

**From:** [Deborah J. Bortot](#)  
**To:** [Teresa L. Williamson](#)  
**Subject:** FW: Representative Tom Price  
**Date:** Friday, December 16, 2016 1:10:00 PM

---

**From:** Ann M Donaldson (b) (6)  
**Sent:** Friday, December 16, 2016 12:56 PM  
**To:** Deborah J. Bortot  
**Cc:** James Carroll; Katja Bullock  
**Subject:** Representative Tom Price

Good afternoon,

The Public Financial Disclosure Report (OGE-278) for Tom Price is now available for your review in *Integrity* regarding a possible nomination by the President-Elect to be Secretary of the Department of Health and Human Services.

Because Representative Price has not been formally nominated, please treat the identity and contents of the report confidentially, unless and until the Presidential Transition Team makes an official announcement.

Representative Price can be reached via Stefan Passatino of Dentons at (b) (6) .

Please begin your review of the report and coordinate with our office as soon as possible. The Presidential Transition Team contact currently assigned to this matter is Jim Carroll. Mr. Carroll can be reached at (b) (6) or by email at (b) (6) .

Thank you,

Presidential Transition Team

Ann M. Donaldson  
Associate  
[JONES DAY® - One Firm Worldwide<sup>SM</sup>](#)  
51 Louisiana Avenue, NW  
Washington, DC 20001  
Office + (b) (6)

=====  
This e-mail (including any attachments) may contain information that is private, confidential, or protected by attorney-client or other privilege. If you received this e-mail in error, please delete it from your system without copying it and notify sender by reply e-mail, so that our records can be corrected.  
=====

**From:** [Sandra S. Mabry](#)  
**To:** [Teresa L. Williamson](#)  
**Subject:** RE: OGE Reports for Trump Nominees  
**Date:** Monday, December 19, 2016 6:31:10 PM

---

I spoke to him this afternoon. Sandy

---

**From:** Teresa L. Williamson  
**Sent:** Monday, December 19, 2016 3:14 PM  
**To:** Sandra S. Mabry  
**Subject:** FW: OGE Reports for Trump Nominees

**HEALTH**

Committee

(b) (6)

**Chung Shek (chief clerk)**

(b) (6)

Liz Hackett (deputy clerk)

(b) (6)

---

**From:** Shek, Chung (HELP Committee) (b) (6)  
**Sent:** Monday, December 19, 2016 1:42 PM  
**To:** Teresa L. Williamson  
**Subject:** OGE Reports for Trump Nominees

Hey Teresa,

Wanted to check in to see if there was a status on the OGE reports for any of the upcoming Trump nominees. We're looking for Price, DeVos, and Puzder.

Thanks!  
Chung

Referral to HHS



Referral to HHS



---

**From:** Patrick J. Lightfoot [<mailto:pjlightf@oge.gov>]  
**Sent:** Tuesday, December 27, 2016 7:49 AM  
**To:** Hall, Randall (HHS/OGC)  
**Cc:** Olesh, Stanley D. (HHS/OGC)  
**Subject:** RE: Secretary report

Good morning,

Following up on my message below. Thanks!

--Patrick

---

**From:** Patrick J. Lightfoot  
**Sent:** Thursday, December 22, 2016 8:09 AM  
**To:** 'Hall, Randall (HHS/OGC)'  
**Cc:** Olesh, Stanley D. (HHS/OGC)  
**Subject:** RE: Secretary report

Hi Randy and Stan,

Just wanted to check in and see if you'd been able to touch base with the filer's representative.

Thanks!

--Patrick

---

Referral to HHS



---

**From:** Patrick J. Lightfoot [<mailto:pjlightf@oge.gov>]  
**Sent:** Tuesday, December 20, 2016 4:39 PM  
**To:** Hall, Randall (HHS/OGC)  
**Subject:** RE: Secretary report

Randy,

Kim had mentioned you did not have the filer representative's contact information for the Secretary report. The representative's name is Stefan Passatino at Dentons. His phone number is (b) (6)

Also, the Transition Team POC is Jim Carroll, who can be reached at (b) (6) or at

(b) (6)

--Patrick

---

**From:** Patrick J. Lightfoot  
**Sent:** Tuesday, December 20, 2016 2:13 PM  
**To:** 'Hall, Randall (HHS/OGC)'  
**Subject:** RE: Secretary report

Randy,

I've just submitted my first set of confirmations, questions, and edits in Integrity. There are a decent number of general comments as well as individual line item comments. One change I did make without adding a comment as I was going through was (b) (3), (5), (6)

Please let me know if you have any questions as you and the filer/filer's representative review.

Thanks!

--Patrick

Referral to HHS



---

**From:** Patrick J. Lightfoot [<mailto:pjlightf@oge.gov>]  
**Sent:** Monday, December 19, 2016 12:58 PM  
**To:** Hall, Randall (HHS/OGC)  
**Subject:** RE: Secretary report

Hi Randall,

I'm in the process of doing my initial review of the report. Quick question in light of the upcoming holidays: Will you be out of the office at all over the next few weeks? If so, could you send me the contact information of your back-up reviewer in your absence?

Thanks in advance! I look forward to working with you.

All the best,

Patrick

~~

Patrick J. Lightfoot  
Assistant Counsel, Ethics Law & Policy Branch  
General Counsel & Legal Policy Division

U.S. Office of Government Ethics  
1201 New York Ave NW, Suite 500  
Washington, DC 20005  
Telephone: (202) 482-9271

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

---

**From:** Kimberly L. Sikora Panza  
**Sent:** Monday, December 19, 2016 12:36 PM  
**To:** 'Hall, Randall (HHS/OGC)'  
**Cc:** Patrick J. Lightfoot  
**Subject:** Secretary report

Hi Randy,

You mentioned to me that you rec'd the report for the potential nominee for Secretary, and inquired about the OGE POC. The OGE POC for this report is Patrick Lightfoot (cc:ed on this email) – his phone number is 202.482.9271.

