross  
**Date:** Sunday, January 15, 2017 3:52:40 PM

---

what are recent examples of a two year recusal?

**From:** Heather A. Jones [<mailto:hajones@oge.gov>]  
**Sent:** Sunday, January 15, 2017 3:47 PM  
**To:** Kassinger, Theodore W.  
**Cc:** Walter M. Shaub  
**Subject:** RE: When do expect to hear from Mr. Ross

Ok, we will talk with you at 4:45

**From:** Kassinger, Theodore W. [<mailto:tkassinger@omm.com>]  
**Sent:** Sunday, January 15, 2017 3:46 PM  
**To:** Heather A. Jones  
**Cc:** Walter M. Shaub  
**Subject:** RE: When do expect to hear from Mr. Ross

Heather,

I've alerted Walt. We've run into an issue with (b)(3), (6) (b)(5), (6)  
Reg Brown and WilmerHale would like a  
call at 4:45pm to discuss (b)(5), (6). They  
circulated an invite to Walt that I will forward to you.

Apologies for the surprise.

Ted

**From:** Heather A. Jones [<mailto:hajones@oge.gov>]  
**Sent:** Sunday, January 15, 2017 3:40 PM  
**To:** Kassinger, Theodore W.  
**Subject:** When do expect to hear from Mr. Ross

Ted-

I need to run a quick errand but I will wait if you think it will be in the next 30 minutes.

Heather

Heather Jones

(202) 482-9316

Office of Government Ethics

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On Jan 15, 2017, at 8:53 PM, Kassinger, Theodore W. <[tkassinger@omm.com](mailto:tkassinger@omm.com)> wrote:

I will send you clean in a minute

On Jan 15, 2017, at 8:49 PM, Kassinger, Theodore W. <[tkassinger@omm.com](mailto:tkassinger@omm.com)> wrote:

All-

I approved the change and the agreement as revised to incorporate the change.

We appreciate your quick attention and willingness to resolve this issue.

Your advice is well taken, and Mr. Ross will strive to invest (b)(3), (6)

quickly.,

Ted

---

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

**Sent:** Sunday, January 15, 2017 8:38 PM

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

**Cc:** Director of OGE; Heather A. Jones; Keith Labeledz

**Subject:** RE: (b)(3), (6)

Ted & David,

Based on Ted's response below, I've gone ahead and amended the ethics agreement. We can live with this on our end, and David says Commerce can too. Based on a telephone call that Ted and I just had, I have merged the two revised pages (pages 2 and 3) with the version he signed and deleted the two corresponding pages in the original. (Note that the Page 3 is revised only in that some of the material previously on Page 2 now appears on Page 3.) I have also attached a one-paragraph document that shows the tracked changes.

Because we're using his old signature and a new first page, I'll need an email back from Ted ratifying this change before we can send the package to the Senate.

I just want to reiterate a note of caution that I've raised a couple of times in this process. I know I sound like a broken record, but I'll feel better if I

know I've given Wilbur Ross the best guidance I know how to give. It's this:

The timeframes in this agreement are unusually long. This is fully compliant with 18 USC 208, and he and his representatives have assured OGE and Commerce that he will recuse from as much, and for as long, as he needs to recuse. That's all we can ask. What I have no ability to do, and insufficient experience in legislative matters to do, is predict what effect the unusual nature of the agreement will have on the Senate with regard to the question of confirmation. From our conversation with him, that sounds like a risk he's comfortable with taking, and he knows the players far better than we do. I just wanted to have been diligent about flagging the risks, so that he can make an informed decision.

Please just give us the green light if you're good with this agreement. We'll wait to send it to the Senate until after we hear back from you.

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](mailto:walter.shaub@oge.gov)

---

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

**Sent:** Sunday, January 15, 2017 7:40 PM


**To:** 'Maggi, David (Federal)'

**Cc:** Director of OGE; Heather A. Jones; Keith Labeledz

**Subject:** RE: (b)(3), (6)

we can make that work. if we get any hook at all, I also think he will persuade (b)(3), (6) to come to its senses about this. he wants to sell this stuff asap.

Referral to DOC



On Jan 15, 2017, at 7:30 PM, Kassinger, Theodore W.  
<[tkassinger@omm.com](mailto:tkassinger@omm.com)> wrote:

thanks. (b)(3), (6) is being incredibly difficult about this.  
got to find a path out of their thicket

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

**Sent:** Sunday, January 15, 2017 7:27 PM

**To:** Kassinger, Theodore W.

**Cc:** Director of OGE; Heather A. Jones; David Maggi ([dMaggi@doc.gov](mailto:dMaggi@doc.gov)); Keith Labeledz

**Subject:** RE: (b)(3), (6)

The 2-year recusal is much narrower in scope than this recusal. I need a few minutes to research the difference between recusing from (b)(3), (6) and recusing from (b)(3), (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](mailto:walter.shaub@oge.gov)

**From:** Kassinger, Theodore W.

[<mailto:tkassinger@omm.com>]

**Sent:** Sunday, January 15, 2017 7:23 PM

**To:** Walter M. Shaub

**Cc:** Director of OGE; Heather A. Jones; David Maggi ([dMaggi@doc.gov](mailto:dMaggi@doc.gov)); Keith Labeledz

**Subject:** RE: (b)(3), (6)

understood, but he will be working to sell (b)(3), (6) (b)(3), (6), and he has up to 180 days for those. he will recuse for two years, voluntarily, from (b)(3), (6) matters overall.

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

**Sent:** Sunday, January 15, 2017 7:22 PM

**To:** Kassinger, Theodore W.

**Cc:** Director of OGE; Heather A. Jones; David Maggi ([dMaggi@doc.gov](mailto:dMaggi@doc.gov)); Keith Labeledz

**Subject:** RE: (b)(3), (6)

It's not a drafting issue. We're concerned about the length of the recusal.

Walter M. Shaub, Jr.

Director

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Telephone: 202.482.9292

Email: [walter.shaub@oge.gov](mailto:walter.shaub@oge.gov)

**From:** Kassinger, Theodore W.

[<mailto:tkassinger@omm.com>]

**Sent:** Sunday, January 15, 2017 7:20 PM

**To:** Walter M. Shaub

**Cc:** Director of OGE; Heather A. Jones

**Subject:** RE: (b)(3), (6)  
Wilmer is checking but says they can't confirm tonight even if company is willing.. Unless (b)(3), (6) agrees, then (b)(3), (4), (5), (6)

A simple additional sentence will fix it: (b)(3), (4), (5), (6)

This would be no more than 180 days.

**From:** Walter M. Shaub [<mailto:wmschaub@oge.gov>]

**Sent:** Sunday, January 15, 2017 7:02 PM

**To:** Kassinger, Theodore W.

**Cc:** Director of OGE; Heather A. Jones

**Subject:** RE: (b)(3), (6)

Well, I think it is clear. It provides for 90-day divestiture. We can consider agreeing to these different terms, but I'll have to talk to David, Heather, and Keith. Also, the divestiture period would have to be more than 180 days, which would really jump off the page and cause a stir on the Hill. He's better off if (b)(3), (6).

Walter M. Shaub, Jr.

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Washington, DC 20005-3917

Telephone: 202.482.9292

Email: [walter.shaub@oge.gov](mailto:walter.shaub@oge.gov)

**From:** Kassinger, Theodore W.

[<mailto:tkassinger@omm.com>]

**Sent:** Sunday, January 15, 2017 6:59 PM

**To:** Walter M. Shaub

**Cc:** Director of OGE; Heather A. Jones

**Subject:** Re: (b)(3), (6)

Not clear they can't, but they raised it this afternoon. If we can make the sentence clear tonight please let's do so.

On Jan 15, 2017, at 6:55 PM, Walter M. Shaub

<[wmschaub@oge.gov](mailto:wmschaub@oge.gov)> wrote:

Ted,

That provision provides for (b)(3), (5), (6)

I'm not sure if Heather has already sent the package to the Senate.

Can you call (b)(3), (6) and find out (b)(3), (5), (6)

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

Walt

**From:** Kassinger, Theodore W.

[<tkassinger@omm.com>](mailto:tkassinger@omm.com)

**Sent:** Sunday, January 15, 2017 6:24 PM

**To:** Heather A. Jones; David Maggi

**Subject:** (b)(3), (6) question

under section 2:

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

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**From:** [Heather A. Jones](#)  
**To:** [Teresa L. Williamson](#)  
**Subject:** Fw: (b)(3), (6)  
**Date:** Sunday, January 15, 2017 8:51:53 PM  
**Attachments:** [CORRECTED Signed Ethics Agreement - Ross Wilbur L.pdf](#)  
[one paragraph tracked changes key.pdf](#)

Final EA available at <https://extapps2.oge.gov/2017/Presiden.nsf/PAS%20Index?OpenView>. 1 page attachment withheld in full - (b)(5), (6)

---

Here is the EA. Everything else is in the folder

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

---

**From:** Director of OGE  
**Sent:** Sunday, January 15, 2017 8:37 PM  
**To:** 'Kassinger, Theodore W.'; 'Maggi, David (Federal)'  
**Cc:** Director of OGE; Heather A. Jones; Keith Labeledz  
**Subject:** RE: (b)(3), (6)

10 pages of attachments withheld in full - (b)(5), (6)

Ted & David,

Based on Ted's response below, I've gone ahead and amended the ethics agreement. We can live with this on our end, and David says Commerce can too. Based on a telephone call that Ted and I just had, I have merged the two revised pages (pages 2 and 3) with the version he signed and deleted the two corresponding pages in the original. (Note that the Page 3 is revised only in that some of the material previously on Page 2 now appears on Page 3.) I have also attached a one-paragraph document that shows the tracked changes.

Because we're using his old signature and a new first page, I'll need an email back from Ted ratifying this change before we can send the package to the Senate.

I just want to reiterate a note of caution that I've raised a couple of times in this process. I know I sound like a broken record, but I'll feel better if I know I've given Wilbur Ross the best guidance I know how to give. It's this:

The timeframes in this agreement are unusually long. This is fully compliant with 18 USC 208, and he and his representatives have assured OGE and Commerce that he will recuse from as much, and for as long, as he needs to recuse. That's all we can ask. What I have no ability to do, and insufficient experience in legislative matters to do, is predict what effect the unusual nature of the agreement will have on the Senate with regard to the question of confirmation. From our conversation with him, that sounds like a risk he's comfortable with taking, and he knows the players far better than we do. I just wanted to have been diligent about flagging the risks, so that he can make an informed decision.

Please just give us the green light if you're good with this agreement. We'll wait to send it to the Senate until after we hear back from you.

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](mailto:walter.shaub@oge.gov)


Rest of email chain partially disclosed above

**From:** [Kassinger, Theodore W.](#)  
**To:** "[Maggi, David \(Federal\)](#)"; [Director of OGE](#)  
**Cc:** [Heather A. Jones](#); [Keith Labedz](#); [Jacobi, Will \(Federal\)](#)  
**Subject:** RE: unvested stock question  
**Date:** Sunday, January 15, 2017 8:50:31 PM

---

Thanks, I just sent the green light.

Referral to DOC



On Jan 15, 2017, at 8:38 PM, Director of OGE <[director@oge.gov](mailto:director@oge.gov)> wrote:

Ted & David,

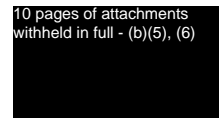
Based on Ted's response below, I've gone ahead and amended the ethics agreement. We can live with this on our end, and David says Commerce can too. Based on a telephone call that Ted and I just had, I have merged the two revised pages (pages 2 and 3) with the version he signed and deleted the two corresponding pages in the original. (Note that the Page 3 is revised only in that some of the material previously on Page 2 now appears on Page 3.) I have also attached a one-paragraph document that shows the tracked changes.

Because we're using his old signature and a new first page, I'll need an email back from Ted ratifying this change before we can send the package to the Senate.

I just want to reiterate a note of caution that I've raised a couple of times in this process. I know I sound like a broken record, but I'll feel better if I know I've given Wilbur Ross the best guidance I know how to give. It's this:

The timeframes in this agreement are unusually long. This is fully compliant with 18 USC 208, and he and his representatives have assured OGE and Commerce that he will recuse from as much, and for as long, as he needs to recuse. That's all we can ask. What I have no ability to do, and insufficient experience in legislative matters to do, is predict what effect the unusual nature of the agreement will have on the Senate with regard to the question of confirmation. From our conversation with him, that sounds like a risk he's comfortable with taking, and he knows the players far better than we do. I just wanted to have been diligent about flagging the risks, so that he can make an informed decision.

10 pages of attachments  
withheld in full - (b)(5), (6)



Please just give us the green light if you're good with this agreement. We'll wait to send it to the Senate until after we hear back from you.

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](mailto:walter.shaub@oge.gov)

Rest of email chain partially disclosed above



**From:** [Kassinger, Theodore W.](#)  
**To:** [Director of OGE](#)  
**Cc:** [Heather A. Jones](#); [David Maggi \(dMaggi@doc.gov\)](#); [Keith Labeledz](#)  
**Subject:** RE: (b)(3), (6)  
**Date:** Sunday, January 15, 2017 7:57:45 PM

---

my expectation is that they will not respond yes or no.

If we add a sentence along the line I suggested earlier - (b)(3), (5), (6)

**From:** Director of OGE [<mailto:director@oge.gov>]  
**Sent:** Sunday, January 15, 2017 7:38 PM  
**To:** Kassinger, Theodore W.; Director of OGE  
**Cc:** Heather A. Jones; David Maggi ([dMaggi@doc.gov](mailto:dMaggi@doc.gov)); Keith Labeledz  
**Subject:** RE: (b)(3), (6)

Would you mind if I emailed Reg? I'm happy to copy you. I won't do it, though, if you think it will make things more difficult for you.

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](mailto:walter.shaub@oge.gov)

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

**Sent:** Sunday, January 15, 2017 7:29 PM

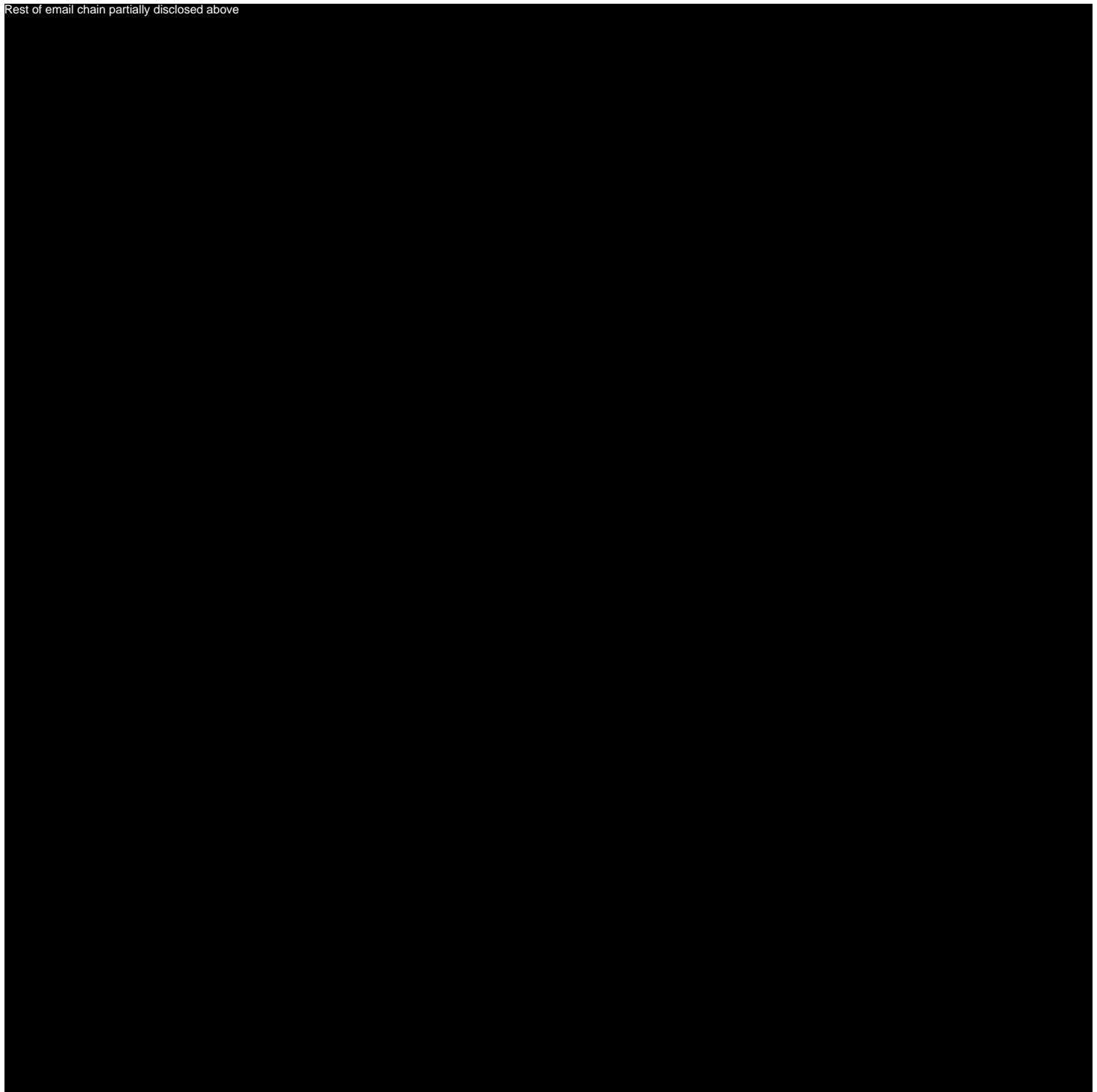
**To:** Director of OGE

**Cc:** Heather A. Jones; David Maggi ([dMaggi@doc.gov](mailto:dMaggi@doc.gov)); Keith Labeledz

**Subject:** RE: (b)(3), (6)

thanks. (b)(3), (6) is being incredibly difficult about this. got to find a path out of their thicket

Rest of email chain partially disclosed above



**From:** [Walter M. Shaub](#)  
**To:** [Brown, Reginald](#)  
**Cc:** ["Kassinger, Theodore W."](#); [Heather A. Jones](#); [David Maggi \(dMaggi@doc.gov\)](#)  
**Subject:** time-sensitive  
**Date:** Sunday, January 15, 2017 7:47:05 PM  
**Importance:** High

---

Reg,

Heather was literally seconds away from hitting "send" on Mr. Ross's report to the Senate. We've certified his report and cleared the ethics agreement. I think the transition team may have told the Senate that we will be meeting their deadline, which is today, for his report. It's particularly sensitive because Mr. Ross's hearing is one of the three hearings they delayed, partly as a result of my letter to the Senate. So, there's a lot at stake here for Mr. Ross if we miss the deadline and the hearing is postponed again.

From our perspective, at OGE and Commerce, (b)(3), (5), (6)

If there is any way you could move heaven and earth to get the (b)(3), (6) guys back in action to make a decision, you will solve what has become a significant problem.

