

From: [Douglas L. Chapman](#)
To: [Agency Wide](#)
Subject: PA-21-01, Updates to Certification of Ethics Agreement Compliance
Date: Friday, February 26, 2021 12:47:15 PM

Good afternoon,

Program Advisory, PA-21-01, Updates to Certification of Ethics Agreement Compliance, has been posted to the website [here](#). This Program Advisory describes recent updates to the Certification of Ethics Agreement Compliance required to be filed with OGE by Presidential appointees following their confirmation by the Senate. The updates were necessary to reflect the revocation of [Executive Order 13770](#) and the implementation of [Executive Order 13989](#). Other updates include clarification of one of the recusal requirements, the addition of a Privacy Act Statement, and the inclusion of a reminder for PAS officials of their personal responsibility to timely comply with the terms of their ethics agreements.

Desk Officers received an advance copy that was circulated earlier today.

If you have questions regarding the Program Advisory, please let me know.

Doug

Doug Chapman

Chief, Program Review Branch

U.S. Office of Government Ethics

1201 New York Avenue, NW Suite 500

Washington, DC 20005

202-482-9223

Referred to DOD

From: Maura Leary <mleary@oge.gov>
Sent: Tuesday, February 16, 2021 12:39 PM
To: Green, Jeffrey A CIV OSD OGC (USA) (b) (6)
Cc: Bernadette Tolson <btolson@oge.gov>
Subject: Pledge question

All active links contained in this email were disabled. Please verify the identity of the sender, and confirm the authenticity of all links contained within the message prior to copying and pasting the address to a Web browser.

Hi Jeff:

Bernadette and I are just getting back to you on the pledge question you raised. I understood from our call that your question was (b) (5)

Please let us know if you have any questions or concerns. Thank you!
Maura

Maura K. Leary
Assistant Counsel
U.S. Office of Government Ethics
Telephone: 202-482-9231
mleary@oge.gov < Caution-mailto:mleary@oge.gov >

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From: [Maura Leary](#)
To: [Bernadette Tolson](#)
Subject: RE: Pledge question from DoD
Date: Tuesday, February 16, 2021 12:35:06 PM

Bernadette,

Sounds good – I will respond to Jeff now and CC you.

Thanks!

Maura

Maura K. Leary
Assistant Counsel
U.S. Office of Government Ethics
Telephone: 202-482-9231
mleary@oge.gov

From: Bernadette Tolson
Sent: Tuesday, February 16, 2021 8:32 AM
To: Maura Leary <mleary@oge.gov>
Subject: RE: Pledge question from DoD

Hi Maura,

Thank you for this email and looping me in. I did take over DOD from Steve. I'm ok with you replying to Jeff regarding this as it seems to be a fairly common question that many agencies are asking now as they wait for additional guidance.

Thanks
Bernadette

From: Maura Leary
Sent: Friday, February 12, 2021 4:13 PM
To: Bernadette Tolson <btolson@oge.gov>
Cc: Rachel K. McRae <rkmcrae@oge.gov>; Monica M. G. Ashar <mmgashar@oge.gov>
Subject: Pledge question from DoD

Hi Bernadette,

I believe you have taken over as desk officer for DoD from Steve – let me know if this is not the case! I received a question from Jeff Green, with whom I was recently working on a nomination, that relates to the pledge. It is not related to my nomination report, so I wanted to loop you in as desk officer, and I also wanted to loop in Rachel and Monica who are tracking the Pledge questions.

The question is fairly simple: (b) (5)

[Redacted]

[Redacted]

So I'm happy to get back to Jeff (unless I'm missing something!), but wanted to loop in Bernadette and make sure this question is tracked correctly. Thank you!

Maura

Maura K. Leary
Assistant Counsel
U.S. Office of Government Ethics
Telephone: 202-482-9231
mleary@oge.gov

From: [Rachel K. McRae](#)
To: [Rolando DeLeon](#)
Cc: [Monica M. G. Ashar](#)
Subject: RE: Question about Ethics Pledge
Date: Wednesday, February 3, 2021 3:41:31 PM

Hi again,

Our guidance on this issue in past administrations is as follows: (b) (5)

Let me know if you'd like to discuss. Thanks!

Rachel

From: Rolando DeLeon
Sent: Tuesday, February 2, 2021 1:24 PM
To: Rachel K. McRae <rkmcrae@oge.gov>; Monica M. G. Ashar <mmgashar@oge.gov>
Subject: FW: Question about Ethics Pledge

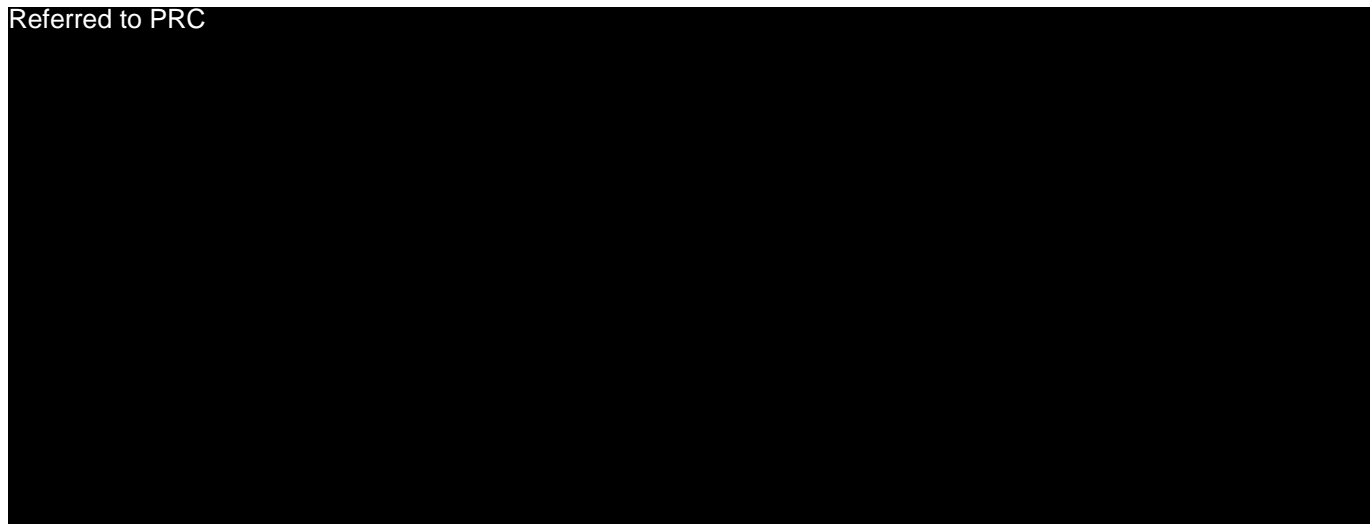
Please see below.

The situation appears to be (b) (5)
I believe our current guidance says (b) (5)

Rolando DeLeon
Government Ethics Specialist
U.S. Office of Government Ethics
1201 New York Avenue NW, Suite 500
Washington DC 20005
202.482.9284
Rolando.DeLeon@oge.gov

Referred to PRC

Referred to PRC



From: Rolando DeLeon <rdeleon@oge.gov>
Sent: Tuesday, February 2, 2021 11:26 AM
To: O'Connor, Anne C <(b) (6)>
Subject: RE: Question about Ethics Pledge

Hello Anne,

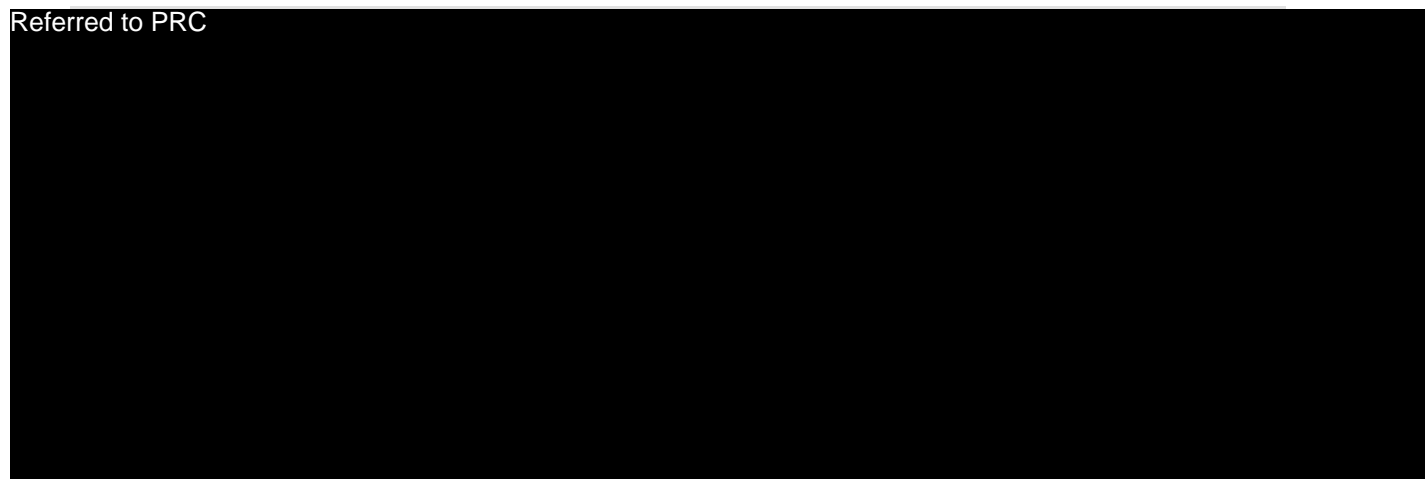
(b) (5)



Based on the facts you provided it looks as if (b) (5).

Rolando DeLeon
Government Ethics Specialist
U.S. Office of Government Ethics
1201 New York Avenue NW, Suite 500
Washington DC 20005
202.482.9284
Rolando.DeLeon@oge.gov

Referred to PRC



Referred to PRC



From: Rolando DeLeon <rdeleon@oge.gov>
Sent: Thursday, January 21, 2021 10:09 AM
To: O'Connor, Anne C <(b) (6)>
Subject: RE: Question about Ethics Pledge

Anne,

Our Ethics Law and Policy Branch should be meeting today to discuss this and produce initial guidance. As soon as I get something from them I will let you know.

I also expect guidance will be published via the list serve and on OGE.gov.

Rolando DeLeon
Government Ethics Specialist
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Washington DC 20005
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Rolando.DeLeon@oge.gov

Referred to PRC



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From: [Rolando DeLeon](#)
To: [Rachel K. McRae](#)
Cc: [Monica M. G. Ashar](#)
Subject: RE: Question about Ethics Pledge
Date: Wednesday, February 3, 2021 8:52:27 AM

AIMS updated

Rolando DeLeon
Government Ethics Specialist
U.S. Office of Government Ethics
1201 New York Avenue NW, Suite 500
Washington DC 20005
202.482.9284
Rolando.DeLeon@oge.gov

From: Rachel K. McRae
Sent: Wednesday, February 3, 2021 8:29 AM
To: Rolando DeLeon <rdeleon@oge.gov>
Cc: Monica M. G. Ashar <mmgashar@oge.gov>
Subject: RE: Question about Ethics Pledge

Good morning – Could you refer this in AIMS (if you haven't already)? Just want to make sure I don't let this question fall through the cracks 😊

From: Rolando DeLeon
Sent: Tuesday, February 2, 2021 1:24 PM
To: Rachel K. McRae <rkmcrae@oge.gov>; Monica M. G. Ashar <mmgashar@oge.gov>
Subject: FW: Question about Ethics Pledge

Please see below.

The situation appears to be (b)(5)

(b)(5) I believe our current guidance says (b)(5)

Rolando DeLeon
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Remainder of thread released or referred above

From: [Rolando DeLeon](#)
To: [Monica M. G. Ashar](#); [Rachel K. McRae](#)
Subject: FW: Question about Ethics Pledge
Date: Tuesday, February 2, 2021 1:30:38 PM

For clarity here is (b)(5)

[Redacted]

[Redacted]

(b)(5)
[Redacted]

[Redacted]

[Redacted]

Rolando DeLeon
Government Ethics Specialist
U.S. Office of Government Ethics

1201 New York Avenue NW, Suite 500
Washington DC 20005
202.482.9284
Rolando.DeLeon@oge.gov

From: Rolando DeLeon
Sent: Tuesday, February 2, 2021 1:24 PM
To: Rachel K. McRae <rkmcrae@oge.gov>; Monica M. G. Ashar <mmgashar@oge.gov>
Subject: FW: Question about Ethics Pledge

Please see below.

The situation appears to be (b)(5) [REDACTED]
[REDACTED]. I believe our current guidance says (b)(5) [REDACTED]
[REDACTED]

Rolando DeLeon
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Remainder of thread released or referred above



From: [Rachel K. McRae](#)
To: [David Taube](#); [Monica M. G. Ashar](#)
Subject: RE: Pledge advisory draft
Date: Wednesday, January 27, 2021 3:04:09 PM

I also filled in the remaining chart sections – let me know if you have thoughts on the substance (may also have wording changes based on David’s suggestions, but we can discuss tomorrow).

From: David Taube
Sent: Wednesday, January 27, 2021 2:46 PM
To: Monica M. G. Ashar <mmgashar@oge.gov>; Rachel K. McRae <rkmcrae@oge.gov>
Subject: RE: Pledge advisory draft

Monica and Rachel,

One of my due-outs from this morning's meeting was to suggest some (b)(5)

(b)(5) Here's a suggestion, using the first block that Monica prepared.

(b)(5)



I welcome any feedback.

Thanks,
David

From: Monica M. G. Ashar
Sent: Wednesday, January 27, 2021 07:53
To: David Taube <dtaube@oge.gov>; Rachel K. McRae <rkmcrae@oge.gov>
Subject: RE: Pledge advisory draft

Thanks, David. Could the three of us have a quick call after the DAEO meeting? I think I’m at a point where I’m ready for you to take a look at the draft of the chart (more for the concept, than anything) – it’s still very much a work in progress, and there are a number of blanks that need to be filled in. I ended up making it a two-column chart – one column for the pledge language, and the other column for any commentary. The other big change is that, (b) (5)

(b)(5)

The draft chart is at the following link: (b)(5) internal network address

Thanks,
Monica

From: David Taube

Sent: Tuesday, January 26, 2021 6:21 PM

To: Monica M. G. Ashar <mmgashar@oge.gov>; Rachel K. McRae <rkmcrae@oge.gov>

Subject: Pledge advisory draft

Rachel and Monica,

This will probably sound like overkill, but I created two drafts of a possible legal advisory about the new ethics pledge. The drafts are nearly identical in substance, but they are organized differently.

Both drafts are in the (b)(5) internal network address . Please look them over and let me know your thoughts.

Thanks,
David

From: [David Taube](#)
To: [Monica M. G. Ashar](#); [Rachel K. McRae](#)
Subject: Pledge advisory draft

For this meeting, I can call everyone and patch us together. Please let me know if you would like me to use a different number from the one listed below:

* Monica – x282
* Rachel – x267

I'll try to call immediately after the DAEO meeting. I have an 11:30 meeting as well, so we may be squeezed for time.

-David

From: Monica M. G. Ashar
Sent: Wednesday, January 27, 2021 07:53
To: David Taube <dtaube@oge.gov> <<mailto:dtaube@oge.gov>>>; Rachel K. McRae <rkmcrae@oge.gov> <<mailto:rkmcrae@oge.gov>>>
Subject: RE: Pledge advisory draft

Thanks, David. Could the three of us have a quick call after the DAEO meeting? I think I'm at a point where I'm ready for you to take a look at the draft of the chart (more for the concept, than anything) – it's still very much a work in progress, and there are a number of blanks that need to be filled in. I ended up making it a two-column chart – one column for the pledge language, and the other column for any commentary. The other big change is that (b) (5)

The draft chart is at the following link: (b)(5) internal network address

Thanks,
Monica

From: David Taube
Sent: Tuesday, January 26, 2021 6:21 PM
To: Monica M. G. Ashar <mmgashar@oge.gov> <<mailto:mmgashar@oge.gov>>>; Rachel K. McRae <rkmcrae@oge.gov> <<mailto:rkmcrae@oge.gov>>>
Subject: Pledge advisory draft

Rachel and Monica,

This will probably sound like overkill, but I created two drafts of a possible legal advisory about the new ethics pledge. The drafts are nearly identical in substance, but they are organized differently.

Both drafts are in the (b)(5) internal network address. Please look them over and let me know your thoughts.

Thanks,
David

From: [Kehli Cage](#)
To: [Rachel K. McRae](#)
Subject: RE: Interaction Number: 21009
Date: Tuesday, January 26, 2021 10:14:23 PM
Attachments: [RE Question about EO 13770 - Trump Pledge.msg](#)

Attachment follows

Hi Rachel,

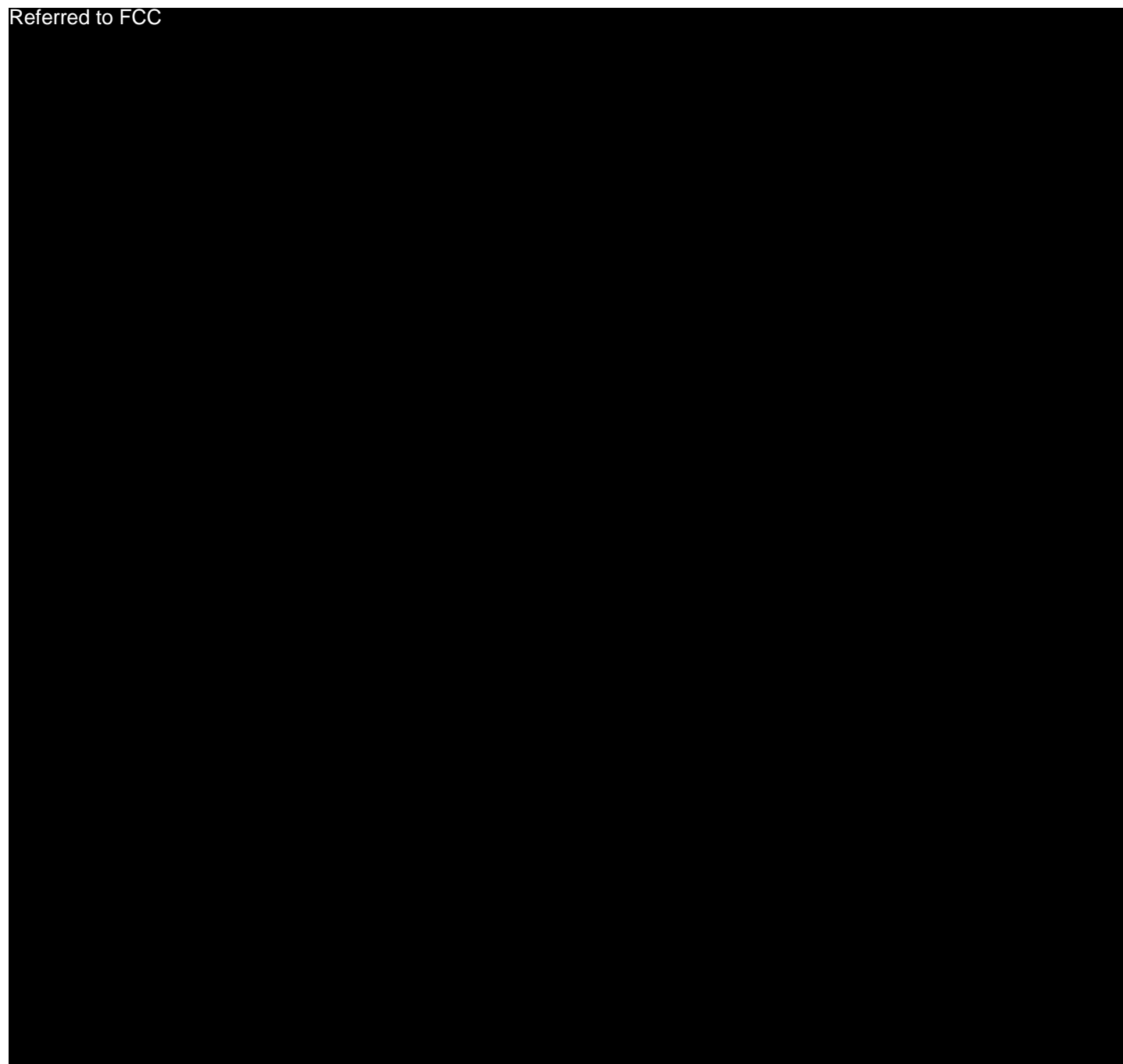
Here is the latest email from FCC. I have attached it.

Thank you,
Kehli

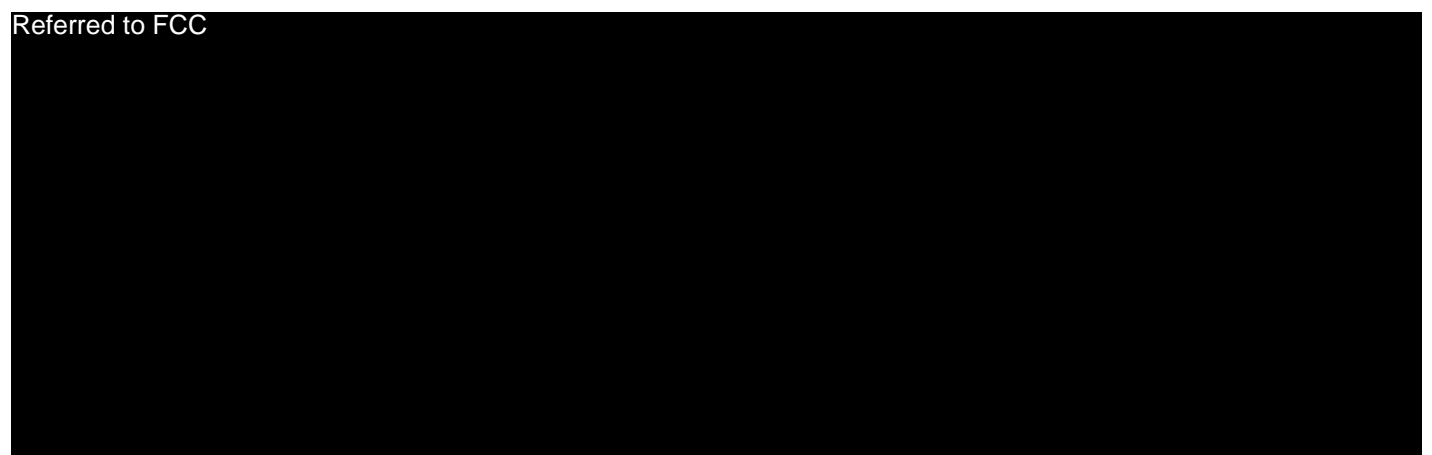
From: Rachel K. McRae
Sent: Tuesday, January 26, 2021 2:19 PM
To: Kehli Cage <kcage@oge.gov>
Subject: Interaction Number: 21009

Hi again – Were you able to resolve this one based on the chart answers? If not, what issues from FCC are still pending?