Thanks,  
Kim

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

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

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

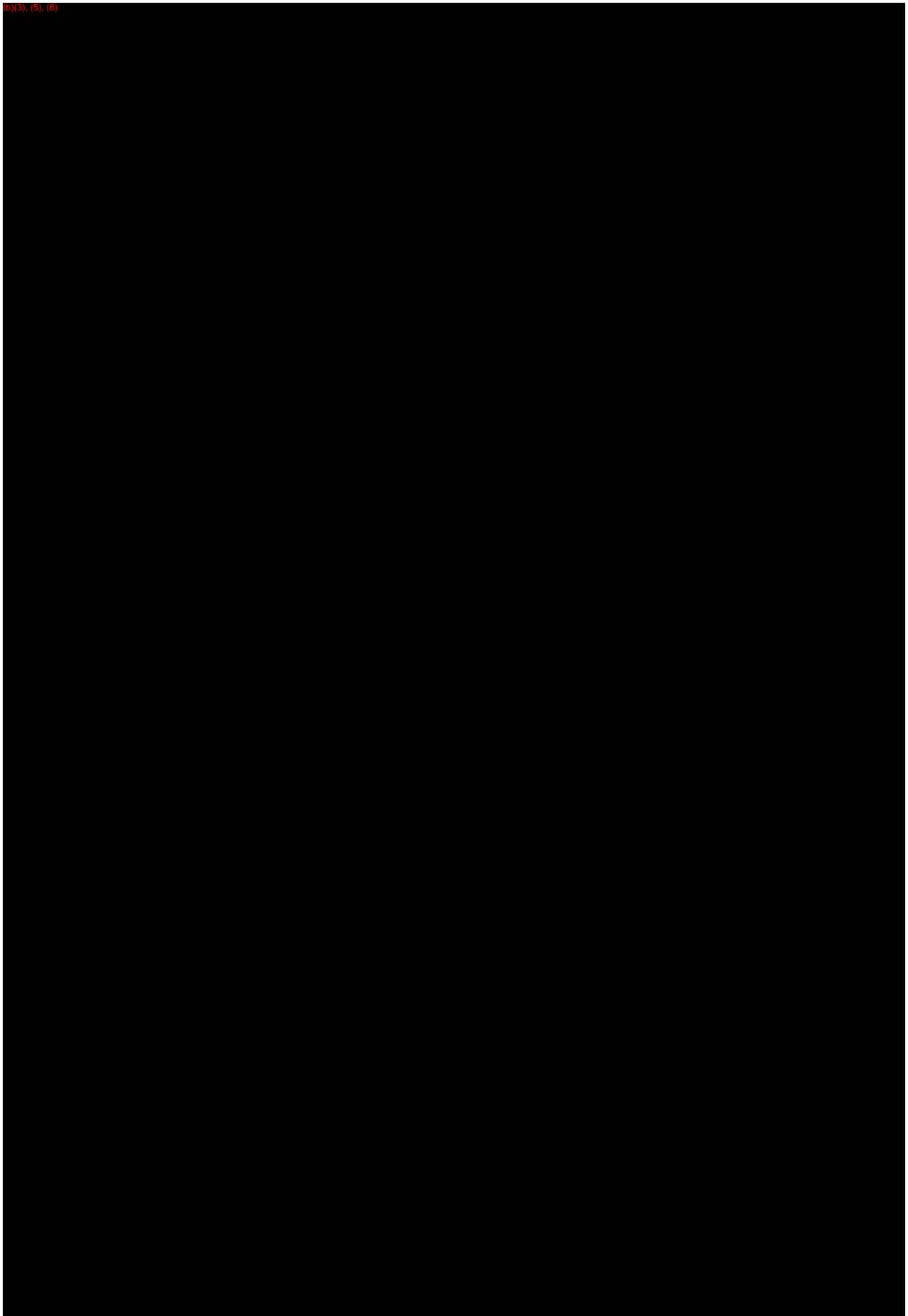
**From:** [Passantino, Stefan C.](#)  
**To:** [Olesh, Stanley D. \(HHS/OGC\)](#)  
**Cc:** [Hall, Randall \(HHS/OGC\)](#); [Fischmann, Elizabeth \(HHS/OGC\)](#); [Silbaugh, Kathleen \(HHS/OGC\)](#); [Keane, Benjamin P.](#); [Cindy Berry](#); [Patrick J. Lightfoot](#)  
**Subject:** RE: Public Financial Disclosure Report (OGE 278e form) [DEN-US\_Active.FID13145093]  
**Date:** Thursday, December 29, 2016 4:53:01 PM  
**Attachments:** [image001.png](#)

---

Here are the answers to your questions. As noted below, we are currently in the process of updating the 278 via the Integrity system and that process will be completed shortly (if it isn't already complete). I am available at any time to discuss question 35. Stefan.

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

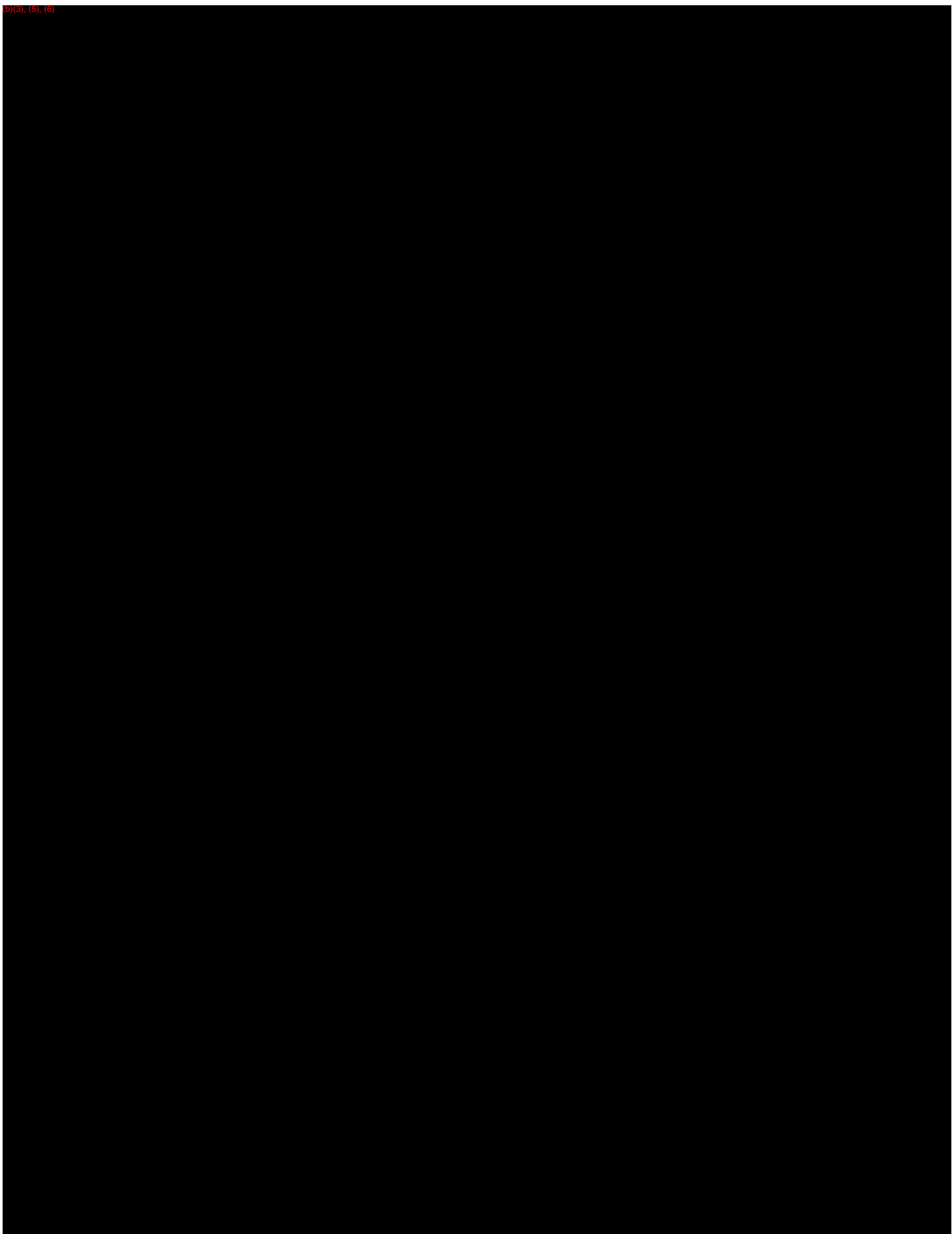












(b)(3), (b)



Stefan C. Passantino  
Partner

D + (b)(6) | Fax: +1 202 496 7756

M (b)(6)

Blog: [www.paytoplaylawblog.com](http://www.paytoplaylawblog.com)

[Bio](#) | [Blog](#) | [Website](#)

Chair, [Dentons Political Law](#) Practice

Dentons US LLP  
1900 K Street, NW, Washington, DC 20006

Dentons US LLP  
303 Peachtree Street, Suite 5300, Atlanta, GA 30308

大成 Salans FMC SNR Denton McKenna Long

Dentons is a global legal practice providing client services worldwide through its member firms and affiliates. This email may be confidential and protected by legal privilege. If you are not the intended recipient, disclosure, copying, distribution and use are prohibited; please notify us immediately and delete this copy from your system. Please see [dentons.com](http://dentons.com) for Legal Notices.