Thanks

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](mailto:walter.shaub@oge.gov)



**From:** [Kassinger, Theodore W.](#)  
**To:** [Director of OGE](#)  
**Cc:** [Heather A. Jones](#); [David Maggi \(dMaggi@doc.gov\)](#); [Keith Labeledz](#)  
**Subject:** RE: (b)(3), (6)  
**Date:** Sunday, January 15, 2017 7:39:38 PM

---

please do.

**From:** Director of OGE [mailto:director@oge.gov]  
**Sent:** Sunday, January 15, 2017 7:38 PM  
**To:** Kassinger, Theodore W.; Director of OGE  
**Cc:** Heather A. Jones; David Maggi (dMaggi@doc.gov); Keith Labeledz  
**Subject:** RE: (b)(3), (6)

Would you mind if I emailed Reg? I'm happy to copy you. I won't do it, though, if you think it will make things more difficult for you.

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](mailto:walter.shaub@oge.gov)

Rest of email chain partially disclosed above



**From:** [Ann M Donaldson](#)  
**To:** [Heather A. Jones](#)  
**Subject:** RE: is there a number where I can call you?  
**Date:** Sunday, January 15, 2017 5:28:49 PM

---

Thank you. On it.


----- Message from "Heather A. Jones" <[hajones@oge.gov](mailto:hajones@oge.gov)> on Sun, 15 Jan 2017 22:21:32 GMT -----

**From:** "Heather A. Jones" <[hajones@oge.gov](mailto:hajones@oge.gov)>  
**To:** "Ann M Donaldson"  
**Subject:** FW: is there a number where I can call you?

This is the changed language at the end of Section 2

**From:** Heather A. Jones  
**Sent:** Sunday, January 15, 2017 4:38 PM  
**To:** 'Kassinger, Theodore W.'  
**Subject:** RE: is there a number where I can call you?


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



**From:** Kassinger, Theodore W. [<mailto:tkassinger@omm.com>]  
**Sent:** Sunday, January 15, 2017 4:35 PM  
**To:** Heather A. Jones  
**Subject:** RE: is there a number where I can call you?

Current language is:

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



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

Is this correct for the change?

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

**From:** Heather A. Jones [<mailto:hajones@oge.gov>]  
**Sent:** Sunday, January 15, 2017 4:01 PM  
**To:** Kassinger, Theodore W.  
**Subject:** is there a number where I can call you?

Heather Jones

(202) 482-9316

Office of Government Ethics

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**From:** [Kassinger, Theodore W.](#)  
**To:** [Heather A. Jones](#)  
**Subject:** Re: is there a number where I can call you?  
**Date:** Sunday, January 15, 2017 4:40:56 PM

---

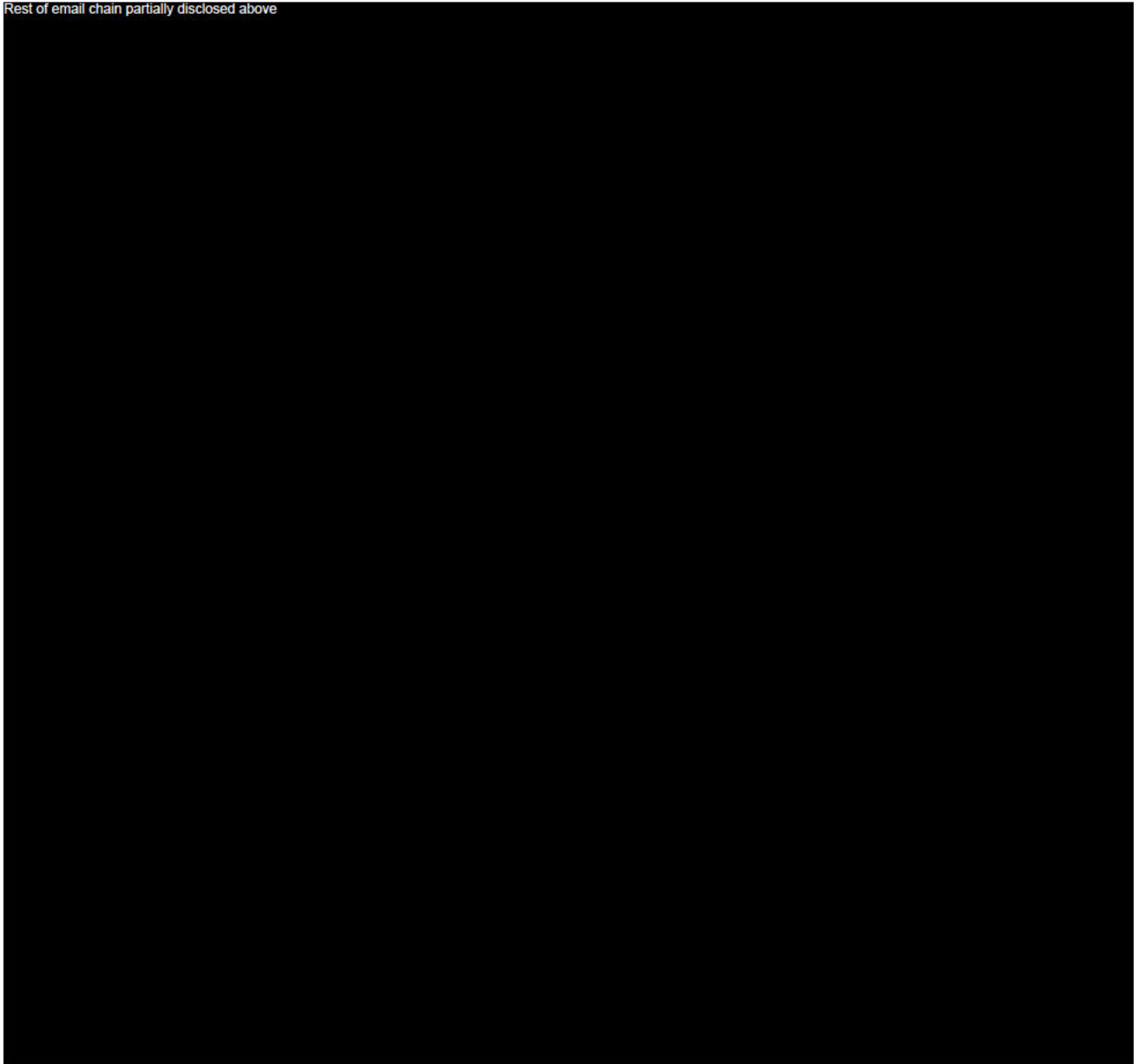
Ok. Thx

On Jan 15, 2017, at 4:38 PM, Heather A. Jones <[hajones@oge.gov](mailto:hajones@oge.gov)> wrote:

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

A large black rectangular redaction box covers the majority of the email body content.

Rest of email chain partially disclosed above

A very large black rectangular redaction box covers the entire lower half of the page, obscuring the rest of the email chain.

**From:** [Raviv, Adam](#)  
**To:** [Heather A. Jones](#)  
**Subject:** RE: FW: Call with (b)(3), (6) Counsel re Wilbur Ross  
**Date:** Sunday, January 15, 2017 4:25:57 PM

---

Yes, I sent Mr. Shaub an invite for that time. Same dial-in and passcode.

**From:** Heather A. Jones [mailto:hajones@oge.gov]  
**Sent:** Sunday, January 15, 2017 4:25 PM  
**To:** Raviv, Adam  
**Subject:** RE: FW: Call with (b)(3), (6) Counsel re Wilbur Ross

We can do a call at 5.

-----Original Appointment-----

**From:** Heather A. Jones  
**Sent:** Sunday, January 15, 2017 4:23 PM  
**To:** Raviv, Adam  
**Subject:** Declined: FW: Call with (b)(3), (6) Counsel re Wilbur Ross  
**When:** Sunday, January 15, 2017 4:45 PM-5:15 PM (UTC-05:00) Eastern Time (US & Canada).  
**Where:** Dial-in (b) (6), passcode (b) (6)

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**From:** [Kassinger, Theodore W.](#)  
**To:** [Heather A. Jones](#)  
**Subject:** RE: is there a number where I can call you?  
**Date:** Sunday, January 15, 2017 4:02:03 PM

---

202-383-5170 in 5 minutes

**From:** Heather A. Jones [mailto:hajones@oge.gov]  
**Sent:** Sunday, January 15, 2017 4:01 PM  
**To:** Kassinger, Theodore W.  
**Subject:** is there a number where I can call you?

Heather Jones

(202) 482-9316

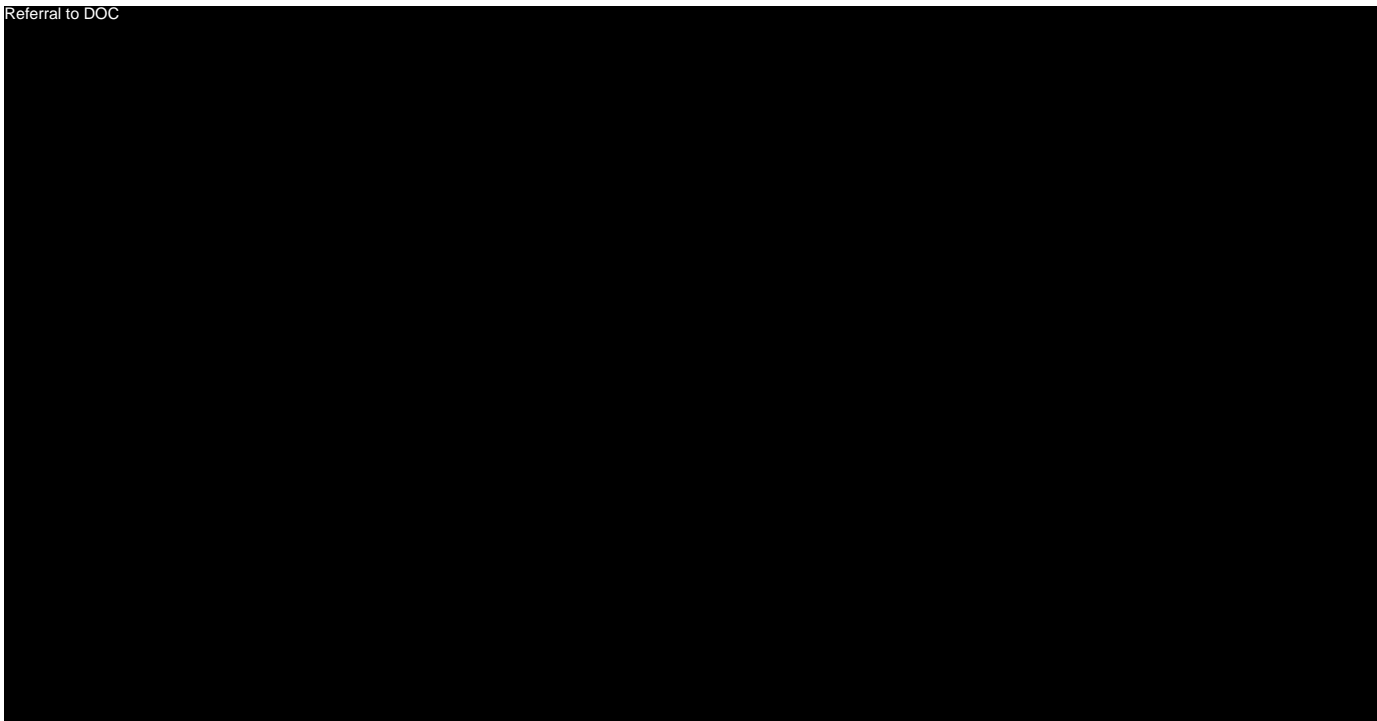
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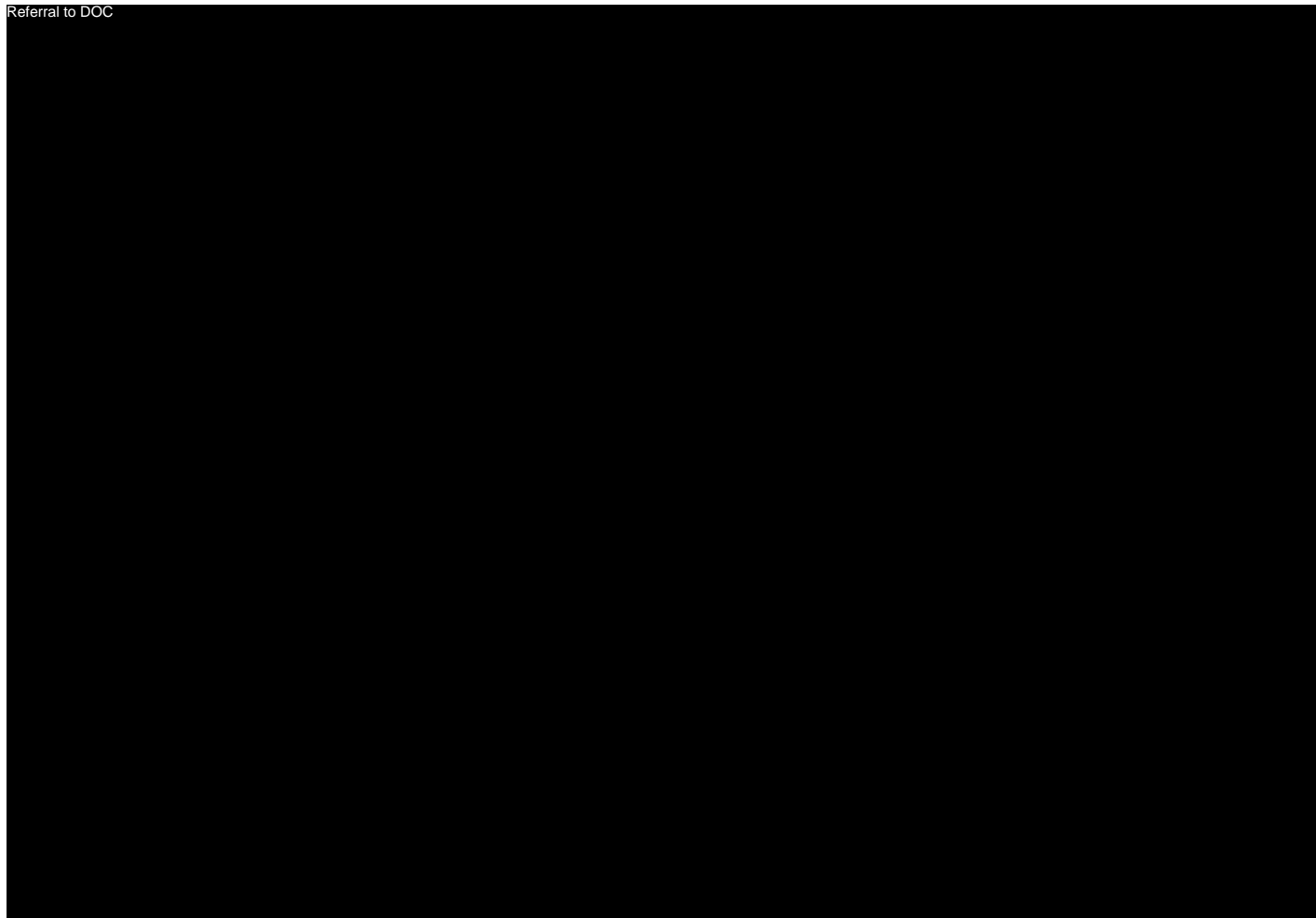
Referral to DOC



On Jan 15, 2017, at 3:18 PM, Heather A Jones <[hajones@oge.gov](mailto:hajones@oge.gov)> wrote:

I will change it in Part 3

Referral to DOC





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**From:** [Sandra S. Mabry](#)  
**To:** [Michael Hanson](#); [Timothy Mallon](#)  
**Subject:** FW: reports on website  
**Date:** Tuesday, January 17, 2017 4:41:03 PM

---

Tim, I see Mike is out of the office. I just checked our website and found that the Ethics Agreements for Mulvaney and Ross are not on the website. Who is handling this? Can you help us or tell me who can? Thanks, Sandy 202-482-9258

---

**From:** Teresa L. Williamson  
**Sent:** Tuesday, January 17, 2017 2:43 PM  
**To:** Vincent Salamone  
**Cc:** Deborah J. Bortot; Heather A. Jones; Sandra S. Mabry  
**Subject:** reports on website

FYI. Mulvaney, Ross, McMahon have been added to the website.

**From:** [Keith Labeledz](#)  
**To:** [Heather A. Jones](#)  
**Subject:** RE: Ross notes  
**Date:** Tuesday, January 17, 2017 2:21:41 PM

---

The notes have been updated. Thanks.

---

**From:** Heather A. Jones  
**Sent:** Sunday, January 15, 2017 5:49 PM  
**To:** Keith Labeledz  
**Subject:** Ross notes

There is one thing we need to add, but it does not need to happen until Tuesday. Enjoy a few days of peace.

Heather

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

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

**From:** [Deborah J. Bortot](#)  
**To:** [Jack MacDonald](#); [Sandra S. Mabry](#)  
**Subject:** FW: Nominee progress Jan 17  
**Date:** Tuesday, January 17, 2017 10:13:56 AM  
**Attachments:** [Financial Disclosure Tracking System \(FDTS\)-Progress Reports Consolidated \(12\).xlsb](#)  
**Importance:** High

---

Could one of you print this and bring it to Walt?

Thanks

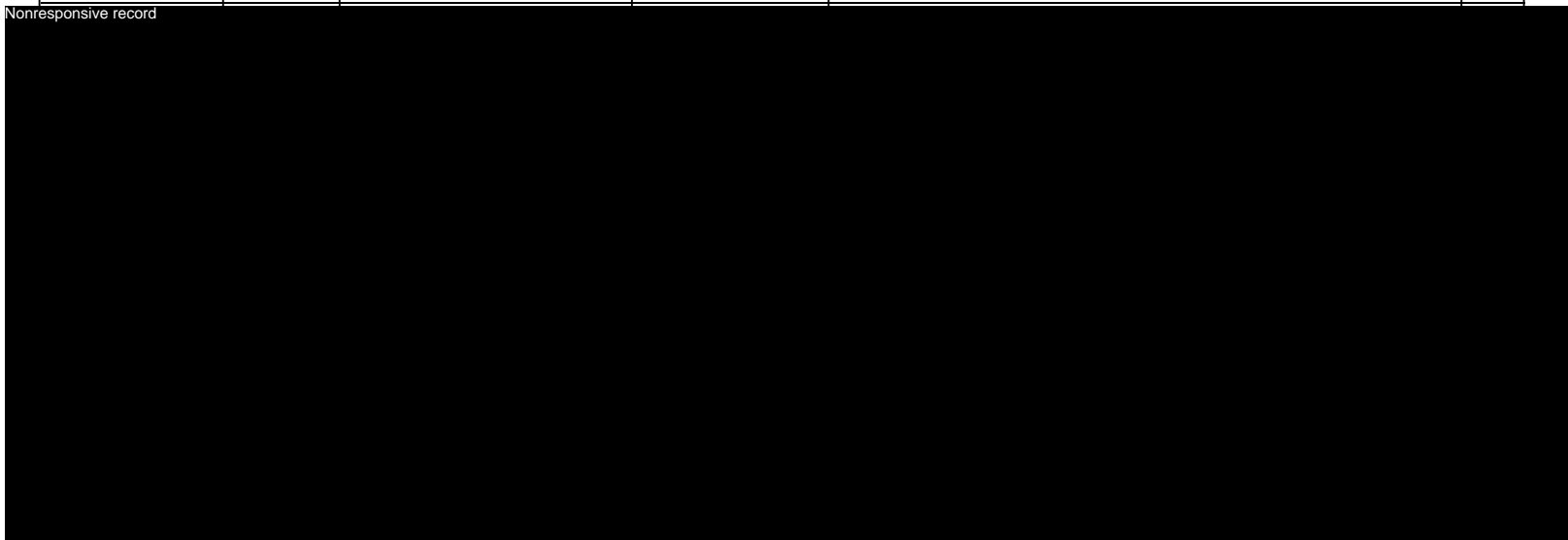
---

**From:** Teresa L. Williamson  
**Sent:** Tuesday, January 17, 2017 9:49 AM  
**To:** Deborah J. Bortot; Heather A. Jones  
**Subject:** Nominee progress Jan 17  
**Importance:** High

Here's the update for Walt's 10am meeting – if that's still on.