Referred to FCC



Referred to FCC



Referred to FCC



From: Kehli Cage <kcage@oge.gov>
Sent: Monday, January 25, 2021 3:43 PM
To: Ellen Herr <(b) (6)>
Cc: Kathleen Fulp <(b) (6)>
Subject: RE: Question about EO 13770 - Trump Pledge

Hi Ellen,

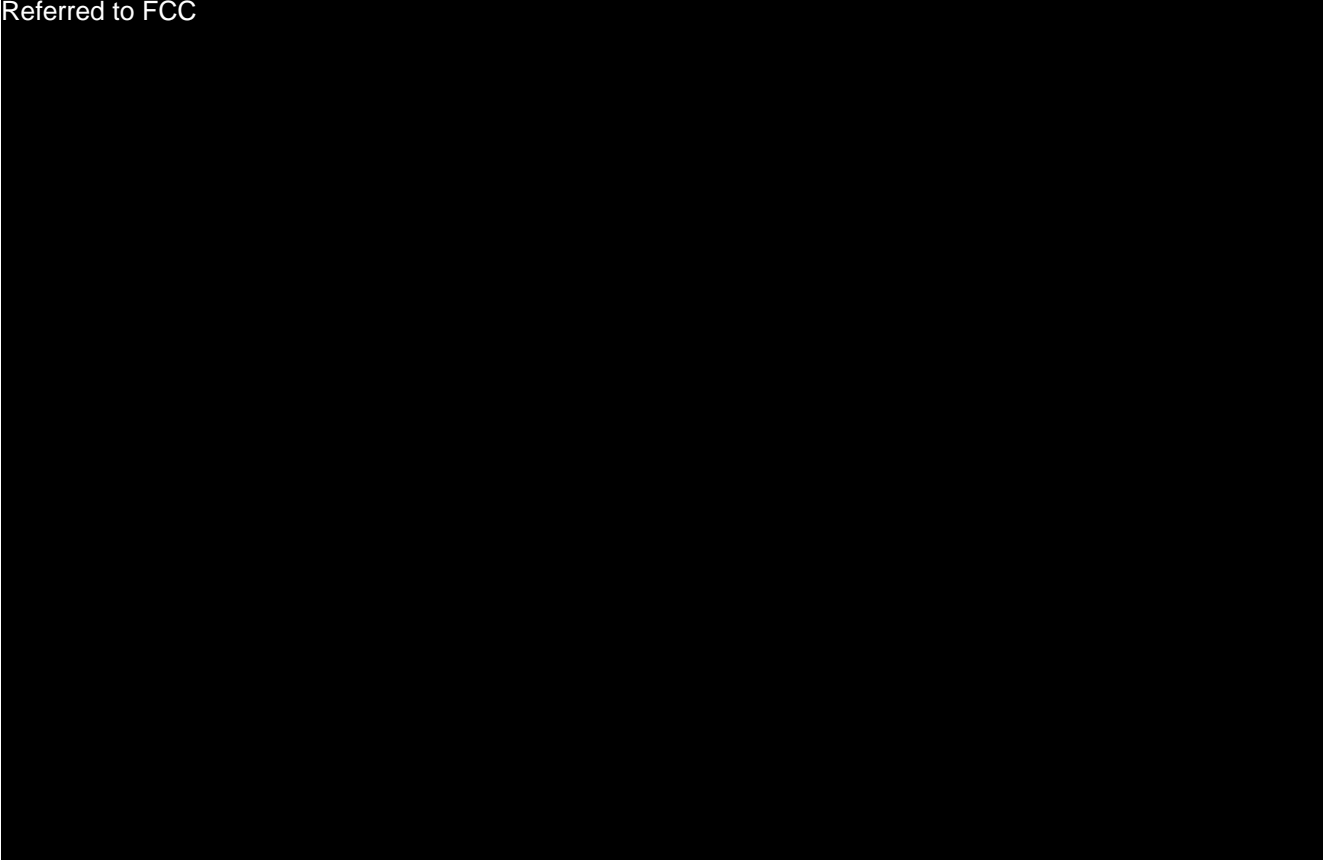
(b) (5)
[Redacted text block]

(b) (5)
[Redacted text block]

I hope this provides some clarity, if not just give me let me know!

Thank you,
Kehli

Referred to FCC



From: Kehli Cage <kcage@oge.gov>
Sent: Monday, January 25, 2021 9:13 AM
To: Ellen Herr <(b) (6)>
Cc: Kathleen Fulp <(b) (6)>
Subject: RE: Question about EO 13770 - Trump Pledge

Hi Ellen,

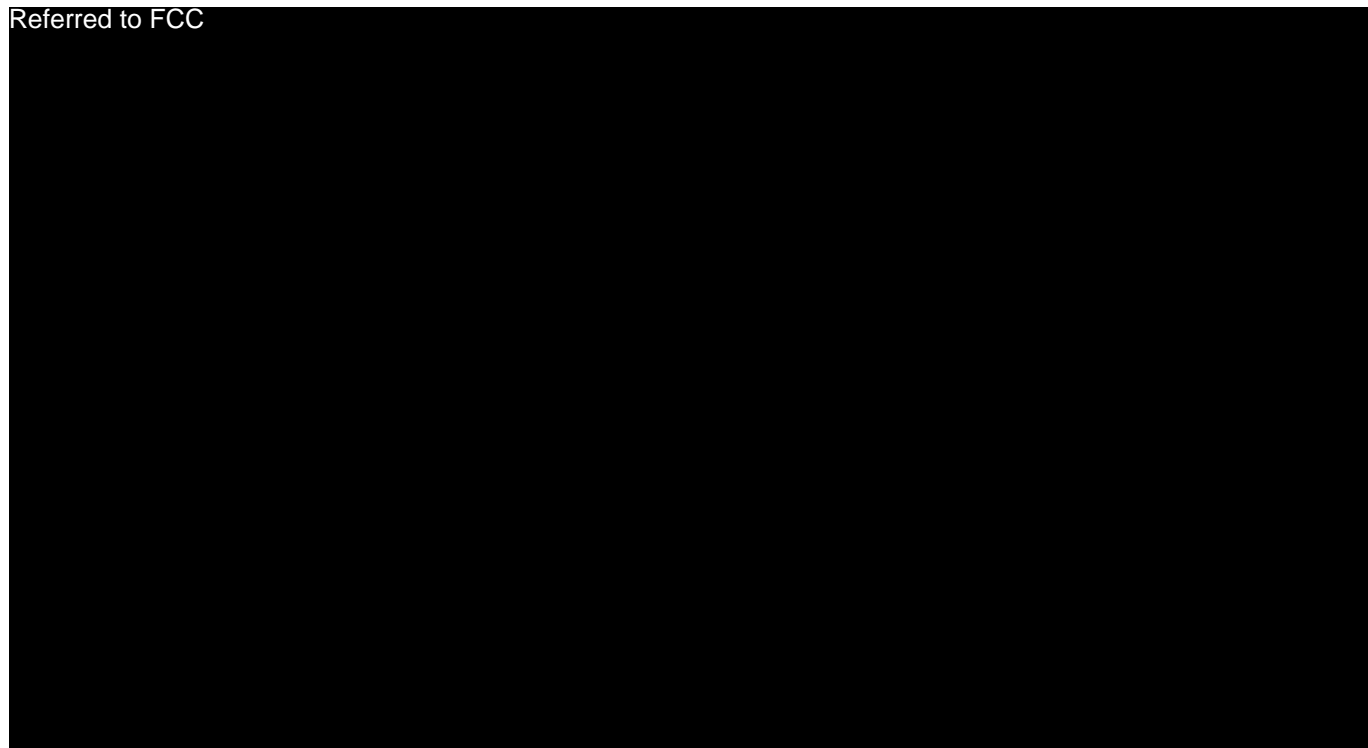
I will circle back once I speak to GC on this matter. I have something set for this morning

Thank you,
Kehli

Referred to FCC



Referred to FCC



From: Kehli Cage <kcage@oge.gov>
Sent: Thursday, January 21, 2021 11:40 PM
To: Ellen Herr <(b) (6)>
Cc: Kathleen Fulp <(b) (6)>
Subject: RE: Question about EO 13770 - Trump Pledge

Hi Ellen, Happy New Year!!

We are getting new questions in on EO 13770. I can confirm that the language of the revocation clearly states: "Executive Order 13770 . . . is hereby revoked, effective at noon January 20, 2021. Employees and former employees subject to the commitments in Executive Order 13770 will not be subject to those commitments after noon January 20, 2021."

OGE will issue additional guidance on this soon, I will refer your additional question about the Biden pledge to GC.

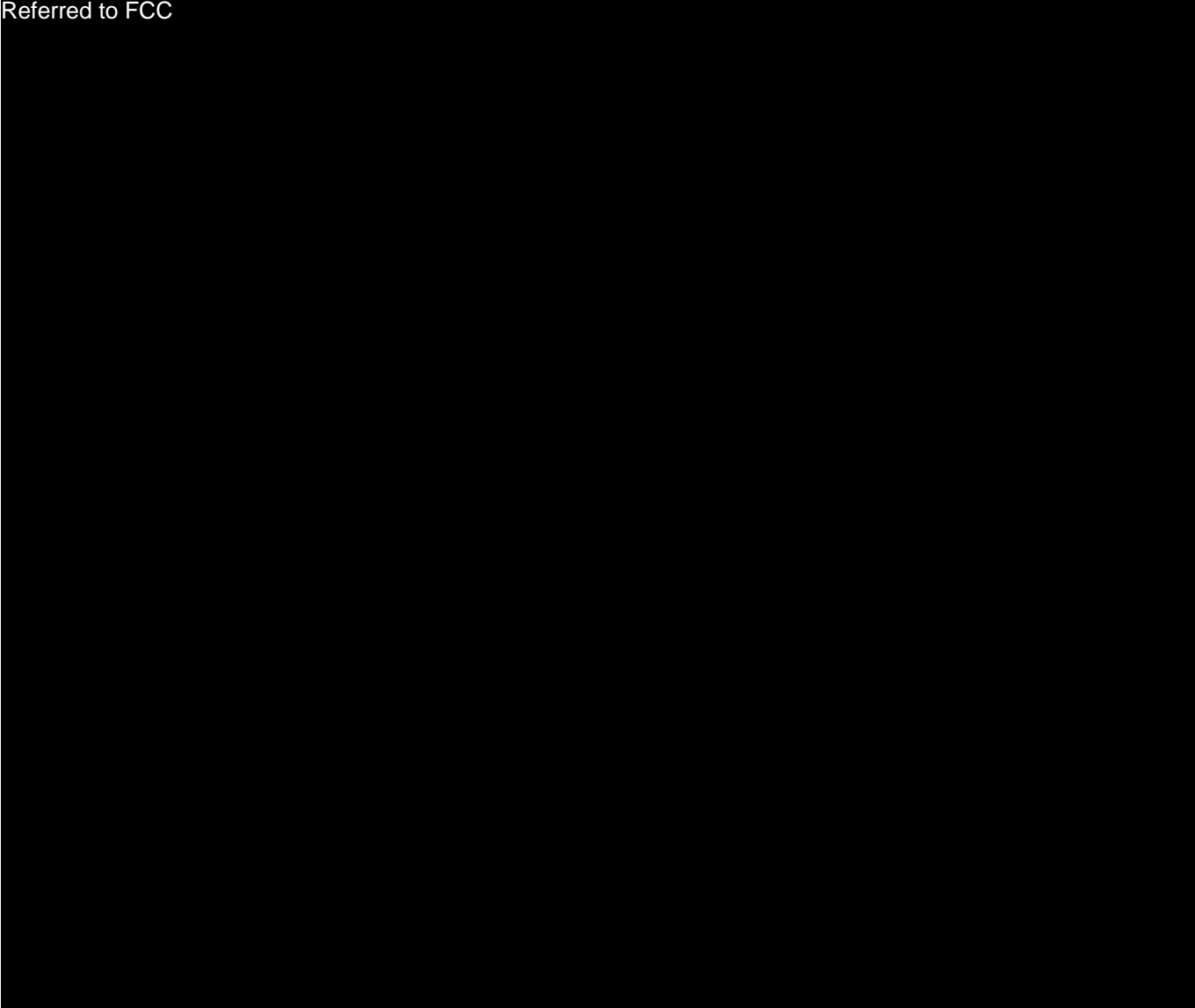
Thank you and I will be in touch.

Kehli

Referred to FCC



Referred to FCC



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From: [Jennifer Matis](#)
To: [Agency Wide](#); [News Clippings](#)
Subject: Legislative Update for Monday, January 25, 2021
Date: Monday, January 25, 2021 10:52:32 AM

The Senate reconvenes at 3:00 p.m.

According to *CQ*, the Senate convenes at 3 p.m. Following the conclusion of morning business, the Senate will proceed to executive session to consider the nomination of Janet Yellen to be Treasury secretary. At 7 p.m., the House managers will read the article of impeachment against former President Donald Trump to the Senate.

The House is not in session.

Legislative and Related News

The Augusta Free Press reports that Member Spanberger has reintroduced the Transparent Representation Upholding Service and Trust (TRUST) in Congress Act to prevent insider trading by members of Congress. Among other things, it would require all members of Congress, and their spouses and dependent children, to put certain investment assets into a qualified blind trust. [Bipartisan coalition reintroducing House legislation to prevent insider trading](#)

Executive Branch Ethics and Related News

Bloomberg reports on the release of labor secretary nominee Marty Walsh's ethics agreement and financial disclosure. [Punching In: Walsh, DOL Secretary Nominee, Gets Ethics Sign-Off](#)

The Hill provides additional coverage of President Biden's new ethics pledge. [Biden expands on Obama ethics pledge](#)

Politico provides additional coverage of the repeal of the Trump ethics pledge and its impact. [One of Trump's final acts will allow former aides to profit from foreign ties](#)

Federal Agency and Related News

Government Executive reports that President Biden signed an Executive Order rescinding the new Schedule F job classification. [Biden Signs Executive Order Killing Schedule F, Restoring Collective Bargaining Rights](#)

Next Scheduled Recess:

House: Jan. 22 – Feb. 1

Senate: Feb. 15 – Feb. 19

From: [Suzanne L. Meyer](#)
To: [Seth Jaffe](#); [Monica M. G. Ashar](#); [Rachel K. McRae](#)
Subject: FW: EO numbers
Date: Monday, January 25, 2021 10:25:22 AM

Good morning, All.

Please see below.

Thanks,

Suzanne

From: Suzanne L. Meyer
Sent: Monday, January 25, 2021 10:24 AM
To: 'Pankey, Lorielle' <(b) (6)>
Subject: RE: EO numbers

Thanks very much, Lorielle!

I will share that information with the staff that put out that information. I can see how there might have been some confusion. (b) (5)

Refe
rral
to

Best,

Suzanne

Referred to FTC

Referred to FTC



From: Suzanne L. Meyer <slmeyer@oge.gov>

Sent: Monday, January 25, 2021 9:15 AM

To: Pankey, Lorielle <(b) (6)>

Subject: RE: EO numbers

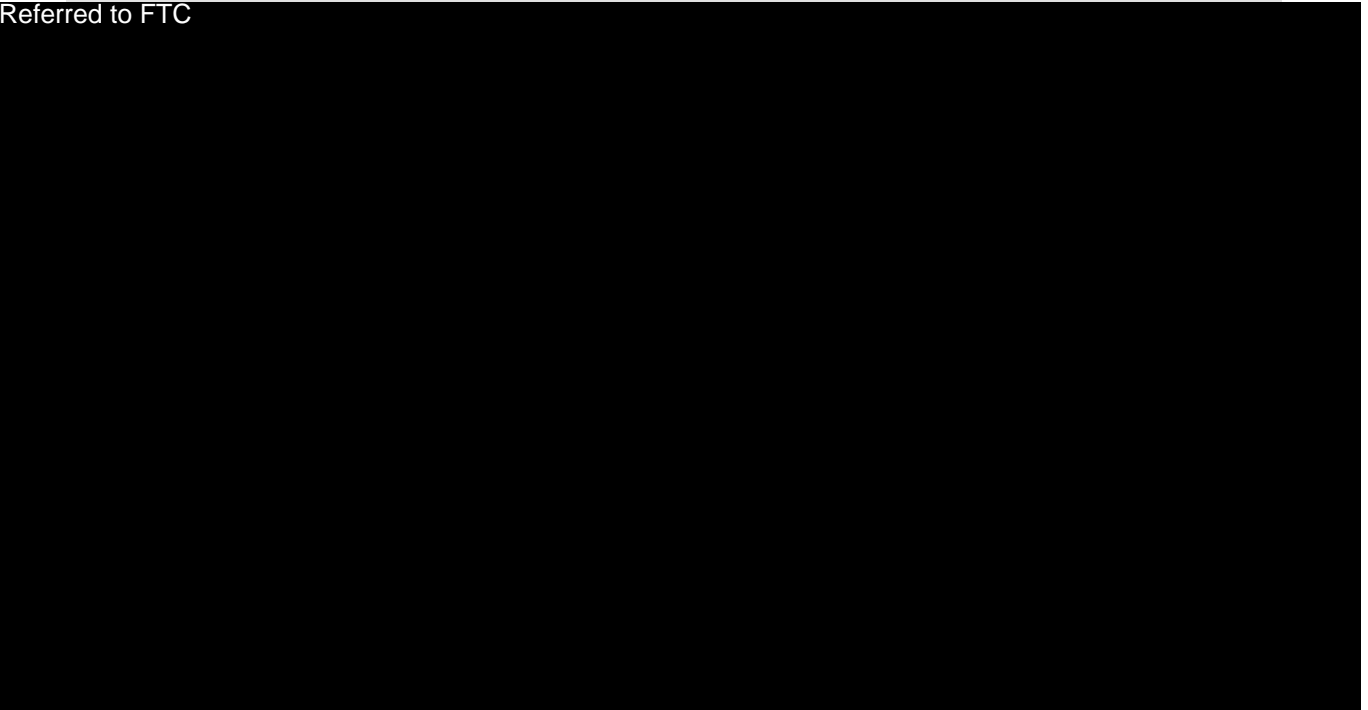
Hi Lorielle,

I hadn't seen your question before now, apologies! I went back and saw you sent it after 8 pm on the 19th and likely didn't see it when back to work on the 21st. Will aim to get an answer for you today.

Best,

Suzanne

Referred to FTC



From: Suzanne L. Meyer <slmeyer@oge.gov>
Sent: Monday, January 25, 2021 8:52 AM
To: Suzanne L. Meyer <slmeyer@oge.gov>
Subject: EO numbers

Good morning,

Hope you had a nice weekend.

The new ethics pledge executive order and the executive order revoking the old pledge now have numbers assigned to them:

The Executive Order that establishes the new ethics pledge is E.O. 13989: <https://www.govinfo.gov/content/pkg/FR-2021-01-25/pdf/2021-01762.pdf>. The Executive Order that revokes E.O. 13770 is E.O. 13983: <https://www.govinfo.gov/content/pkg/FR-2021-01-25/pdf/2021-01713.pdf>.

Best,

Suzanne

Suzanne Meyer
Desk Officer/Ethics Specialist
U.S. Office of Government Ethics
202-482-9249 | suzanne.meyer@oge.gov
www.oge.gov | @OfficeGovEthics

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From: [Seth Jaffe](#)
To: [Monica M. G. Ashar](#)
Subject: RE: Executive Order numbers
Date: Saturday, January 23, 2021 10:07:49 AM

Thanks!

Sent from my Verizon, Samsung Galaxy smartphone

----- Original message -----

From: "Monica M. G. Ashar" <mmgashar@oge.gov>
Date: 1/23/21 9:52 AM (GMT-05:00)
To: GCLPD MailGroup <GCLPDMailGroup@oge.gov>, DeskOfficers MailGroup <DeskOfficersMailGroup@oge.gov>
Subject: Executive Order numbers

The Executive Order that establishes the new ethics pledge is E.O. 13989: <https://www.govinfo.gov/content/pkg/FR-2021-01-25/pdf/2021-01762.pdf>. The Executive Order that revokes E.O. 13770 is E.O. 13983: <https://www.govinfo.gov/content/pkg/FR-2021-01-25/pdf/2021-01713.pdf>.

Monica

From: [Suzanne L. Meyer](#)
To: [Monica M. G. Ashar](#)
Cc: [Agency Wide](#)
Subject: RE: LA-21-03 available online
Date: Friday, January 22, 2021 12:17:23 PM

Thanks to Monica, Rachel, Seth, and whoever else worked on this, and for getting this published so quickly!

Much appreciated!

Suzanne

From: Monica M. G. Ashar
Sent: Friday, January 22, 2021 11:43 AM
To: Agency Wide <AgencyWide@oge.gov>
Subject: LA-21-03 available online

Good morning,

In accordance with the OGE Legal Advisory Procedures, I wanted to let you know that a new Legal Advisory, LA-21-03, has been posted to the website at the following link:
[https://www.oge.gov/Web/oge.nsf/Legal%20Docs/4EAB053F755BE5968525866500599F75/\\$FILE/LA-21-03.pdf?open](https://www.oge.gov/Web/oge.nsf/Legal%20Docs/4EAB053F755BE5968525866500599F75/$FILE/LA-21-03.pdf?open). Desk Officers should already have received the advance copy that was circulated this morning.

If you have questions regarding the Legal Advisory, please feel free to reach out to me.

Thanks,
Monica

From: [News and Info for Ethics Officials](#) on behalf of [Ethics Mailinglist](#)
To: OGE-ETHICSINFO@LISTSERV.GSA.GOV
Subject: New Legal Advisory: OGE Issues Guidance on Recent Executive Orders on Ethics Commitments by Executive Branch Personnel
Date: Friday, January 22, 2021 11:42:12 AM

On January 20, 2021, President Biden signed an Executive Order titled “Executive Order on Ethics Commitments by Executive Branch Personnel.” Pursuant to the Executive Order, the Office of Government Ethics (OGE) is providing agency ethics officials with a copy of the Ethics Pledge and a link to the Executive Order. The legal advisory also addresses the revocation of Executive Order 13770.

The Legal Advisory is available on OGE’s website at:

[https://www.oge.gov/Web/oge.nsf/Legal%20Docs/4EAB053F755BE5968525866500599F75/\\$FILE/LA-21-03.pdf?open](https://www.oge.gov/Web/oge.nsf/Legal%20Docs/4EAB053F755BE5968525866500599F75/$FILE/LA-21-03.pdf?open).

