

**From:** [Margaret E. Dylus-Yukins](#)  
**To:** [David J. Apol](#)  
**Cc:** [Seth Jaffe](#)  
**Subject:** RE: FOR REVIEW: Crato Gift Waiver  
**Date:** Monday, July 26, 2021 2:08:02 PM

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Hi Dave, friendly reminder that the below gift waiver requires your review and signature. Please let me know if you have any questions.

Thanks,  
Margaret

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**From:** Margaret E. Dylus-Yukins  
**Sent:** Thursday, July 15, 2021 5:10 PM  
**To:** David J. Apol <djapol@oge.gov>  
**Cc:** Seth Jaffe <sjaffe@oge.gov>  
**Subject:** FOR REVIEW: Crato Gift Waiver

Hi Dave,

The Catherine Crato gift waiver request is ready for your review. The file is available here:  (b)(5) - internal agency network

Please review the folder's contents and the letter granting the waiver. Please let me know once you've completed the review, and I will prepare the letter for signature.

Thank you,  
Margaret

**Margaret Dylus-Yukins**  
Assistant Counsel  
Ethics Law & Policy Branch  
International Assistance & Outreach Program  
U.S. Office of Government Ethics  
(202) 482-9222  
[meyukins@oge.gov](mailto:meyukins@oge.gov)  
Pronouns: she/her

**From:** [Seth Jaffe](#)  
**To:** [Christie Chung](#); [Margaret E. Dylus-Yukins](#)  
**Cc:** [Cheryl L. Kane-Piasecki](#)  
**Subject:** FW: Gift waiver reporting request  
**Date:** Monday, July 12, 2021 4:53:58 PM  
**Attachments:** [Gift waiver request -- Catherine Crato 7-12-21.pdf](#)

Attachment referred to Treasury

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Christie & Margaret,

Hi, we just got in this gift reporting waiver request. Could one of you please review the request and recommend to Dave Apol whether he should grant or deny the waiver request? Only one of you needs to handle it, but I thought that you could work that out between the two of you - based on work load.

Please let me know who plans to handle this once you have decided.

Thanks,

Seth

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**From:** Cheryl L. Kane-Piasecki  
**Sent:** Monday, July 12, 2021 4:11 PM  
**To:** Seth Jaffe <[sjaffe@oge.gov](mailto:sjaffe@oge.gov)>  
**Subject:** FW: Gift waiver reporting request

Hi Seth—

Hope you are well and enjoying your summer!

I have never had to process a gift waiver request before but, if the SOP from 2020 is still valid, it appears I am supposed to forward it to you for assignment.

Please let me know if there is someone else I should be directing this to.

Thanks so much!

Cheryl

Cheryl Kane-Piasecki

Senior Instructor

OGE Institute for Ethics in Government

Program Counsel Division

T: 202-482-9252

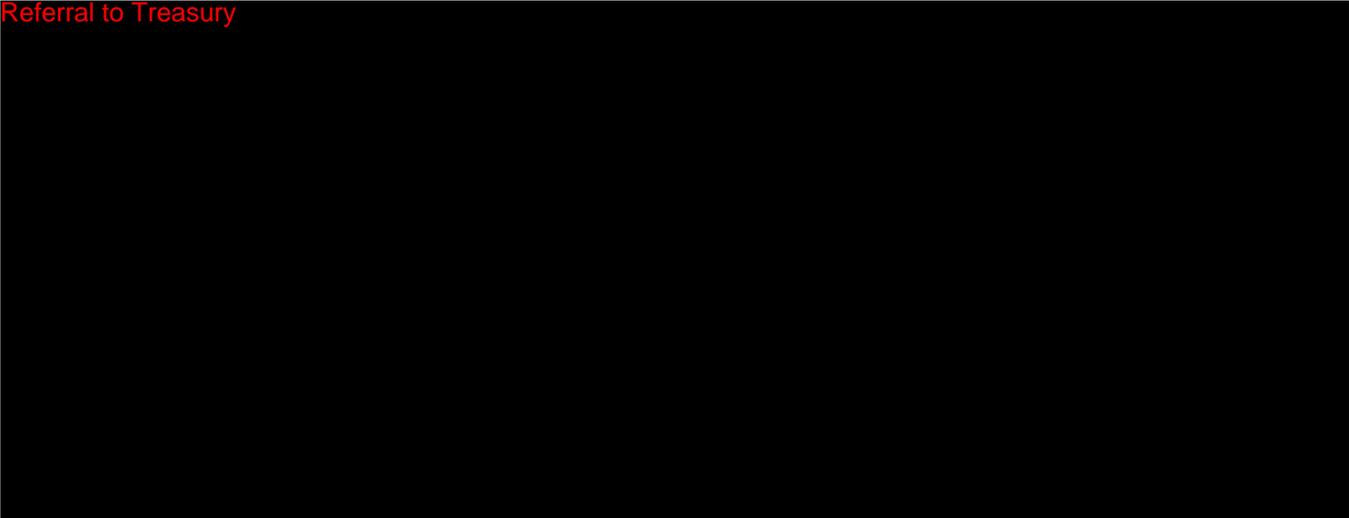
Email: [clkanepi@oge.gov](mailto:clkanepi@oge.gov)