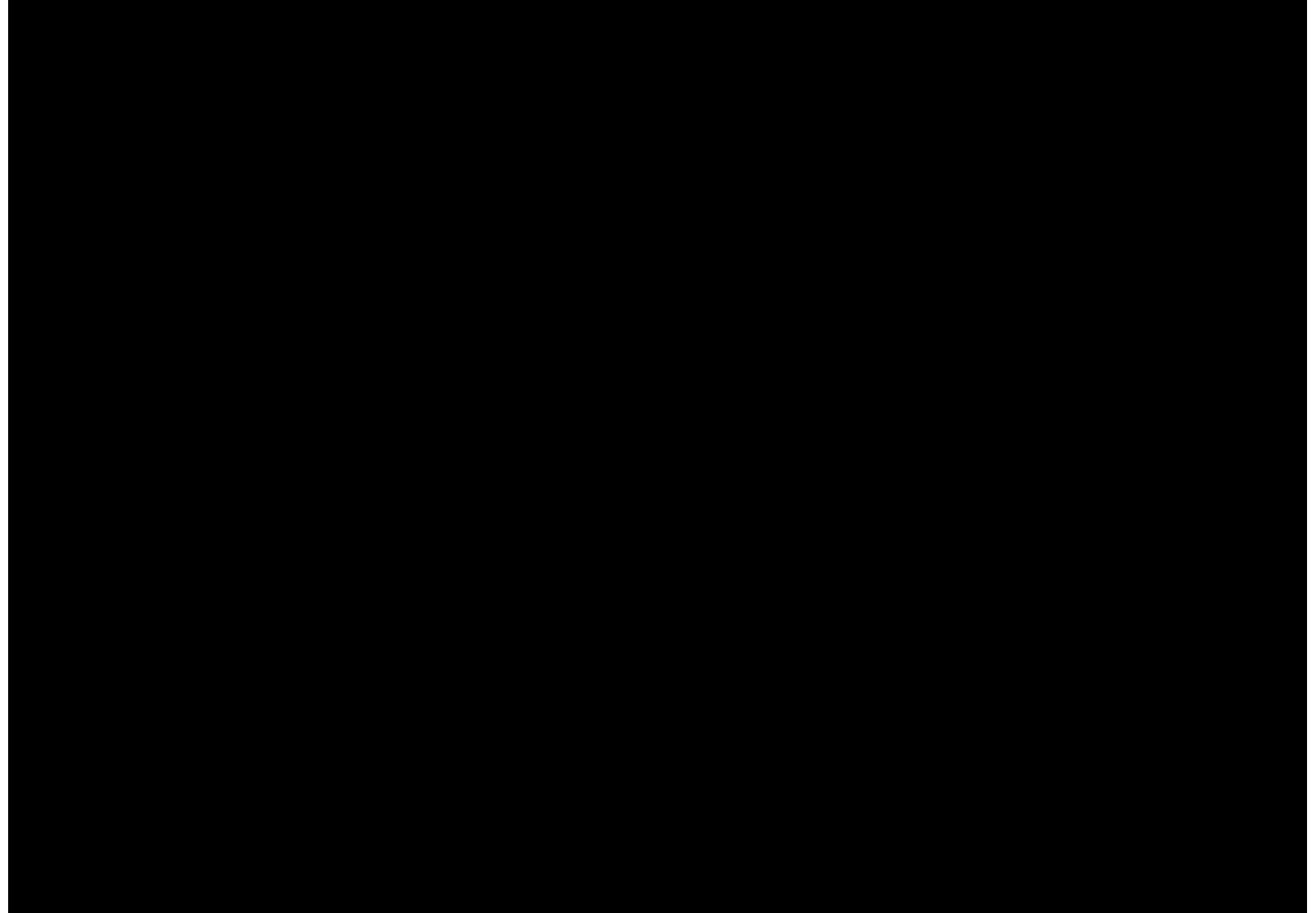
Filer	Date Recd	Agency [Position]	Reviewer	Report Progress	Days Pending
-------	-----------	-------------------	----------	-----------------	--------------

Nonresponsive record



Ross, Wilbur	12/21/2016	Department Of Commerce [Secretary]	Keith Labeledz	(b) (5)	27
--------------	------------	------------------------------------	----------------	---------	----

Nonresponsive record



**From:** [Keith Labedz](#)  
**To:** [Heather A. Jones](#); [Director of OGE](#)  
**Subject:** RE: something's wrong  
**Date:** Sunday, January 15, 2017 6:12:12 PM

---

The report is very large now with an extensive change history. If others are in the report at the same time, there may be \ have been a drag updating everything on the certification step.

---

**From:** Heather A. Jones  
**Sent:** Sunday, January 15, 2017 6:12 PM  
**To:** Director of OGE; Keith Labedz  
**Subject:** RE: something's wrong

It is showing up as signed on my end. I have a certified PDF

---

**From:** Director of OGE  
**Sent:** Sunday, January 15, 2017 6:10 PM  
**To:** Heather A. Jones; Director of OGE; Keith Labedz  
**Subject:** RE: something's wrong

Any idea why the system is stuck? The wheel keeps spinning and spinning

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](mailto:walter.shaub@oge.gov)

---

**From:** Heather A. Jones  
**Sent:** Sunday, January 15, 2017 6:09 PM  
**To:** Walter M. Shaub; Director of OGE  
**Subject:** RE: something's wrong

I have no idea. Keith is the best bet on that one.

---

**From:** Walter M. Shaub  
**Sent:** Sunday, January 15, 2017 6:08 PM  
**To:** Heather A. Jones; Director of OGE  
**Subject:** something's wrong

I clicked certify, but the wheel keeps spinning and spinning

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](mailto:walter.schaub@oge.gov)



**From:** [Heather A. Jones](#)  
**To:** [Director of OGE](#); [Keith Labeledz](#)  
**Subject:** RE: something's wrong  
**Date:** Sunday, January 15, 2017 6:10:29 PM

---

Can you close and try again?

---

**From:** Director of OGE  
**Sent:** Sunday, January 15, 2017 6:10 PM  
**To:** Heather A. Jones; Director of OGE; Keith Labeledz  
**Subject:** RE: something's wrong

Any idea why the system is stuck? The wheel keeps spinning and spinning

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](mailto:walter.shaub@oge.gov)

---

**From:** Heather A. Jones  
**Sent:** Sunday, January 15, 2017 6:09 PM  
**To:** Walter M. Shaub; Director of OGE  
**Subject:** RE: something's wrong

I have no idea. Keith is the best bet on that one.

---

**From:** Walter M. Shaub  
**Sent:** Sunday, January 15, 2017 6:08 PM  
**To:** Heather A. Jones; Director of OGE  
**Subject:** something's wrong

I clicked certify, but the wheel keeps spinning and spinning

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](mailto:walter.shaub@oge.gov)

**From:** [Walter M. Shaub](#)  
**To:** [Heather A. Jones](#); [Director of OGE](#)  
**Subject:** RE: Ross letter  
**Date:** Sunday, January 15, 2017 5:27:07 PM

---

I have an idea for fixing it. Can you send me the MS Word version?

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](mailto:walter.shaub@oge.gov)

---

**From:** Walter M. Shaub  
**Sent:** Sunday, January 15, 2017 5:25 PM  
**To:** Heather A. Jones; Director of OGE  
**Subject:** RE: Ross letter

I just realized this is not on letter head.

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](mailto:walter.shaub@oge.gov)

---

**From:** Heather A. Jones  
**Sent:** Sunday, January 15, 2017 12:56 AM  
**To:** Director of OGE  
**Subject:** Ross letter

**From:** [Director of OGE](#)  
**To:** [Heather A. Jones](#); [Director of OGE](#)  
**Cc:** [Deborah J. Bortot](#)  
**Subject:** RE: This evening  
**Date:** Sunday, January 15, 2017 4:55:40 PM

---

Yes. We'll have this call, and then you can go. We've been working around the clock, and this last minute wrinkle will get sorted out.

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](mailto:walter.shaub@oge.gov)

---

**From:** Heather A. Jones  
**Sent:** Sunday, January 15, 2017 4:53 PM  
**To:** Director of OGE  
**Cc:** Deborah J. Bortot  
**Subject:** This evening

I'm supposed to <sup>(b) (6)</sup> [REDACTED]. Depending on how the call goes, I'm hoping to go and I can come home to move things when needed. I will have my blackberry with me and you can call me at that number or e-mail me if you need me.

Heather

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

Visit OGE's website: [www.oge.gov](http://www.oge.gov)  
Follow OGE on Twitter: [@OfficeGovEthics](https://twitter.com/OfficeGovEthics)

**From:** [Deborah J. Bortot](#)  
**To:** [Walter M. Shaub](#); [Keith Labeledz](#)  
**Subject:** RE: quick question  
**Date:** Sunday, January 15, 2017 2:32:17 PM

---

Correct

---

**From:** Walter M. Shaub  
**Sent:** Sunday, January 15, 2017 2:04 PM  
**To:** Keith Labeledz; Deborah J. Bortot  
**Subject:** quick question

Am I correct that the purchase of a Treasury would not be reportable in a periodic transaction report?

**From:** [Director of OGE](#)  
**To:** [Keith Labedz](#); [Director of OGE](#); [Heather A. Jones](#)  
**Subject:** RE: revised EA  
**Date:** Sunday, January 15, 2017 11:47:47 AM

---

Everything we have is on the website. They can help themselves to anything they want. We're going to stay focused on our work.

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](mailto:walter.shaub@oge.gov)

---

**From:** Keith Labedz  
**Sent:** Sunday, January 15, 2017 11:34 AM  
**To:** Director of OGE; Heather A. Jones  
**Subject:** RE: revised EA

Ok. I called Maggi and we went through the logistics. Commerce is doing a double-check on everything but he said not to wait. As soon as the filer signs, he will certify. The transmittal letter is ready.

Also -- I did not get the full background on this but the committee apparently asked Commerce for copies of ethics agreements going back to the 1990s. He asked whether we had a database of old ethics agreements. I explained our records disposition schedule and noted that ethics agreements should generally be destroyed after the final 278 reaches the end of the retention cycle.

---

**From:** Director of OGE  
**Sent:** Sunday, January 15, 2017 11:26 AM  
**To:** Heather A. Jones; Keith Labedz; Director of OGE  
**Subject:** RE: revised EA

Keith, you did OUTSTANDING work on this.

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](mailto:walter.shaub@oge.gov)

---

**From:** Heather A. Jones  
**Sent:** Sunday, January 15, 2017 11:18 AM

**To:** Keith Labeledz; Director of OGE  
**Subject:** Re: revised EA

Keith

I can pull it forward and send to Walt so you don't need to sit around and wait. You did great work on this.

Heather

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

---

**From:** Keith Labeledz  
**Sent:** Sunday, January 15, 2017 11:05 AM  
**To:** Heather A. Jones; Director of OGE  
**Subject:** FW: revised EA

One issue with the next steps is that I will need them to give us some timeline for actions. In the absence of a Blackberry, I would more or less have to sit and watch outlook all day until they decide to approve/submit. That seems inefficient. Alternatively, if not wrapped up by 1:00, I will check in at set times.

---

**From:** Director of OGE  
**Sent:** Sunday, January 15, 2017 10:42 AM  
**To:** Heather A. Jones; Director of OGE; Deborah J. Bortot; Keith Labeledz; Director of OGE  
**Subject:** RE: revised EA

Sorry, I just got disconnected, so none of you were probably able to dial in. Let's try this again:

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

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](mailto:walter.shaub@oge.gov)

---

**From:** Heather A. Jones  
**Sent:** Sunday, January 15, 2017 10:40 AM  
**To:** Director of OGE; Deborah J. Bortot; Keith Labeledz; Director of OGE  
**Subject:** Re: revised EA

What number are we using?

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

---

**From:** Director of OGE  
**Sent:** Sunday, January 15, 2017 10:35 AM  
**To:** Heather A. Jones; Deborah J. Bortot; Keith Labeledz; Director of OGE  
**Subject:** RE: revised EA

I've opened the line 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](mailto:walter.shaub@oge.gov)

---

**From:** Heather A. Jones  
**Sent:** Sunday, January 15, 2017 10:35 AM  
**To:** Deborah J. Bortot; Keith Labeledz; Director of OGE  
**Subject:** Re: revised EA

At 11

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

---

**From:** Deborah J. Bortot  
**Sent:** Sunday, January 15, 2017 10:27 AM  
**To:** Heather A. Jones; Keith Labeledz; Director of OGE  
**Subject:** RE: revised EA

I just got off my 10:00 call. Do we have a call schedule for this or is the next call at 11:45 on Megan's report?

**From:** [Director of OGE](#)  
**To:** [Keith Labedz](#); [Heather A. Jones](#); [Director of OGE](#)  
**Subject:** RE: revised EA  
**Date:** Sunday, January 15, 2017 11:08:33 AM

---

Thanks, Keith. I'll send you an update. We'll also get you a blackberry next time you're in DC.

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

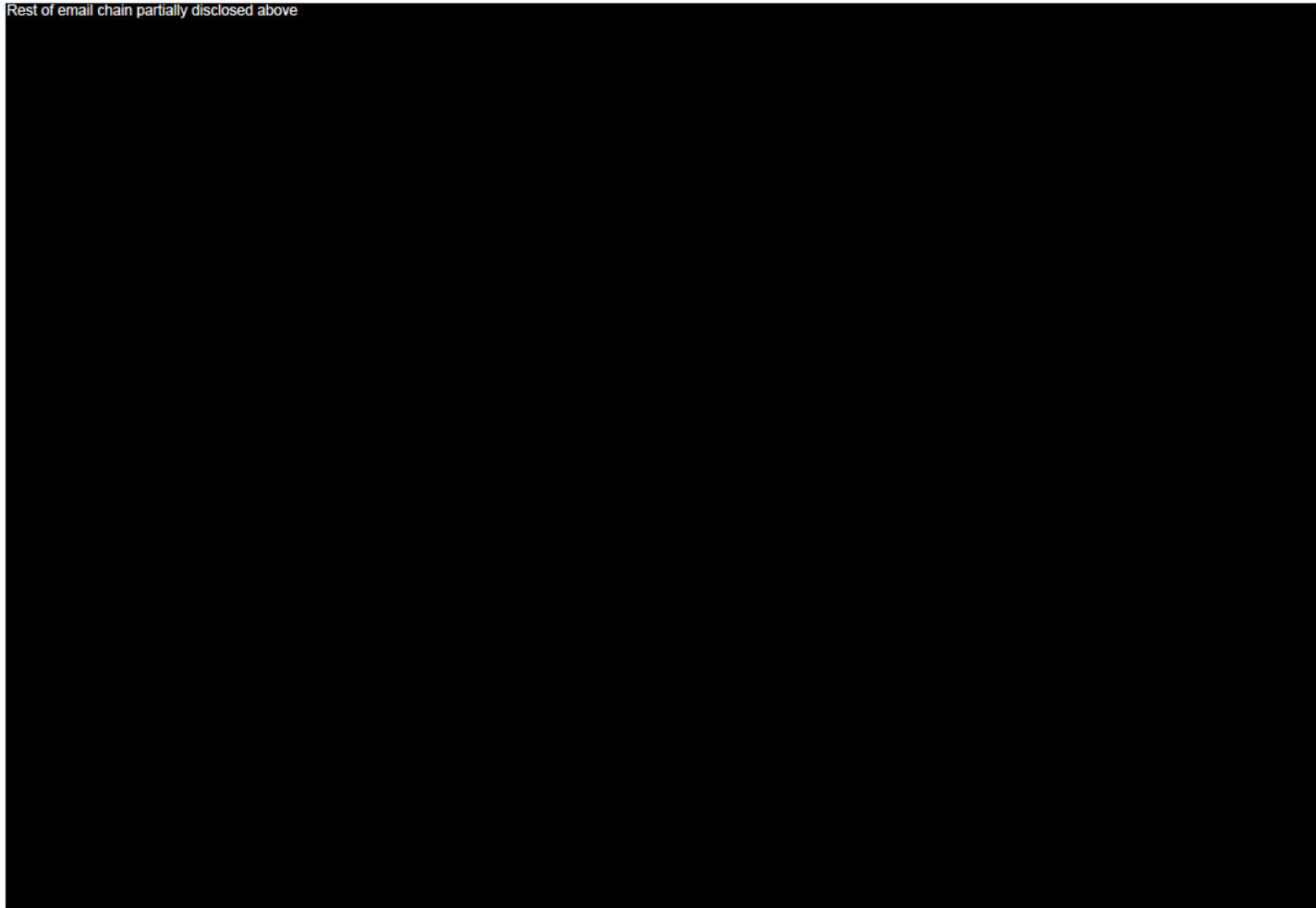
Telephone: 202.482.9292  
Email: [walter.shaub@oge.gov](mailto:walter.shaub@oge.gov)

---

**From:** Keith Labedz  
**Sent:** Sunday, January 15, 2017 11:06 AM  
**To:** Heather A. Jones; Director of OGE  
**Subject:** FW: revised EA