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From: [Monica M. G. Ashar](#)
To: [DeskOfficers MailGroup](#)
Subject: New legal advisory - LA-21-03: Executive Orders on Ethics Commitments by Executive Branch Personnel
Date: Friday, January 22, 2021 10:54:39 AM
Attachments: [LA-21-03.pdf](#) Attachment is released below

Good morning,

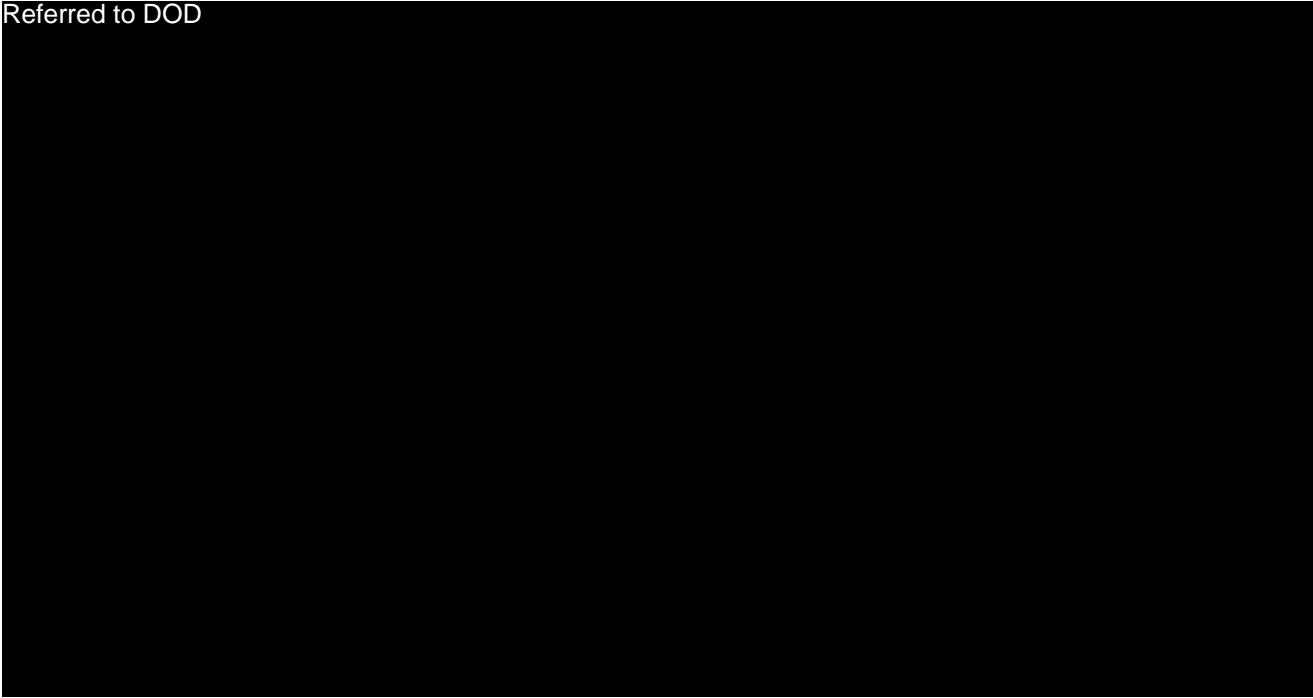
OGE is issuing a new Legal Advisory that will be posted to the website today, January 22. The Legal Advisory (attached) provides agency ethics officials with a copy of the Ethics Pledge and a link to the Executive Order. The legal advisory also address the revocation of Executive Order 13770. Please note that the new ethics pledge format will also be added to OGE's website on the forms page.

If you have any questions, please let me know and I am happy to discuss.

Because this is not yet public, please do not distribute to agencies until such time as it is posted on our website.

Thanks,
Monica

Referred to DOD



Referred to ODNI

Nonresponsive record

Nonresponsive record

Referred to EPA

Referred to ODNI

Nonresponsive record

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Nonresponsive record

Nonresponsive record

Nonresponsive record

Nonresponsive record

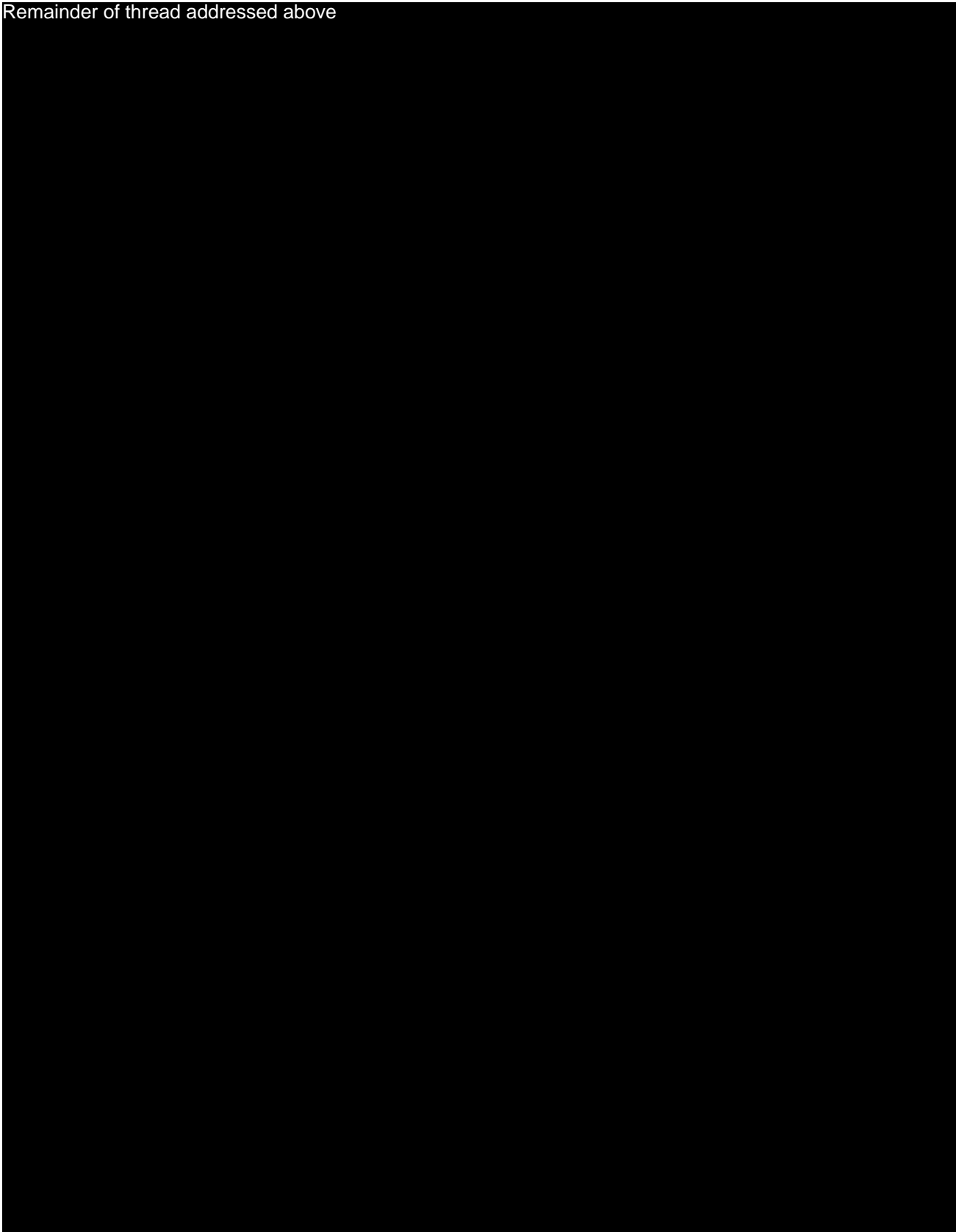
Nonresponsive record

Duplicate of email referred to DOD

From: Rachel K. McRae
To: [Rachel K. McRae](#)
Subject: W [EXTERNAL] | RE: help needed
Date: Wed, 26 Jun 2021, 20:45:47 EDT

-----Original Message-----
From: Mike via M. G. Ashar
Sent: Friday, June 25, 2021 9:17 AM
To: Rachel K. McRae <kmcrac@tpep.gov>
Sub: ext FW [EXTERNAL] RE: Phlog: r-ohad

Remainder of thread addressed above



From: [Bernadette Tolson](#)
To: [Bernadette Tolson](#), [Bernadette Tolson](#)
Subject: W (2475906) | RE: Helpo - evicted
Date: Wed, January 23, 2023 9:10:17 AM

Please see chatter below.

-----Original Message-----
From: Suzanne L. Meyer
Sent: Friday, January 20, 2023 9:09 AM
To: **(b)(6)**
Cc: **(b)(6)**
Subject: FW: [EXTERNAL] RE: Pingge - e - what

**(b)(6) Araj
Ahmed email**

Hi to Araj
I was copy ed in on your email. I am copying in your OGE dock off cor. Bernadette Tolson.
Best

Suzanne

Remainder of thread addressed above



From: [David J. Apol](#)
To: [Monica M. G. Ashar](#)
Cc: [Seth Jaffe](#)
Subject: FW: LA-21-03 Ethics pledge LA 1.docx
Date: Friday, January 22, 2021 8:39:31 AM
Attachments: [LA-21-03 Ethics pledge LA 1.docx](#)

(b)(5) 2 page draft legal advisory
withheld in full

Monica,

Emory reviewed the draft I send him and suggested one small change that I made as a redline on the H drive. With that, I think you can put in in final and get it back to him. Also, please have someone do a side by side with the attachment and pledge just to make sure they are identical. Thanks for your quick work.

From: Emory A. Rounds III
Sent: Friday, January 22, 2021 8:09 AM
To: David J. Apol <djapol@oge.gov>
Subject: LA-21-03 Ethics pledge LA 1.docx

[An edit . . .](#)

From: [Monica M. G. Ashar](#)
To: [David J. Apol](#); [Seth Jaffe](#)
Subject: RE: LA-21-03 -- Ethics Pledge Advisory
Date: Friday, January 22, 2021 8:02:40 AM

Additionally, once the advisory is issued, I'll add the ethics pledge format to the forms page of OGE's website, and I'll remove the format for the 13770 pledge.

<https://www.oge.gov/web/oge.nsf/OGE+Forms>

From: Monica M. G. Ashar
Sent: Friday, January 22, 2021 7:10 AM
To: David J. Apol <djapol@oge.gov>; Seth Jaffe <sjaffe@oge.gov>
Subject: RE: LA-21-03 -- Ethics Pledge Advisory

Thanks, Dave. I've moved the folder over. Also, I checked the Federal Register this morning, and the two new Executive Orders still have not yet been assigned numbers.

Thanks,
Monica

From: David J. Apol
Sent: Thursday, January 21, 2021 9:23 PM
To: Seth Jaffe <sjaffe@oge.gov>; Monica M. G. Ashar <mmgashar@oge.gov>
Subject: RE: LA-21-03 -- Ethics Pledge Advisory

Monica,

I've signed the routing slip and sent a copy of the draft to Emory so he could look at it tomorrow morning before you get in. Please move the files into his H drive when you get in. Thanks.

Dave

From: Seth Jaffe
Sent: Thursday, January 21, 2021 5:00 PM
To: David J. Apol <djapol@oge.gov>
Cc: Monica M. G. Ashar <mmgashar@oge.gov>
Subject: FW: LA-21-03 -- Ethics Pledge Advisory
Importance: High

Hi Dave,

I have reviewed the draft LA concerning Executive Orders on Ethics Commitments by Executive Branch Personnel, and I have signed the routing slip. It is ready for your review. (b)(5) internal network address

If you sign if please let Monica and I know so she can put the file in the (b)(5) internal network address file for his review after you have called to let him know it is there for his review. (FYI: The goal is still to publish today or tomorrow)

Thanks,
Seth

From: Monica M. G. Ashar
Sent: Thursday, January 21, 2021 4:55 PM
To: Seth Jaffe <sjaffe@oge.gov>
Subject: LA-21-03 -- Ethics Pledge Advisory

Seth,

The file on LA-21-03, Executive Orders on Ethics Commitments by Executive Branch Personnel, is ready for your review. (b)(5) internal network address .

Thanks,
Monica

From: [Grant Anderson](#)
To: [Agency Wide](#); [News Clippings](#)
Subject: Legislative Update for Thursday, January 21, 2021
Date: Thursday, January 21, 2021 3:46:34 PM

The Senate reconvened at 12:00 p.m.

According to *CQ*, the Senate reconvened at noon. Following leader remarks, the chamber will be in a period of morning business. At 10 a.m., the Senate Commerce, Science, and Transportation Committee held a hearing on the nomination of Pete Buttigieg to be Secretary of Transportation ([Senate.gov: Hearings & Meetings](#)).

The House reconvened at 2:00 p.m.

According to *CQ*, the House reconvened at 2 p.m. for legislative business and is expected to consider a bill (HR 335) that would provide for an exception to a limitation against appointment of persons as Defense Secretary within seven years of relief from active duty.

Legislative and Related News

Multiple outlets report on the status of Senate negotiations on rules and procedure. [Democrats take control of 50-50 Senate, with Harris presiding for first time \(Washington Post\)](#); [Democrats poised to rebuff McConnell's filibuster demands \(Politico\)](#); [Democrats swear in three senators to gain majority \(The Hill\)](#); [Democrats officially control the Senate after final members are sworn in \(Politico\)](#); [Democrats shoot down McConnell's filibuster gambit \(The Hill\)](#); [Meet the Democrats poised to lead Senate committees \(WP\)](#); [Schumer and McConnell trade places, but icy relationship holds \(The Hill\)](#)

Multiple outlets report that the Justice Department will not criminally charge Sen. Burr in connection with certain stock trades. [DOJ will not criminally charge Sen. Richard Burr for stock trades he made after getting Covid intelligence \(CNBC\)](#); [Justice Dept. closes insider trading case against Burr without charges \(The Hill\)](#); [US Sen. Richard Burr won't face charges in stock trade inquiry \(News & Observer\)](#)

Multiple outlets report that the Senate [voted](#) 84-10 to confirm Avril Haines to be Director of National Intelligence. [Senate confirms Biden's intel chief, giving him first Cabinet official \(The Hill\)](#); [Senate confirms Avril Haines as director of national intelligence \(WP\)](#)

Multiple outlets report on [S. 1](#), the For the People Act of 2021, which will include ethics reforms for the President, VP and federal officers and employees in Title VIII. [Democrats seek momentum for voting, political money overhaul \(Roll Call\)](#); [Senate Democrats Prove 'Democracy Reform Is a Top Priority' by Putting 'For the People Act' First \(Common Dreams\)](#); [Senate Democrats Announce First Order Of Business For New Majority: Fixing Democracy \(Huffington Post\)](#)

Executive Branch Ethics and Related News

Multiple outlets report and opine on President Biden's [executive order](#) on ethics commitments by executive branch personnel. [Biden ethics rules aim to curtail revolving door, 'shadow lobbying' \(Open Secrets\)](#); [Biden signs executive order invoking 2-year lobbying ban for appointees \(The Hill\)](#); [Biden Imposes New Restrictions on Corporate Lobbying \(Bloomberg\)](#); [Biden ethics order marks departure from Trump administration \(AP\)](#); [Biden Issues Sweeping Ethics Plan for Appointees \(Gov Exec\)](#); [Ethics in the Biden White House: A Chance for a New Beginning \(Bloomberg Law\)](#); [Biden to implement new ethics rules banning 'golden parachute' bonuses for appointees \(CNN\)](#); [I Wrote](#)

[President Obama's Ethics Plan—Biden's Is Better \(Yahoo\)](#); [Biden, Trump take dueling approaches to ethics, lobbying \(Roll Call\)](#)

Multiple outlets report that former President Trump signed an [executive order](#) revoking Executive Order 13770 “Ethics Commitments by Executive Branch Appointees” on his final day in office. [Trump frees former aides from ethics pledge, lobbying ban \(AP\)](#); [So much for 'draining the swamp'! Trump revokes his own rules preventing White House staff from lobbying in one of his final acts as President \(Daily Mail\)](#); [Trump revokes 5-year lobbying ban for administration officials on last day in office \(The Hill\)](#); [Trump revokes ethics order barring former aides from lobbying \(Axios\)](#); [Trump rescinded order barring White House employees from lobbying the government. \(NYT\)](#); [Trump revokes rule barring lobbying by former officials as he leaves office \(CNN\)](#); [Trump revokes rule preventing White House staff from lobbying \(Politico\)](#)

Multiple outlets report on financial disclosure reports filed by nominees. [Biden Energy Nominee Holds Energy Investments, Including Interest In Electric Vehicle Company Set To Go Public This Year \(Forbes\)](#); [National profile and media deals prove lucrative for Pete Buttigieg \(South Bend Tribune\)](#); [Biden's pick for secretary of state commits to diplomacy, diversity, alliances in confirmation hearing \(ABC News\)](#); [Biden energy secretary nominee Jennifer Granholm has millions in energy investments \(WEIS\)](#); [Janet Yellen tells lawmakers it's 'critically important to act now' on economic relief plan \(WP\)](#); [Raimondo signs federal ethics agreement, details her finances \(WPRI\)](#); [Biden's DHS Pick Defends Ethics Record, Promises Morale Boost for Workforce \(Gov Exec\)](#); [Biden Cabinet nominees trailed by ethics concerns \(Fox News\)](#); [Austin plays up civilian control \(Politico\)](#)

Multiple outlets report on former President Trump's [financial disclosure](#) report released yesterday. [Trump Businesses See Sharp Revenue Decline at Key Properties \(WSJ\)](#); [Trump Financial Disclosure Reveals a Business Upended by the Pandemic \(NYT\)](#); [Trump Reveals Extent of Pandemic Damage to Business Empire \(Bloomberg\)](#); [Donald Trump's Latest Financial Disclosure Shows a Huge Revenue Drop at His DC Hotel \(Washingtonian\)](#)

Yahoo reports that transition team lawyers for President Biden have reminded Vice President Harris' niece that she can't profit off her aunt's image. [Biden lawyers remind Kamala Harris' niece that she can't profit off aunt's name](#)

Multiple outlets report that the National Labor Relations Board General Counsel has been fired. [Trump labor board counsel fired after resisting Biden's call for resignation \(Politico\)](#); [Biden fires Trump-appointed labor board general counsel who refused to resign \(WP\)](#); [Biden fires Trump-era NLRB counsel \(The Hill\)](#)

The Hill reports that former President Trump [granted pardons](#) to 73 individuals and commuted the sentences of an additional 70 individuals on his final day in office. [Trump grants clemency to more than 100 people, including Bannon](#)

Federal Agency and Related News

Multiple outlets report on additional executive orders issued by President Biden. [On day 1, Biden issues mask mandate for federal employees, reinstates diversity training \(FNN\)](#); [These are the executive orders Biden has signed so far \(The Hill\)](#); [In Depth: Here Are the 17 Executive Orders Joe Biden Issued on Day One \(Law & Crime\)](#)

The White House details acting federal agency leadership. [President Joe Biden Announces Acting Federal Agency Leadership](#)

Next Scheduled Recess:

House: Jan. 22 – Feb. 1
Senate: Feb. 15 – Feb. 19

From: [Patrick J. Lightfoot](#)
To: [David J. Apol](#); [Seth Jaffe](#)
Cc: [Monica M. G. Ashar](#)
Subject: RE: Note for Trump Pledge LAs
Date: Thursday, January 21, 2021 2:57:11 PM
Attachments: [image001.png](#)
[image002.png](#)

(b) (5)

From: David J. Apol
Sent: Thursday, January 21, 2021 2:56 PM
To: Patrick J. Lightfoot <pjlightf@oge.gov>; Seth Jaffe <sjaffe@oge.gov>
Cc: Monica M. G. Ashar <mmgashar@oge.gov>
Subject: RE: Note for Trump Pledge LAs

I'm fine with this. (b) (5)

From: Patrick J. Lightfoot
Sent: Thursday, January 21, 2021 2:01 PM
To: Seth Jaffe <sjaffe@oge.gov>; David J. Apol <djapol@oge.gov>
Cc: Monica M. G. Ashar <mmgashar@oge.gov>
Subject: RE: Note for Trump Pledge LAs

Sorry, one last revision:

I'll modify the description for EO 13770:

To say "Executive Order 13770 has been revoked. It required political appointees to agree to additional restrictions by signing an Ethics Pledge. Additionally, it revoked and superseded Executive Order 13490."

This will make it relatively consistent with the description for 13490:

Executive Orders	01/21/2009	E.O. 13490: Ethics Commitments by Executive Branch Personnel	Executive Order 13490 has been revoked and superseded. It required political appointees to agree to additional restrictions by signing an Ethics Pledge.
------------------	------------	--	--

From: Seth Jaffe

Sent: Thursday, January 21, 2021 1:44 PM
To: Patrick J. Lightfoot <pjlightf@oge.gov>; David J. Apol <djapol@oge.gov>
Cc: Monica M. G. Ashar <mmgashar@oge.gov>
Subject: RE: Note for Trump Pledge LAs

Sounds good.

From: Patrick J. Lightfoot
Sent: Thursday, January 21, 2021 1:43 PM
To: Seth Jaffe <sjaffe@oge.gov>; David J. Apol <djapol@oge.gov>
Cc: Monica M. G. Ashar <mmgashar@oge.gov>
Subject: RE: Note for Trump Pledge LAs

Seth, I don't see a reason to hold off; particularly given that the word is already out to ethics officials. I'd say we do it today.

Dave, do these notes seem fine to you/do you have further thoughts on timing?

--Patrick

From: Seth Jaffe
Sent: Thursday, January 21, 2021 1:30 PM
To: Patrick J. Lightfoot <pjlightf@oge.gov>; David J. Apol <djapol@oge.gov>
Cc: Monica M. G. Ashar <mmgashar@oge.gov>
Subject: RE: Note for Trump Pledge LAs

Hi Patrick,

That note seems good to me. Is there any reason to wait to put the note on the LAs until after we put out our first LA?

Thanks,
Seth

From: Patrick J. Lightfoot
Sent: Thursday, January 21, 2021 12:44 PM
To: Seth Jaffe <sjaffe@oge.gov>; David J. Apol <djapol@oge.gov>
Cc: Monica M. G. Ashar <mmgashar@oge.gov>
Subject: Note for Trump Pledge LAs

Seth and Dave,

Here is the proposed note for the Trump Pledge advisories:

Note: Executive Order 13770 has been revoked. "Employees and former employees subject to the commitments in Executive Order 13770 will not be subject to those commitments after noon January 20, 2021."

I plan to add this note to the top of the following advisories:

[LA-17-02](#)

[LA-17-03](#)

[LA-19-01](#) (mentions pledge restrictions during shutdown for gifts issues)

[LA-20-09](#)

If this looks good to you all, I will add the notes to all of those advisories and update the website shortly.

CC'ing Monica for her situational awareness in case any of this spills over into tomorrow.

On another front – we will get a new subject matter tag added to the new Biden LAs once we know the EO number. **We might know that number by tomorrow if the first LA doesn't go out until then.**

Thanks!

--Patrick

From: [Patrick J. Lightfoot](#)
To: [David J. Apol](#); [Seth Jaffe](#)
Cc: [Monica M. G. Ashar](#)
Subject: RE: Note for Trump Pledge LAs
Date: Thursday, January 21, 2021 3:19:26 PM
Attachments: [image001.png](#)
[image002.png](#)

Hi all,

All of the updates noted below are now complete.

--Patrick

From: David J. Apol
Sent: Thursday, January 21, 2021 2:56 PM
To: Patrick J. Lightfoot <pjlightf@oge.gov>; Seth Jaffe <sjaffe@oge.gov>
Cc: Monica M. G. Ashar <mmgashar@oge.gov>
Subject: RE: Note for Trump Pledge LAs

I'm fine with this. (b) (5)




Remainder of thread released above



From: [Rolando DeLeon](#)
To: [Rachel K. McRae](#)
Subject: RE: Question about Ethics Pledge
Date: Thursday, January 21, 2021 2:54:43 PM

Rachel,

Yes, I believe question 3 is referring to (b) (5).

Rolando DeLeon
Government Ethics Specialist
U.S. Office of Government Ethics
1201 New York Avenue NW, Suite 500
Washington DC 20005
202.482.9284
Rolando.DeLeon@oge.gov

From: Rachel K. McRae
Sent: Thursday, January 21, 2021 1:54 PM
To: Rolando DeLeon <rdeleon@oge.gov>
Subject: RE: Question about Ethics Pledge

Hello! W/R/T question 3, is the agency referring to (b) (5) ?