Referral to HHS

Referral to HHS

**From:** Passantino, Stefan C. (b) (6)  
**Sent:** Thursday, December 29, 2016 11:32 AM  
**To:** Olesh, Stanley D. (HHS/OGC)  
**Cc:** Hall, Randall (HHS/OGC); Fischmann, Elizabeth (HHS/OGC); Silbaugh, Kathleen (HHS/OGC); Keane, Benjamin P.; Cindy Berry  
**Subject:** RE: Public Financial Disclosure Report (OGE 278e form)

Yes, my understanding was that the contact we were to be working through at HHS would be out this week and that the discussions needed to wait until the first week of January. If that is incorrect, I am available to talk now. Also copied here is Cindy Berry who is working with Dr. Price on the Transition Team.

(b) (6)  
Stefan C. Passantino  
Partner

D (b) (6) | Fax: +1 202 496 7756

M + (b) (6)  
(b) (6)

Blog: [www.paytoplaylawblog.com](http://www.paytoplaylawblog.com)

[Bio](#) | [Blog](#) | [Website](#)

Chair, [Dentons Political Law](#) Practice

Dentons US LLP  
1900 K Street, NW, Washington, DC 20006

Dentons US LLP  
303 Peachtree Street, Suite 5300, Atlanta, GA 30308

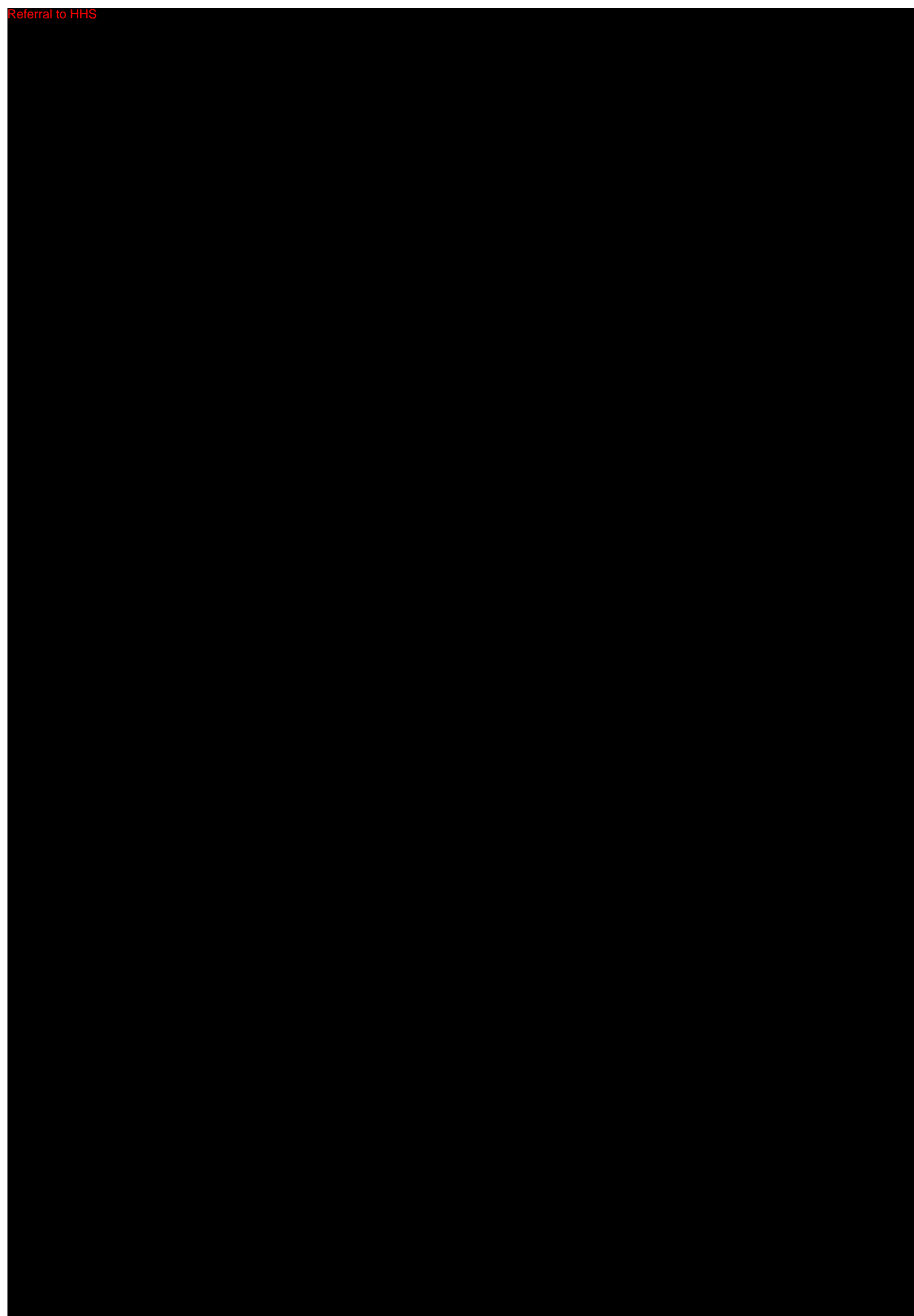
大成 Salans FMC SNR Denton McKenna Long

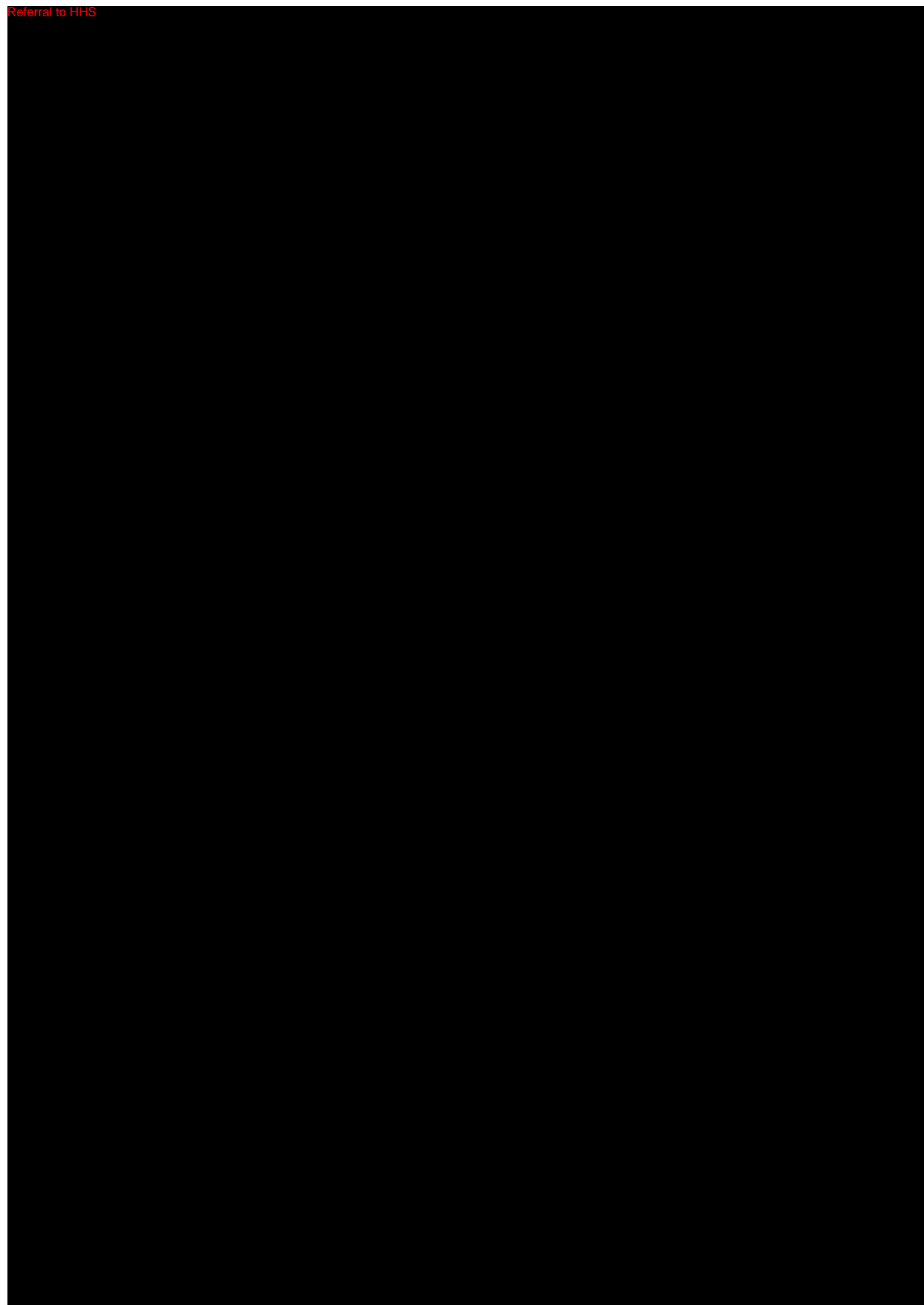
Dentons is a global legal practice providing client services worldwide through its member firms and affiliates. This email may be confidential and protected by legal privilege. If you are not the intended recipient, disclosure, copying, distribution and use are prohibited; please notify us immediately and delete this copy from your system. Please see [dentons.com](http://dentons.com) for Legal Notices.