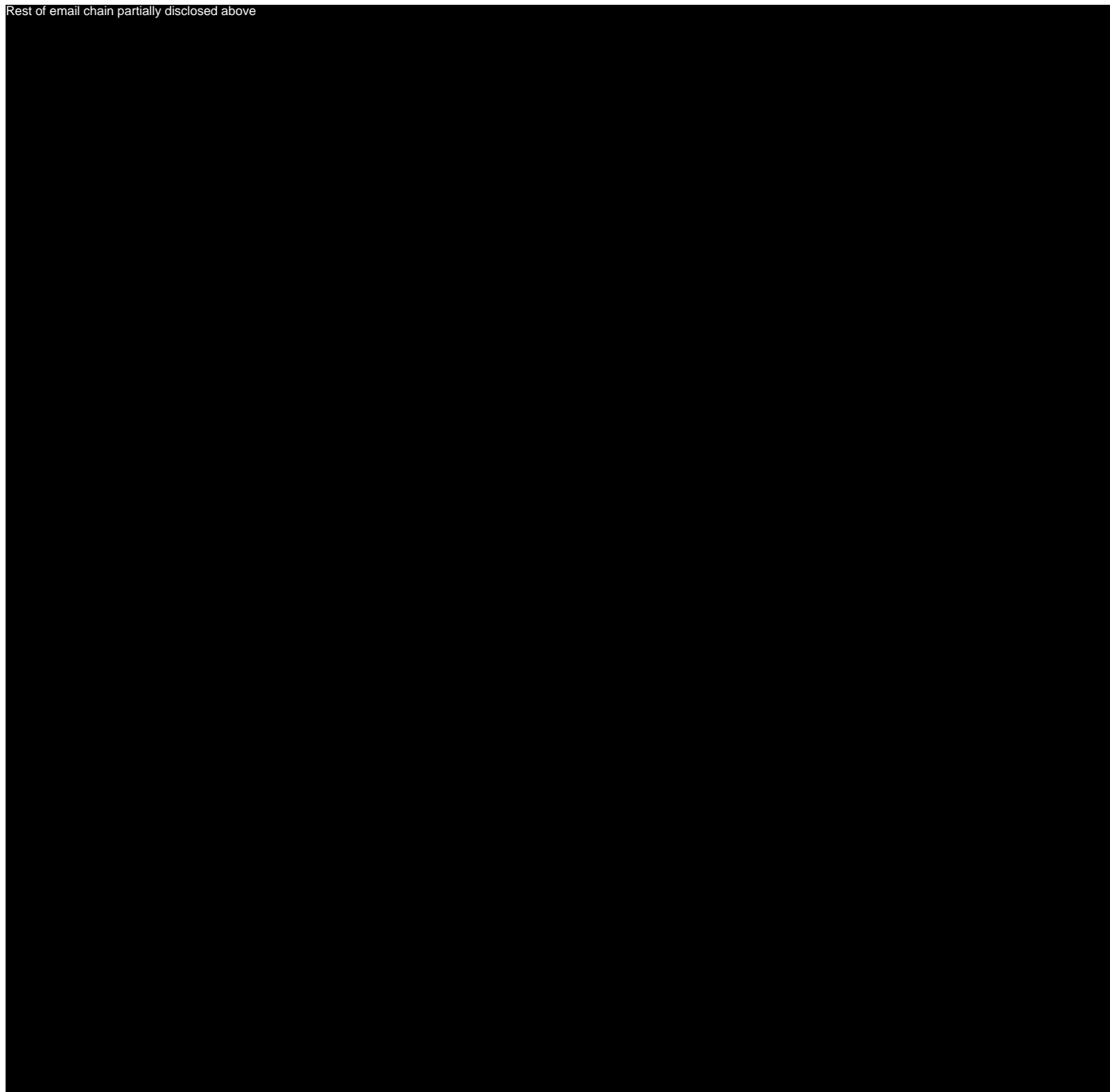
One issue with the next steps is that I will need them to give us some timeline for actions. In the absence of a Blackberry, I would more or less have to sit and watch outlook all day until they decide to approve/submit. That seems inefficient. Alternatively, if not wrapped up by 1:00, I will check in at set times.

Rest of email chain partially disclosed above





Rest of email chain partially disclosed above



**From:** [Director of OGE](#)  
**To:** [Deborah J. Bortot](#); [Director of OGE](#); [Heather A. Jones](#); [Keith Labeledz](#)  
**Subject:** RE: revised EA  
**Date:** Sunday, January 15, 2017 10:42:31 AM

---

no

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](mailto:walter.shaub@oge.gov)

---

**From:** Deborah J. Bortot  
**Sent:** Sunday, January 15, 2017 10:36 AM  
**To:** Director of OGE; Heather A. Jones; Keith Labeledz  
**Subject:** RE: revised EA

Do you need me on this call or should I keep working on Megan's report?

---

**From:** Director of OGE  
**Sent:** Sunday, January 15, 2017 10:35 AM  
**To:** Heather A. Jones; Deborah J. Bortot; Keith Labeledz; Director of OGE  
**Subject:** RE: revised EA

I've opened the line 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](mailto:walter.shaub@oge.gov)

---

**From:** Heather A. Jones  
**Sent:** Sunday, January 15, 2017 10:35 AM  
**To:** Deborah J. Bortot; Keith Labeledz; Director of OGE  
**Subject:** Re: revised EA

At 11

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

---

**From:** Deborah J. Bortot  
**Sent:** Sunday, January 15, 2017 10:27 AM  
**To:** Heather A. Jones; Keith Labeledz; Director of OGE

**Subject:** RE: revised EA

I just got off my 10:00 call. Do we have a call schedule for this or is the next call at 11:45 on Megan's report?

**From:** [Deborah J. Bortot](#)  
**To:** [Heather A. Jones](#); [Keith Labedz](#); [Director of OGE](#)  
**Subject:** RE: revised EA  
**Date:** Sunday, January 15, 2017 10:35:18 AM

---

What's the call in number for the 11:00 call?

---

**From:** Heather A. Jones  
**Sent:** Sunday, January 15, 2017 10:35 AM  
**To:** Deborah J. Bortot; Keith Labedz; Director of OGE  
**Subject:** Re: revised EA

At 11

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

---

**From:** Deborah J. Bortot  
**Sent:** Sunday, January 15, 2017 10:27 AM  
**To:** Heather A. Jones; Keith Labedz; Director of OGE  
**Subject:** RE: revised EA

I just got off my 10:00 call. Do we have a call schedule for this or is the next call at 11:45 on Megan's report?

**From:** [Director of OGE](#)  
**To:** [Heather A. Jones](#); [Director of OGE](#)  
**Subject:** RE: Emailing: Ross, Wilbur L. finalsenateltr (unsigned).pdf  
**Date:** Sunday, January 15, 2017 12:49:54 AM

---

Can the date be centered with the "Sincerely"?

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

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

From: Heather A. Jones  
Sent: Sunday, January 15, 2017 12:44 AM  
To: Director of OGE  
Subject: Emailing: Ross, Wilbur L. finalsenateltr (unsigned).pdf

1 page attachment withheld in full - (b)(5)

Your message is ready to be sent with the following file or link attachments:

Ross, Wilbur L. finalsenateltr (unsigned).pdf

Note: To protect against computer viruses, e-mail programs may prevent sending or receiving certain types of file attachments. Check your e-mail security settings to determine how attachments are handled.

**From:** [Van Beek, Jason \(Commerce\)](#)  
**To:** [Sandra S. Mabry](#)  
**Subject:** posting of Wilbur Ross OGE package to website  
**Date:** Tuesday, January 17, 2017 4:26:20 PM

---

Hi Sandy, if you don't mind, do you think you could post Mr. Ross's OGE package on OGE's website today? We find it helpful to refer the media and interested staff to your website for this information.

Best,  
Jason Van Beek  
General Counsel  
Chairman John Thune (R-SD)  
U.S. Senate Commerce Committee  
512 Dirksen Senate Office Building  
Washington, DC 20510

(b) (6)

**From:** [Kassinger, Theodore W.](#)  
**To:** [Walter M. Shaub](#); [Heather A. Jones](#); [David Maggi \(dMaggi@doc.gov\)](#)  
**Subject:** RE: Senate Docs  
**Date:** Monday, January 16, 2017 11:15:57 AM

---

thanks

**From:** Walter M. Shaub [mailto:wmshaub@oge.gov]  
**Sent:** Monday, January 16, 2017 9:38 AM  
**To:** Kassinger, Theodore W.; Heather A. Jones; David Maggi (dMaggi@doc.gov)  
**Subject:** Senate Docs

278 attachment withheld in full - (b)(3) - available on OGE's website. EA available on OGE's website at <https://extapps2.oge.gov/201/Presiden%20Index?OpenView>

Ted,

Here are the 278 and EA we sent to the Senate.

Walt

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**From:** [Deborah J. Bortot](#)  
**To:** [Teresa L. Williamson](#)  
**Cc:** [Heather A. Jones](#); [Sandra S. Mabry](#)  
**Subject:** RE: Hard copy of paperwork for Senate  
**Date:** Monday, January 16, 2017 9:32:03 AM

---

That's great. Thanks!

---

**From:** Teresa L. Williamson  
**Sent:** Monday, January 16, 2017 9:26 AM  
**To:** Deborah J. Bortot  
**Subject:** Re: Hard copy of paperwork for Senate

I will talk to Rod tomorrow to get him to make the packages. If he's not there I'll reach out to Kaneisha to have her have one if her staff do it and include instructions.

I can print the packages from here and send it to the nominee room printer.

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

---

**From:** Deborah J. Bortot  
**Sent:** Monday, January 16, 2017 8:39 AM  
**To:** Teresa L. Williamson  
**Cc:** Heather A. Jones; Sandra S. Mabry  
**Subject:** Hard copy of paperwork for Senate

Teresa,

Who is preparing the hard copy packages for Mulvaney and Ross?

Thanks,  
Deb



On Jan 16, 2017, at 8:43 AM, Deborah J. Bortot <[djbortot@oge.gov](mailto:djbortot@oge.gov)> wrote:

---

**From:** Teresa L. Williamson  
**Sent:** Sunday, January 15, 2017 9:41 PM  
**To:** '[Jason\\_vanbeek@commerce.senate.gov](mailto:Jason_vanbeek@commerce.senate.gov)'  
**Cc:** Deborah J. Bortot; Sandra S. Mabry; Rodrick T. Johnson; Heather A. Jones; '[adonaldson@jonesday.com](mailto:adonaldson@jonesday.com)'  
**Subject:** Public Financial Disclosure Report of Wilbur L. Ross

Good Evening,

I've attached the financial disclosure package for Wilbur L. Ross. President-Elect Trump has announced his intention to nominate Mr. Ross for the position of Secretary, Department of Commerce.

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

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

Thanks!

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

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278 attachment withheld in full - (b)(3) - available on OGE's website, EA available on OGE's website at <https://extapps2.oge.gov/201/Presiden.nsf/PAS%20Index?OpenView>; final senate letter released below

<ROSS, Wilber L. finalsenateltr.pdf>

<Ross Wilbur L. Final 278.pdf>

<Ross, Wilbur L finalEA.PDF>



UNITED STATES OFFICE OF  
GOVERNMENT ETHICS



January 15, 2017

The Honorable John Thune  
Chairman  
Committee on Commerce, Science,  
and Transportation  
United States Senate  
Washington, DC 20510

Dear Mr. Chairman:

In accordance with the Ethics in Government Act of 1978, I enclose a copy of the financial disclosure report filed by Wilbur L. Ross. President-Elect Trump has announced his intention to nominate Mr. Ross for the position of Secretary, Department of Commerce.

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

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

Sincerely,

Walter M. Shaub, Jr.  
Director

Enclosures



**From:** [Deborah J. Bortot](#)  
**To:** ["Maggi, David \(Federal\)"; Keith Labeledz; Heather A. Jones](#)  
**Cc:** [Jacobi, Will \(Federal\); Stowers, Jim \(Federal\)](#)  
**Subject:** RE: Mr. Wilbur Ross confirmation documents  
**Date:** Monday, January 16, 2017 8:42:23 AM

---

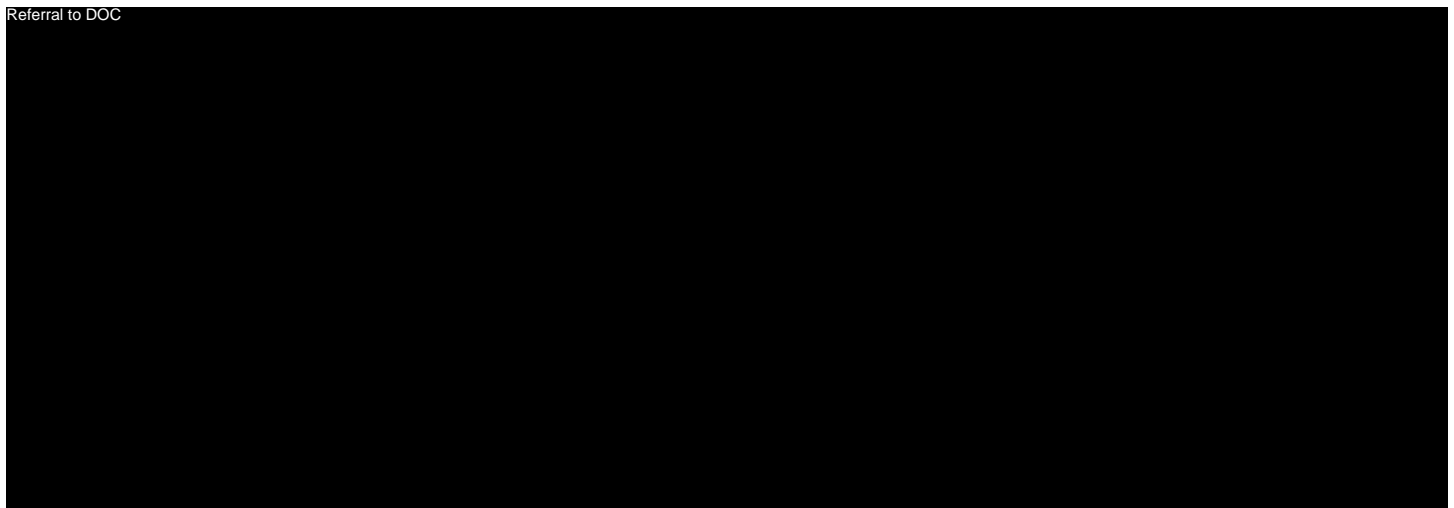
David,

W email OGE's letter, the report and the EA to the Commerce Committee last night at 9:41 pm.

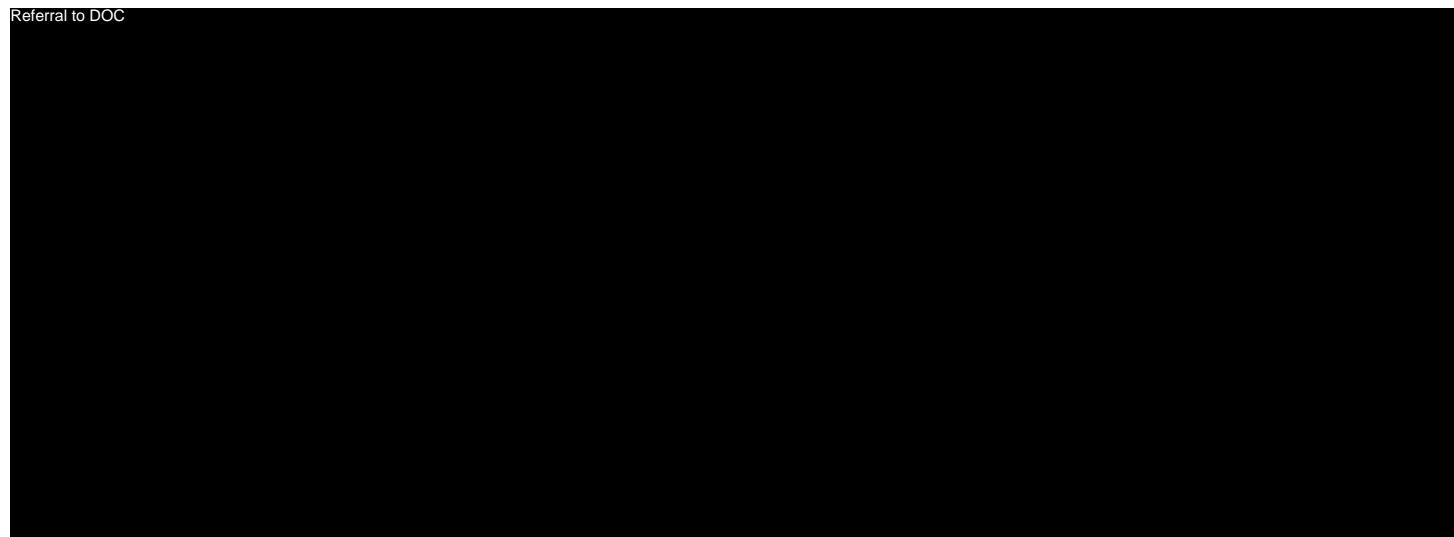
I'll forward you the email we sent.

Thanks,  
Deb

Referral to DOC



Referral to DOC



**From:** "Day, Christopher (Commerce)"

<[\(b\) \(6\)](#)>

**Date:** January 16, 2017 at 12:22:26 AM EST

**To:** "Stowers, Jim (Federal)" <[JStowers@doc.gov](mailto:JStowers@doc.gov)>

**Cc:** "Torpey, Brad (Commerce)"

<[\(b\) \(6\)](#)>, "Schufreider, Jim"

(Federal)" <[JSchufreider@doc.gov](mailto:JSchufreider@doc.gov)>, "Schufreider, James"  
<[jim.schufreider@nist.gov](mailto:jim.schufreider@nist.gov)>

**Subject: Re: Mr. Wilbur Ross confirmation documents**

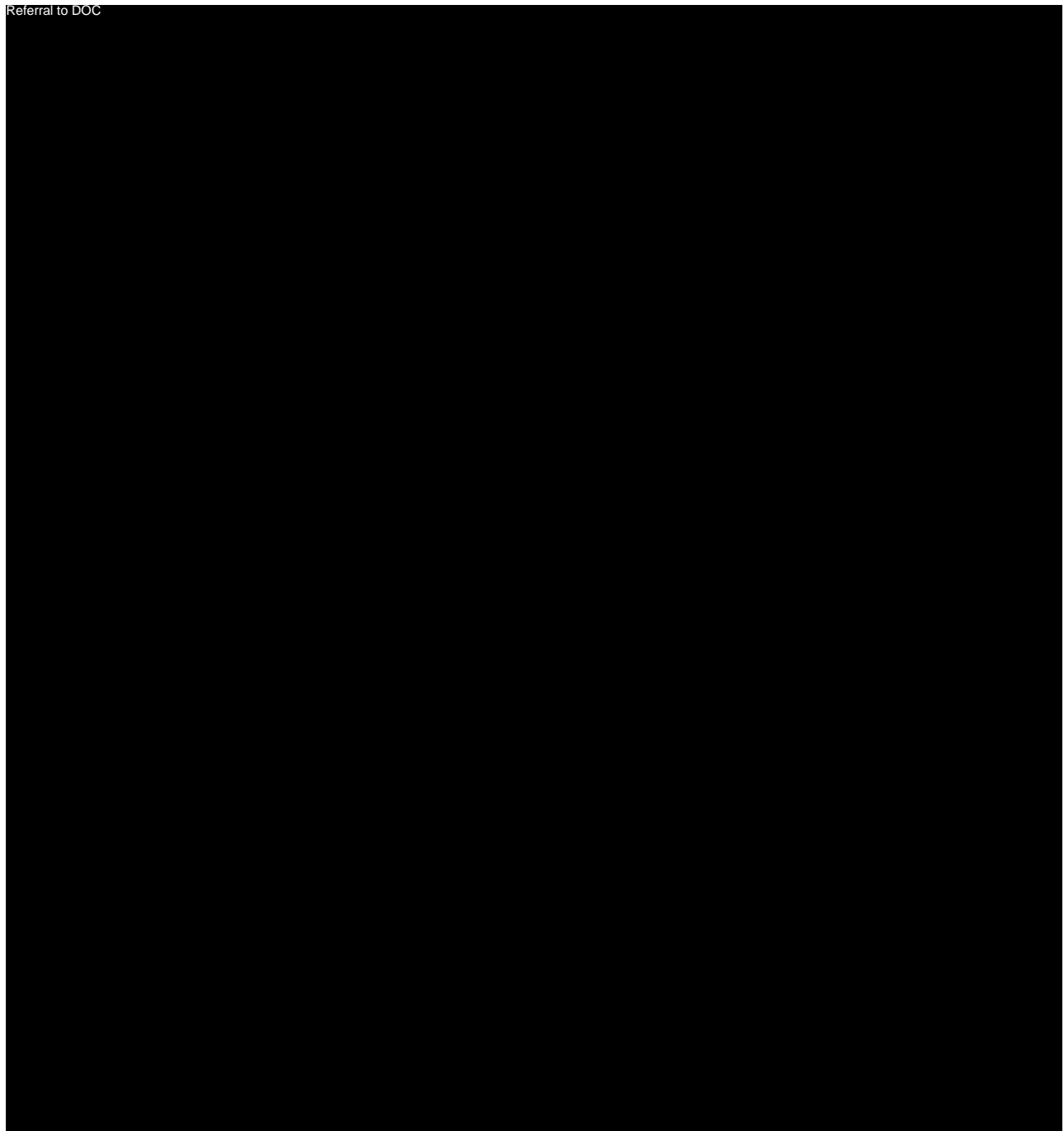
Jim:

Thanks for sending. Do you know whether the 278 and OGE letter are also complete?