From: Rolando DeLeon
Sent: Thursday, January 21, 2021 9:59 AM
To: DeskOfficers MailGroup <DeskOfficersMailGroup@oge.gov>
Subject: FW: Question about Ethics Pledge
Importance: High

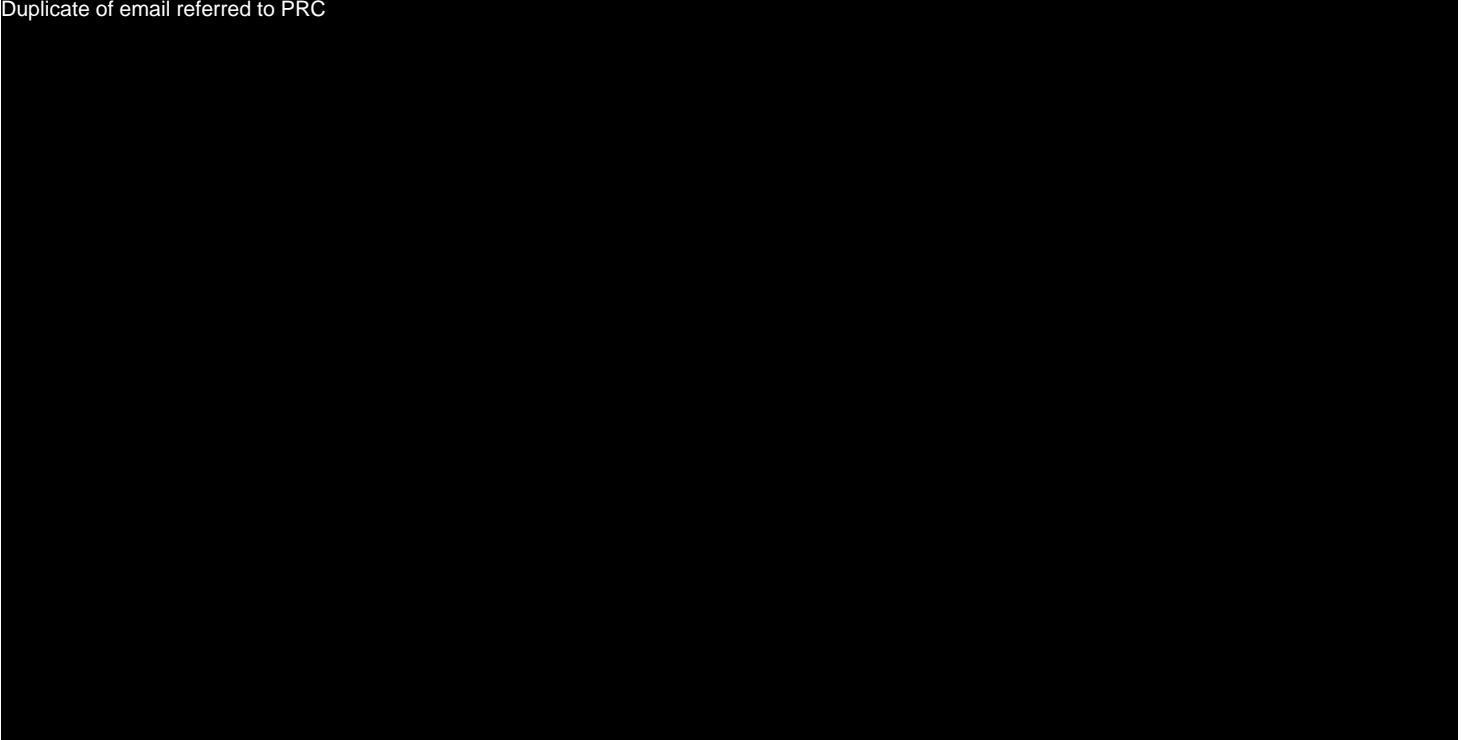
I put this in AIMS [20992](#).

I knew these questions would be coming in. Do we have any initial feedback to provide?

Rolando DeLeon
Government Ethics Specialist
U.S. Office of Government Ethics
1201 New York Avenue NW, Suite 500
Washington DC 20005
202.482.9284
Rolando.DeLeon@oge.gov

Duplicate of email referred to PRC

Duplicate of email referred to PRC



From: [Patrick J. Lightfoot](#)
To: [Seth Jaffe](#)
Subject: RE: Note for Trump Pledge LAs
Date: Thursday, January 21, 2021 2:51:33 PM
Attachments: [image001.png](#)
[image002.png](#)

Great; will do!

And, yes, the earlier LAs that have notes directing readers to the 2017 LAs will remain in place until we issue updated guidance on the Biden pledge.

From: Seth Jaffe
Sent: Thursday, January 21, 2021 2:51 PM
To: Patrick J. Lightfoot <pjlightf@oge.gov>
Subject: RE: Note for Trump Pledge LAs

Patrick,

On our conversation earlier, Dave OK'd the substance of the changes to the notes and he did not indicate that we needed to wait so I think it is OK to go ahead and update the notes on the LA's you previously mentioned.

So far as the updates to the earlier LA's (2009, et. al.) and indicating that the 2017 updates are now 2021 updates it is my understanding that we are waiting until the new LAs are issued. Correct?

Thanks,
Seth

From: Patrick J. Lightfoot
Sent: Thursday, January 21, 2021 2:47 PM
To: Seth Jaffe <sjaffe@oge.gov>
Subject: RE: Note for Trump Pledge LAs

Seth

Am I correct that I should wait for confirmation from Dave on all of this, or am I clear to update the website?

--Patrick

From: Seth Jaffe
Sent: Thursday, January 21, 2021 2:46 PM
To: Patrick J. Lightfoot <pjlightf@oge.gov>
Subject: RE: Note for Trump Pledge LAs

Patrick,

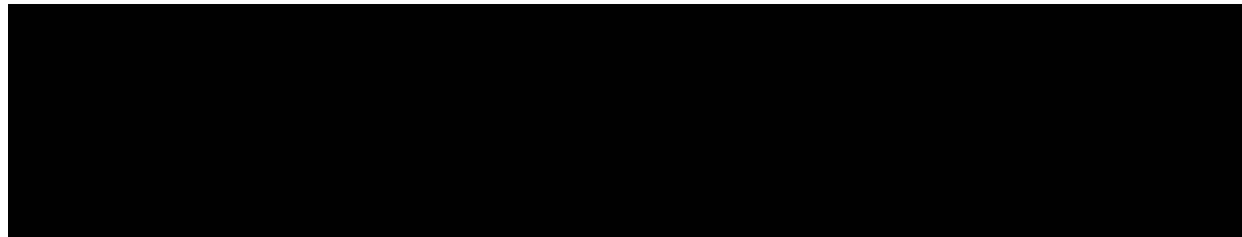
Sounds good.

Seth

From: Patrick J. Lightfoot
Sent: Thursday, January 21, 2021 2:01 PM
To: Seth Jaffe <sjaffe@oge.gov>; David J. Apol <djapol@oge.gov>
Cc: Monica M. G. Ashar <mmgashar@oge.gov>
Subject: RE: Note for Trump Pledge LAs

Sorry, one last revision:

I'll modify the description for EO 13770:



To say "Executive Order 13770 has been revoked. It required political appointees to agree to additional restrictions by signing an Ethics Pledge. Additionally, it revoked and superseded Executive Order 13490."

This will make it relatively consistent with the description for 13490:

Executive Orders	01/21/2009	E.O. 13490: Ethics Commitments by Executive Branch Personnel	Executive Order 13490 has been revoked and superseded. It required political appointees to agree to additional restrictions by signing an Ethics Pledge.
------------------	------------	--	--

From: Seth Jaffe
Sent: Thursday, January 21, 2021 1:44 PM
To: Patrick J. Lightfoot <pjlightf@oge.gov>; David J. Apol <djapol@oge.gov>
Cc: Monica M. G. Ashar <mmgashar@oge.gov>
Subject: RE: Note for Trump Pledge LAs

Sounds good.

From: Patrick J. Lightfoot
Sent: Thursday, January 21, 2021 1:43 PM
To: Seth Jaffe <sjaffe@oge.gov>; David J. Apol <djapol@oge.gov>
Cc: Monica M. G. Ashar <mmgashar@oge.gov>
Subject: RE: Note for Trump Pledge LAs

Seth, I don't see a reason to hold off; particularly given that the word is already out to ethics officials. I'd say we do it today.

Dave, do these notes seem fine to you/do you have further thoughts on timing?

--Patrick

From: Seth Jaffe
Sent: Thursday, January 21, 2021 1:30 PM
To: Patrick J. Lightfoot <pjlightf@oge.gov>; David J. Apol <djapol@oge.gov>
Cc: Monica M. G. Ashar <mmgashar@oge.gov>
Subject: RE: Note for Trump Pledge LAs

Hi Patrick,

That note seems good to me. Is there any reason to wait to put the note on the LAs until after we put out our first LA?

Thanks,
Seth

From: Patrick J. Lightfoot
Sent: Thursday, January 21, 2021 12:44 PM
To: Seth Jaffe <sjaffe@oge.gov>; David J. Apol <djapol@oge.gov>
Cc: Monica M. G. Ashar <mmgashar@oge.gov>
Subject: Note for Trump Pledge LAs

Seth and Dave,

Here is the proposed note for the Trump Pledge advisories:

Note: Executive Order 13770 has been revoked. "Employees and former employees subject to the commitments in Executive Order 13770 will not be subject to those commitments after noon January 20, 2021."

I plan to add this note to the top of the following advisories:

[LA-17-02](#)

[LA-17-03](#)

[LA-19-01](#) (mentions pledge restrictions during shutdown for gifts issues)

[LA-20-09](#)

If this looks good to you all, I will add the notes to all of those advisories and update the website shortly.

CC'ing Monica for her situational awareness in case any of this spills over into tomorrow.

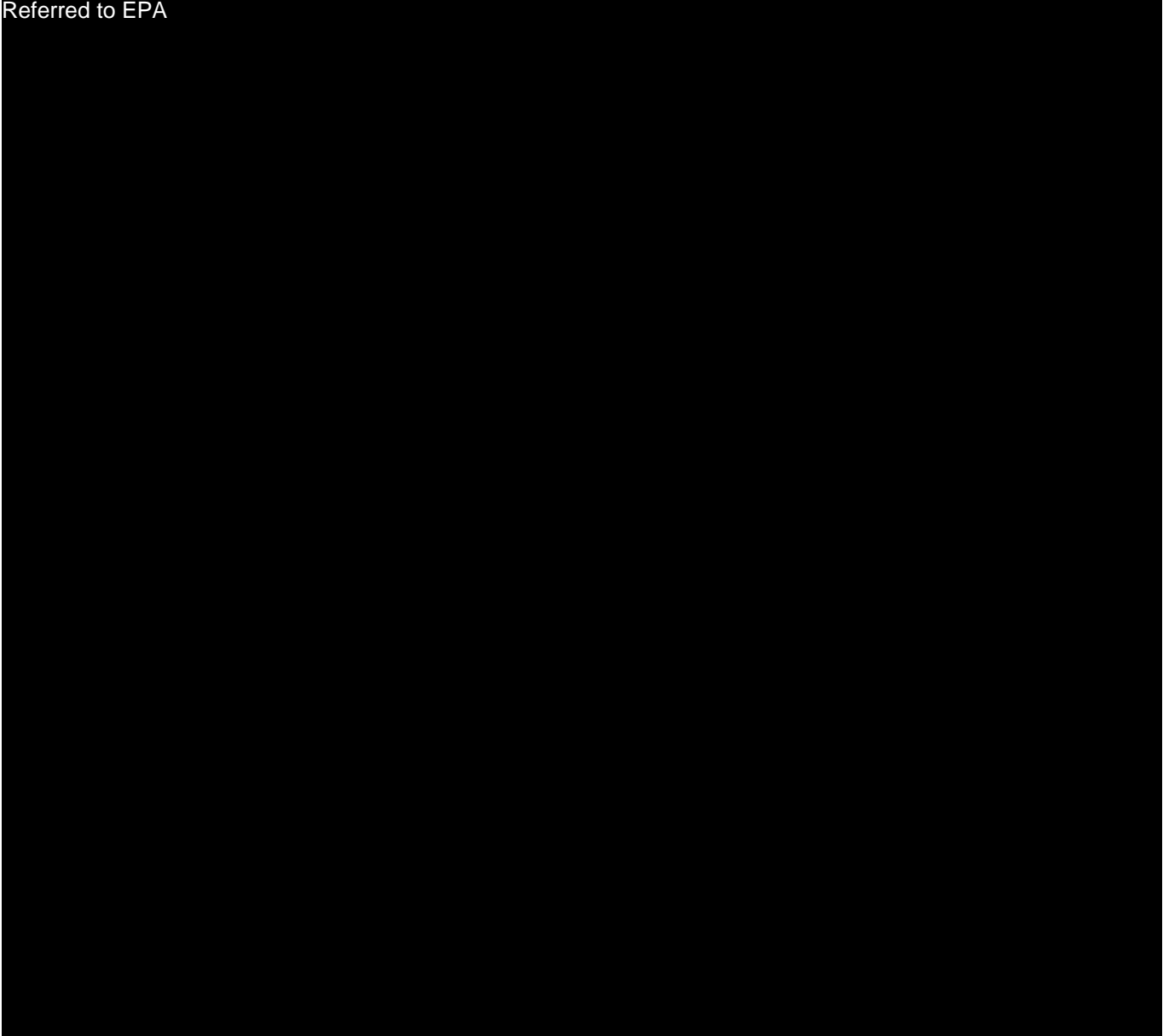
On another front – we will get a new subject matter tag added to the new Biden LAs once we know the EO number. **We might know that number by tomorrow if the first LA doesn't go out until then.**

Thanks!

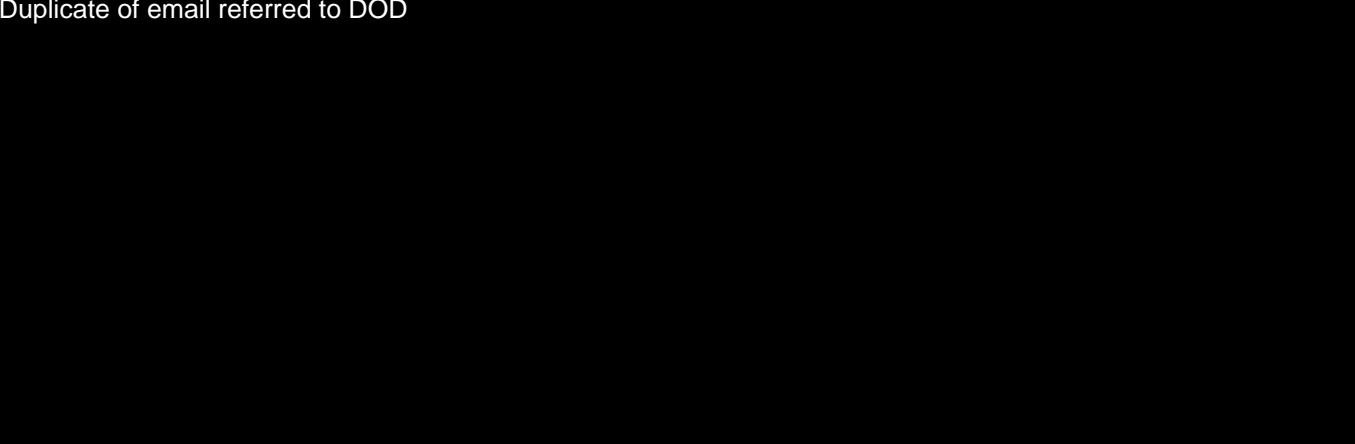
--Patrick

From: [Monica M. G. Ashar](#)
To: [Rachel K. McRae](#)
Subject: FW: Pledge revoked
Date: Thursday, January 21, 2021 2:43:45 PM


Referred to EPA



Duplicate of email referred to DOD



Duplicate of email referred to DOD



From: [Seth Jaffe](#)
To: [Rachel K. McRae](#)
Subject: RE: Biden Ethics Pledge / EO 13770 Revocation Questions
Date: Thursday, January 21, 2021 12:41:28 PM

Thanks!

From: Rachel K. McRae
Sent: Thursday, January 21, 2021 12:36 PM
To: DeskOfficers MailGroup <DeskOfficersMailGroup@oge.gov>
Subject: Biden Ethics Pledge / EO 13770 Revocation Questions

Hi all,

As you start receiving new Pledge questions from your agencies, please feel free to consult the table [here](#) to see if the question has already been answered. As with the last Pledge, a lot of the questions coming in are similar, so this will hopefully save us all time. If the question has not been addressed on the table, and if the answer is not clear from another source, please refer it in AIMS to ELPB for review and inclusion in the table.

Thanks!
Rachel

From: [Suzanne L. Meyer](#)
To: [Rachel K. McRae](#); [Monica M. G. Ashar](#)
Subject: FW: Trump Ethics Pledge
Date: Thursday, January 21, 2021 12:30:53 PM

Hi Rachel and Monica,

I know these are the types of questions you are getting (see below), but I'm sending anyway. Based on what Seth wrote in his email, I don't think this needs an AIMS referral for that reason. If I'm incorrect, please let me know.

Thanks,

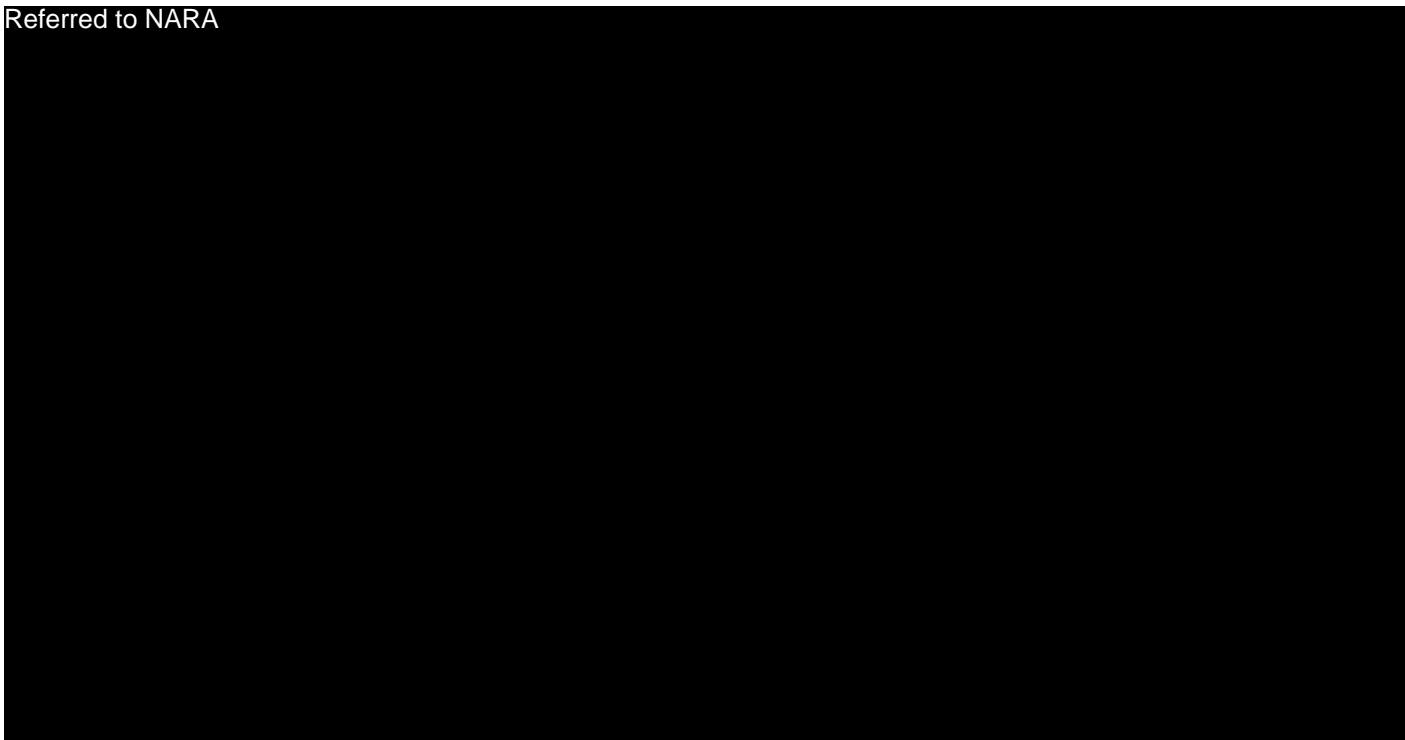
Suzanne

Referred to FTC

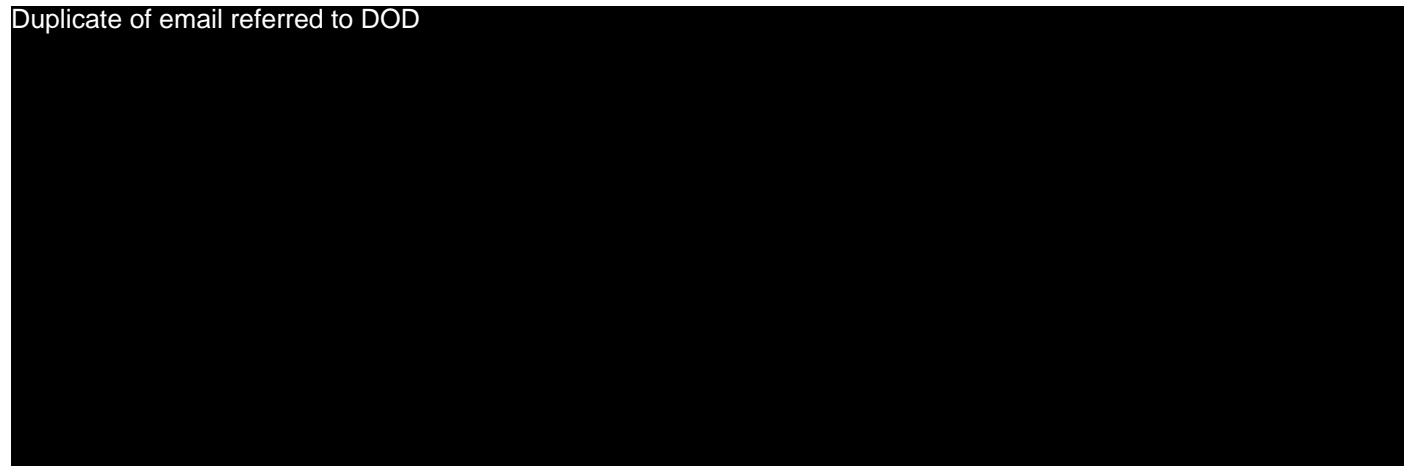


From: [David Taube](#)
To: [David J. Apol](#); [Seth Jaffe](#); [Monica M. G. Ashar](#); [Morris C. Barren](#); [Patrick J. Lightfoot](#); [Rachel K. McRae](#)
Subject: Pledge revocation link
Date: Thursday, January 21, 2021 11:57:00 AM

Referred to NARA



Duplicate of email referred to DOD



From: [Rachel K. McRae](#)
To: [Seth Jaffe](#)
Subject: Revocation
Date: Thursday, January 21, 2021 10:39:28 AM
Attachments: [Revocation of EO 13770.png](#)

Attachment follows

Seth,

I was only able to track down a partial screenshot of the revocation. I'll keep looking for the full version, but this at least captures the language we'll need for the LA.

Thanks!
Rachel

EXECUTIVE ORDER

- - - - -

REVOCATION OF EXECUTIVE ORDER 13770

By the authority vested in me as President of the United States by the Constitution and laws of the United States of America, including section 301 of title 3, United States Code, and sections 3301 and 7301 of title 5, United States Code, it is hereby ordered as follows:

Section 1. Revocation. Executive Order 13770 of January 28, 2017, "Ethics Commitments by Executive Branch Appointees," is hereby revoked, effective at noon January 20, 2021. Employees and former employees subject to the commitments in Executive Order 13770 will not be subject to those commitments after noon January 20, 2021.