Referral to HHS

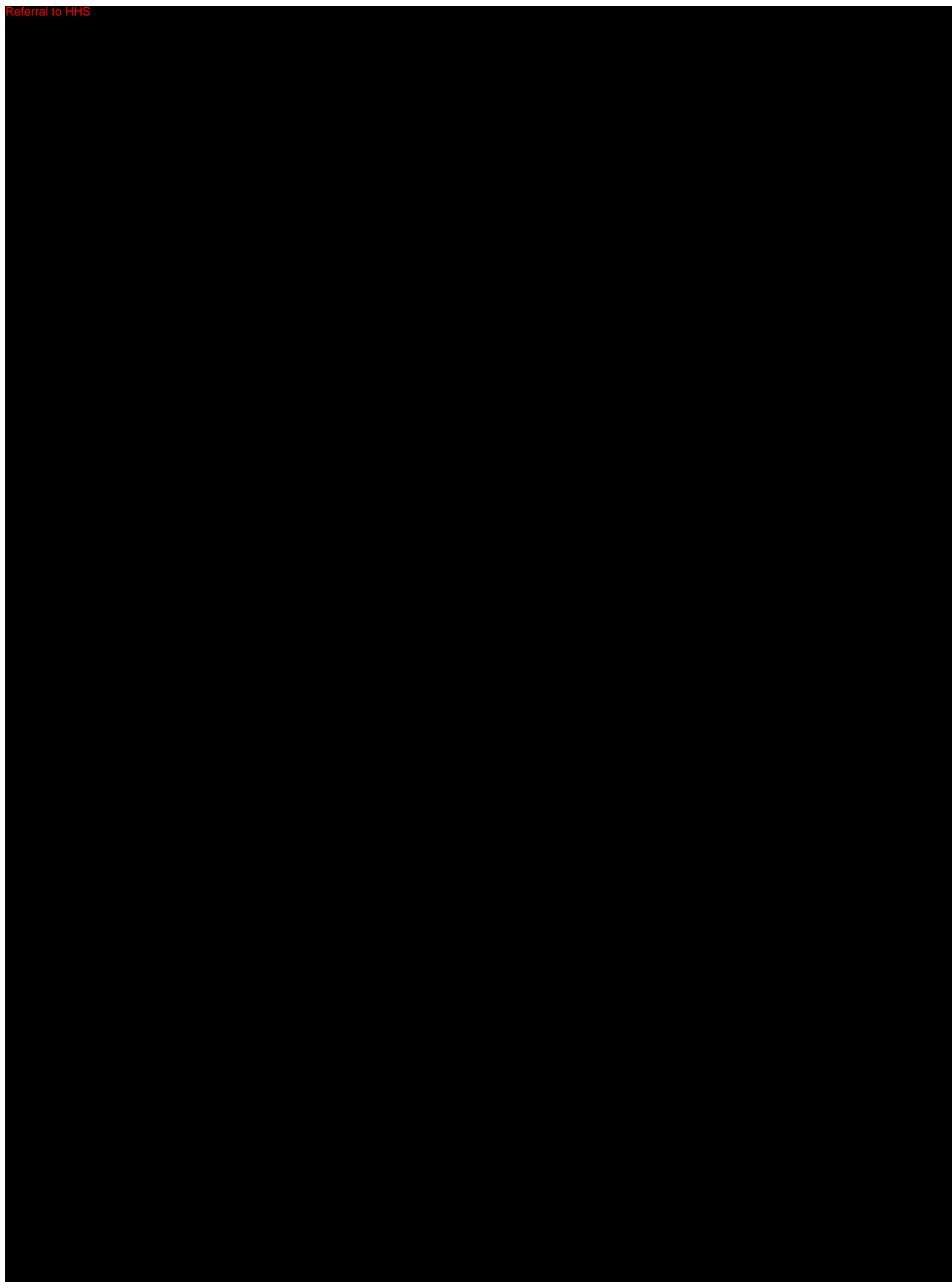
Referral to HHS

Referral to HHS











Referral to HHS



Referral to HHS



Referral to HHS



From: Patrick J. Lightfoot [<mailto:pjlightf@oge.gov>]

Sent: Thursday, January 05, 2017 2:39 PM

To: Olesh, Stanley D. (HHS/OGC)

Cc: Hall, Randall (HHS/OGC)

Subject: RE: Public Financial Disclosure Report (OGE 278e form)

Wanted to follow-up on my other question re: any changes Elizabeth might suggest to the EA. I'm planning to meet with Deb and Heather in an hour or so to discuss the version I've seen.

--Patrick

Referral to HHS



From: Patrick J. Lightfoot [<mailto:pjlightf@oge.gov>]


Sent: Thursday, January 05, 2017 10:17 AM


To: Olesh, Stanley D. (HHS/OGC)

Cc: Hall, Randall (HHS/OGC)

Subject: RE: Public Financial Disclosure Report (OGE 278e form)

Apologies for the confusion. I addressed everything with respect to 

 Do you have an estimate on when you'll receive comments from Elizabeth on the EA? We're hoping to go over a solid first draft of the EA towards the end of the day today (even if the Innate issue is still being worked out).

Thanks for the answers to my last set of questions! I'm going to adjust those remaining alterations to the report shortly 

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

--Patrick

Referral to HHS

From: Patrick J. Lightfoot [<mailto:pjlightf@oge.gov>]  
Sent: Wednesday, January 04, 2017 5:11 PM  
To: Olesh, Stanley D. (HHS/OGC)  
Cc: Hall, Randall (HHS/OGC)  
Subject: RE: Public Financial Disclosure Report (OGE 278e form)

No attachment found in search

Hi Stan,

Attached are my comments/edits to the first draft of the EA. I realize mine may overlap with some of Elizabeth's, but I altered some paragraphs to conform more closely with the EA Guide. Please let me know if you have any questions.