Chris

Sent from my iPhone

Referral to DOC



**From:** [Kassinger, Theodore W.](#)  
**To:** [Walter M. Shaub](#)  
**Cc:** [David Maggi \(dMaggi@doc.gov\)](#); [Heather A. Jones](#); [Keith Labeledz](#)  
**Subject:** Re: sent  
**Date:** Sunday, January 15, 2017 10:33:48 PM

---

thank you, Heather, Keith, David.

It's a very strong agreement, and we appreciate the long hours you've put into it.

Can someone send us a copy of what actually went to the Senate - the 278 and agreement? I know we can pull both, but just in case....

On Jan 15, 2017, at 10:18 PM, "Walter M. Shaub" <[wmschaub@oge.gov](mailto:wmschaub@oge.gov)> wrote:

The package is now with the Senate. Thanks for your work on this everyone!

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](mailto:walter.schaub@oge.gov)

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



**From:** [Deborah J. Bortot](#)  
**To:** [Teresa L. Williamson](#); [Heather A. Jones](#)  
**Subject:** RE: Wilbur Ross - Senate and OGE documents  
**Date:** Sunday, January 15, 2017 10:01:40 PM

---

Thank you

---

**From:** Teresa L. Williamson  
**Sent:** Sunday, January 15, 2017 9:42 PM  
**To:** Heather A. Jones; Deborah J. Bortot  
**Subject:** RE: Wilbur Ross - Senate and OGE documents

I bcc'd walt at director's email address. Have a good night!

---

**From:** Heather A. Jones  
**Sent:** Sunday, January 15, 2017 9:41 PM  
**To:** Deborah J. Bortot; Teresa L. Williamson  
**Subject:** Re: Wilbur Ross - Senate and OGE documents

Yes. Teresa is sending now

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

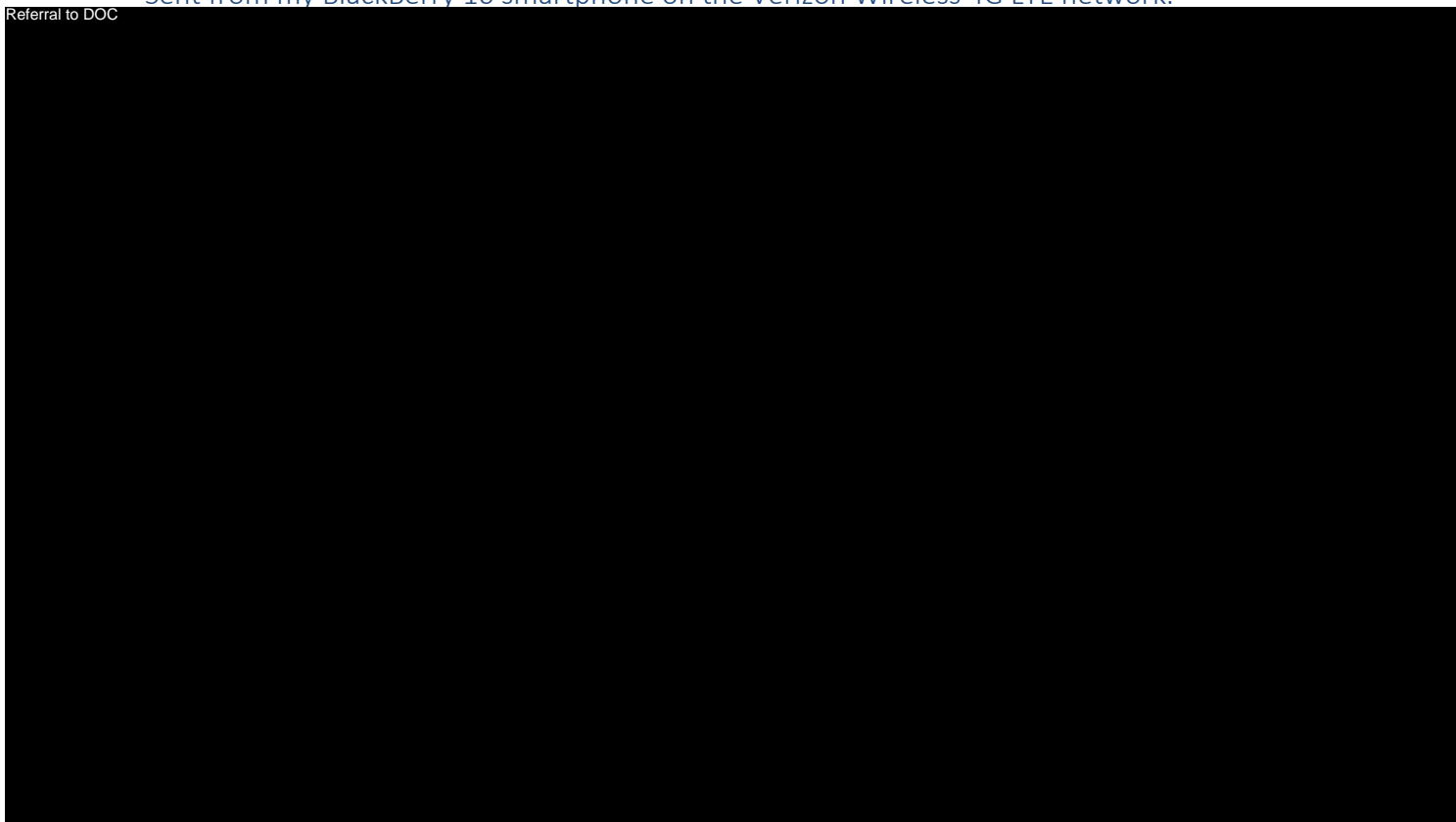
---

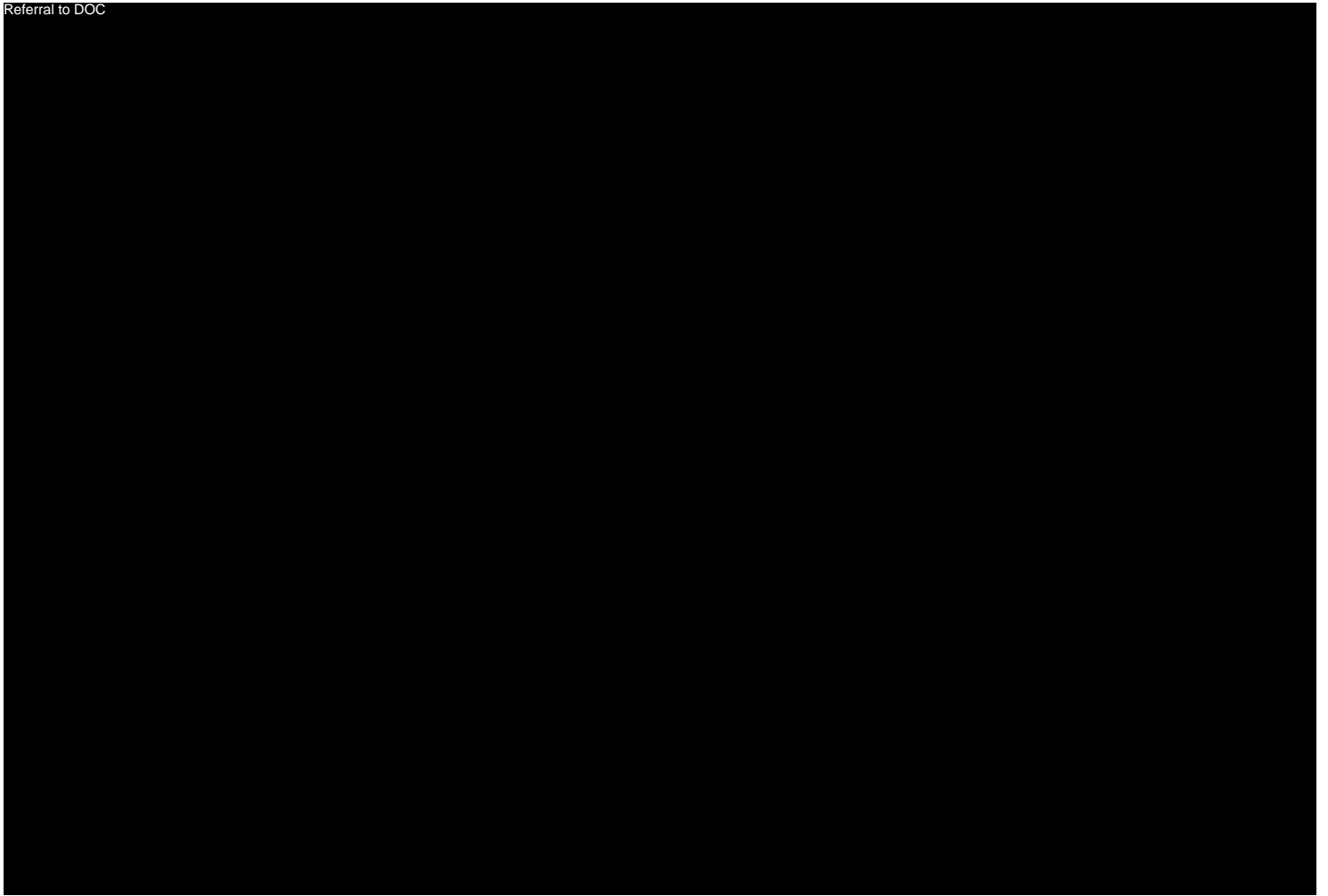
**From:** Deborah J. Bortot  
**Sent:** Sunday, January 15, 2017 9:40 PM  
**To:** Heather A. Jones; Teresa L. Williamson  
**Subject:** Fw: Wilbur Ross - Senate and OGE documents

Heather, Is this the new EA?

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

Referral to DOC





**From:** [Heather A. Jones](#)  
**To:** [Director of OGE](#)  
**Subject:** Fw: Public Financial Disclosure Report of Wilbur L. Ross  
**Date:** Sunday, January 15, 2017 9:49:40 PM  
**Attachments:** [ROSS, Wilber L. finalsenateltr.pdf](#)  
[Ross Wilbur L. Final 278.pdf](#)  
[Ross, Wilbur L finalEA.PDF](#)

278 attachment withheld in full - (b)(3) - available on OGE's website. EA available on OGE's website at <https://extapps2.oge.gov/201/Presiden.nsf/PAS%20Index?OpenView>; final senate letter released above

---

It has gone to the senate

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

---

**From:** Teresa L. Williamson <[tlwillia@oge.gov](mailto:tlwillia@oge.gov)>  
**Sent:** Sunday, January 15, 2017 9:41 PM  
**To:** Jason Vanbeek email (b)(6)  
**Cc:** Deborah J. Bortot; Sandra S. Mabry; Rodrick T. Johnson; Heather A. Jones; Ann Donaldson email (b)(6)  
**Subject:** Public Financial Disclosure Report of Wilbur L. Ross

Good Evening,

I've attached the financial disclosure package for Wilbur L. Ross. President-Elect Trump has announced his intention to nominate Mr. Ross for the position of Secretary, Department of Commerce.

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

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

Thanks!

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

**From:** [Deborah J. Bortot](#)  
**To:** [Heather A. Jones](#); [Teresa L. Williamson](#)  
**Subject:** Fw: Wilbur Ross - Senate and OGE documents  
**Date:** Sunday, January 15, 2017 9:40:02 PM  
**Attachments:** [ross-thune-1-15-2017.pdf](#)  
[ross-nelson-1-15-2017.pdf](#)  
[ross-shaub-1-15-2017.pdf](#)  
[WLR-signed-ethics-agreement.PDF](#)

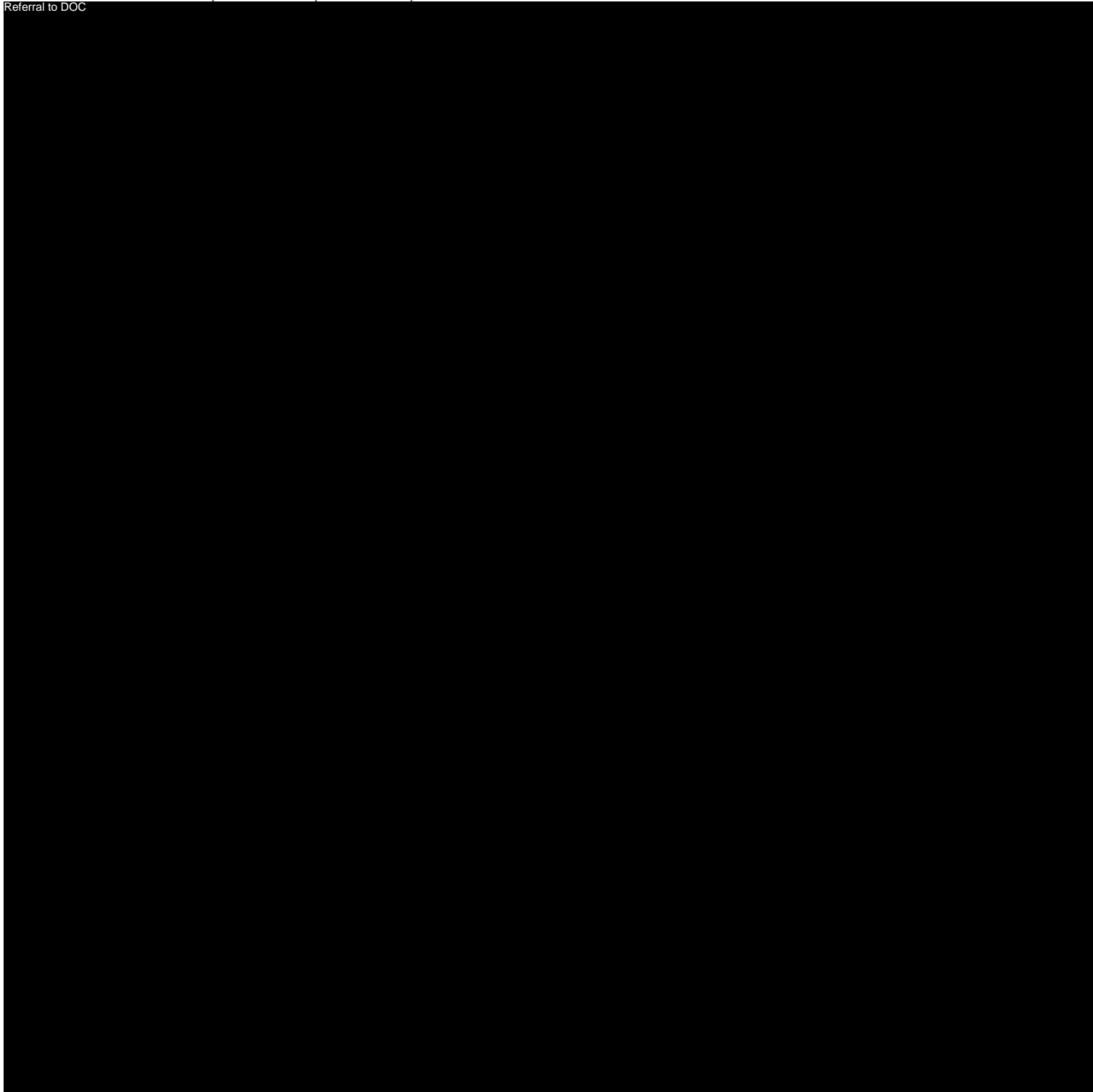
3 attachments referred to DOC; EA  
available online

---

Heather, Is this the new EA?

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

Referral to DOC





**From:** [Walter M. Shaub](#)  
**To:** [Kassinger, Theodore W.](#); [David Maggi](#); [Jacobi, Will \(Federal\) \(wjacobi@doc.gov\)](#); [Heather A. Jones](#); [Keith Labeledz](#)  
**Cc:** [Schlom, Evan N.](#); [Dorey, David R.](#)  
**Subject:** Re:  
**Date:** Sunday, January 15, 2017 9:39:26 PM

---

Thanks

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

---

**From:** Kassinger, Theodore W.  
**Sent:** Sunday, January 15, 2017 9:24 PM  
**To:** Walter M. Shaub; David Maggi; Jacobi, Will (Federal) (wjacobi@doc.gov); Heather A. Jones; Keith Labeledz  
**Cc:** Schlom, Evan N.; Dorey, David R.  
**Subject:** RE:

---

Yes, we agree.

**From:** Walter M. Shaub [mailto:wmshaub@oge.gov]  
**Sent:** Sunday, January 15, 2017 9:18 PM  
**To:** Kassinger, Theodore W.; David Maggi; Jacobi, Will (Federal) (wjacobi@doc.gov); Heather A. Jones; Keith Labeledz  
**Cc:** Schlom, Evan N.; Dorey, David R.  
**Subject:** Re:

Thanks. This works. Can you confirm that you're ok with us sending this one to the Senate? I need an express authorization.

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

**From:** Kassinger, Theodore W.

**Sent:** Sunday, January 15, 2017 9:12 PM

**To:** Walter M. Shaub; David Maggi; Jacobi, Will (Federal) ([wjacobi@doc.gov](mailto:wjacobi@doc.gov)); Heather A. Jones; Keith Labeledz

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

**Subject:** RE:

Will was just trying to get a copy of what you sent with a signature page without the fax headers showing. I sent the attached, which is your document with a clean signature page

spliced in, but if you can create and send, all the better.

**From:** Walter M. Shaub [<mailto:wmschaub@oge.gov>]  
**Sent:** Sunday, January 15, 2017 9:10 PM  
**To:** Kassinger, Theodore W.; David Maggi; Jacobi, Will (Federal) ([wjacobi@doc.gov](mailto:wjacobi@doc.gov)); Heather A. Jones; Keith Labedz  
**Cc:** Schlom, Evan N.; Dorey, David R.  
**Subject:** RE:

I'm not sure what this document is. I just need a green light on the document I sent, unless there's a concern.