From: [Patrick J. Lightfoot](#)
To: [Rolando DeLeon](#)
Subject: RE: Question about Ethics Pledge
Date: Thursday, January 21, 2021 10:18:17 AM

Correct – 13770 has indeed been revoked, so we’re planning to address that as well. Possibly including adding notes to the various 13770 LAs to indicate as much.

From: Rolando DeLeon
Sent: Thursday, January 21, 2021 10:17 AM
To: Patrick J. Lightfoot <pjlightf@oge.gov>
Subject: RE: Question about Ethics Pledge

Patrick,

Thanks for all the feedback

I let the agency know OGE is evaluating changes related to any new E.O. I think the biggest question comes here based on reports that President Trump revoked 13770.

<https://trumpwhitehouse.archives.gov/presidential-actions/executive-order-revocation-executive-order-13770/>

Rolando DeLeon
Government Ethics Specialist
U.S. Office of Government Ethics
1201 New York Avenue NW, Suite 500
Washington DC 20005
202.482.9284
Rolando.DeLeon@oge.gov

From: Patrick J. Lightfoot
Sent: Thursday, January 21, 2021 10:05 AM
To: Rolando DeLeon <rdeleon@oge.gov>; DeskOfficers MailGroup <DeskOfficersMailGroup@oge.gov>
Subject: RE: Question about Ethics Pledge

Roland,

ELPB is meeting on pledge stuff today and we will probably have further preliminary info after that, but I’d think (b) (5)

[REDACTED]

[REDACTED]

[REDACTED]

--Patrick

From: Rolando DeLeon
Sent: Thursday, January 21, 2021 9:59 AM
To: DeskOfficers MailGroup <DeskOfficersMailGroup@oge.gov>
Subject: FW: Question about Ethics Pledge
Importance: High

I put this in AIMS [20992](#).

I knew these questions would be coming in. Do we have any initial feedback to provide?

Rolando DeLeon
Government Ethics Specialist
U.S. Office of Government Ethics
1201 New York Avenue NW, Suite 500
Washington DC 20005
202.482.9284
Rolando.DeLeon@oge.gov

Duplicate of email referred to PRC



From: [Seth Jaffe](#)
To: [Rolando DeLeon](#); [DeskOfficers MailGroup](#); [GCLPD MailGroup](#)
Cc: [Rachel K. McRae](#); [Monica M. G. Ashar](#)
Subject: RE: Question about Ethics Pledge
Date: Thursday, January 21, 2021 10:14:29 AM

Dear folks,

FYI: Rachel and Monica will be compiling all the new ethics pledge questions. You can still enter them in AIMS if needed to refer.

Thanks,
Seth


From: Rolando DeLeon
Sent: Thursday, January 21, 2021 9:59 AM
To: DeskOfficers MailGroup <DeskOfficersMailGroup@oge.gov>
Subject: FW: Question about Ethics Pledge
Importance: High

I put this in AIMS [20992](#).

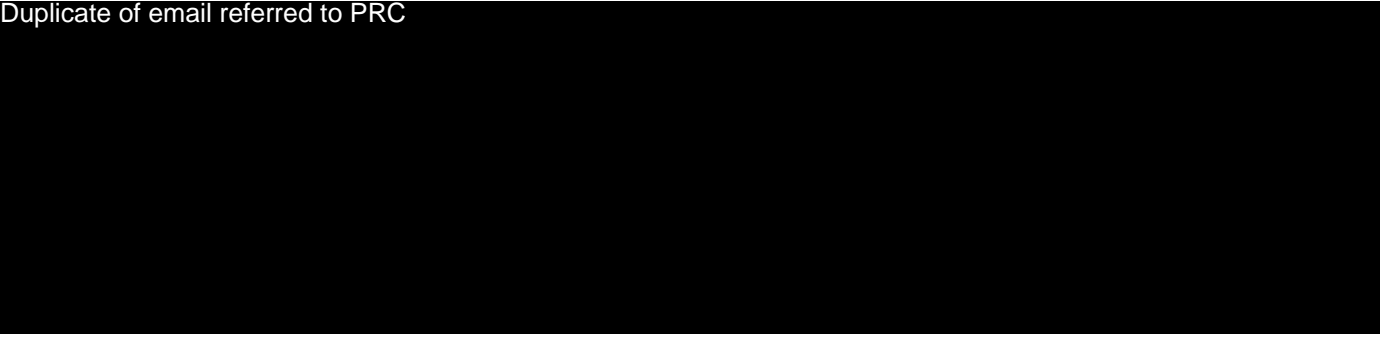
I knew these questions would be coming in. Do we have any initial feedback to provide?

Rolando DeLeon
Government Ethics Specialist
U.S. Office of Government Ethics
1201 New York Avenue NW, Suite 500
Washington DC 20005
202.482.9284
Rolando.DeLeon@oge.gov

Duplicate of email referred to PRC



Duplicate of email referred to PRC



From: [Patrick J. Lightfoot](#)
To: [Rolando DeLeon](#); [DeskOfficers MailGroup](#)
Subject: RE: Question about Ethics Pledge
Date: Thursday, January 21, 2021 10:11:26 AM

Sorry one more thing – I was typing too quickly to capture things fully. (b) (5)

Now I'll stop flooding inboxes!

From: Patrick J. Lightfoot
Sent: Thursday, January 21, 2021 10:05 AM
To: Rolando DeLeon <rdeleon@oge.gov>; [DeskOfficers MailGroup](#) <DeskOfficersMailGroup@oge.gov>
Subject: RE: Question about Ethics Pledge

Correction: (b) (5)

From: Patrick J. Lightfoot
Sent: Thursday, January 21, 2021 10:05 AM
To: Rolando DeLeon <rdeleon@oge.gov>; [DeskOfficers MailGroup](#) <DeskOfficersMailGroup@oge.gov>
Subject: RE: Question about Ethics Pledge

Roland,

ELPB is meeting on pledge stuff today and we will probably have further preliminary info after that, but I'd think (b) (5)

--Patrick


From: Rolando DeLeon
Sent: Thursday, January 21, 2021 9:59 AM
To: [DeskOfficers MailGroup](#) <DeskOfficersMailGroup@oge.gov>
Subject: FW: Question about Ethics Pledge
Importance: High

I put this in AIMS [20992](#).

I knew these questions would be coming in. Do we have any initial feedback to provide?

Rolando DeLeon
Government Ethics Specialist
U.S. Office of Government Ethics
1201 New York Avenue NW, Suite 500
Washington DC 20005
202.482.9284
Rolando.DeLeon@oge.gov

Duplicate of email referred to PRC



From: [Seth Jaffe](#)
To: [Monica M. G. Ashar](#); [Rachel K. McRae](#); [Patrick J. Lightfoot](#); [Morris C. Barren](#); [David Taube](#)
Subject: FW: Ethics pledge
Date: Thursday, January 21, 2021 9:54:07 AM

FYI:

From: Suzanne L. Meyer
Sent: Thursday, January 21, 2021 9:52 AM
To: Seth Jaffe <sjaffe@oge.gov>
Subject: FW: Ethics pledge


Hi Seth,

Here's the other question I received.

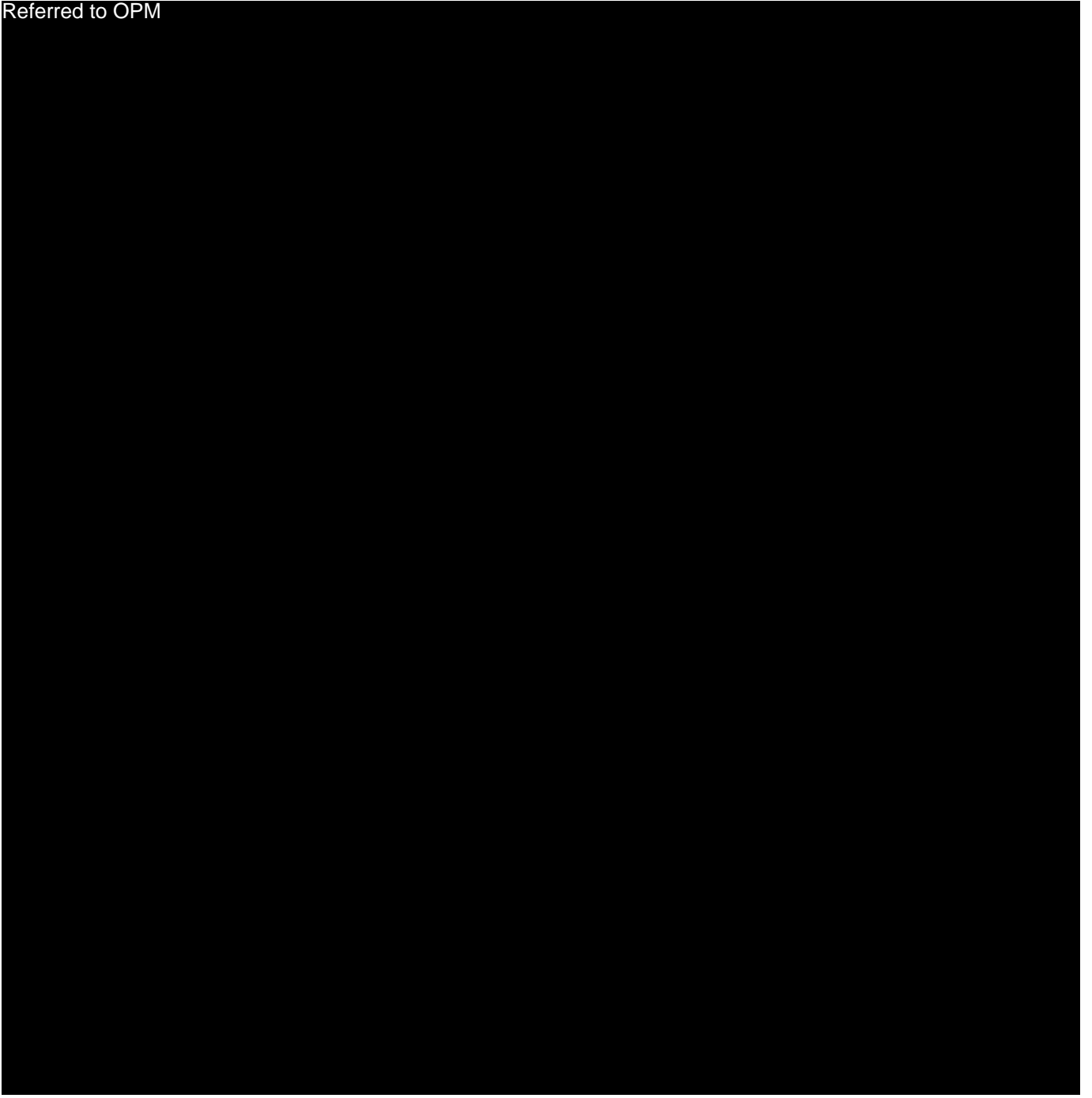
Thanks,

Suzanne

Referred to OPM



Referred to OPM



From: [Seth Jaffe](#)
To: [Suzanne L. Meyer](#)
Cc: [Monica M. G. Ashar](#); [Rachel K. McRae](#)
Subject: RE: Ethics pledges
Date: Thursday, January 21, 2021 9:53:07 AM

Hi Suzanne,

Thank you. We are working on it.

Seth

From: Suzanne L. Meyer
Sent: Thursday, January 21, 2021 9:46 AM
To: Seth Jaffe <sjaffe@oge.gov>
Subject: Ethics pledges

Hi Seth,

Hope this email finds you well.

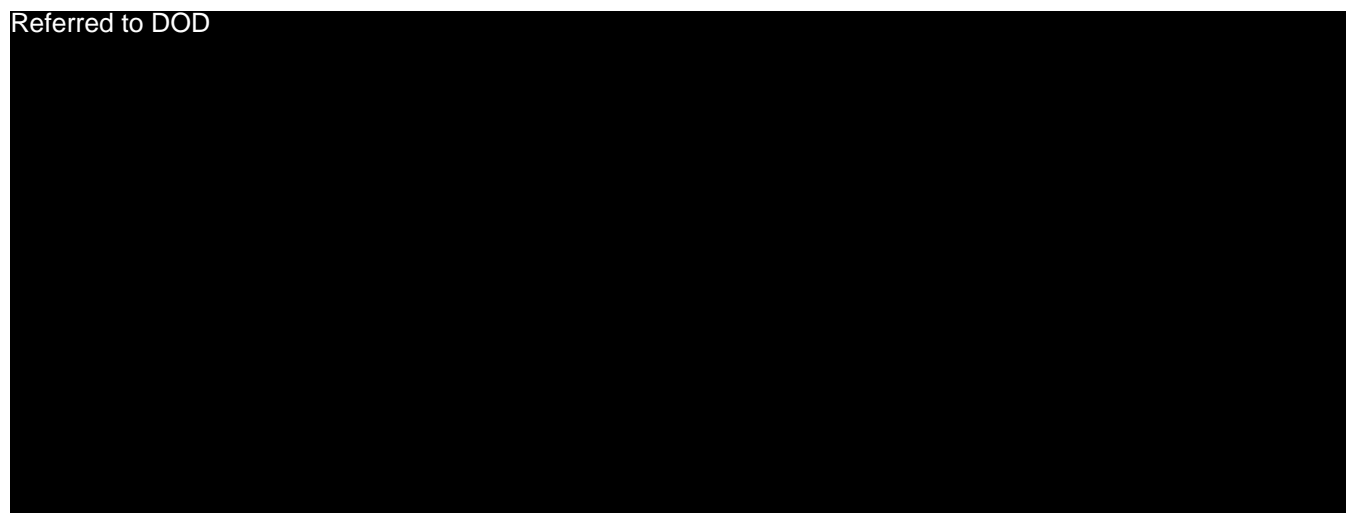
I have a number of emails from agencies (I'm copied into one long series and have a separate question from OPM) about the revoked EO and the new one. Will we be issuing anything on the revoked one anytime soon? I know we'll have guidance on the new one.

Thanks,

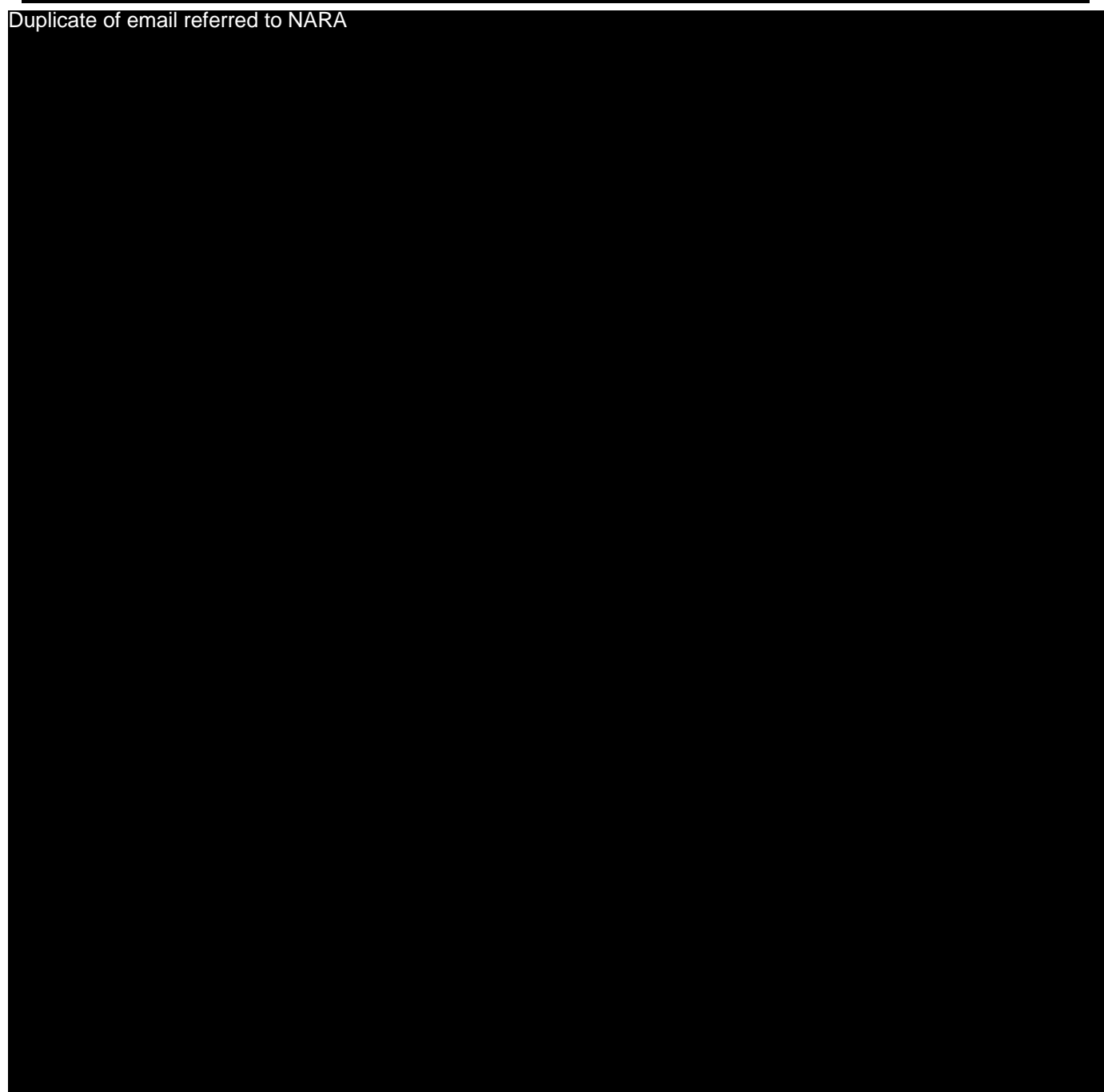
Suzanne

Suzanne Meyer
Desk Officer/Ethics Specialist
U.S. Office of Government Ethics
202-482-9249 | suzanne.meyer@oge.gov
www.oge.gov | @OfficeGovEthics


Referred to DOD




Duplicate of email referred to NARA



Duplicate of email referred to NARA



Duplicate of email referred to DOD



From: [Patrick J. Lightfoot](#)
To: [Seth Jaffe](#)
Cc: [Monica M. G. Ashar](#); [Rachel K. McRae](#); [David J. Apol](#); [Morris C. Barren](#); [David Taube](#)
Subject: RE: EO 13770 Revoked
Date: Wednesday, January 20, 2021 1:12:44 PM

Fair enough! Monica and I will await further word from you all on website updates.

--Patrick

From: Seth Jaffe
Sent: Wednesday, January 20, 2021 1:06 PM
To: Patrick J. Lightfoot <pjlightf@oge.gov>
Cc: Monica M. G. Ashar <mmgashar@oge.gov>; Rachel K. McRae <rkmcrae@oge.gov>; David J. Apol <djapol@oge.gov>; Morris C. Barren <mbarren@oge.gov>; David Taube <dtaube@oge.gov>
Subject: RE: EO 13770 Revoked

Hi Patrick,

Thank you for your thoughts. I appreciate it. I think we should figure out exactly what the note should say. (b) (5)

I think we may need to address that in (b) (5)

Let's think about it and try to get a note on the LA(s) – this week if possible.

Thanks,
Seth

From: Patrick J. Lightfoot
Sent: Wednesday, January 20, 2021 12:31 PM
To: Seth Jaffe <sjaffe@oge.gov>; Morris C. Barren <mbarren@oge.gov>; David Taube <dtaube@oge.gov>
Cc: Monica M. G. Ashar <mmgashar@oge.gov>; Rachel K. McRae <rkmcrae@oge.gov>; David J. Apol <djapol@oge.gov>
Subject: RE: EO 13770 Revoked

Hi Seth,

I can add a note today to the LA and the legal research portal if you'd like. Does the following work?

Note:

(b) (5)

I defer to you all if you'd prefer that

(b) (5)

--Patrick

From: Seth Jaffe

Sent: Wednesday, January 20, 2021 11:20 AM

To: Morris C. Barren <mbarren@oge.gov>; David Taube <dtaube@oge.gov>

Cc: Monica M. G. Ashar <mmgashar@oge.gov>; Patrick J. Lightfoot <pjlightf@oge.gov>; Rachel K. McRae <rkmcrae@oge.gov>; David J. Apol <djapol@oge.gov>

Subject: FW: EO 13770 Revoked

Morris & David,

FYI: We will need to add a note to the 13770 PGE LA in the near future indicating this action.

I also suggest, but is still TBD, that we issue a preliminary LA soon that

(b) (5)

Thanks,
Seth

From: Seth Jaffe

Sent: Wednesday, January 20, 2021 9:42 AM

To: David J. Apol <djapol@oge.gov>

Cc: Deborah J. Bortot <djbortot@oge.gov>; Shelley K. Finlayson <skfinlay@oge.gov>; Diana Veilleux <djveille@oge.gov>; Emory A. Rounds III <earounds@oge.gov>

Subject: EO 13770 Revoked

FYI: <https://www.whitehouse.gov/presidential-actions/executive-order-revocation-executive-order-13770/>

From: [Seth Jaffe](#)
To: [Rachel K. McRae](#)
Subject: RE: EO 13770 Revoked
Date: Wednesday, January 20, 2021 9:41:28 AM

Thank you.

From: Rachel K. McRae
Sent: Wednesday, January 20, 2021 9:19 AM
To: Seth Jaffe <sjaffe@oge.gov>
Subject: EO 13770 Revoked

FYI: <https://www.whitehouse.gov/presidential-actions/executive-order-revocation-executive-order-13770/>



LA-21-03

LEGAL ADVISORY

TO: Designated Agency Ethics Officials

FROM: Emory A. Rounds, III
Director

SUBJECT: Executive Orders on Ethics Commitments by Executive Branch Personnel

On January 20, 2021, President Biden signed an Executive Order titled “Executive Order on Ethics Commitments by Executive Branch Personnel.” Pursuant to section 4(c)(i) of the Executive Order, the U.S. Office of Government Ethics (OGE) is providing agency ethics officials with the attached copy of the Ethics Pledge and a [link](#) to the Executive Order.

Among other things, this Executive Order requires every “appointee” in each executive agency appointed on or after January 20, 2021, to sign the Ethics Pledge established therein. The definition of “appointee” in the Executive Order covers “every full-time, non-career Presidential or Vice-Presidential appointee, non-career appointee in the Senior Executive Service (or other SES-type system), and appointee to a position that has been excepted from the competitive service by reason of being of a confidential or policymaking character (Schedule C and other positions excepted under comparable criteria) in an executive agency.” Executive Order, sec. 2(b). However, “[i]t does not include any person appointed as a member of the Senior Foreign Service or solely as a uniformed service commissioned officer.” *Id.*

With respect to this Executive Order, ethics officials and employees may continue to rely on OGE’s prior guidance regarding Executive Orders 13490 and 13770 to the extent that such guidance addresses language common to either of these Executive Orders and the new Executive Order. OGE will issue additional interpretive guidance as needed to address issues implicating new language that appears only in the new Executive Order.

Additionally, Executive Order 13770, which applied to appointees appointed on or after January 20, 2017, was revoked by an Executive Order signed by President Trump on January 20, 2021. The latter [Executive Order](#) states, in part, that “[e]mployees and former employees subject to the commitments in Executive Order 13770 will not be subject to those commitments after noon January 20, 2021.”

As always, agency ethics officials may contact their OGE Desk Officers for advice concerning the application of these Executive Orders in individual cases.