Pronouns: she, her

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Referral to Treasury





UNITED STATES OFFICE OF  
GOVERNMENT ETHICS



August 16, 2021

**VIA ELECTRONIC MAIL**

Catherine Crato  
Senior Research Economist  
Department of the Treasury  
1500 Pennsylvania Ave, NW  
Washington, DC 20220

Dear Ms. Crato,

This letter is in response to your request for a waiver of the requirement to report personal gifts on your annual OGE Form 278e financial disclosure report. Your request for a waiver is granted pursuant to 5 U.S.C. app. § 102(a)(2)(C), as implemented by 5 C.F.R. § 2634.304(f).

Based on information provided by you, OGE has determine the following:

- The basis of the relationship between you and the donor is personal, as is the motivation behind the gift. The donor has a close familial relationship to you.
- There is no countervailing public purpose that requires public disclosure of the nature, source, and value of the gift. To your knowledge, the donor is not a prohibited source or representative of a prohibited source.

This waiver and the cover letter to your request are public documents pursuant to 5 C.F.R. § 2634.304(f)(2). You will need to note on Part 9 of your financial disclosure report that you received this waiver.

Sincerely,

DAVID APOL

Digitally signed by DAVID  
APOL  
Date: 2021.08.16 17:34:12  
-04'00'

David J. Apol  
General Counsel

cc: DAEO, Department of the Treasury



**General Counsel and Legal Policy Division Routing Slip**

	<b>Order No.</b>	<b>Initials</b>	<b>Date</b>
<b>Emory Rounds, Director</b>			
<b>Shelley Finlayson, Chief of Staff</b>			
<b>David Apol, General Counsel</b>	3		
Heather Jones			
<b>Seth Jaffe, Chief, ELPB</b>	2	SHJ	7/15/21
Monica Ashar			
Christie Chung			
Maura Leary			
Patrick Lightfoot			
Rachel McRae			
Elaine Newton			
Kimberly L. Sikora Panza			
David Taube			
Margaret Dylus-Yukins	1	MDY	7/15/21
<b>Deborah Bortot, Chief, PNB</b>			
Jody Keegan			
Keith Labeledz			
Jack MacDonald			
Joyce Merilos			
Stephanie Nonluecha			
Lorna Syme			
Teresa Williamson			
<b>Megan Granahan, Chief, IFDB</b>			
Grace Clark			
Lori Kelly			
Mark Stewart			
<p><b>REMARKS:</b> The Department of Treasury has submitted a request for a waiver of the gift reporting requirements for a gift that would otherwise be reportable on the filer's annual financial disclosure report. The filer, Catherine Crato, is a Senior Research Economist.</p>			
<b>ELECT. FILE DESIGNATION:</b>			
<b>Subject FILE CODE – PRIMARY:</b>		<b>FILE CODE – AGENCY:</b>	
<b>SUITABLE FOR PUBLICATION:</b>		<b>YES</b>	<b>NO</b>
<b>DATE ASSIGNED:</b>			
<b>DATE REC'D ALL NECESSARY INFORMATION:</b>			
<b>From:</b> Margaret Dylus-Yukins		<b>Date:</b>	<b>Ext. 222</b>

UNITED STATES OFFICE OF  
GOVERNMENT ETHICS



MEMORANDUM

TO: General Counsel  
Program Counsel  
Deputy Director for Compliance

FROM: Emory A. Rounds, III **EMORY ROUNDS**  Digitally signed by EMORY ROUNDS  
Date: 2020.06.09 16:29:52 -04'00'

SUBJECT: Delegation of Authority for Issuance of Individual Waivers Under 5 C.F.R. §  
2634.304(f)(1)

Pursuant to my authority under 5 C.F.R. § 2634.304(f), I hereby delegate to the General Counsel, the Program Counsel, and the Deputy Director for Compliance the authority to review and grant waivers in accordance with the requirements set forth in 5 C.F.R. § 2634.304(f)(1). This authority may not be re-delegated.

This supersedes all previous delegations of this authority that may have been issued.