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](mailto:walter.schaub@oge.gov)

**From:** Kassinger, Theodore W. [<mailto:tkassinger@omm.com>]  
**Sent:** Sunday, January 15, 2017 8:54 PM  
**To:** David Maggi; Jacobi, Will (Federal) ([wjacobi@doc.gov](mailto:wjacobi@doc.gov)); Walter M. Shaub; Heather A. Jones; Keith Labedz  
**Cc:** Schlom, Evan N.; Dorey, David R.  
**Subject:**

Attachment released above: Signature page to EA



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**From:** [Teresa L. Williamson](#)  
**To:** [Heather A. Jones](#)  
**Subject:** Re: I'm on my way home  
**Date:** Sunday, January 15, 2017 9:28:44 PM

---

completely up to you. I was able to get the fax stuff off the top of page 7. It's saved to the N drive. There are two transmittal letters. One ending in pdf and one ending in doxt.pdf. I'm assuming since they both look the same the. Pdf is the right one

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

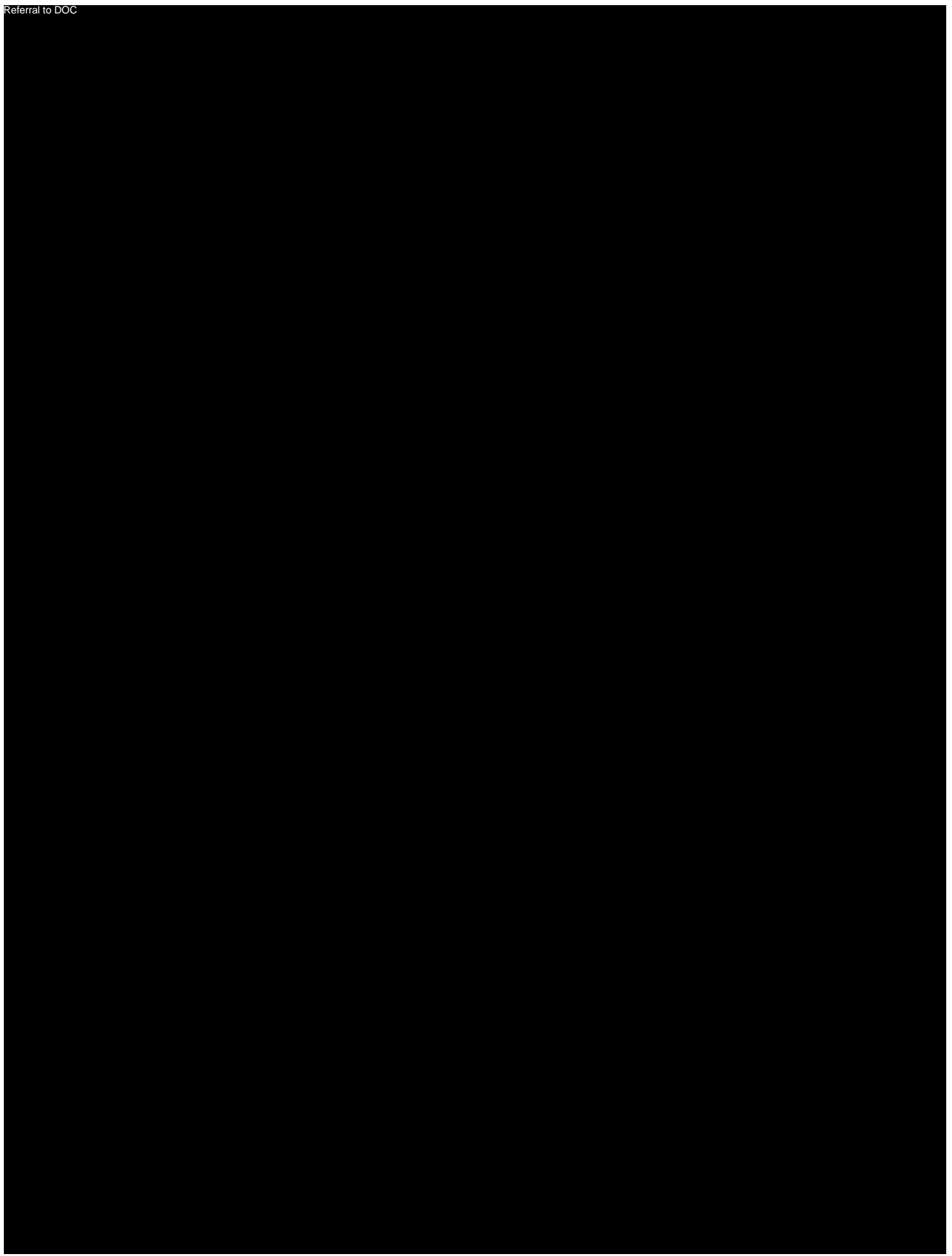
---

**From:** Heather A. Jones  
**Sent:** Sunday, January 15, 2017 9:21 PM  
**To:** Teresa L. Williamson  
**Subject:** I'm on my way home

---

Want me to take over?

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



**From:** [Teresa L. Williamson](#)  
**To:** [Heather A. Jones](#)  
**Subject:** Re:  
**Date:** Sunday, January 15, 2017 9:21:43 PM

---

OK. Can we go with the corrected page 7 inserted?

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

---

**From:** Heather A. Jones  
**Sent:** Sunday, January 15, 2017 9:20 PM  
**To:** Teresa L. Williamson  
**Subject:** Re:

---

We are waiting for authorization now

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

---

**From:** Teresa L. Williamson  
**Sent:** Sunday, January 15, 2017 9:19 PM  
**To:** Heather A. Jones  
**Subject:** Re:

---

I'm trying but I'm not sure I can do it.

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

---

**From:** Heather A. Jones  
**Sent:** Sunday, January 15, 2017 9:14 PM  
**To:** Teresa L. Williamson  
**Subject:** Fw:

---

Walt is worried about changes. Can you just remove the fax line from what he sent

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

---

**From:** Walter M. Shaub <wmshaub@oge.gov>  
**Sent:** Sunday, January 15, 2017 9:10 PM  
**To:** 'Kassinger, Theodore W.'; David Maggi; Jacobi, Will (Federal) (wjacobi@doc.gov); Heather A. Jones; Keith Labeledz  
**Cc:** Schlom, Evan N.; Dorey, David R.  
**Subject:** RE:

---

I'm not sure what this document is. I just need a green light on the document I sent, unless there's a concern.

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]

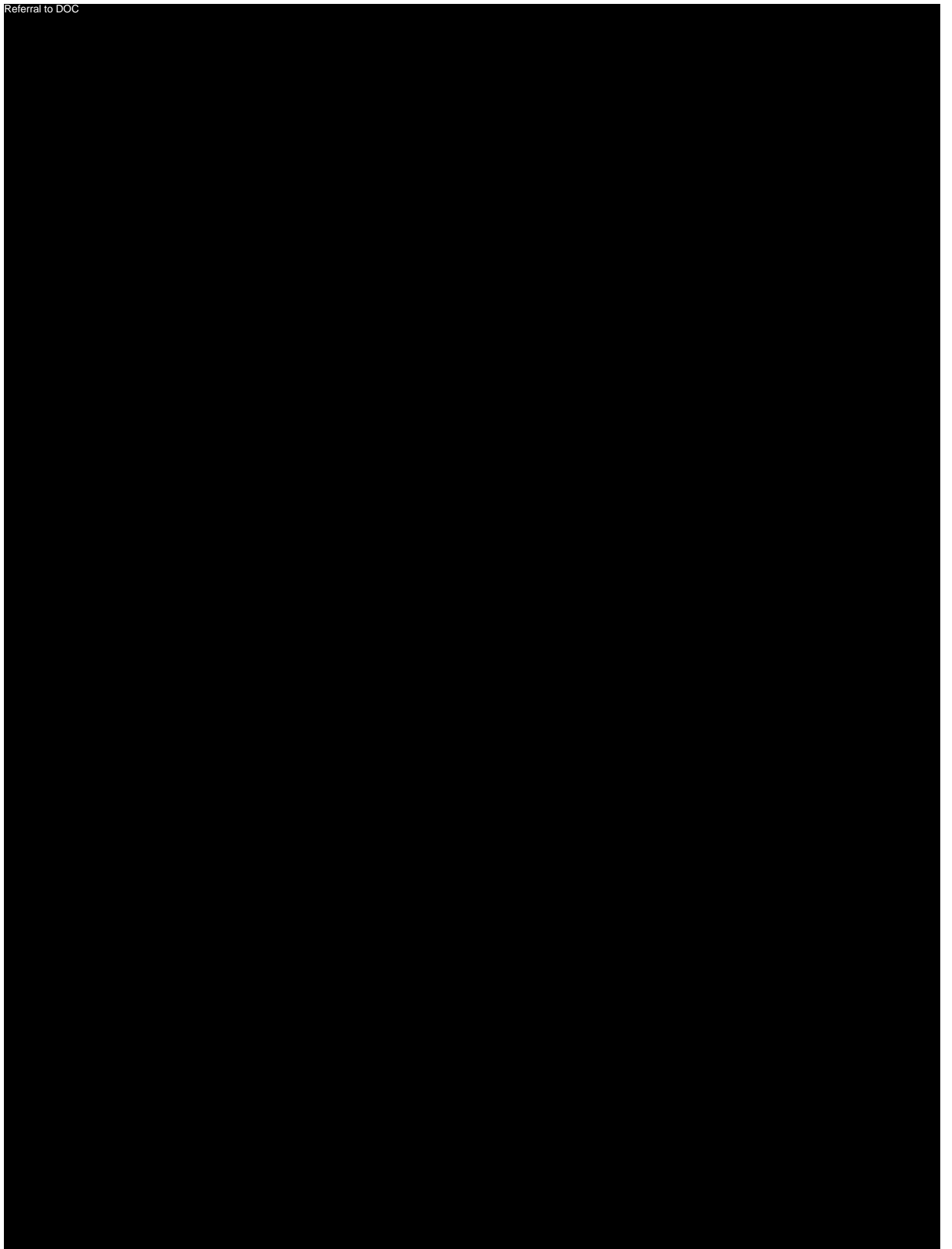
**Sent:** Sunday, January 15, 2017 8:54 PM

**To:** David Maggi; Jacobi, Will (Federal) (wjacobi@doc.gov); Walter M. Shaub; Heather A. Jones; Keith Labeledz

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

**Subject:**

Signature page to EA, available  
online



---

**From:** Walter M. Shaub <[wmschaub@oge.gov](mailto:wmschaub@oge.gov)>  
**Sent:** Sunday, January 15, 2017 9:10 PM  
**To:** 'Kassinger, Theodore W.'; Maggi, David (Federal); Jacobi, Will (Federal); Heather A. Jones; Keith Labeledz  
**Cc:** Schlom, Evan N.; Dorey, David R.  
**Subject:** RE:

I'm not sure what this document is. I just need a green light on the document I sent, unless there's a concern.

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](mailto:walter.schaub@oge.gov)

---

**From:** Kassinger, Theodore W. [<mailto:tkassinger@omm.com>]  
**Sent:** Sunday, January 15, 2017 8:54 PM  
**To:** David Maggi; Jacobi, Will (Federal) ([wjacobi@doc.gov](mailto:wjacobi@doc.gov)); Walter M. Shaub; Heather A. Jones; Keith Labeledz  
**Cc:** Schlom, Evan N.; Dorey, David R.  
**Subject:**

Signature page to EA -  
available on oge.gov

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**From:** [Kassinger, Theodore W.](#)  
**To:** [Walter M. Shaub](#); [David Maggi](#); [Jacobi, Will \(Federal\) \(wjacobi@doc.gov\)](#); [Heather A. Jones](#); [Keith Labeledz](#)  
**Cc:** [Schlom, Evan N.](#); [Dorey, David R.](#)  
**Subject:** RE:  
**Date:** Sunday, January 15, 2017 9:12:15 PM  
**Attachments:** [OMM\\_US-#75389221-v1-corrected\\_EA\\_Wilbur\\_Ross\\_15\\_Jan\\_2017.pdf](#)

EA available at <https://extapps2.oge.gov/201/Presiden.nsf/PAS%20Index?OpenView>

Will was just trying to get a copy of what you sent with a signature page without the fax headers showing. I sent the attached, which is your document with a clean signature page spliced in, but if you can create and send, all the better.

**From:** Walter M. Shaub [mailto:wmshaub@oge.gov]  
**Sent:** Sunday, January 15, 2017 9:10 PM  
**To:** Kassinger, Theodore W.; David Maggi; Jacobi, Will (Federal) (wjacobi@doc.gov); Heather A. Jones; Keith Labeledz  
**Cc:** Schlom, Evan N.; Dorey, David R.  
**Subject:** RE:

I'm not sure what this document is. I just need a green light on the document I sent, unless there's a concern.

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

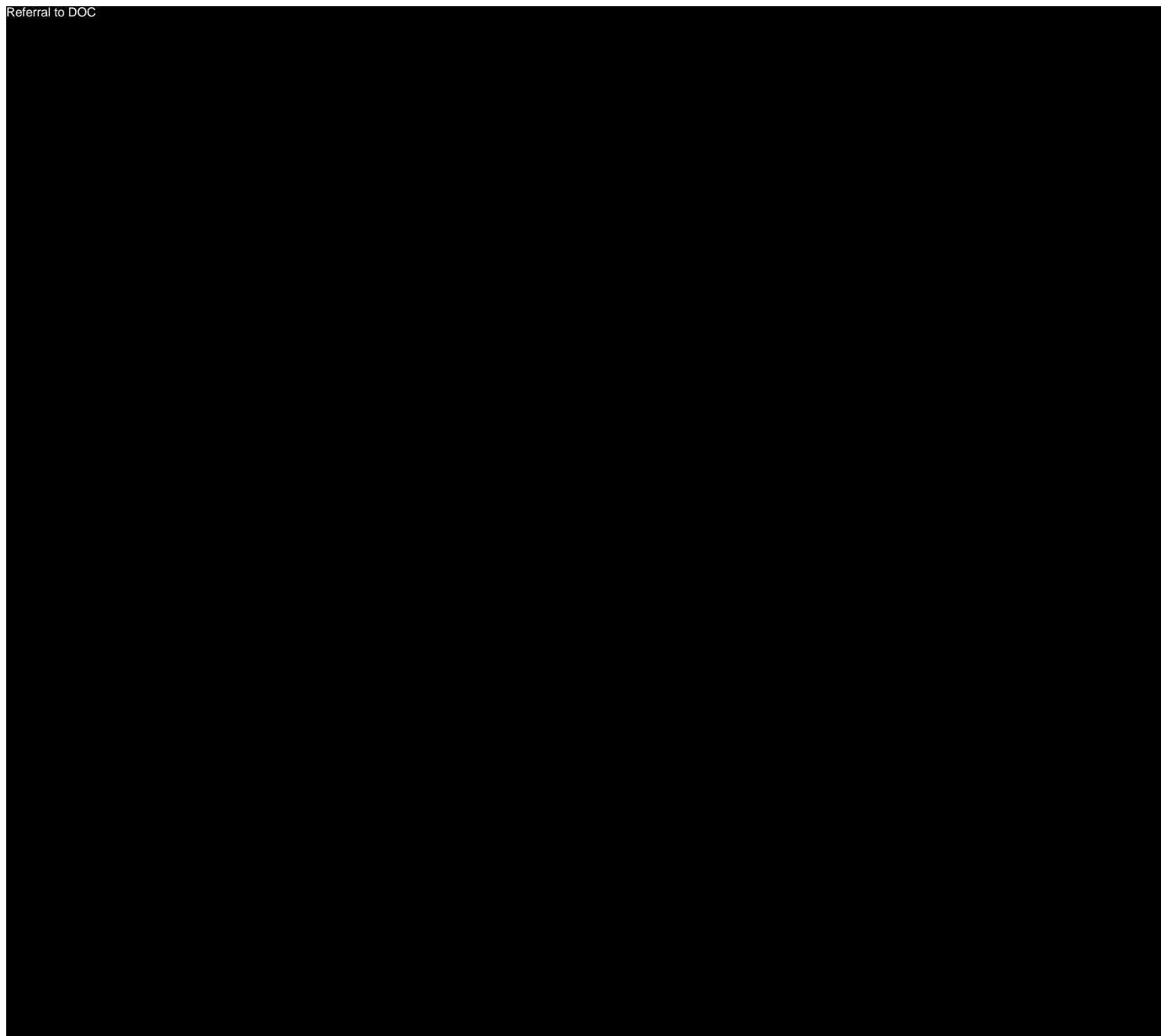
Email: [walter.shaub@oge.gov](mailto:walter.shaub@oge.gov)

**From:** Kassinger, Theodore W. [mailto:tkassinger@omm.com]  
**Sent:** Sunday, January 15, 2017 8:54 PM  
**To:** David Maggi; Jacobi, Will (Federal) (wjacobi@doc.gov); Walter M. Shaub; Heather A. Jones; Keith Labeledz  
**Cc:** Schlom, Evan N.; Dorey, David R.  
**Subject:**

Signature page to EA; EA available at <https://extapps2.oge.gov/201/Presiden.nsf/PAS%20Index?OpenView>