Attachment: Ethics Pledge Form



ETHICS PLEDGE

I recognize that this pledge is part of a broader ethics in government plan designed to restore and maintain public trust in government, and I commit myself to conduct consistent with that plan. I commit to decision-making on the merits and exclusively in the public interest, without regard to private gain or personal benefit. I commit to conduct that upholds the independence of law enforcement and precludes improper interference with investigative or prosecutorial decisions of the Department of Justice. I commit to ethical choices of post-Government employment that do not raise the appearance that I have used my Government service for private gain, including by using confidential information acquired and relationships established for the benefit of future clients.

Accordingly, as a condition, and in consideration, of my employment in the United States Government in a position invested with the public trust, I commit myself to the following obligations, which I understand are binding on me and are enforceable under law:

1. *Lobbyist Gift Ban.* I will not accept gifts from registered lobbyists or lobbying organizations for the duration of my service as an appointee.
2. *Revolving Door Ban — All Appointees Entering Government.* I will not for a period of 2 years from the date of my appointment participate in any particular matter involving specific parties that is directly and substantially related to my former employer or former clients, including regulations and contracts.
3. *Revolving Door Ban — Lobbyists and Registered Agents Entering Government.* If I was registered under the Lobbying Disclosure Act, 2 U.S.C. 1601 *et seq.*, or the Foreign Agents Registration Act (FARA), 22 U.S.C. 611 *et seq.*, within the 2 years before the date of my appointment, in addition to abiding by the limitations of paragraph 2, I will not for a period of 2 years after the date of my appointment:
 - (a) participate in any particular matter on which I lobbied, or engaged in registrable activity under FARA, within the 2 years before the date of my appointment;
 - (b) participate in the specific issue area in which that particular matter falls; or
 - (c) seek or accept employment with any executive agency with respect to which I lobbied, or engaged in registrable activity under FARA, within the 2 years before the date of my appointment.
4. *Revolving Door Ban — Appointees Leaving Government.* If, upon my departure from the Government, I am covered by the post-employment restrictions on communicating with employees of my former executive agency set forth in section 207(c) of title 18, United States Code, and its implementing regulations, I agree that I will abide by those restrictions for a period of 2 years following the end of my appointment. I will abide by these same restrictions with respect to communicating with the senior White House staff.
5. *Revolving Door Ban — Senior and Very Senior Appointees Leaving Government.* If, upon my departure from the Government, I am covered by the post-employment restrictions set forth in sections 207(c) or 207(d) of title 18, United States Code, and those sections' implementing regulations, I agree that, in addition, for a period of 1 year following the end of my appointment, I will not materially assist others in making communications or appearances that I am prohibited from undertaking myself by (a) holding myself out as being available to engage in lobbying activities in support of any such communications or appearances; or (b) engaging in any such lobbying activities.
6. *Revolving Door Ban — Appointees Leaving Government to Lobby.* In addition to abiding by the limitations of paragraph 4, I also agree, upon leaving Government service, not to lobby any covered executive branch official or non-career Senior Executive Service appointee, or engage in any activity on behalf of any foreign government or foreign political party which, were it undertaken on January 20, 2021, would require that I register under FARA, for the remainder of the Administration or 2 years following the end of my appointment, whichever is later.
7. *Golden Parachute Ban.* I have not accepted and will not accept, including after entering Government, any salary or other cash payment from my former employer the eligibility for and payment of which is limited to individuals accepting a position in the United States Government. I also have not accepted and will not accept any non-cash benefit from my former employer that is provided in lieu of such a prohibited cash payment.
8. *Employment Qualification Commitment.* I agree that any hiring or other employment decisions I make will be based on the candidate's qualifications, competence, and experience.
9. *Assent to Enforcement.* I acknowledge that the Executive Order entitled "Ethics Commitments by Executive Branch Personnel," issued by the President on January 20, 2021, which I have read before signing this document, defines certain of the terms applicable to the foregoing obligations and sets forth the methods for enforcing them. I expressly accept the provisions of that Executive Order as a part of this agreement and as binding on me. I understand that the terms of this pledge are in addition to any statutory or other legal restrictions applicable to me by virtue of Federal Government service.

Signature

_____, 20_____
Date

Name (Type or Print): _____

**General Counsel & Legal Policy Division
Staff Meeting 1/21/21**

Agenda

I. General Announcements/Updates

Not agency record, nor responsive record. Attorney notes, intended for her personal use only and not intended for distribution. Notes were taken on a circulated agenda (roman numerals), which is disclosed. If it were a responsive agency record, (b)(5) applies.

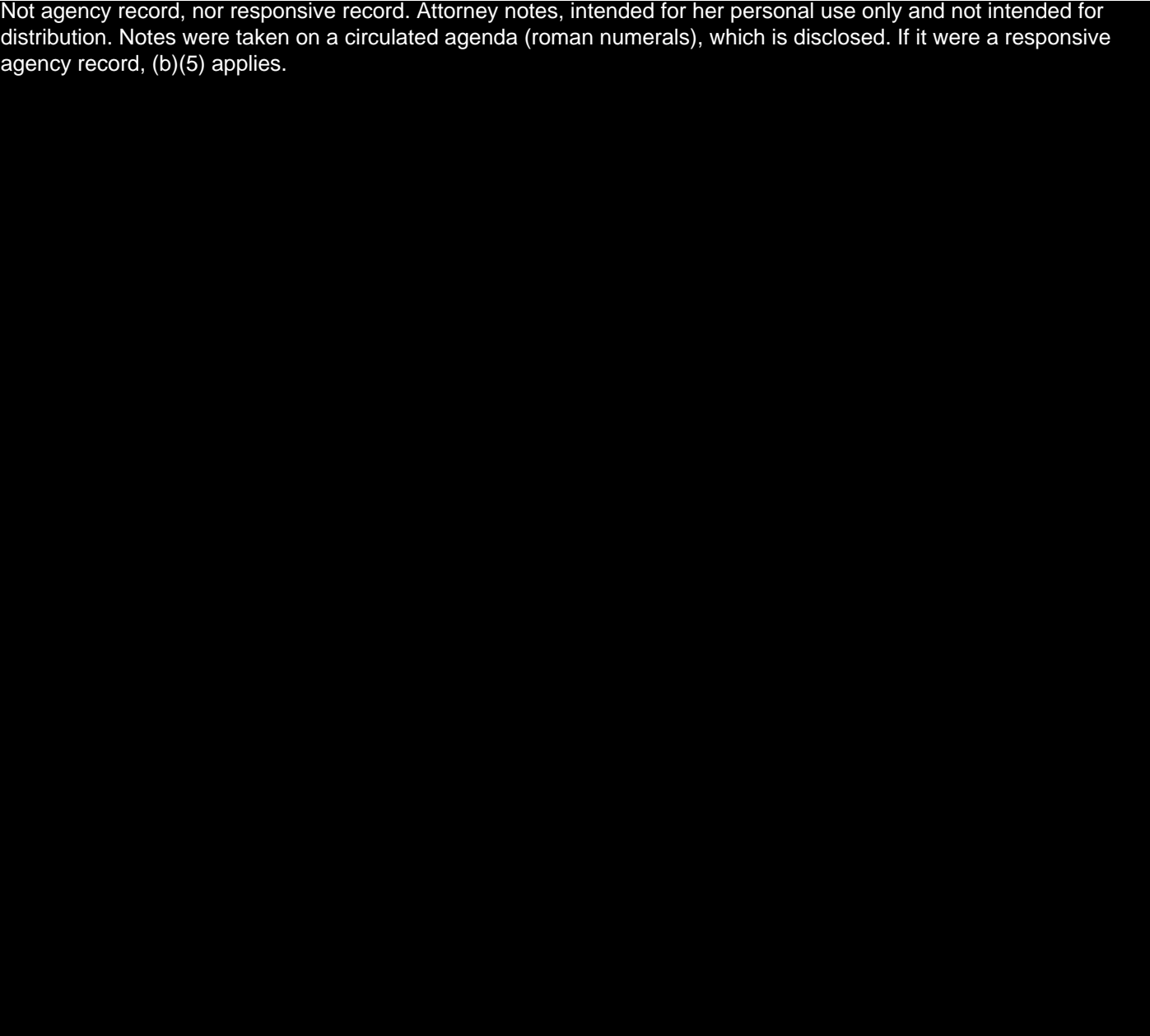
II. Updates/Announcements From Ethics Law and Policy Branch

Not agency record. Attorney notes, intended for her personal use only and not intended for distribution. Notes were taken on a circulated agenda (roman numerals), which is disclosed. If it were a responsive agency record, (b)(5) applies.

III. Updates/Announcements From Presidential Nominations Branch

Not agency record, nor responsive record. Attorney notes, intended for her personal use only and not intended for distribution. Notes were taken on a circulated agenda (roman numerals), which is disclosed. If it were a responsive agency record, (b)(5) applies.

Not agency record, nor responsive record. Attorney notes, intended for her personal use only and not intended for distribution. Notes were taken on a circulated agenda (roman numerals), which is disclosed. If it were a responsive agency record, (b)(5) applies.



IV. Updates/Announcements From Financial Disclosure Branch

V. Attendees Share Substantive Issues w/Group and ask Questions of Management

My Dashboard

New Interaction

New Outreach

Search

Trends

Agencies

Administration

Resolved Interaction

Interaction Number: 21009

Initiation Date*:	2021-01-21
Title*:	EO 13770 - Trump Pledge
Question*:	Hi Kehli – (b)(5) deliberative [Redacted] [Redacted] Thanks! Ellen
Update:	
Categories*:	Ethics Pledge (E.O. 13770)
Origin Of Interaction*:	Email
Source*:	Agency Federal Communications Commission
First Name:	Ellen
Last Name:	Herr
Title:	
Position:	Ethics Official
Email:	(b) (6)
Phone:	(b) (6)
Other Contact Notes:	
Assignment:	Kehli Cage, Monica M. G. Ashar, Rachel K. McRae
Watching:	David J. Apol, Nicole Stein, Seth Jaffe
Temporary Notes:	
<i>created by:</i>	Kehli Cage

Resolution Information

Resolution Date*:	2021-01-22
Resolution Category*:	Resolved
Response*:	(b)(5) deliberative [Redacted] [Redacted]

	(b)(5) deliberative <i>(Assigned to: Kehli Cage; Monica M. G. Ashar; Rachel K. McRae)</i>
Complexity (level):	4 [Click to view/hide complexity guidelines]
Time Spent (hours):	1-4 hours
Contributor:	
<input type="button" value="reopen"/>	

Reopen Information	
Date:	2021-02-04
Reason:	Providing follow up based on more info provided by agency

Interaction History Log	
Closed	02/11/2021 08:37:03 AM by Rachel K. McRae
Update	02/04/2021 03:34:38 PM by Rachel K. McRae
Reopen	02/04/2021 03:34:06 PM by Rachel K. McRae
Closed	02/03/2021 03:25:32 PM by Rachel K. McRae
Update	01/22/2021 10:32:35 AM by Seth Jaffe
Now Assigned: Kehli Cage Monica M. G. Ashar Rachel K. McRae	01/22/2021 10:32:35 AM by Seth Jaffe
Create	01/21/2021 11:49:55 PM by Kehli Cage
Now Assigned: Kehli Cage AIMS GCLPD Intake	01/21/2021 11:49:55 PM by Kehli Cage

Division(s) assigned: PCD; GCLPD

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[New Outreach](#)

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[Agencies](#)

[Administration](#)

Resolved Interaction

Interaction Number: 20992

Initiation Date*:	2021-01-21
Title*:	New Pledge
Question*:	(b)(5) deliberative <div style="background-color: black; width: 100%; height: 1.2em; margin-bottom: 5px;"></div> <div style="background-color: black; width: 100%; height: 1.2em; margin-bottom: 5px;"></div>
Update:	
Categories*:	Ethics Pledge (E.O. 13770), Ethics Pledge (E.O. 13989)
Origin Of Interaction*:	Email
Source*:	Agency Postal Regulatory Commission
First Name:	Anne
Last Name:	O'Connor
Title:	
Position:	Ethics Official
Email:	(b) (6)
Phone:	(b) (6)
Other Contact Notes:	
Assignment:	Monica M. G. Ashar, Rachel K. McRae, Rolando DeLeon
Watching:	David J. Apol, Nicole Stein, Se h Jaffe
Temporary Notes:	
<i>created by:</i>	<i>Rolando DeLeon</i>

Resolution Information

Resolution Date*:	2021-01-21
Resolution Category*:	Resolved
Response*:	provided the agency with the latest guidance on the new EO and the revocation of EO 13770 . <i>(Assigned to: Monica M. G. Ashar; Rachel K. McRae; Rolando DeLeon)</i>
Complexity (level):	2 <input type="text" value="[Click to view/hide complexity guidelines]"/>
Time Spent (hours):	0-1 hour
Contributor:	
<input type="button" value="reopen"/>	

Interaction History Log

Closed	01/25/2021 12:38 02 PM by Rolando DeLeon
--------	--

Update	01/21/2021 12:42:48 PM by Seth Jaffe
Now Assigned: Rolando DeLeon Monica M. G. Ashar Rachel K. McRae	01/21/2021 12:42:48 PM by Seth Jaffe
Update	01/21/2021 12:38:36 PM by Rolando DeLeon
Now Assigned: Rolando DeLeon AIMS GCLPD Intake	01/21/2021 12:38:36 PM by Rolando DeLeon
Create	01/21/2021 09:57:13 AM by Rolando DeLeon
Now Assigned: Rolando DeLeon	01/21/2021 09:57:13 AM by Rolando DeLeon

Division(s) assigned: GCLPD; PCD

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[New Interaction](#)

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[Search](#)



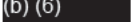
[Trends](#)

[Agencies](#)


[Administration](#)

Resolved Interaction

Interaction Number: 20991

Initiation Date*:	2021-01-21
Title*:	Revocation of EO 13770
Question*:	(b)(5) del berative 
Update:	
Categories*:	Ethics Pledge (E.O. 13770)
Origin Of Interaction*:	Email
Source*:	Agency Defense Nuclear Facilities Safety Board
First Name:	Joseph
Last Name:	Gilman
Title:	Acting General Counsel
Position:	
Email:	(b) (6) 
Phone:	(b) (6) 
Other Contact Notes:	
Assignment:	Kimberley H. Kaplan, Monica M. G. Ashar, Rachel K. McRae
Watching:	David J. Apol, Nicole Stein, Seth Jaffe
Temporary Notes:	
<i>created by:</i>	<i>Kimberley H. Kaplan</i>

Resolution Information

Resolution Date*:	2021-01-22
Resolution Category*:	Resolved – ELPB Consultation
Response*:	(b)(5) deliberative  <i>(Assigned to: Kimberley H. Kaplan; Monica M. G. Ashar; Rachel K. McRae)</i>
Complexity (level):	4 <input type="button" value="[Click to view/hide complexity guidelines]"/>
Time Spent (hours):	0-1 hour
Contributor:	
<input type="button" value="reopen"/>	

Interaction History Log

Closed	01/22/2021 01:51:16 PM by Kimberley H. Kaplan
Update	01/21/2021 11:13:04 AM by Kimberley H. Kaplan
Update	01/21/2021 09:55:32 AM by Seth Jaffe
Now Assigned: Kimberley H. Kaplan Monica M. G. Ashar Rachel K. McRae	01/21/2021 09:55:32 AM by Seth Jaffe
Create	01/21/2021 09:53:08 AM by Kimberley H. Kaplan
Now Assigned: Kimberley H. Kaplan AIMS GCLPD Intake	01/21/2021 09:53:08 AM by Kimberley H. Kaplan

Division(s) assigned: PCD; GCLPD

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[New Interaction](#)

[New Outreach](#)

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[Administration](#)

Resolved Interaction

Interaction Number: 21001

Initiation Date*:	2021-01-21
Title*:	EO revocation of EO 13770
Question*:	(b)(5) deliberative  Thanks,
Update:	
Categories*:	Ethics Pledge (E.O. 13770), Ethics Pledge (E.O. 13989)
Origin Of Interaction*:	Email
Source*:	Agency Federal Trade Commission
First Name:	Lorielle
Last Name:	Pankey
Title:	
Position:	Ethics Official
Email:	(b) (6)
Phone:	(b) (6)
Other Contact Notes:	
Assignment:	Suzanne L. Meyer
Watching:	
Temporary Notes:	
<i>created by:</i>	<i>Suzanne L. Meyer</i>

Resolution Information

Resolution Date*:	2021-01-21
Resolution Category*:	Resolved
Response*:	Conferred with RM and sent her the (b)(5) deliberative  <i>(Assigned to: Suzanne L. Meyer)</i>
Complexity (level):	2 <input type="text" value="[Click to view/hide complexity guidelines]"/>
Time Spent (hours):	0-1 hour
Contributor:	
<input type="button" value="reopen"/>	

Reopen Information**Date:** 2021-01-25**Reason:** Add category E.O. 13989.**Interaction History Log**

Closed	01/25/2021 12:12:00 PM by Suzanne L. Meyer
Reopen	01/25/2021 12:11:44 PM by Suzanne L. Meyer
Closed	01/21/2021 03:55:15 PM by Suzanne L. Meyer
Now Assigned: Suzanne L. Meyer	01/21/2021 03:55:15 PM by Suzanne L. Meyer

Division(s) assigned: PCD

From: [David J. Apol](#)
To: [Emory A. Rounds III](#)
Subject: RE: MIGHT I BE SEEING ANYTHING . . .
Date: Thursday, January 21, 2021 9:11:31 PM
Attachments: [LA-21-03 Ethics pledge LA 1.docx](#)

2 pp draft advisory withheld in full
(b)(5) del berative

Here is the draft. And that's the way it is. Good night, and good luck.

From: Emory A. Rounds III
Sent: Thursday, January 21, 2021 6:27 PM
To: David J. Apol
Subject: RE: MIGHT I BE SEEING ANYTHING . . .

And since I assume this also means nothing nom-ish is on the docket this evening . . . then, good evening!

From: David J. Apol
Sent: Thursday, January 21, 2021 6:26 PM
To: Emory A. Rounds III <earounds@oge.gov>
Subject: RE: MIGHT I BE SEEING ANYTHING . . .

Your right. LA.

I will send you a draft as an attachment since you are an early riser. Monica will move the materials to your H drive in the morning.

From: Emory A. Rounds III
Sent: Thursday, January 21, 2021 6:16 PM
To: David J. Apol <djapol@oge.gov>
Subject: RE: MIGHT I BE SEEING ANYTHING . . .

“EA” or “PA”?

From: David J. Apol
Sent: Thursday, January 21, 2021 6:15 PM
To: Emory A. Rounds III <earounds@oge.gov>
Subject: RE: MIGHT I BE SEEING ANYTHING . . .

I'll be sending a draft of the EA, but it can wait for tomorrow. We will not sending it out today.

From: Emory A. Rounds III
Sent: Thursday, January 21, 2021 6:01 PM
To: David J. Apol <djapol@oge.gov>
Subject: MIGHT I BE SEEING ANYTHING . . .

. . . this evening?

Thanks!

Tagging Form: Website Legal Research Portal

Citation:	LA-21-03
Date of Issuance:	1/22/2021
Title:	Executive Orders on Ethics Commitments by Executive Branch Personnel
Description:	On January 20, 2021, President Biden signed an Executive Order titled "Executive Order on Ethics Commitments by Executive Branch Personnel." Pursuant to the Executive Order, OGE is providing a copy of the Ethics Pledge and a link to the Executive Order. The legal advisory also address the revocation of Executive Order 13770.

Statute Tags (Check All That Apply)

✓	Tag Name (STATUTES)	Tagging Rules
<input type="checkbox"/>	5 U.S.C. app. §§ 101-111—Financial Disclosure Requirements	<i>If selected, CONSIDER SELECTING 5 C.F.R. pt. 2634.</i>
<input type="checkbox"/>	5 U.S.C. app. §§ 401-408— Office of Government Ethics	<i>If selected, CONSIDER SELECTING 5 C.F.R. pt. 2638.</i>
<input type="checkbox"/>	5 U.S.C. app. §§ 501-505—Outside Earned Income and Employment Limitations	<i>If selected, CONSIDER SELECTING 5 C.F.R. pt. 2636.</i>
<input type="checkbox"/>	18 U.S.C. § 201—Bribery	
<input type="checkbox"/>	18 U.S.C. § 202—Definitions	
<input type="checkbox"/>	18 U.S.C. § 203—Compensation in matters affecting the Government	
<input type="checkbox"/>	18 U.S.C. § 205—Claims against and other matters affecting the Government	
<input type="checkbox"/>	18 U.S.C. § 207—Post-Employment Restrictions	<i>If selected, CONSIDER SELECTING 5 C.F.R. pt. 2641 AND/OR 5 C.F.R. pt. 2637 (2008 and earlier).</i>
<input type="checkbox"/>	18 U.S.C. § 207(a)—Restrictions on All Officers and Employees	<i>If selected, ALSO SELECT 18 U.S.C. § 207. CONSIDER SELECTING 5 C.F.R. pt. 2641 AND/OR 5 C.F.R. pt. 2637 (2008 and earlier).</i>
<input type="checkbox"/>	18 U.S.C. § 207(b)—One-Year Restrictions on Aiding or Advising	<i>If selected, ALSO SELECT 18 U.S.C. § 207. CONSIDER SELECTING 5 C.F.R. pt. 2641 AND/OR 5 C.F.R. pt. 2637 (2008 and earlier).</i>
<input type="checkbox"/>	18 U.S.C. § 207(c)—Restrictions on Senior Employees	<i>If selected, ALSO SELECT 18 U.S.C. § 207. CONSIDER SELECTING 5 C.F.R. pt. 2641 AND/OR 5 C.F.R. pt. 2637 (2008 and earlier).</i>

✓	Tag Name (STATUTES)	Tagging Rules
<input type="checkbox"/>	18 U.S.C. § 207(d)—Restrictions on Very Senior Employees	<i>If selected, ALSO SELECT 18 U.S.C. § 207. CONSIDER SELECTING 5 C.F.R. pt. 2641 AND/OR 5 C.F.R. pt. 2637 (2008 and earlier).</i>
<input type="checkbox"/>	18 U.S.C. § 207(f)—Restrictions Relating to Foreign Entities	<i>If selected, ALSO SELECT 18 U.S.C. § 207. If selected CONSIDER SELECTING 18 U.S.C. § 207(c) and/or 18 U.S.C. § 207(d) AND/OR 5 C.F.R. pt. 2641 AND/OR 5 C.F.R. pt. 2637 (2008 and earlier).</i>
<input type="checkbox"/>	18 U.S.C. § 207—Component Designations	<i>If selected, ALSO SELECT 18 U.S.C. § 207. CONSIDER SELECTING 5 C.F.R. pt. 2641 AND/OR 5 C.F.R. pt. 2637 (2008 and earlier).</i>
<input type="checkbox"/>	18 U.S.C. § 207—Exceptions and Waivers	<i>If selected, ALSO SELECT 18 U.S.C. § 207. CONSIDER SELECTING 5 C.F.R. pt. 2641 AND/OR 5 C.F.R. pt. 2637 (2008 and earlier).</i>
<input type="checkbox"/>	18 U.S.C. § 207—Official Responsibility	<i>If selected, ALSO SELECT 18 U.S.C. § 207; CONSIDER SELECTING 5 C.F.R. pt. 2641 AND/OR 5 C.F.R. pt. 2637 (2008 and earlier).</i>
<input type="checkbox"/>	18 U.S.C. § 208—Acts affecting a financial interest	<i>If selected, CONSIDER SELECTING 5 C.F.R. pt. 2640 AND/OR 5 C.F.R. pt. 2635, subpt. D AND/OR 5 C.F.R. pt. 2635.</i>
<input type="checkbox"/>	18 U.S.C. § 208(b)(1) and (b)(3) Waivers	<i>If selected, ALSO SELECT 18 U.S.C. § 208. CONSIDER SELECTING 5 C.F.R. pt. 2640 AND/OR 5 C.F.R. pt. 2635, subpt. D, AND/OR C.F.R. pt. 2635.</i>
<input type="checkbox"/>	18 U.S.C. § 208—Negotiation for Employment	<i>If selected, ALSO SELECT 18 U.S.C. § 208. CONSIDER SELECTING 5 C.F.R. pt. 2640 AND/OR 5 C.F.R. pt. 2635, subpt. D AND/OR 5 C.F.R. pt. 2635.</i>
<input type="checkbox"/>	18 U.S.C. § 208—Regulatory Exemptions	<i>If selected, ALSO SELECT 18 U.S.C. § 208. CONSIDER SELECTING 5 C.F.R. pt. 2640.</i>
<input type="checkbox"/>	18 U.S.C. § 209—Supplementation of Salary	
<input type="checkbox"/>	Privacy Act of 1974	
<input type="checkbox"/>	STOCK Act	<i>If selected, CONSIDER SELECTING 5 U.S.C. app. §§ 101-111 AND/OR 5 C.F.R. pt. 2634 AND/OR 5 C.F.R. pt. 2635, subpt. F AND/OR 5 C.F.R. pt. 2635.</i>

