

From: [Nicole Stein](#)
To: [Deborah J. Bortot](#); [Tracy Hurston](#); [David J. Apol](#); [Diana Veilleux](#); [Dale A. Christopher](#)
Cc: [Heather A. Jones](#)
Subject: RE: MOA - [Contains CUI]
Date: Tuesday, March 5, 2024 9:38:20 AM
Attachments: [image001.jpg](#)

A few possibilities:

- (b)(5) deliberative [REDACTED]
- [REDACTED]

Tracy and I were tasked with creating a joint communication that documents the options to present to the appointee after confirmation about (b)(5) deliberative [REDACTED] etc. It could include some of the ideas we discussed at the meeting such as (b)(5) deliberative [REDACTED].

I'll start a document that includes the various scenarios and time frames (I know that would help me sort through the issues) and then schedule another meeting to continue brainstorming so we can provide recommendations to Shelley.

Nicole

From: Deborah J. Bortot <djbortot@oge.gov>
Sent: Friday, March 1, 2024 5:53 PM
To: Tracy Hurston <thurston@oge.gov>; Shelley K. Finlayson <skfinlay@oge.gov>; David J. Apol <djapol@oge.gov>; Diana Veilleux <djveille@oge.gov>; Dale A. Christopher <dachrist@oge.gov>; Nicole Stein <nstein@oge.gov>
Cc: Heather A. Jones <hajones@oge.gov>
Subject: RE: MOA - [Contains CUI]

I'm not sure I understand what happens if the nominee report is assigned from PPO to another target agency that is already in the system with respect to (b)(5) deliberative [REDACTED].
[REDACTED] Per Tracy's email below, in that case an Integrity MOA is not required, but how (b)(5) deliberative [REDACTED].
[REDACTED]
[REDACTED]?

Thanks,

Deb

From: Tracy Hurston <thurston@oge.gov>
Sent: Friday, March 1, 2024 5:42 PM
To: Deborah J. Bortot <djbortot@oge.gov>; Shelley K. Finlayson <skfinlay@oge.gov>; David J. Apol <djapol@oge.gov>; Diana Veilleux <djveille@oge.gov>
Cc: Heather A. Jones <hajones@oge.gov>; Tracy Hurston <thurston@oge.gov>
Subject: RE: MOA - [Contains CUI]

Deb, see my responses below in orange.

Thanks,

Tracy Hurston

INTEGRITY Manager

Integrity@oge.gov

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

Sent: Friday, March 1, 2024 5:33 PM

To: Shelley K. Finlayson <skfinlay@oge.gov>; David J. Apol <djapol@oge.gov>; Diana Veilleux <djveille@oge.gov>; Tracy Hurston <thurston@oge.gov>

Cc: Heather A. Jones <hajones@oge.gov>

Subject: FW: MOA - [Contains CUI]

All,

Please see Paige's question below. Please advise on how I should respond.

Thanks,

Deb

From: Chabora, Paige E. EOP/WHO (b) (6) >

Sent: Friday, March 1, 2024 4:58 PM

To: Deborah J. Bortot <djbortot@oge.gov>

Cc: Heather A. Jones <hajones@oge.gov>; Teresa L. Williamson <twillia@oge.gov>; Chabora, Paige E. EOP/WHO (b) (6) >

Subject: RE: MOA - [Contains CUI]

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Hi Deb,

Thank you for this. I've been researching how the ethics review was done for the other regional commissions, as we learned that the WHCO did not conduct the ethics review and conflict of interest analysis. In the case of the Southeast Crescent Regional Commission, the ethics office for USDA handled the ethics review. In the case of the Southwest Border Regional Commission, the Appalachian Commission handled it. (b)(5) deliberative

(b)(5) deliberative. During our call, one of you (I think Heather?) suggested the (b)(5) deliberative, so I will very likely start there.

So, this leads me to two questions related to the MOA.

1. Below, Tracy notes that this is an MOA that that WH DAEO/ADAEO would be required to sign. Is that the case if the WHCO is not the office conducting the review? **If the WH DAEO/ADAEO is not setting up a brand new agency in Integrity, this is not required.** Or would it be signed by the agency that agrees to take on the review? **If a brand new agency is being created in Integrity, the agency taking responsibility would be the one to sign.** If the nominee report is going to be routed to another agency, that is already established in Integrity, then the MOA is not necessary.
2. Did the USDA and the Appalachian Commission complete this MOA when they agreed to take on the conflicts reviews, as discussed above? **This MOA is only necessary when a new agency is created in Integrity, that is not what happened for the nominee reports that USDA and Appalachian Commission reviewed.** Whether a different MOA was established between the WH and those agencies so they would review the reports using their agencies in Integrity, as

the Integrity Program Manager, I am not involved in the Review process, so I don't know.

Thanks,
Paige

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

Sent: Friday, March 1, 2024 4:24 PM

To: Chabora, Paige E. EOP/WHO (b) (6) <[REDACTED]>

Cc: Heather A. Jones <hajones@oge.gov>; Teresa L. Williamson <twillia@oge.gov>

Subject: MOA - [Contains CUI]

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Hi Paige,

Please see Tracy's email below attaching the MOA that will be required if the WH or another agency is going to agree to service the new agency until it is established.

Thanks,

Deb

Deborah J. Bortot

Chief, Presidential Nominations Branch

U.S. Office of Government Ethics

250 E Street, SW, Suite 750

Washington, DC 20024

Telephone: (202) 482-9227

From: Tracy Hurston <thurston@oge.gov>

Sent: Friday, March 1, 2024 3:33 PM

To: Deborah J. Bortot <djbortot@oge.gov>

Cc: Diana Veilleux <dveille@oge.gov>; Rolando DeLeon <rdeleon@oge.gov>; Tracy Hurston <thurston@oge.gov>

Subject: MOA for PPO

Deb,

Attached is the MOA that the WH DAEO/ADAEO will be required to sign in order to set up an agency in Integrity for an agency that is not yet established (doesn't have a minimum of two employees). If they choose to setup the agency, they can email me, cc Roland, to assist with getting the MOA put in place.

Thank you,

Tracy Hurston

Integrity Manager

Program Counsel Division

Legal, External Affairs and Performance Branch

Office of Government Ethics

1201 New York Avenue, NW, Suite 500

Washington, DC 20005

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