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

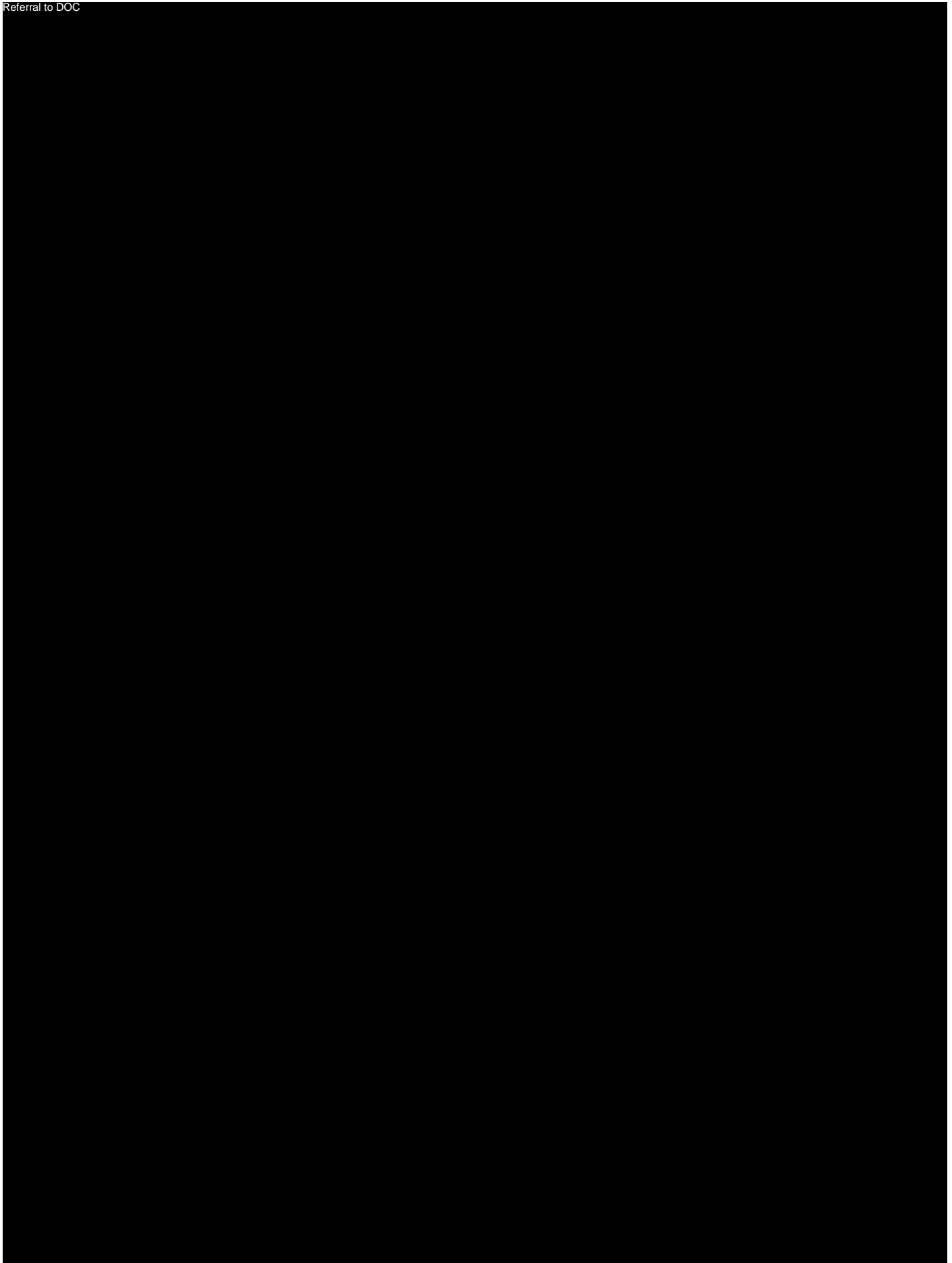
**Sent:** Sunday, January 15, 2017 8:54 PM

**To:** Maggi, David (Federal); Jacobi, Will (Federal); Walter M. Shaub (wmshaub@oge.gov); Heather A. Jones (hajones@oge.gov); Keith Labeledz

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

**Subject:**

Signature page to EA; EA available at  
[https://extapps2.oge.gov/2017/Presiden.nsf/  
PAS%20Index?OpenView](https://extapps2.oge.gov/2017/Presiden.nsf/PAS%20Index?OpenView)



**From:** [Kassinger, Theodore W.](#)  
**To:** [Heather A. Jones](#); "[Maggi, David \(Federal\)](#)"; [Keith Labeledz](#); [Jacobi, Will \(Federal\)](#); [Deborah J. Bortot](#)  
**Cc:** [Dorey, David R.](#); [Jacob, Dana \(Federal\)](#); [Williams, Gaye \(Federal\)](#); [Warren, Arthur \(Federal\)](#)  
**Subject:** RE: Ross Report Certified - Awaiting Signed Ethics Agreement  
**Date:** Sunday, January 15, 2017 6:10:33 PM

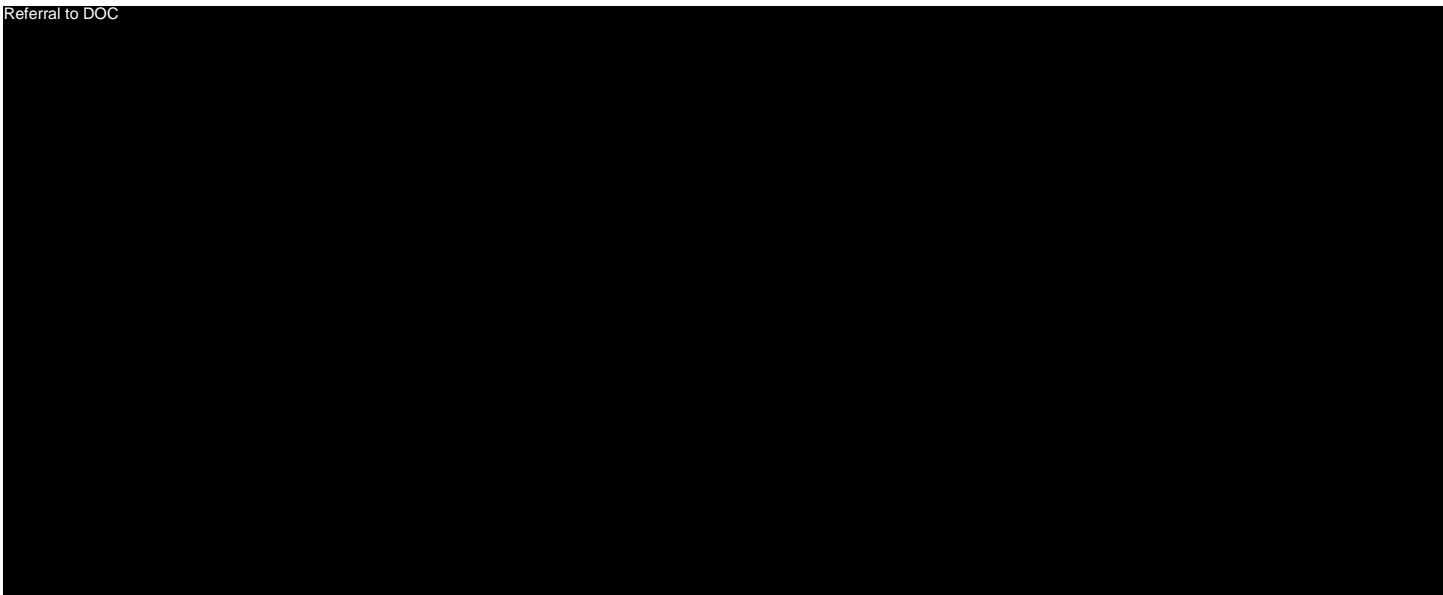
---

we are waiting for Mr. Ross's signature page.

**From:** Heather A. Jones [mailto:hajones@oge.gov]  
**Sent:** Sunday, January 15, 2017 6:04 PM  
**To:** 'Maggi, David (Federal)'; Kassinger, Theodore W.; Keith Labeledz; Jacobi, Will (Federal); Deborah J. Bortot  
**Cc:** Dorey, David R.; Jacob, Dana (Federal); Williams, Gaye (Federal); Warren, Arthur (Federal)  
**Subject:** RE: Ross Report Certified - Awaiting Signed Ethics Agreement

Please send the EA and your letter saying all conflicts have been resolved to me and I will get everything up to the Senate.

Referral to DOC



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**From:** [Deborah J. Bortot](#)  
**To:** [Heather A. Jones](#)  
**Cc:** [Keith Labeledz](#)  
**Subject:** RE: Mr. Wilbur Ross  
**Date:** Sunday, January 15, 2017 5:57:02 PM

---

Okay. so I don't have to notify David then?

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

From: Heather A. Jones  
Sent: Sunday, January 15, 2017 5:55 PM  
To: Deborah J. Bortot; Teresa L. Williamson  
Cc: Keith Labeledz  
Subject: RE: Mr. Wilbur Ross

Yes, he has signed and it is with David Maggi.

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

From: Deborah J. Bortot  
Sent: Sunday, January 15, 2017 5:55 PM  
To: Teresa L. Williamson  
Cc: Heather A. Jones; Keith Labeledz  
Subject: FW: Mr. Wilbur Ross

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

From: Ann M Donaldson [[mailto:\(b\) \(6\)](#)]  
Sent: Sunday, January 15, 2017 5:44 PM  
To: Deborah J. Bortot; Heather A. Jones  
Subject: Mr. Wilbur Ross

On behalf of the President-Elect, this email serves as confirmation that the President-Elect intends to nominate Mr. Wilbur Ross to be Commerce Secretary. Please transmit his pre-cleared 278 report to the appropriate Senate committee.

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

On Jan 15, 2017, at 5:48 PM, Heather A. Jones <[hajones@oge.gov](mailto:hajones@oge.gov)> wrote:

All-

We have received authorization from the President-Elect to send the paperwork to the Senate. Please ask Mr. Ross to certify and sign the EA.

Thanks,  
Heather

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

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

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**From:** [Director of OGE](#)  
**To:** [Heather A. Jones](#)  
**Subject:** RE: Please ask Mr. Ross to certify to 278 and sign the EA  
**Date:** Sunday, January 15, 2017 5:48:20 PM

---

Thanks, let me know when I should go in and sign.

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](mailto:walter.shaub@oge.gov)

---

**From:** Heather A. Jones  
**Sent:** Sunday, January 15, 2017 5:48 PM  
**To:** 'Kassinger, Theodore W.'; Maggi, David (Federal)  
**Cc:** 'Jacobi, Will (Federal)'; 'Schlom, Evan N.'; Keith Labeledz; Director of OGE  
**Subject:** Please ask Mr. Ross to certify to 278 and sign the EA

All-

We have received authorization from the President-Elect to send the paperwork to the Senate. Please ask Mr. Ross to certify and sign the EA.

Thanks,  
Heather

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

Visit OGE's website: [www.oge.gov](http://www.oge.gov)  
Follow OGE on Twitter: [@OfficeGovEthics](https://twitter.com/OfficeGovEthics)

**From:** [Walter M. Shaub](#)  
**To:** [Heather A. Jones](#)  
**Cc:** [Director of OGE](#)  
**Subject:** signed cover letter  
**Date:** Sunday, January 15, 2017 5:38:20 PM  
**Attachments:** [ROSS, Wilber L. finalsenateltr.pdf](#)

---



**From:** [Director of OGE](#)  
**To:** [Heather A. Jones](#); [David Maggi \(dMaggi@doc.gov\)](mailto:dMaggi@doc.gov)  
**Cc:** [Maggi, David \(Federal\)](#); ["Jacobi, Will \(Federal\)"](#); [Director of OGE](#)  
**Subject:** Dave, we'll need you to certify and then send the cover letter to us ASAP. We're going to try to get this to the hill tonight  
**Date:** Sunday, January 15, 2017 5:23:14 PM

---

Dave, we'll need you to certify and then send the cover letter to us ASAP. We're going to try to get this to the hill tonight

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

**From:** [Director of OGE](#)  
**To:** [Heather A. Jones](#)  
**Subject:** RE: Preclearance: Wilbur L. Ross  
**Date:** Sunday, January 15, 2017 5:21:47 PM

---

If you need me, you can call me anytime at (b) (6). I'll send you the signed letter in a minute. Then, just send me an email when you want me to certify.

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](mailto:walter.shaub@oge.gov)

---

**From:** Heather A. Jones  
**Sent:** Sunday, January 15, 2017 5:21 PM  
**To:** 'Ann M Donaldson'  
**Cc:** Maggi, David (Federal); 'Jacobi, Will (Federal)'; Deborah J. Bortot; David J. Apol; Director of OGE; Sandra S. Mabry; Rodrick T. Johnson; Teresa L. Williamson; Emory A. Rounds III  
**Subject:** Preclearance: Wilbur L. Ross

Annie, Wilbur Ross is precleared. I have attached the ethics agreement.

Thanks!  
Heather

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

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Follow OGE on Twitter: [@OfficeGovEthics](https://twitter.com/OfficeGovEthics)

**From:** [Heather A. Jones](#)  
**To:** ["Ann M. Donaldson"](#)  
**Cc:** [Maggi, David \(Federal\)](#); ["Jacobi, Will \(Federal\)"](#); [Deborah J. Bortot](#); [David J. Apol](#); [Director of OGE](#); [Sandra S. Mabry](#); [Rodrick T. Johnson](#); [Teresa L. Williamson](#); [Emory A. Rounds III](#)  
**Subject:** Preclearance: Wilbur L. Ross  
**Date:** Sunday, January 15, 2017 5:20:44 PM  
**Attachments:** [Ethics Agreement for Preclearance - Ross, Wilbur L 5pm.docx](#)

9 page attachment withheld in full - (b)(5); final version at <https://extapps2.oge.gov/201/Presiden.nsf/PAS%20Index?OpenView>

---

Annie, Wilbur Ross is precleared. I have attached the ethics agreement.

Thanks!  
Heather

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

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Follow OGE on Twitter: [@OfficeGovEthics](https://twitter.com/OfficeGovEthics)

**From:** [Heather A. Jones](#)  
**To:** ["Schlom, Evan N."](#)  
**Subject:** Ethics Agreement for Preclearance - Ross, Wilbur L.docx  
**Date:** Sunday, January 15, 2017 3:21:36 PM  
**Attachments:** [Ethics Agreement for Preclearance - Ross, Wilbur L.docx](#)

---

9 page attachment withheld in full - (b)(5); final version at <https://extapps2.oge.gov/2017/Presiden.nsf/PAS%20Index?OpenView>

I made the changes

**From:** [Heather A. Jones](#)  
**To:** [Ann M Donaldson](#)  
**Subject:** Re: Thank you  
**Date:** Sunday, January 15, 2017 9:50:50 PM

---

Sorry about the confusion. Apparently (b)(3), (6) did not get involved until this afternoon

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

Original Message

From: Ann M Donaldson  
Sent: Sunday, January 15, 2017 9:49 PM  
To: Heather A. Jones  
Subject: Thank you

**From:** [Director of OGE](#)  
**To:** [Heather A. Jones](#)  
**Subject:** RE: question  
**Date:** Sunday, January 15, 2017 7:39:25 PM

---

We're in a holding pattern. David and I are going back and forth with Ted. Question: How does "Reg" sign his emails --- Reg?

Walter M. Shaub, Jr.  
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---

**From:** Heather A. Jones  
**Sent:** Sunday, January 15, 2017 7:26 PM  
**To:** Director of OGE  
**Subject:** Fw: question

It is down the chain

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

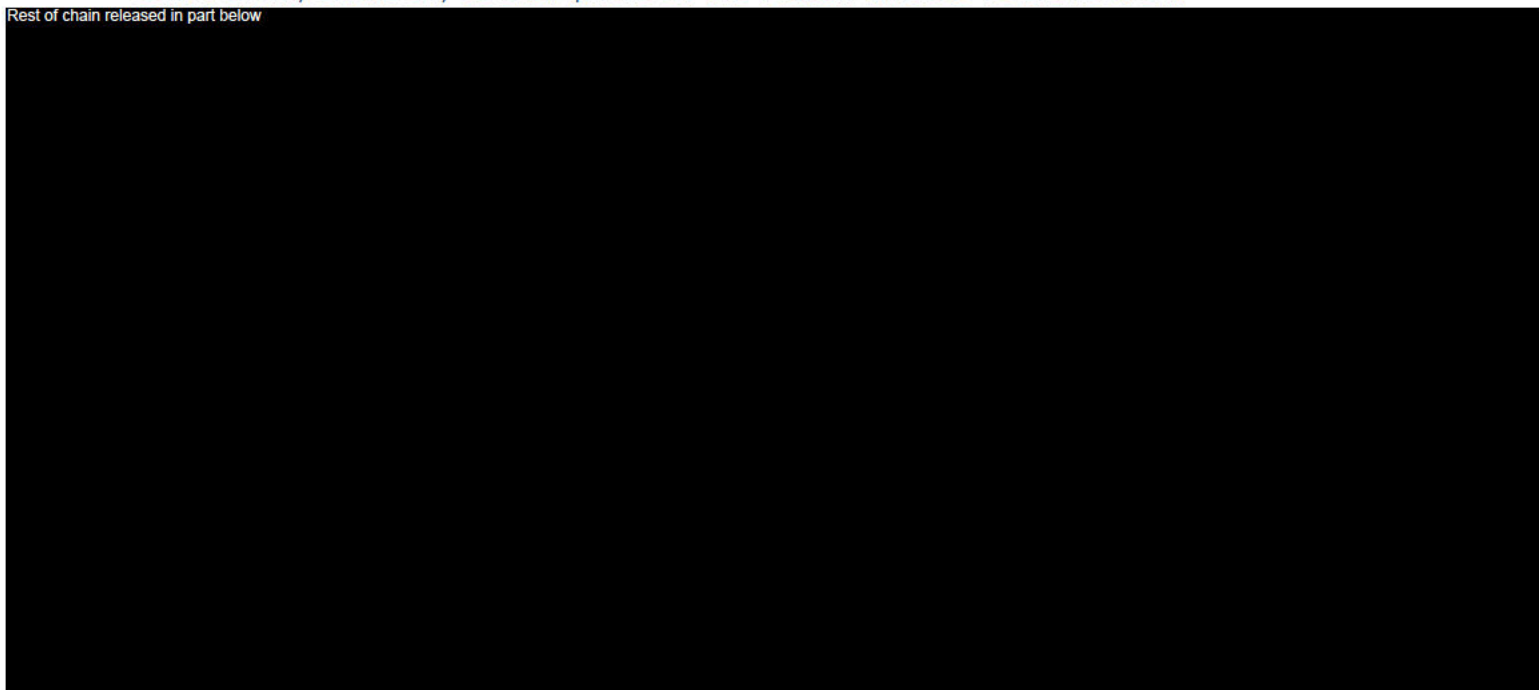
---

**From:** Heather A. Jones <[hajones@oge.gov](mailto:hajones@oge.gov)>  
**Sent:** Saturday, January 14, 2017 10:00 PM  
**To:** Keith Labeledz; Director of OGE  
**Subject:** Re: question

Yes. I can't put the date in until we hear from the PTT. Thanks for everything

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

Rest of chain released in part below



**From:** [Ann M Donaldson](#)  
**To:** [Heather A. Jones](#)  
**Subject:** RE: We are just waiting for Mr. Ross" Approval  
**Date:** Sunday, January 15, 2017 3:56:26 PM

---

Understood.

----- Message from "Heather A. Jones" <hajones@oge.gov> on Sun, 15 Jan 2017 20:49:16 GMT -----

**From:** "Heather A. Jones" <hajones@oge.gov>  
**To:** "Ann M Donaldson"  
**Subject:** RE: We are just waiting for Mr. Ross' Approval

Apparently (b)(3), (6) has an issue.

**From:** Heather A. Jones  
**Sent:** Sunday, January 15, 2017 3:15 PM  
**To:** 'Ann M Donaldson'  
**Subject:** RE: We are just waiting for Mr. Ross' Approval

Here is the draft that is with Mr. Ross

**From:** Ann M Donaldson [[mailto:\(b\) \(6\)](#)]  
**Sent:** Sunday, January 15, 2017 3:06 PM  
**To:** Heather A. Jones  
**Subject:** RE: We are just waiting for Mr. Ross' Approval

Great. We should be able to move quickly. Is there a current draft EA we can go ahead and review understanding that if he has any changes from the current version, we will re-review?

Thanks,  
Annie

----- Message from "Heather A. Jones" <[hajones@oge.gov](mailto:hajones@oge.gov)> on Sun, 15 Jan 2017 19:56:38 GMT -----

**From:** "Heather A. Jones" <[hajones@oge.gov](mailto:hajones@oge.gov)>  
**To:** "Ann M Donaldson"  
**Subject:** We are just waiting for Mr. Ross' Approval

Annie-

Just wanted you to know we are waiting for Mr. Ross' approval before we preclear. We hope it will come in the next couple of minutes. How much time do you think you will need before you can authorize?