--Patrick

Referral to HHS

From: Patrick J. Lightfoot [<mailto:pjlightf@oge.gov>]  
Sent: Wednesday, January 04, 2017 2:14 PM  
To: Hall, Randall (HHS/OGC); Olesh, Stanley D. (HHS/OGC)  
Subject: RE: Public Financial Disclosure Report (OGE 278e form)

Hi Randy and Stan,

Could one of you give me a call when you have a free moment? I've got two brief follow-up questions on the report and wanted to check on the status of the ethics agreement.

Thanks!

--Patrick

---

From: Patrick J. Lightfoot

Sent: Tuesday, January 03, 2017 9:15 AM

To: 'Olesh, Stanley D. (HHS/OGC)'

Cc: Hall, Randall (HHS/OGC); Fischmann, Elizabeth (HHS/OGC); Silbaugh, Kathleen (HHS/OGC)

Subject: RE: Public Financial Disclosure Report (OGE 278e form)

Stan,

Will do re: the CD. I agree on the technical side and will remove the corresponding entries in Part 1 accordingly.

As we had discussed beforehand, (b)(3), (5), (6) [REDACTED]

[REDACTED]

If you or Randy could send a draft ethics agreement my way as soon as you can (despite the open question on (b)(3), (6) [REDACTED] that would be great.

Thanks!

--Patrick

Referral to HHS

[REDACTED]

---

From: Patrick J. Lightfoot [<mailto:pjlightf@oge.gov>]

Sent: Friday, December 30, 2016 4:08 PM

To: Olesh, Stanley D. (HHS/OGC)

Cc: Hall, Randall (HHS/OGC)

Subject: RE: Public Financial Disclosure Report (OGE 278e form)

Stan,

Hope the conversation went well; this should help nail things down some. I' ll review the overall changes in Integrity first thing Tuesday and we' ll go from there.

Have a Happy New Year!

--Patrick

---

From: Passantino, Stefan C. (b)(6) [REDACTED]

Sent: Friday, December 30, 2016 3:04 PM

To: Olesh, Stanley D. (HHS/OGC)

Cc: Hall, Randall (HHS/OGC); Fischmann, Elizabeth (HHS/OGC); Silbaugh, Kathleen (HHS/OGC); Keane, Benjamin P.;

Cindy Berry; Patrick J. Lightfoot

Subject: RE: Public Financial Disclosure Report (OGE 278e form)

Stanley, it was good speaking with you earlier today. I have had an opportunity to speak with Dr. Price and was able to confirm the issues we discussed. Specifically, I have confirmed the following:

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



(b) (5)



Stefan C. Passantino  
Partner

D + (b) (6) | Fax: +1 202 496 7756

M (b) (6)

(b) (6)

Blog: [www.paytoplaylawblog.com](http://www.paytoplaylawblog.com)

Bio | [Blog](#) | [Website](#)

Chair, [Dentons Political Law](#) Practice

Dentons US LLP

1900 K Street, NW, Washington, DC 20006

Dentons US LLP

303 Peachtree Street, Suite 5300, Atlanta, GA 30308

大成 Salans FMC SNR Denton McKenna Long

Dentons is a global legal practice providing client services worldwide through its member firms and affiliates. This email may be confidential and protected by legal privilege. If you are not the intended recipient, disclosure, copying, distribution and use are prohibited; please notify us immediately and delete this copy from your system. Please see [dentons.com](http://dentons.com) for Legal Notices.

Referral to HHS

[Redacted content]

Rest of chain mentioned above

[Redacted content]



Referral to HHS



**From:** Patrick J. Lightfoot [<mailto:pjlightf@oge.gov>]  
**Sent:** Thursday, January 05, 2017 2:39 PM  
**To:** Olesh, Stanley D. (HHS/OGC)  
**Cc:** Hall, Randall (HHS/OGC)  
**Subject:** RE: Public Financial Disclosure Report (OGE 278e form)

Wanted to follow-up on my other question re: any changes Elizabeth might suggest to the EA. I'm planning to meet with Deb and Heather in an hour or so to discuss the version I've seen.

--Patrick

Referral to HHS

**From:** Passantino, Stefan C. (b) (6)

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

**To:** Olesh, Stanley D. (HHS/OGC)

**Cc:** Fischmann, Elizabeth (HHS/OGC); Hall, Randall (HHS/OGC); Silbaugh, Kathleen (HHS/OGC); Keane, Benjamin P.; Cindy Berry; Patrick J. Lightfoot; Deborah J. Bortot; Weaver, Gretchen (NIH/OD) [E]; Caplan, Andrew (HHS/OGC)

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

Good morning Stanley. I tried calling about this this morning. We would all like to try to get this to a resolution today if possible. If there is someone else I can speak with regarding this matter I am in my office and available. Thank you. Stefan.

Stefan C. Passantino

Partner

D +1 (b) (6) | Fax: +1 202 496 7756

M + (b) (6)

(b) (6)

Blog: [www.paytoplaylawblog.com](http://www.paytoplaylawblog.com)

[Bio](#) | [Blog](#) | [Website](#)