Regulation Tags (Check All That Apply)

✓	Tag Name (REGULATIONS)	Tagging Rules
<input type="checkbox"/>	5 C.F.R. pt. 2600—Organization of OGE	
<input type="checkbox"/>	5 C.F.R. pt. 2601—OGE Gift Acceptance Authority	
<input type="checkbox"/>	5 C.F.R. pt. 2604—FOIA Rules and Fees for Producing Public Financial Disclosure Reports	
<input type="checkbox"/>	5 C.F.R. pt. 2606—Privacy Act Rules	
<input type="checkbox"/>	5 C.F.R. pt. 2608—OGE Employee Testimony and Production of Official Records in Legal Proceedings	

✓	Tag Name (REGULATIONS)	Tagging Rules
	5 C.F.R. pt. 2610—Equal Access to Justice Act Implementation	
	5 C.F.R. pt. 2611—Guidance Documents	
	5 C.F.R. pt. 2634—Financial Disclosure, Qualified Trusts, and Certificates of Divestiture	<i>If selected, CONSIDER SELECTING 5 U.S.C. app. §§ 101-111.</i>
	5 C.F.R. pt. 2635—Standards of Conduct	
	5 C.F.R. pt. 2635, subpt. A—General Provisions	<i>If selected, ALSO SELECT 5 C.F.R. pt. 2635.</i>
	5 C.F.R. pt. 2635, subpt. B—Gifts From Outside Sources	<i>If selected, ALSO SELECT 5 C.F.R. pt. 2635.</i>
	5 C.F.R. § 2635.204—Gift Exceptions	<i>If selected, ALSO SELECT 5 C.F.R. pt. 2635, subpt. B, AND 5 C.F.R. pt. 2635</i>
	5 C.F.R. pt. 2635, subpt. C—Gifts Between Employees	<i>If selected, ALSO SELECT 5 C.F.R. pt. 2635.</i>
	5 C.F.R. pt. 2635, subpt. D—Conflicting Financial Interests	<i>If selected, ALSO SELECT 5 C.F.R. pt. 2635. CONSIDER SELECTING 18 U.S.C. § 208 AND/OR 5 C.F.R. pt. 2640.</i>
	5 C.F.R. pt. 2635, subpt. E—Impartiality	<i>If selected, ALSO SELECT 5 C.F.R. pt. 2635.</i>
	5 C.F.R. § 2635.502(b)(1)—Covered Relationships	<i>If selected, ALSO SELECT 5 C.F.R. pt. 2635, subpt. E AND Impartiality</i>
	5 C.F.R. § 2635.503—Extraordinary Payments	<i>If selected, ALSO SELECT 5 C.F.R. pt. 2635, subpt. E AND Impartiality.</i>
	5 C.F.R. pt. 2635, subpt. F—Seeking Other Employment	<i>If selected, ALSO SELECT 5 C.F.R. pt. 2635.</i>
	5 C.F.R. pt. 2635, subpt. G—Misuse of Position	<i>If selected, ALSO SELECT 5 C.F.R. pt. 2635.</i>
	5 C.F.R. § 2635.702—Public Office for Private Gain	<i>If selected, ALSO SELECT 5 C.F.R. pt. 2635, subpt. G, AND 5 C.F.R. pt. 2635.</i>
	5 C.F.R. pt. 2635, subpt. H—Outside Activities	<i>If selected, ALSO SELECT 5 C.F.R. pt. 2635.</i>
	5 C.F.R. § 2635.802—Conflicting Outside Employment/Activities	<i>If selected, ALSO SELECT 5 C.F.R. pt. 2635, subpt. H, AND 5 C.F.R. pt. 2635.</i>
	5 C.F.R. § 2635.803—Expert Witness Service	<i>If selected, ALSO SELECT 5 C.F.R. pt. 2635, subpt. H, AND 5 C.F.R. pt. 2635.</i>
	5 C.F.R. § 2635.807—Teaching, Speaking, and Writing	<i>If selected, ALSO SELECT 5 C.F.R. pt. 2635, subpt. H, AND 5 C.F.R. pt. 2635.</i>
	5 C.F.R. § 2635.808—Fundraising	<i>If selected, ALSO SELECT 5 C.F.R. pt. 2635, subpt. H, AND 5 C.F.R. pt. 2635.</i>
	5 C.F.R. pt. 2635, subpt. J—Legal Expense Funds	
	5 C.F.R. pt. 2636—Outside Earned Income, Employment and Affiliations Limitations	<i>If selected, CONSIDER SELECTING 15% Outside Earned Income Limitation AND/OR 5 U.S.C. app. §§ 501-505.</i>
	5 C.F.R. pt. 2637 (REMOVED)—Post-Employment Restrictions	<i>If selected, CONSIDER SELECTING 18 U.S.C. § 207.</i>

<input checked="" type="checkbox"/>	Tag Name (REGULATIONS)	Tagging Rules
<input type="checkbox"/>	5 C.F.R. pt. 2638—Executive Branch Ethics Program	<i>If selected, CONSIDER SELECTING 5 U.S.C. app. §§ 401-408.</i>
<input type="checkbox"/>	5 C.F.R. pt. 2640—18 U.S.C. 208 Interpretation, Exemptions, and Waivers	<i>If selected, CONSIDER SELECTING 18 U.S.C. § 208 AND/OR 5 C.F.R. pt. 2635, subpt. D AND/OR 5 C.F.R. pt. 2635.</i>
<input type="checkbox"/>	5 C.F.R. pt. 2641—Post-Employment Restrictions	<i>If selected, ALSO SELECT 18 U.S.C. § 207.</i>

Executive Order Tags (Check All That Apply)

<input checked="" type="checkbox"/>	Tag Name (EXECUTIVE ORDERS)	Tagging Rules
<input type="checkbox"/>	E.O. 13490 (Obama Ethics Pledge)	<i>If selected, ALSO SELECT Political Appointees.</i>
<input checked="" type="checkbox"/>	E.O. 13770 (Trump Ethics Pledge)	<i>If selected, ALSO SELECT Political Appointees.</i>

Topic Tags (Check All That Apply)

<input checked="" type="checkbox"/>	Tag Name (TOPICS)	Tagging Rules
<input type="checkbox"/>	15% Outside Earned Income Limitation	<i>If selected, CONSIDER SELECTING 5 U.S.C. app. §§ 501-505 AND 5 C.F.R. pt. 2636 AND/OR Limitations on Outside Income.</i>
<input type="checkbox"/>	Acting as Agent or Attorney	<i>If selected, CONSIDER SELECTING 18 U.S.C. § 203 AND/OR 18 U.S.C. § 205 AND/OR Communication or Appearance AND/OR Intent to Influence.</i>
<input type="checkbox"/>	Awards & Honors	<i>If selected, ALSO SELECT 5 C.F.R. pt. 2635, subpt. B, AND 5 C.F.R. pt. 2635.</i>
<input type="checkbox"/>	Certificates of Divestiture	<i>If selected, CONSIDER SELECTING 5 C.F.R. pt. 2634.</i>
<input type="checkbox"/>	Communication or Appearance	<i>If selected, CONSIDER SELECTING 18 U.S.C. § 205 AND/OR 18 U.S.C. § 207 AND/OR 5 C.F.R. pt. 2641 AND/OR 5 C.F.R. pt. 2637 (2008 and earlier) AND/OR Acting as Agent or Attorney AND/OR Intent to Influence.</i>
<input type="checkbox"/>	Confidential Financial Disclosure	<i>If selected, CONSIDER SELECTING 5 U.S.C. app. §§ 101-111 AND/OR 5 C.F.R. pt. 2634.</i>
<input type="checkbox"/>	Detailees	
<input type="checkbox"/>	Direct and Predictable Effect	<i>If selected, CONSIDER SELECTING 18 U.S.C. § 208 AND/OR 5 C.F.R. pt. 2640 AND/OR 5 C.F.R. pt. 2635, subpt. D AND/OR 5 C.F.R. pt. 2635.</i>
<input type="checkbox"/>	Enforcement	
<input type="checkbox"/>	Ethics Program Management	<i>If selected, ALSO SELECT 5 C.F.R. pt. 2638. CONSIDER SELECTING 5 U.S.C. app. §§ 401-408.</i>
<input type="checkbox"/>	Ethics Training	<i>If selected, ALSO SELECT 5 C.F.R. pt. 2638. CONSIDER SELECTING 5 U.S.C. app. §§ 401-408.</i>

✓	Tag Name (TOPICS)	Tagging Rules
	Ethics Agreements	<i>If selected, CONSIDER SELECTING 5 U.S.C. app. §§ 101-111 AND/OR 5 C.F.R. pt. 2634 AND/OR Political Appointees.</i>
	Federal Advisory Committee Members	<i>If selected, CONSIDER SELECTING Special Government Employees.</i>
	Financial Interests (Personal or Imputed)	<i>If selected, CONSIDER SELECTING 18 U.S.C. § 208 AND/OR 5 C.F.R. pt. 2640 AND/OR 5 C.F.R. pt. 2635, subpt. D AND/OR 5 C.F.R. pt. 2635.</i>
	Furlough Due to Lapse in Appropriations	
	Impartiality	<i>If selected, ALSO SELECT 5 C.F.R. pt. 2635, subpt. E, AND 5 C.F.R. pt. 2635.</i>
	Intent to Influence	<i>If selected, CONSIDER SELECTING 18 U.S.C. § 205 AND/OR 18 U.S.C. § 207 AND/OR 5 C.F.R. pt. 2641 AND/OR 5 C.F.R. pt. 2637 (2008 and earlier) AND/OR Acting as Agent or Attorney AND/OR Communication or Appearance.</i>
	Invitations from Outside Sources	<i>If selected, CONSIDER SELECTING 5 C.F.R. pt. 2635, subpt. B, AND 5 C.F.R. pt. 2635 AND/OR Travel.</i>
	On Behalf of Any Other Person	<i>If selected, CONSIDER SELECTING 18 U.S.C. § 205 AND/OR 18 U.S.C. § 207 AND/OR 5 C.F.R. pt. 2641 AND/OR 5 C.F.R. pt. 2637 (2008 and earlier).</i>
	Outside Earned Income Ban	<i>If selected, CONSIDER SELECTING 5 C.F.R. pt. 2635, subpt. H, AND 5 C.F.R. pt. 2635.</i>
	Participate Personally and Substantially	<i>If selected, CONSIDER SELECTING 18 U.S.C. § 207 AND/OR 5 C.F.R. pt. 2641 AND/OR 5 C.F.R. pt. 2637 (2008 and earlier) AND/OR 18 U.S.C. § 208 AND/OR 5 C.F.R. pt. 2640 AND/OR 5 C.F.R. pt. 2635, subpt. D AND/OR 5 C.F.R. pt. 2635.</i>
	Particular Matter	<i>If selected, CONSIDER SELECTING 18 U.S.C. § 203 AND/OR 18 U.S.C. § 205 AND/OR 18 U.S.C. § 207 AND/OR 5 C.F.R. pt. 2641 AND/OR 5 C.F.R. pt. 2637 (2008 and earlier) AND/OR 18 U.S.C. § 208 AND/OR 5 C.F.R. pt. 2640 AND/OR 5 C.F.R. pt. 2635, subpt. D AND/OR 5 C.F.R. pt. 2635, subpt. E AND/OR Impartiality AND/OR 5 C.F.R. pt. 2635.</i>
	Particular Matter of General Applicability	<i>If selected, CONSIDER SELECTING 18 U.S.C. § 207 AND/OR 5 C.F.R. pt. 2641 AND/OR 5 C.F.R. pt. 2637 (2008 and earlier) AND/OR 18 U.S.C. § 208 AND/OR 5 C.F.R. pt. 2640 AND/OR 5 C.F.R. pt. 2635, subpt. D AND/OR 5 C.F.R. pt. 2635.</i>
	Particular Matter Involving Specific Parties	<i>If selected, CONSIDER SELECTING 18 U.S.C. § 207 AND/OR 5 C.F.R. pt. 2641 AND/OR 5 C.F.R. pt. 2637 (2008 and earlier) AND/OR 18 U.S.C. § 208 AND/OR 5 C.F.R. pt. 2640 AND/OR 5 C.F.R. pt. 2635, subpt. D AND/OR 5 C.F.R. pt. 2635, subpt. E AND/OR Impartiality AND/OR 5 C.F.R. pt. 2635.</i>

✓	Tag Name (TOPICS)	Tagging Rules
<input type="checkbox"/>	Particular Matter (Same Particular Matter)	<i>If selected, CONSIDER SELECTING 18 U.S.C. § 207 AND/OR 5 C.F.R. pt. 2641 AND/OR 5 C.F.R. pt. 2637 (2008 and earlier).</i>
<input type="checkbox"/>	Political Activities	<i>If selected, CONSIDER SELECTING 5 C.F.R. pt. 2635, subpt. H—Outside Activities.</i>
<input checked="" type="checkbox"/>	Political Appointees	
<input type="checkbox"/>	President and Vice President (Applicability of Laws to)	
<input type="checkbox"/>	Prior Approval of Outside Activities	<i>If selected, CONSIDER SELECTING Supplemental Agency Regulations AND/OR 5 C.F.R. pt. 2635, subpt. H, AND/OR 5 C.F.R. pt. 2635.</i>
<input type="checkbox"/>	Prohibited Financial Interests	<i>If selected, CONSIDER SELECTING Supplemental Agency Regulations AND/OR 5 C.F.R. pt. 2635, subpt. A AND/OR 5 C.F.R. pt. 2635, AND/OR 5 C.F.R. pt. 2635, subpt. D.</i>
<input type="checkbox"/>	Public Financial Disclosure	<i>If selected, CONSIDER SELECTING 5 U.S.C. app. §§ 101-111 AND/OR 5 C.F.R. pt. 2634 AND/OR STOCK Act AND/OR Political Appointees.</i>
<input type="checkbox"/>	Qualified Trusts	<i>If selected, CONSIDER SELECTING 5 U.S.C. app. §§ 101-111 AND/OR 5 C.F.R. pt. 2634.</i>
<input type="checkbox"/>	Representational Services	<i>If selected, CONSIDER SELECTING 18 U.S.C. § 203 AND/OR 18 U.S.C. § 205 AND/OR 18 U.S.C. § 207 AND/OR 5 C.F.R. pt. 2641 AND/OR 5 C.F.R. pt. 2637 (2008 and earlier).</i>
<input type="checkbox"/>	Resolving Conflicts of Interest	<i>If selected, CONSIDER SELECTING 18 U.S.C. § 208 AND/OR other COI statutes, as appropriate.</i>
<input type="checkbox"/>	Special Government Employees	<i>If selected, CONSIDER SELECTING 18 U.S.C. § 202 AND/OR Federal Advisory Committee Members.</i>
<input type="checkbox"/>	Supplemental Agency Regulations	<i>If selected, ALSO SELECT 5 C.F.R. pt. 2635, subpt. A, AND 5 C.F.R. pt. 2635.</i>
<input type="checkbox"/>	Travel	
<input type="checkbox"/>	U.S. Is Party or Has Direct and Substantial Interest	<i>If selected, CONSIDER SELECTING 18 U.S.C. § 203 AND/OR 18 U.S.C. § 205 AND/OR 18 U.S.C. § 207 AND/OR 5 C.F.R. pt. 2641 AND/OR 5 C.F.R. pt. 2637 (2008 and earlier).</i>

Tagging Tips

Tag if it explains/aids in understanding of the substance of the tag

Example: do not tag with Part 2638: “Your letter requests that OGE issue a ‘formal’ opinion. While OGE does have the authority to issue formal advisory opinions, we have considered the criteria set forth in subpart C of 5 C.F.R. part 2638 and have determined that a formal opinion is not appropriate in this case.” (08x6)

Example: tag with 18 U.S.C. § 207(f): “It is also significant that a position waiver under section 207(c)(2)(C) has the additional effect of categorically exempting senior employees from the restrictions in 18 U.S.C. § 207(f) with respect to activities on behalf of foreign entities. *See 68 Federal Register 7844, 7867 (February 18, 2003)*(preamble to proposed rule describing waiver procedure and relationship to foreign entity restrictions).” (from 06x5)

Example: do not tag with 5 U.S.C. app. §§ 401-408: “As an initial matter, although OGE has authority to provide interpretive assistance concerning 18 U.S.C. § 207, OGE is not authorized to make a determination that an individual has violated 18 U.S.C. § 207 or any other criminal conflict of interest law. *See Ethics in Government Act, 5. U.S.C. app. § 402(f)(5)*.” (from 05x6)

Do not tag brief, passing references that restate the substance of the tag without providing additional explanation

Example: do not tag with 18 U.S.C. § 207(a): “In addition, other provisions of section 207, such as section 207(a), could affect your plans to represent others before the [agency].” (from 07x15)

Example: do not tag with 18 U.S.C. §§ 207(b) or (f): “If the former employee is able to remain ‘behind-the-scenes,’ he will not violate any of the three main [§ 207] prohibitions discussed in Question 7. Note that the less frequently applicable provisions in section 207(b), (f) and (l) do cover certain behind-the-scenes activities.” (from 06x7)


Example: tag with 18 U.S.C. §§ 207(a) or (b): “It is worth noting here that, while former senior level SGEs are subject to narrower restrictions on their post-employment activities before their former agencies than former regular senior level employees, all former SGEs are subject to the same restrictions as former regular employees, as set forth in the more general provisions of this statute, namely, sections 207(a) and (b).” (from 03x5)

Agency Questions on Revocation of E.O. 13770 & New Biden Ethics Pledge (Pending questions highlighted)

Agency	Question	Answer
I. Revocation of EO 13770 (b)(5) deliberative draft prepared by staff attorneys for internal use		

Agency	Question	Answer
<p>(b)(5) deliberative draft prepared by staff attorneys for internal use</p>		
<p>II. Signing the Pledge (b)(5) deliberative draft prepared by staff attorneys for internal use</p>		

NOT FOR DISTRIBUTION

Agency	Question	Answer
<p>(b)(5) deliberative draft prepared by staff attorneys for internal use</p> 		


NOT FOR DISTRIBUTION

Agency	Question	Answer
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(b)(5) deliberative draft prepared by staff attorneys for internal use




NOT FOR DISTRIBUTION

Agency	Question	Answer
<p>(b)(5) deliberative draft prepared by staff attorneys for internal use</p> 		

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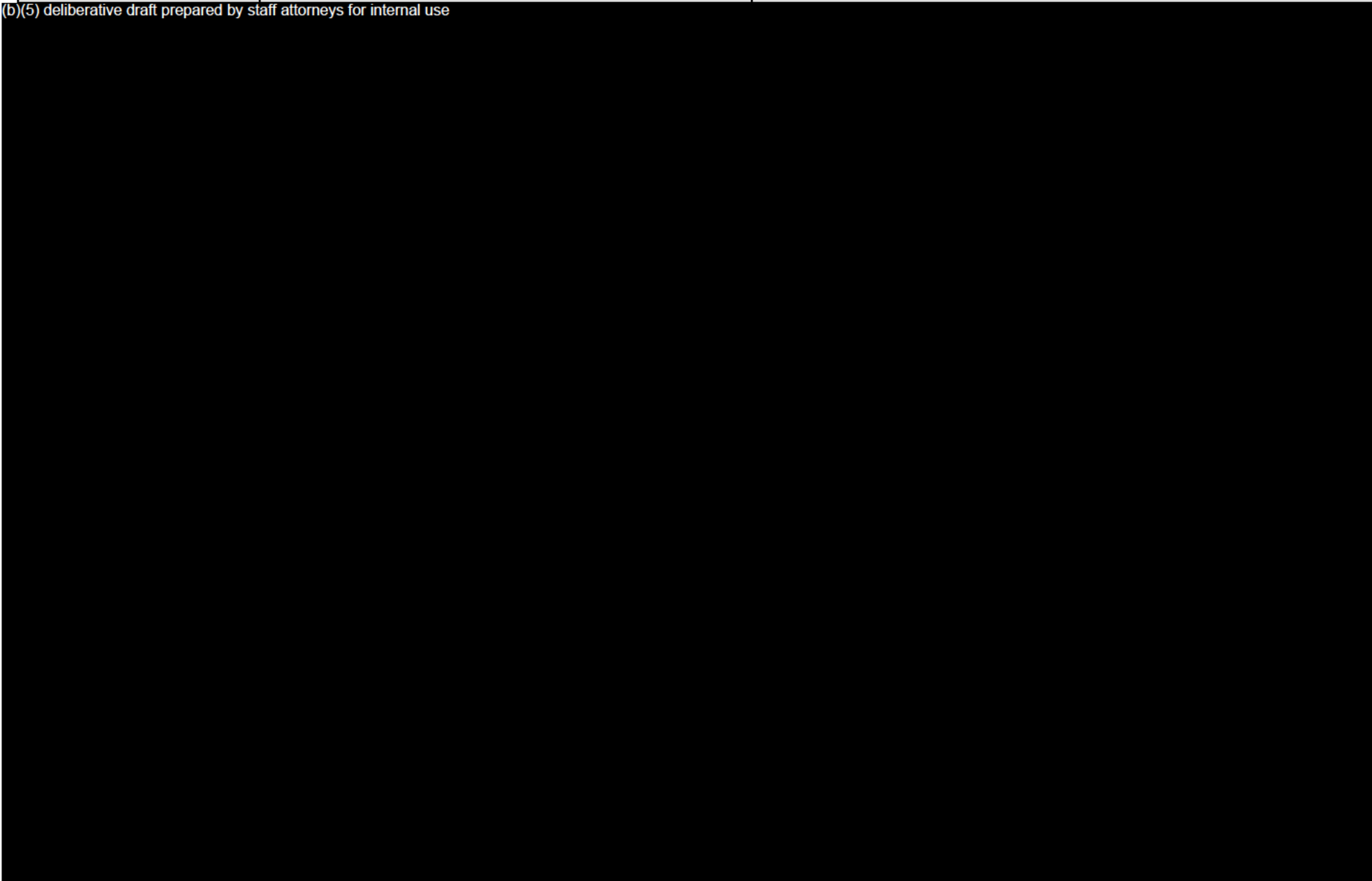
Agency	Question	Answer
<p>(b)(5) deliberative draft prepared by staff attorneys for internal use</p>		