Thanks,

Heather

Heather Jones

(202) 482-9316

Office of Government Ethics

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**From:** [Director of OGE](#)  
**To:** [Keith Labedz](#); [Heather A. Jones](#); [Director of OGE](#)  
**Cc:** [Deborah J. Bortot](#)  
**Subject:** RE: revised EA  
**Date:** Sunday, January 15, 2017 10:34:30 AM

---

Keith, I'm confused by your comment. Let's have a quick call. I'll open the line now, and everyone can call:

(b) (6)

Walter M. Shaub, Jr.  
Director  
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Washington, DC 20005-3917

Telephone: 202.482.9292  
Email: [walter.shaub@oge.gov](mailto:walter.shaub@oge.gov)

---

**From:** Keith Labedz  
**Sent:** Sunday, January 15, 2017 9:52 AM  
**To:** Heather A. Jones; Director of OGE  
**Cc:** Deborah J. Bortot  
**Subject:** RE: revised EA

The EA looks ok to me except that (b)(3), (6) from Section 8 does not appear in the Attachment. My guess is that it should be Attachment B. Once they agreed to the revisions, I will build the EA tracking sheet in FDTs.

---

**From:** Heather A. Jones  
**Sent:** Sunday, January 15, 2017 9:48 AM  
**To:** Director of OGE; Keith Labedz  
**Cc:** Deborah J. Bortot  
**Subject:** RE: revised EA

I'm good with all of the changes and believe we have resolved the outstanding questions.

---

**From:** Director of OGE  
**Sent:** Sunday, January 15, 2017 12:50 AM  
**To:** Heather A. Jones; Keith Labedz; Director of OGE  
**Cc:** Deborah J. Bortot  
**Subject:** RE: revised EA

Yes. Go to sleep

Walter M. Shaub, Jr.  
Director  
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Washington, DC 20005-3917

Telephone: 202.482.9292  
Email: [walter.shaub@oge.gov](mailto:walter.shaub@oge.gov)

---

**From:** Heather A. Jones  
**Sent:** Sunday, January 15, 2017 12:40 AM  
**To:** Keith Labeledz; Director of OGE  
**Cc:** Deborah J. Bortot  
**Subject:** RE: revised EA

Ok, I'm going to look at it with fresh eyes in the morning

---

**From:** Walter M. Shaub  
**Sent:** Sunday, January 15, 2017 12:37 AM  
**To:** Heather A. Jones; Keith Labeledz  
**Cc:** Deborah J. Bortot  
**Subject:** revised EA

Heather & Keith,

I have finished my review of the Ross agreement submitted for preclearance. I made some edits to the ethics agreement, including some of my own and some of Keith's suggested language.

The 278 looks good too. I did not cross-reference each item with the EA or between sections to ensure consistency, as I assume you've done that. However, the report looks good from a substantive standpoint. (Let me know if there were any items you wanted me to take an especially hard look at, or any outstanding questions.)

I reviewed the letter the filer sent regarding his name, and it looks fine. Be sure to save that to FDTS.

I also reviewed Keith's notes, which look very good. I made a few edits for clarity, nothing substantive. Keith, I used tracked changes, so you can reject any of the suggestions you don't like.

Here's what I think needs to be done:

1. I'll send an email to Kassinger and Commerce tonight letting them know where things stand.
2. Heather and Keith, please go through the revised ethics agreement to see whether you think I've captured everything and whether you have any concerns or comments.
3. Heather please confirm for me that I've addressed all of the outstanding questions from you and Keith.
4. If we could have one final call among us, just to make sure we're all on the same page, that would be helpful. 11:00 EST might be late enough for Keith to join in. (Keith, if you're up and

ready sooner than that out there in Chicago, just shoot us an email, and we can set up the call for an earlier time.)

5. After we talk, I'll send the revised EA to Kassinger and Commerce.
6. Go ahead and work up the cover letter right away, so we'll be ready to transmit. Type the date (January 15, 2017) into the text of the letter. Then, save the cover letter as a PDF. I'll sign using my electronic signature. (I just tested the signature on a test document, and it worked fine.)
7. As soon as we come to final agreement, Heather can preclear.
8. Then, we'll need the filer and Commerce to move quickly to sign the EA and certify the report.
9. Next, I'll certify it.
10. Then, we'll send to Senate. (Heather, you should try to get Teresa to do that for you, so we can turn to DeVos and try to help with that report.)

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Email: [walter.shaub@oge.gov](mailto:walter.shaub@oge.gov)

**From:** [Heather A. Jones](#)  
**To:** [Keith Labedz](#); [Director of OGE](#)  
**Cc:** [Deborah J. Bortot](#)  
**Subject:** Re: revised EA  
**Date:** Sunday, January 15, 2017 10:02:50 AM

---

I think Walt wants us to talk first

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

---

**From:** Keith Labedz  
**Sent:** Sunday, January 15, 2017 9:59 AM  
**To:** Heather A. Jones; Director of OGE  
**Cc:** Deborah J. Bortot  
**Subject:** RE: revised EA

---

I can speak now if we still need the call. Should we tell OMM that we're now just waiting on them?

---

**From:** Keith Labedz  
**Sent:** Sunday, January 15, 2017 9:52 AM  
**To:** Heather A. Jones; Director of OGE  
**Cc:** Deborah J. Bortot  
**Subject:** RE: revised EA

The EA looks ok to me except that (b)(3), (6) from Section 8 does not appear in the Attachment. My guess is that it should be Attachment B. Once they agreed to the revisions, I will build the EA tracking sheet in FDTs.

---

**From:** Heather A. Jones  
**Sent:** Sunday, January 15, 2017 9:48 AM  
**To:** Director of OGE; Keith Labedz  
**Cc:** Deborah J. Bortot  
**Subject:** RE: revised EA

I'm good with all of the changes and believe we have resolved the outstanding questions.

---

**From:** Director of OGE  
**Sent:** Sunday, January 15, 2017 12:50 AM  
**To:** Heather A. Jones; Keith Labedz; Director of OGE  
**Cc:** Deborah J. Bortot  
**Subject:** RE: revised EA

Yes. Go to sleep

Walter M. Shaub, Jr.  
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Email: [walter.shaub@oge.gov](mailto:walter.shaub@oge.gov)

---

**From:** Heather A. Jones  
**Sent:** Sunday, January 15, 2017 12:40 AM  
**To:** Keith Labeledz; Director of OGE  
**Cc:** Deborah J. Bortot  
**Subject:** RE: revised EA

Ok, I'm going to look at it with fresh eyes in the morning

---

Rest of email chain partially disclosed above



Rest of email chain partially disclosed above



**From:** [Deborah J. Bortot](#)  
**To:** [Heather A. Jones](#); [Director of OGE](#); [Keith Labedz](#)  
**Subject:** RE: revised EA  
**Date:** Sunday, January 15, 2017 9:50:33 AM

---

I'm working on Megan's report right now. Do you need anything from me on this one, if not I'll keep working on the other report?

---

**From:** Heather A. Jones  
**Sent:** Sunday, January 15, 2017 9:48 AM  
**To:** Director of OGE; Keith Labedz  
**Cc:** Deborah J. Bortot  
**Subject:** RE: revised EA

I'm good with all of the changes and believe we have resolved the outstanding questions.

---

**From:** Director of OGE  
**Sent:** Sunday, January 15, 2017 12:50 AM  
**To:** Heather A. Jones; Keith Labedz; Director of OGE  
**Cc:** Deborah J. Bortot  
**Subject:** RE: revised EA

Yes. Go to sleep

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Telephone: 202.482.9292  
Email: [walter.shaub@oge.gov](mailto:walter.shaub@oge.gov)

Rest of email chain partially disclosed above





Rest of email chain partially disclosed above



**From:** [Heather A. Jones](#)  
**To:** [Director of OGE](#); [Keith Labedz](#)  
**Cc:** [Deborah J. Bortot](#)  
**Subject:** RE: revised EA  
**Date:** Sunday, January 15, 2017 12:53:58 AM

---

One more thing, we have to wait for PTT to give the ok before we have him certify. I asked Ted to reach out to the PTT and I e-mailed Annie separately so she will be on the look-out.

---

**From:** Walter M. Shaub  
**Sent:** Sunday, January 15, 2017 12:37 AM  
**To:** Heather A. Jones; Keith Labedz  
**Cc:** Deborah J. Bortot  
**Subject:** revised EA

Heather & Keith,

I have finished my review of the Ross agreement submitted for preclearance. I made some edits to the ethics agreement, including some of my own and some of Keith's suggested language.

The 278 looks good too. I did not cross-reference each item with the EA or between sections to ensure consistency, as I assume you've done that. However, the report looks good from a substantive standpoint. (Let me know if there were any items you wanted me to take an especially hard look at, or any outstanding questions.)

I reviewed the letter the filer sent regarding his name, and it looks fine. Be sure to save that to FDTS.

I also reviewed Keith's notes, which look very good. I made a few edits for clarity, nothing substantive. Keith, I used tracked changes, so you can reject any of the suggestions you don't like.

Here's what I think needs to be done:

1. I'll send an email to Kassinger and Commerce tonight letting them know where things stand.
2. Heather and Keith, please go through the revised ethics agreement to see whether you think I've captured everything and whether you have any concerns or comments.
3. Heather please confirm for me that I've addressed all of the outstanding questions from you and Keith.
4. If we could have one final call among us, just to make sure we're all on the same page, that would be helpful. 11:00 EST might be late enough for Keith to join in. (Keith, if you're up and ready sooner than that out there in Chicago, just shoot us an email, and we can set up the call for an earlier time.)
5. After we talk, I'll send the revised EA to Kassinger and Commerce.
6. Go ahead and work up the cover letter right away, so we'll be ready to transmit. Type the date (January 15, 2017) into the text of the letter. Then, save the cover letter as a PDF. I'll sign using my electronic signature. (I just tested the signature on a test document, and it worked fine.)
7. As soon as we come to final agreement, Heather can preclear.
8. Then, we'll need the filer and Commerce to move quickly to sign the EA and certify the

report.

9. Next, I'll certify it.
10. Then, we'll send to Senate. (Heather, you should try to get Teresa to do that for you, so we can turn to DeVos and try to help with that report.)

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Email: [walter.shaub@oge.gov](mailto:walter.shaub@oge.gov)

**From:** [Heather A. Jones](#)  
**To:** [Ann M Donaldson](#)  
**Cc:** [Deborah J. Bortot](#)  
**Subject:** Ross  
**Date:** Sunday, January 15, 2017 12:49:37 AM

---

I think we may have Ross for you later today. We have been told that the Committee wants it by the end of the day

Thanks

Heather

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

**From:** [Director of OGE](#)  
**To:** [Heather A. Jones](#); [Director of OGE](#); [Keith Labeledz](#); [Director of OGE](#)  
**Subject:** RE: question  
**Date:** Saturday, January 14, 2017 10:22:21 PM

---

Ok. Thank

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---

**From:** Heather A. Jones  
**Sent:** Saturday, January 14, 2017 10:18 PM  
**To:** Director of OGE; Keith Labeledz; Director of OGE  
**Subject:** Re: question

If we resolve the questions below and your ok with the name letter

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

---

**From:** Director of OGE  
**Sent:** Saturday, January 14, 2017 10:15 PM  
**To:** Heather A. Jones; Keith Labeledz; Director of OGE  
**Subject:** RE: question

So, Heather, just to confirm. You recommend preclearance at this point, unless I find something?

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---

**From:** Heather A. Jones  
**Sent:** Saturday, January 14, 2017 10:01 PM  
**To:** Keith Labeledz; Director of OGE  
**Subject:** Re: question

Yes. I can't put the date in until we hear from the PTT. Thanks for everything

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

---

**From:** Keith Labeledz

**Sent:** Saturday, January 14, 2017 9:49 PM  
**To:** Heather A. Jones; Director of OGE  
**Subject:** RE: question

Ok. Submitted. I also added the committee. Once precleared, a placeholder date would be needed in the "Nominated" field on the General Information page. Preclearance + completing that field allows the filer to file officially.

(I am logging off. If needed, I'll have my cell nearby: (b) (6) )

---

**From:** Heather A. Jones  
**Sent:** Saturday, January 14, 2017 9:41 PM  
**To:** Keith Labeledz; Director of OGE  
**Subject:** Re: question

I think yes since issues are really with the EA

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

---

**From:** Keith Labeledz  
**Sent:** Saturday, January 14, 2017 9:31 PM  
**To:** Director of OGE; Heather A. Jones  
**Subject:** RE: question

I saved a "for preclearance" version of the 278 to your folder within the filer's folder. The only difference from the earlier version are two end date corrections based on the EA review. I verified, via Change History, that no further updates have been made. Should I forward the report up to the program manager step so that, if appropriate, the report can be precleared without a pull-forward action?

---

**From:** Director of OGE  
**Sent:** Saturday, January 14, 2017 9:27 PM  
**To:** Heather A. Jones; Keith Labeledz; Director of OGE  
**Subject:** RE: question

Yes, unless they have confirmed that the value is zero.

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---

**From:** Heather A. Jones  
**Sent:** Saturday, January 14, 2017 8:50 PM  
**To:** Keith Labeledz; Director of OGE  
**Subject:** RE: question



o Section 7

- (b)(3), (4), (5), (6) [Redacted]

o Sections 8, 11

- (b)(3), (4), (5), (6) [Redacted]

- Keith made the following point: (b)(3), (5), (6) [Redacted]

1. Are we ok with the EA saying:

- (b)(3), (4), (5), (6) [Redacted]

Keith's thoughts: (b)(3), (5), (6) [Redacted]

---

**From:** Walter M. Shaub  
**Sent:** Saturday, January 14, 2017 8:37 PM  
**To:** Keith Labeledz; Heather A. Jones  
**Subject:** question

Am I looking at this for preclearance at this point, or are there outstanding questions still pending?

Walt

Walter M. Shaub, Jr.  
Director



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**From:** [Deborah J. Bortot](#)  
**To:** [Heather A. Jones](#); [Director of OGE](#); [Keith Labeledz](#)  
**Cc:** [David J. Apol](#)  
**Subject:** RE: Re Ross Positions  
**Date:** Saturday, January 14, 2017 9:23:01 PM

---

Yes. I have a 10:00 call and will be on the 11:45 call that Heather mentioned, but should be available at 11:00.

---

**From:** Heather A. Jones  
**Sent:** Saturday, January 14, 2017 8:37 PM  
**To:** Director of OGE; Keith Labeledz  
**Cc:** Deborah J. Bortot; David J. Apol  
**Subject:** RE: Re Ross Positions

Yes, we have a conference call on DeVos at 11:45.

---

**From:** Director of OGE  
**Sent:** Saturday, January 14, 2017 8:35 PM  
**To:** Heather A. Jones; Keith Labeledz; Director of OGE  
**Cc:** Deborah J. Bortot; David J. Apol  
**Subject:** RE: Re Ross Positions

Thanks. I'll look things over. Would any of you be available for a conference call tomorrow morning? We could do 11:00 since Keith is an hour behind.

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---

**From:** Heather A. Jones  
**Sent:** Saturday, January 14, 2017 8:26 PM  
**To:** Keith Labeledz; Director of OGE  
**Cc:** Deborah J. Bortot; David J. Apol  
**Subject:** RE: Re Ross Positions

Made the changes re the second paragraph and will wait to hear from Walt on the first.

---

**From:** Keith Labeledz  
**Sent:** Saturday, January 14, 2017 8:15 PM  
**To:** Heather A. Jones; Director of OGE  
**Cc:** Deborah J. Bortot; David J. Apol  
**Subject:** RE: Re Ross Positions

I think (b)(3), (5), (6)



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

---

**From:** Heather A. Jones  
**Sent:** Saturday, January 14, 2017 7:54 PM  
**To:** Keith Labeledz; Director of OGE  
**Cc:** Deborah J. Bortot; David J. Apol  
**Subject:** Re Ross Positions

Are we ok with the EA saying:

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

Positions on the report but not in the EA (Are these all (b)(3), (6) positions Keith?):

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

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

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

**From:** [Keith Labeledz](#)  
**To:** [Walter M. Shaub](#); [Heather A. Jones](#)  
**Subject:** RE: question  
**Date:** Saturday, January 14, 2017 8:40:30 PM

---

I think the report is ok at this point assuming the final piece of EA v. 278 reconciliation does not uncover a 278 issue. So far, the problems seem to be with the EA. I've also more or less accounted for Part 2.

---

**From:** Walter M. Shaub  
**Sent:** Saturday, January 14, 2017 8:37 PM  
**To:** Keith Labeledz; Heather A. Jones  
**Subject:** question

Am I looking at this for preclearance at this point, or are there outstanding questions still pending?

Walt

Walter M. Shaub, Jr.  
Director  
U.S. Office of Government Ethics  
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Washington, DC 20005-3917

Telephone: 202.482.9292  
Email: [walter.shaub@oge.gov](mailto:walter.shaub@oge.gov)

**From:** [Keith Labeledz](#)  
**To:** [Heather A. Jones](#)  
**Subject:** RE: ROSS EA  
**Date:** Saturday, January 14, 2017 5:25:31 PM

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They haven't signaled any changes since the last pass-back and this version answers my two open questions.

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**From:** Heather A. Jones  
**Sent:** Saturday, January 14, 2017 5:23 PM  
**To:** Keith Labeledz  
**Subject:** RE: ROSS EA

Do you think we have reached a stable 278 draft?

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**From:** Keith Labeledz  
**Sent:** Saturday, January 14, 2017 5:03 PM  
**To:** Heather A. Jones  
**Subject:** FW: ROSS EA

I have updated my technical notes and added a brief COI discussion. (b) (5)

[REDACTED]

[REDACTED]

In terms of next steps, the email last night suggested I would pass the EA off once we had a stable 278 draft. I will keep working a bit; however, I'll stop at 6:00. If I'm needed, please call (b) (6). I will be at home but I do not always hear the office line. I'll keep the cell phone close.

Thanks.

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**From:** Heather A. Jones  
**Sent:** Saturday, January 14, 2017 4:06 PM  
**To:** Director of OGE  
**Cc:** Keith Labeledz  
**Subject:** ROSS EA

We have two versions with different language in the (b)(3), (6) section. They are in the N drive folder ready for review.

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

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

**From:** [Heather A. Jones](#)  
**To:** [Keith Labeledz](#)  
**Subject:** RE: Edit of EA  
**Date:** Saturday, January 14, 2017 4:04:23 PM

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yes

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**From:** Keith Labeledz  
**Sent:** Saturday, January 14, 2017 4:03 PM  
**To:** Heather A. Jones  
**Subject:** RE: Edit of EA

Ok. I tried a different approach to the (b)(3), (6) entities (#2 on shared drive) but I do not know if that quite works. I guess we are also waiting on a revision from the representatives. Maybe we then forward both up the chain to see which approach (if either) looks promising.

---

**From:** Heather A. Jones  
**Sent:** Saturday, January 14, 2017 3:55 PM  
**To:** Keith Labeledz  
**Subject:** Edit of EA

You can see my edits in a KL-HAJ document in the folder.

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

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