Chair, [Dentons Political Law](#) Practice

Dentons US LLP

1900 K Street, NW, Washington, DC 20006

Dentons US LLP

303 Peachtree Street, Suite 5300, Atlanta, GA 30308

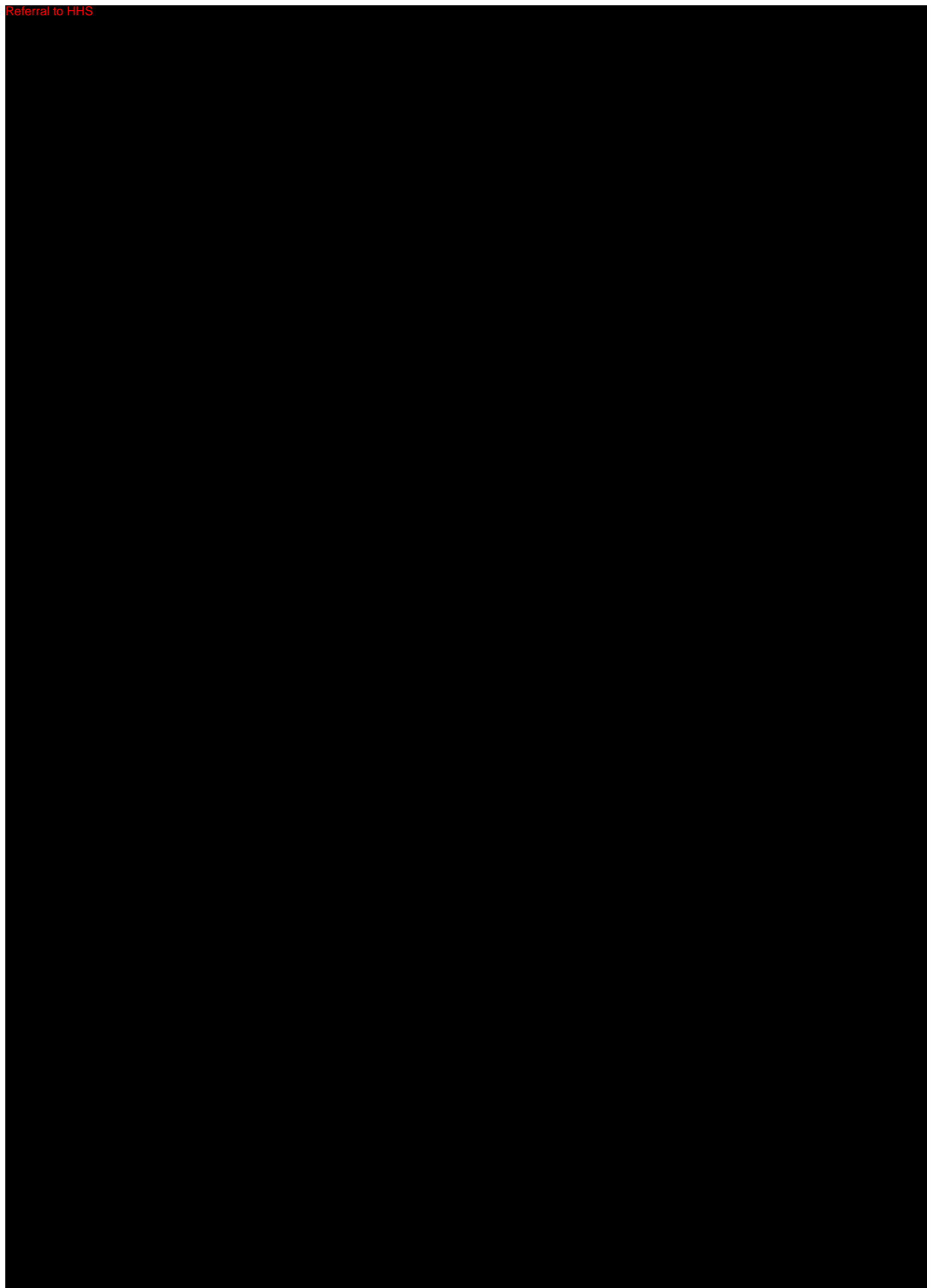
大成 Salans FMC SNR Denton McKenna Long

Dentons is a global legal practice providing client services worldwide through its member firms and affiliates. This email may be confidential and protected by legal privilege. If you are not the intended recipient, disclosure, copying, distribution and use are prohibited; please notify us immediately and delete this copy from your system. Please see [dentons.com](http://dentons.com) for Legal Notices.

Referral to HHS

Referral to HHS





Referral to HHS



Rest of chain mentioned above



Referral to HHS

**From:** Passantino, Stefan C. (b) (6)  
**Sent:** Monday, January 09, 2017 4:36 PM  
**To:** Olesh, Stanley D. (HHS/OGC)  
**Cc:** Hall, Randall (HHS/OGC); Keane, Benjamin P.  
**Subject:** RE: 278 & draft Ethics Agreement [DEN-US\_Active.FID13145093]

I have spoken with Dr. Price and we will make the requested changes to the 278 referenced by Patrick Lightfoot below. With respect to Part 6 and (b)(3), (6), we will make the appropriate changes to reflect the accurate description.

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

Other than that, we are willing to sign this letter. Please advise whether Dr. Price is precleared by OGE. Thank you. Stefan.

 Stefan C. Passantino  
Partner

(b) (6) | Fax: +1 202 496 7756

M +

(b) (6)

Blog: [www.paytoplaylawblog.com](http://www.paytoplaylawblog.com)

[Bio](#) | [Blog](#) | [Website](#)

Chair, [Dentons Political Law](#) Practice

Dentons US LLP  
1900 K Street, NW, Washington, DC 20006

Dentons US LLP  
303 Peachtree Street, Suite 5300, Atlanta, GA 30308

大成 Salans FMC SNR Denton McKenna Long

Dentons is a global legal practice providing client services worldwide through its member firms and affiliates. This email may be confidential and protected by legal privilege. If you are not the intended recipient, disclosure, copying, distribution and use are prohibited; please notify us immediately and delete this copy from your system. Please see [dentons.com](http://dentons.com) for Legal Notices.

Referral to HHS

Referral to HHS

**From:** Patrick J. Lightfoot [<mailto:pjlightf@oge.gov>]  
**Sent:** Monday, January 09, 2017 2:41 PM  
**To:** Olesh, Stanley D. (HHS/OGC)  
**Cc:** Hall, Randall (HHS/OGC)  
**Subject:** RE: (b)(3), (6)

No attachment found in search

Stan,

As discussed, below are the remaining questions/edits to the report we had on our end:

• Part 2:

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



I've also attached a revised ethics agreement with changes made to the spousal employment paragraph (and a revised signature line with the filer's full name).

Thanks!

--Patrick



Referral to RHD

Name: [REDACTED]  
 Email: [REDACTED]  
 Tel: [REDACTED]  
 Co: [REDACTED]  
 Address: [REDACTED]  
 Zip: [REDACTED]  
 City: [REDACTED]  
 State: [REDACTED]  
 Country: [REDACTED]  
 Website: [REDACTED]  
 Notes: [REDACTED]

Benjamin P. Keane  
Marketing Associate  
800-611-1234  
800-611-1234

Devizes 15,  
1900 F 12 and 1900 Washington DC 20006  
101 nacht en 12 and 10 Atlanta GA 30308

There can be a global legal system by setting law on various standards through its members. I am not a lawyer. This email may be considered confidential by legal advice. I am not the intended recipient. Disclosure or copying of this document and any e-mail attached is prohibited. Please notify your nearest authority and delete this copy. No response is required. \_\_\_\_\_ is your best bet.

Referral to HHS

Referral to HHS

**No attachment found in search**

No attachment found in search:

I searched before we took this shot to see if we could find a sign for it in the area. It is in the area of [REDACTED]

[REDACTED] (C) [REDACTED] (C)

If I look good and that file is no, executive has completed his updates, we should be just about ready to move this to what I do. I will advise once.

If it looks good and the feedback is positive, we should be just about ready to move this forward for a decision.

Referral to NHS

doi:10.1371/journal.pone.0141011

A quick note: adding on a 5th axis below  $x, y, z, t$  is 18, 19, 20, 21 and 22, so we could say that  $dx, dy, dz, dt$  could be new axes, but we have another choice: rather than use the  $x, y, z, t$  but a new axis  $u$ , then  $x, y, z, u$  would be a new set on  $t, dx, dy, dz$  and  $u$  would run in the

**D(13), (5), (6)**

Benjamin P. Keane  
Department of Psychology

TD (E) | an +1 202 486 7750  
 TD (E) | an +1 804 527 4298  
 TD (E)

DOI: 10.1002/for

大塚 隆典 [MC158@Dentist.Mi.Rakusai.ac.jp](mailto:MC158@Dentist.Mi.Rakusai.ac.jp)

[illegible]

of chain mentioned above.

**From:** [Passantino, Stefan C.](#)  
**To:** [Olesh, Stanley D. \(HHS/OGC\)](#)  
**Cc:** [Keane, Benjamin P.](#); [Hall, Randall \(HHS/OGC\)](#); [Cindy Berry](#); [Patrick J. Lightfoot](#); [Jim Carroll](#)  
**Subject:** Re: Senate Questionnaire  
**Date:** Wednesday, January 11, 2017 9:10:27 AM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image004.png](#)

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

We will run this to ground and get back this morning I'm sure there is a solution here as we created both at the same time from the same source material.

Referral to HHS

From: Keane, Benjamin P. (b) (6)  
Sent: Tuesday, January 10, 2017 6:38 PM  
To: Olesh, Stanley D. (HHS/OGC); Passantino, Stefan C.  
Cc: Hall, Randall (HHS/OGC); Cindy Berry  
Subject: RE: 278 & draft Ethics Agreement [DEN-US\_Active.FID13145093]

Thanks, Stan. We appreciate your efforts to push this process forward as quickly as possible and believe we've addressed all of our 278e obligations and all of your team's questions. Our hope is that we can now get the pre-clearance finalized in very short order.