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Agency	Question	Answer
<p>(b)(5) deliberative draft prepared by staff attorneys for internal use</p> 		

Agency	Question	Answer
(b)(5) deliberative draft prepared by staff attorneys for internal use		
III. Para. 2		

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Agency	Question	Answer
<p>(b)(5) deliberative draft prepared by staff attorneys for internal use</p> 		

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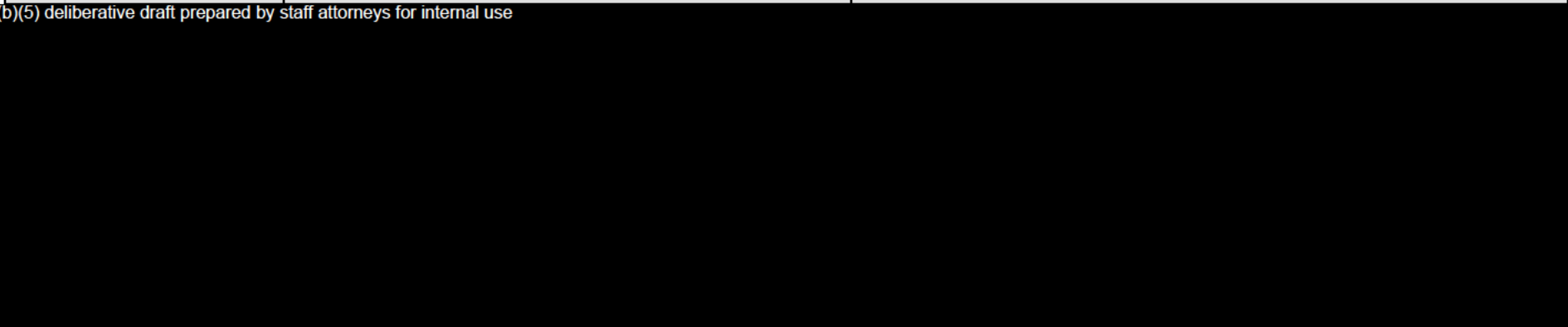
Agency	Question	Answer
<p>(b)(5) deliberative draft prepared by staff attorneys for internal use</p>		

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Agency	Question	Answer
(b)(5) deliberative draft prepared by staff attorneys for internal use		
IV. Para. 3	(b)(5) deliberative draft prepared by staff attorneys for internal use	
V. Para. 5	(b)(5) deliberative draft prepared by staff attorneys for internal use	
VI. Para. 6		

Agency	Question	Answer
(b)(5) deliberative draft prepared by staff attorneys for internal use		
VII. Para. 7 - Golden Parachute		

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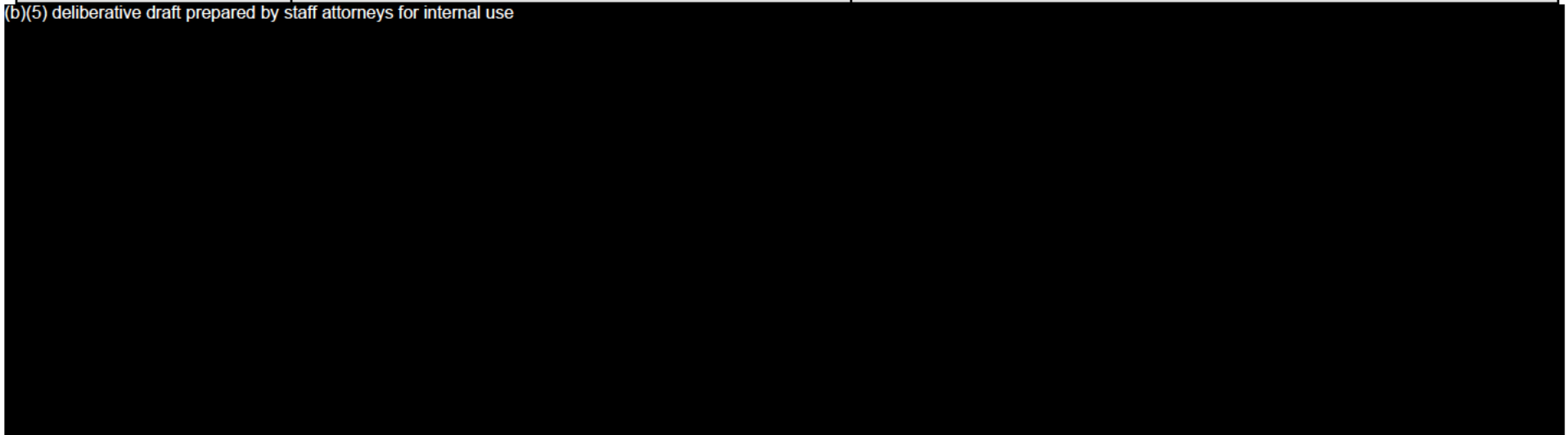
Agency	Question	Answer
<p>(b)(5) deliberative draft prepared by staff attorneys for internal use</p> 		

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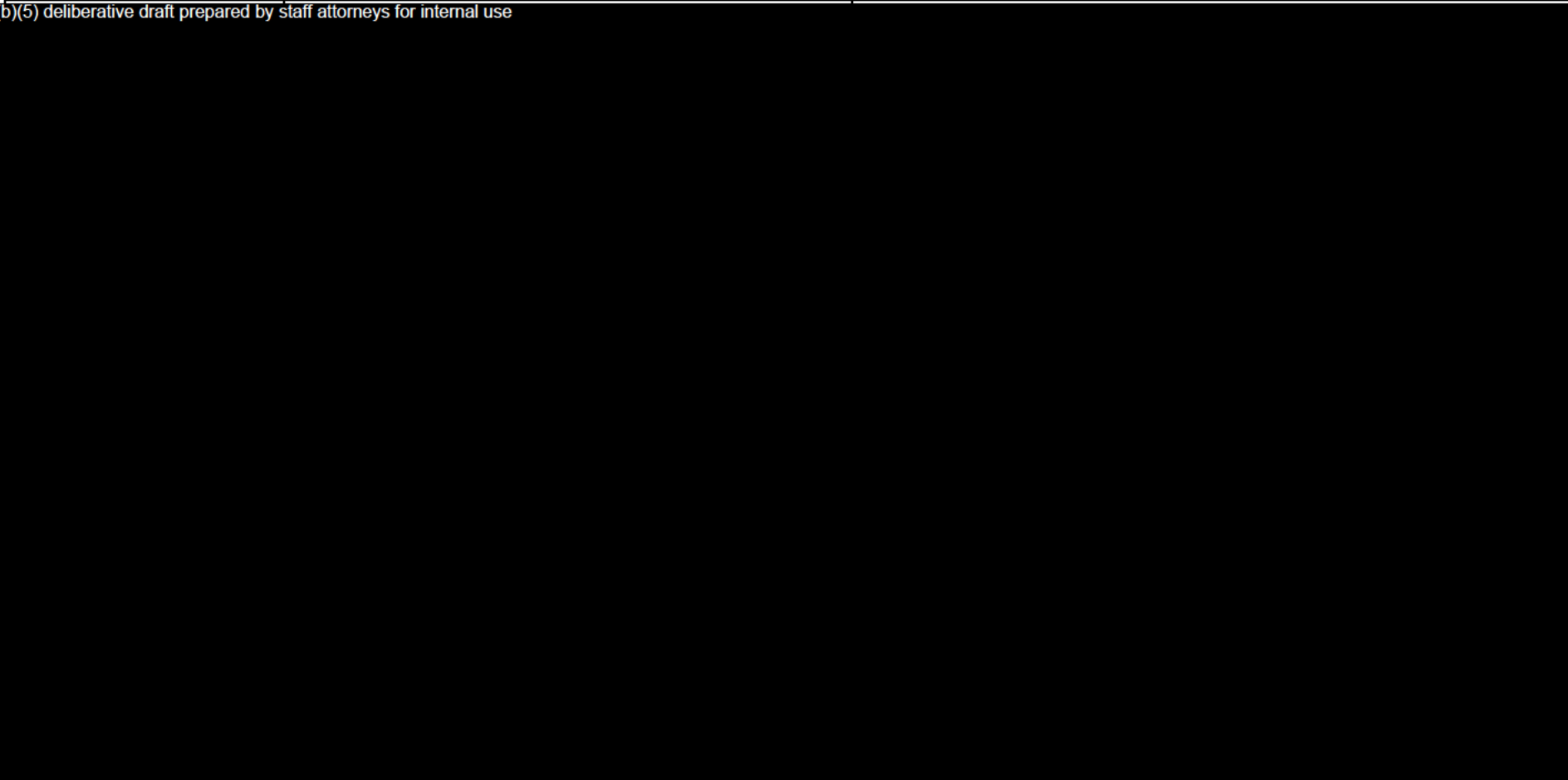
Agency	Question	Answer
<p>(b)(5) deliberative draft prepared by staff attorneys for internal use</p> 		

Agency	Question	Answer
(b)(5) deliberative draft prepared by staff attorneys for internal use		
VIII. Waivers	(b)(5) deliberative draft prepared by staff attorneys for internal use	
IX. Administration		

NOT FOR DISTRIBUTION

Agency	Question	Answer
<p>(b)(5) deliberative draft prepared by staff attorneys for internal use</p> 		

NOT FOR DISTRIBUTION

Agency	Question	Answer
<p>(b)(5) deliberative draft prepared by staff attorneys for internal use</p> 		

Comparison of Executive Order 13490, Executive Order 13770, and Biden Ethics Pledge


E.O. 13490	E.O. 13770	Biden Ethics pledge
(b)(5) deliberative draft prepared by staff attorneys for internal use		

E.O. 13490

E.O. 13770

Biden Ethics pledge

(b)(5) deliberative draft prepared by staff attorneys for internal use




E.O. 13490

E.O. 13770

Biden Ethics pledge

(b)(5) deliberative draft prepared by staff attorneys for internal use




E.O. 13490

E.O. 13770

Biden Ethics pledge

(b)(5) deliberative draft prepared by staff attorneys for internal use

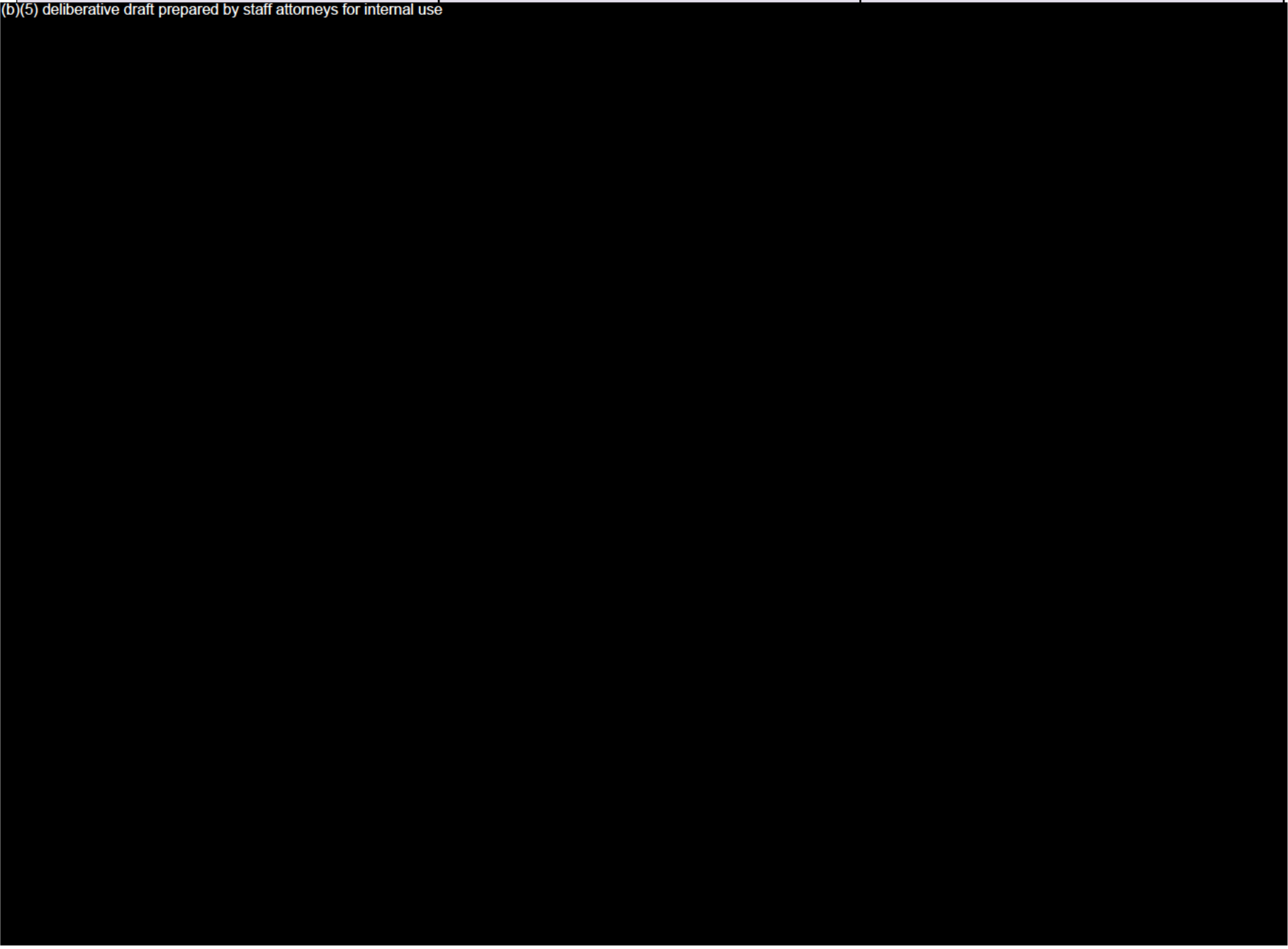


E.O. 13490

E.O. 13770

Biden Ethics pledge

(b)(5) deliberative draft prepared by staff attorneys for internal use




E.O. 13490

E.O. 13770

Biden Ethics pledge

(b)(5) deliberative draft prepared by staff attorneys for internal use




E.O. 13490

E.O. 13770

Biden Ethics pledge

(b)(5) deliberative draft prepared by staff attorneys for internal use




E.O. 13490

E.O. 13770

Biden Ethics pledge

(b)(5) deliberative draft prepared by staff attorneys for internal use




E.O. 13490

E.O. 13770

Biden Ethics pledge

(b)(5) deliberative draft prepared by staff attorneys for internal use




E.O. 13490

E.O. 13770

Biden Ethics pledge

(b)(5) deliberative draft prepared by staff attorneys for internal use

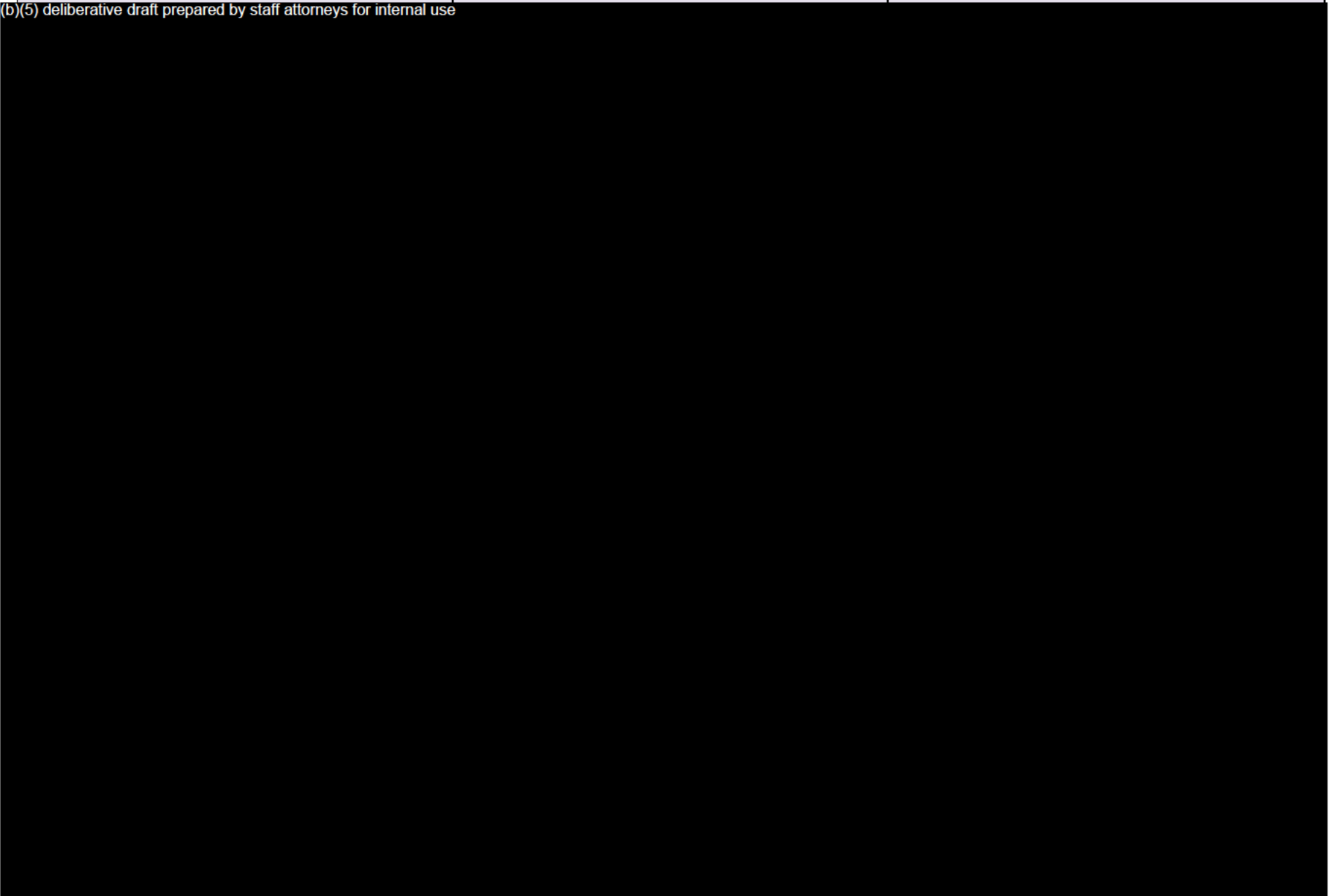


E.O. 13490

E.O. 13770

Biden Ethics pledge

(b)(5) deliberative draft prepared by staff attorneys for internal use




E.O. 13490

E.O. 13770

Biden Ethics pledge

(b)(5) deliberative draft prepared by staff attorneys for internal use

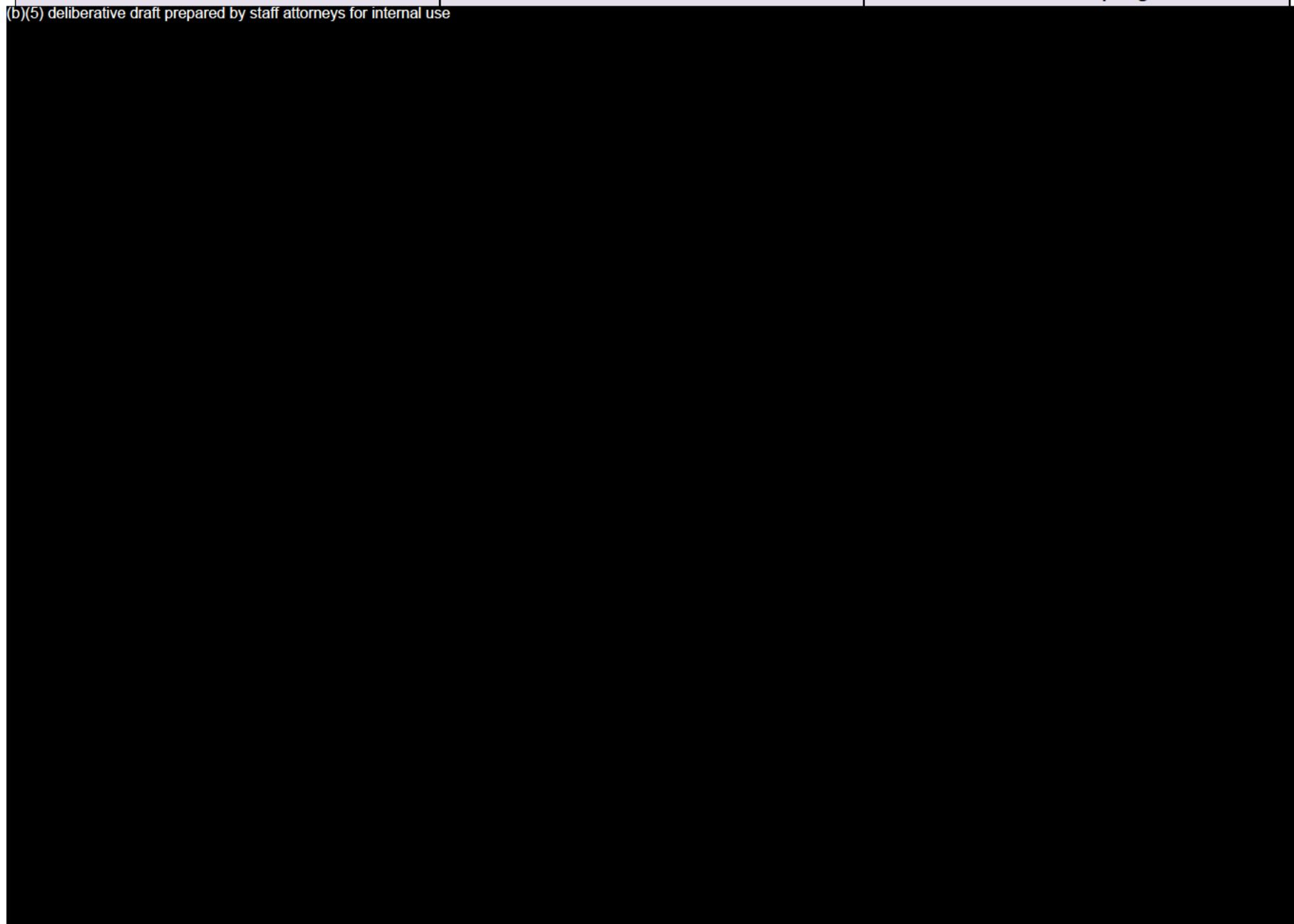


E.O. 13490

E.O. 13770

Biden Ethics pledge

(b)(5) deliberative draft prepared by staff attorneys for internal use




E.O. 13490

E.O. 13770

Biden Ethics pledge

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E.O. 13490

E.O. 13770

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DRAFT

Website Changes

1. Individuals Search Collection

Update Additional Documents

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2. Create a new page for the Biden Pledge Waivers

Landing Page Text:

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3. Glossary of Documents

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4. [Ethics Documents Requiring Submission](#)

On the [Ethics Documents Requiring Submission](#) to OGE page, we have a table of where agencies submit various documents to OGE. Replace the requirement to send us EO 13770 pledge waivers with this text:

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5. OpenGov

<https://www.oge.gov/web/OGE.nsf/Open+Government>

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A large black rectangular redaction box covers the majority of the page content between the first and second list items.

6. https://www.oge.gov/web/oge.nsf/ethicsofficials_mission - add text in red to list

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A large black rectangular redaction box covers the majority of the page content between the second and third list items.

7. Search

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