As for the Senate Questionnaire, we have been informed by the Transition team that they are not authorizing it to be released. If you have questions about that decision, Cindy Berry (who is copied on this e-mail) will be your best resource for additional information.

Stefan and I continued to be available to discuss as needed.

Thanks for your assistance,  
Ben

<image001.png>

Benjamin P. Keane  
Managing Associate

D (b) (6) | Fax +1 202 496 7756  
D (b) (6) | Fax +1 404 527 4198  
[ben.keane@dentons.com](mailto:ben.keane@dentons.com)

Dentons US LLP  
1900 K Street, NW, Washington, DC 20006  
303 Peachtree Street, NE, Atlanta, GA 30308

大成 Salans FMC SNR Denton McKenna Long

Dentons is a global legal practice providing client services worldwide through its member firms and affiliates. This email may be confidential and protected by legal privilege. If you are not the intended recipient, disclosure, copying, distribution and use are prohibited; please notify us immediately and delete this copy from your system. Please see dentons.com<<http://www.dentons.com/>> for Legal Notices.

Referral to HHS



From: Keane, Benjamin P. (b) (6)  
Sent: Tuesday, January 10, 2017 4:47 PM  
To: Olesh, Stanley D. (HHS/OGC); Passantino, Stefan C.  
Cc: Hall, Randall (HHS/OGC)  
Subject: RE: 278 & draft Ethics Agreement [DEN-US\_Active.FID13145093]

Stan,

We should be all set on the final item as well. Our team has cross-referenced the records against the (b)(3), (b) info and checked/unchecked the appropriate boxes in the system. Just a few minor changes, but we should be all set to push this thing forward.

Thanks,  
Ben

<image001.png>

Benjamin P. Keane  
Managing Associate

D +1 (b) (6) | Fax +1 202 496 7756  
D +1 (b) (6) | Fax +1 404 527 4198  
(b) (6)

Dentons US LLP  
1900 K Street, NW, Washington, DC 20006  
303 Peachtree Street, NE, Atlanta, GA 30308

大成 Salans FMC SNR Denton McKenna Long

Dentons is a global legal practice providing client services worldwide through its member firms and affiliates. This email may be confidential and protected by legal privilege. If you are not the intended recipient, disclosure, copying, distribution and use are prohibited; please notify us immediately and delete this copy from your system. Please see dentons.com<<http://www.dentons.com/>> for Legal Notices.

Referral to HHS



Referral to HHS



Referral to HHS

[Redacted]

Referral to HHS

[Redacted]

Rest of chain mentioned above

[Redacted]

**From:** [Patrick J. Lightfoot](#)  
**To:** [Heather A. Jones](#)  
**Subject:** RE: Representative Tom Price  
**Date:** Wednesday, January 11, 2017 1:27:59 PM

---

Thanks!

-----Original Message-----

From: Heather A. Jones  
Sent: Wednesday, January 11, 2017 1:27 PM  
To: Patrick J. Lightfoot; Teresa L. Williamson  
Subject: Fw: Representative Tom Price

Please see below

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

Original Message

From: Ann M Donaldson (b) (6)  
Sent: Wednesday, January 11, 2017 1:21 PM  
To: Deborah J. Bortot; Heather A. Jones  
Subject: Representative Tom Price

On behalf of the President-Elect, this email serves as confirmation that the President-Elect intends to nominate Representative Tom Price to be Secretary of Health and Human Services. Please transmit his pre-cleared 278 report to the appropriate Senate committee.


Ann M. Donaldson  
Associate  
JONES DAY® - One Firm Worldwide  
51 Louisiana Avenue, NW  
Washington, DC 20001  
Office +1 (b) (6)

**From:** [Passantino, Stefan C.](#)  
**To:** [Olesh, Stanley D. \(HHS/OGC\)](#); [Keane, Benjamin P.](#)  
**Cc:** [Fischmann, Elizabeth \(HHS/OGC\)](#); [Hall, Randall \(HHS/OGC\)](#); [Cindy Berry](#); [Patrick J. Lightfoot](#)  
**Subject:** RE: PRECLEASED: Thomas Price  
**Date:** Wednesday, January 11, 2017 4:09:12 PM  
**Attachments:** [image001.png](#)

---

Yes. I believe it is signed. Let me see and get right back.

 Stefan C. Passantino  
Partner

D  | Fax: +1 202 496 7756

M 

Blog: [www.paytoplaylawblog.com](http://www.paytoplaylawblog.com)

[Bio](#) | [Blog](#) | [Website](#)

Chair, [Dentons Political Law](#) Practice

Dentons US LLP  
1900 K Street, NW, Washington, DC 20006

Dentons US LLP  
303 Peachtree Street, Suite 5300, Atlanta, GA 30308

大成 Salans FMC SNR Denton McKenna Long

Dentons is a global legal practice providing client services worldwide through its member firms and affiliates. This email may be confidential and protected by legal privilege. If you are not the intended recipient, disclosure, copying, distribution and use are prohibited; please notify us immediately and delete this copy from your system. Please see [dentons.com](http://dentons.com) for Legal Notices.

Referral to HHS



**From:** Passantino, Stefan C. (b) (6)  
**Sent:** Wednesday, January 11, 2017 2:52 PM  
**To:** Olesh, Stanley D. (HHS/OGC); Keane, Benjamin P.  
**Cc:** Fischmann, Elizabeth (HHS/OGC); Hall, Randall (HHS/OGC); Cindy Berry; Patrick J. Lightfoot  
**Subject:** RE: PRECLEARED: Thomas Price

Thank you. I very much appreciate the professionalism of the entire HHS staff and you in particular. I will get you an answer as to how we get you the letter.

(b) (6)  
Stefan C. Passantino  
Partner

D (b) (6) | Fax: +1 202 496 7756

M (b) (6)

Blog: [www.paytoplaylawblog.com](http://www.paytoplaylawblog.com)

[Bio](#) | [Blog](#) | [Website](#)

Chair, [Dentons Political Law](#) Practice

Dentons US LLP  
1900 K Street, NW, Washington, DC 20006



Dentons US LLP  
303 Peachtree Street, Suite 5300, Atlanta, GA 30308

大成 Salans FMC SNR Denton McKenna Long

Dentons is a global legal practice providing client services worldwide through its member firms and affiliates. This email may be confidential and protected by legal privilege. If you are not the intended recipient, disclosure, copying, distribution and use are prohibited; please notify us immediately and delete this copy from your system. Please see [dentons.com](https://www.dentons.com) for Legal Notices.

Referral to HHS



Referral to HHS

**From:** Patrick J. Lightfoot  
**Sent:** Wednesday, January 11, 2017 12:23 PM  
**To:** 'Ann M Donaldson'  
**Cc:** Hall, Randall (HHS/OGC); Fischmann, Elizabeth (HHS/OGC); Olesh, Stanley D. (HHS/OGC)  
**Subject:** RE: PRECLEASED: Thomas Price

No attachment found in search

Annie,

Mr. Price's draft ethics agreement is attached.

Sincerely,

--

Patrick J. Lightfoot  
Assistant Counsel, Ethics Law & Policy Branch  
General Counsel & Legal Policy Division

U.S. Office of Government Ethics  
1201 New York Ave NW, Suite 500  
Washington, DC 20005  
Telephone: (202) 482-9271

Visit OGE's website: [www.oge.gov](http://www.oge.gov)

Follow OGE on Twitter: @OfficeGovEthics

**From:** Deborah J. Bortot

**Sent:** Wednesday, January 11, 2017 12:21 PM

**To:** 'Ann M Donaldson'

**Cc:** Patrick J. Lightfoot; David J. Apol; Heather A. Jones; Sandra S. Mabry; Keith Labedz; Teresa L. Williamson; Rodrick T. Johnson; Emory A. Rounds III; Hall, Randall (HHS/OGC); 'Fischmann, Elizabeth (HHS/OGC)'

**Subject:** PRECLEASED: Thomas Price

Annie, Thomas Price is precleared.

Patrick, please forward the ethics agreement to Annie.

Thanks!

Deb

Deborah J. Bortot

Chief, Presidential Nominations Branch

U.S. Office of Government Ethics

1201 New York Ave., NW, Suite 500

Washington, DC 20005-3917

Telephone: (202) 482-9227

Facsimile: (202) 482-9237

OGE Confidential Notice: This email, including all attachments, may constitute a Federal record or other Government property that is intended only for the use of the individual or entity to which it is addressed. This email also may contain information that is privileged,

Referral to HHS



---

**From:** Patrick J. Lightfoot [mailto:pjlightf@oge.gov]  
**Sent:** Wednesday, January 11, 2017 6:01 PM  
**To:** Olesh, Stanley D. (HHS/OGC)  
**Subject:** RE: FW: PRECLEASED: Thomas Price

Stan,

What's a good number to reach you at? I tried the number you called me on earlier but it said the mailbox wasn't in service.

--Patrick

Referral to HHS



**From:** Kris Skrzycki [mailto:kskrzycki@gmail.com]  
**Sent:** Wednesday, January 11, 2017 4:23 PM  
**To:** Passantino, Stefan C.; Olesh, Stanley D. (HHS/OGC)  
**Cc:** Keane, Benjamin P.; Cindy Berry  
**Subject:** Re: FW: PRECLEASED: Thomas Price

Stanley, I have a signed copy of the Pre-Clearance letter. I can have it scanned and sent. Who should it be emailed to?

On Wed, Jan 11, 2017 at 4:11 PM, Passantino, Stefan C. <(b) (6)> wrote:

Kris, can you please coordinate and resolve HHS's sense of urgency below? I think this is just logistics.



**Stefan C. Passantino**  
Partner

D (b) (6) | Fax: [+1 202 496 7756](tel:+12024967756)  
M (b) (6)

Referral to HHS



**From:** Patrick J. Lightfoot [mailto:pjlightf@oge.gov]  
**Sent:** Wednesday, January 11, 2017 7:17 PM  
**To:** Fischmann, Elizabeth (HHS/OGC); Olesh, Stanley D. (HHS/OGC)  
**Subject:** RE: Pre-Clearance Letter - Price - HHS

When opening the report, there should be an option to "Sign" the report. After clicking Sign, check the certification that the report is accurate and complete, then scroll to the bottom of the page to click Submit.

If there is a number where we can reach you to walk you through the steps over the phone, we would be happy to do so.

**From:** tom price (b) (6)  
**Sent:** Wednesday, January 11, 2017 6:58 PM  
**To:** Olesh, Stanley D. (HHS/OGC)  
**Cc:** Kris Skrzycki; Patrick J. Lightfoot; Passantino, Stefan C.; Keane, Benjamin P.; Cynthia Berry  
**Subject:** Re: Pre-Clearance Letter - Price - HHS

278e complete and submitted

Referral to HHS



**From:** tom price [mailto:(b) (6)]

**Sent:** Wednesday, January 11, 2017 5:57 PM  
**To:** Kris Skrzycki; Olesh, Stanley D. (HHS/OGC); [pjlightf@oge.gov](mailto:pjlightf@oge.gov)  
**Cc:** Passantino, Stefan C.; Keane, Benjamin P.; Cynthia Berry  
**Subject:** Re: Pre-Clearance Letter - Price - HHS

I thought a pdf was not acceptable.

Is that not true?

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

**From:** Kris Skrzycki  
**Sent:** Wednesday, January 11, 2017 4:36 PM  
**To:** (b) (5); [pjlightf@oge.gov](mailto:pjlightf@oge.gov)  
**Cc:** Passantino, Stefan C.; Keane, Benjamin P.; Cynthia Berry; tom price  
**Subject:** Pre-Clearance Letter - Price - HHS

Final EA released below

Attached is a pre-clearance letter/ethics agreement signed by Dr. Price, nominee for Secretary of Health and Human Services.

Kris

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

**From:** [Deborah J. Bortot](#)  
**To:** [Teresa L. Williamson](#)  
**Cc:** [Sandra S. Mabry](#)  
**Subject:** FW: Final DAEO Letter and Ethics Agreement for Dr. Thomas E. Price  
**Date:** Wednesday, January 11, 2017 7:55:58 PM  
**Attachments:** [DAEO Ltr to OGE Dr. Thomas E. Price FINAL 1.11.17.pdf](#)  
[Ethics Agreement Dr. Thomas E. Price FINAL 1.11.17.pdf](#)

---

DAEO letter referred to HHS; Final ethics agreement released below

Referral to HHS

**From:** [Teresa L. Williamson](#)  
**To:** [Sandra S. Mabry](#)  
**Subject:** FW: OGE Reports  
**Date:** Thursday, January 12, 2017 11:05:31 AM

---

Hi Sandy, See Chung's email below. I figure we have one voice from OGE to the committee on questions on the status of reports and I'm assuming that's your voice☺ Let me know if I should be calling, I'd be happy to do so.

Thanks  
Teresa

---

**From:** Shek, Chung (HELP Committee) (b) (6)  
**Sent:** Thursday, January 12, 2017 11:03 AM  
**To:** Teresa L. Williamson  
**Subject:** OGE Reports

Hey Teresa,

Are there any updates as to when we might be getting OGE reports for Price, (b) (6) ?

Thanks!  
Chung



**From:** [Sandra S. Mabry](#)  
**To:** ["Ann M Donaldson"](#)  
**Subject:** FW: Public Financial Disclosure Report of Thomas E. Price  
**Date:** Thursday, January 12, 2017 7:12:21 PM  
**Attachments:** [Price, Thomas E. final278.pdf](#)  
[Price, Thomas E. finalEA.pdf](#)  
[Price, Thomas E. finalsenateltr-HELP--.docx.pdf](#)

Final EA and final senate letter released below. 278 financial disclosure report withheld in full - (b)(3) - Available at <https://extapps2.oge.gov/201/Presiden.nsf/PAS%20Index?OpenView>

Annie,

Yesterday we sent the documents for Dr. Price to the Senate Finance Committee, the committee that handles the nomination for the Secretary of Health and Human Resources. With the email below, we have transmitted the package to the Committee on Health, Education, Labor, and Pensions, consistent with long-time practice. If you have any questions, please call me at 202-482-9258 or Deb at 202-482-9277. Thanks, Sandy

---

**From:** Sandra S. Mabry  
**Sent:** Thursday, January 12, 2017 7:01 PM  
**To:** 'Chung\_Shek@help.senate.gov'  
**Cc:** Deborah J. Bortot; Teresa L. Williamson; Rodrick T. Johnson; Heather A. Jones; 'Ann M Donaldson'  
**Subject:** Public Financial Disclosure Report of Thomas E. Price

Final EA and final senate letter released below. 278 financial disclosure report withheld in full - (b)(3) - Available at <https://extapps2.oge.gov/201/Presiden.nsf/PAS%20Index?OpenView>

Good Evening,

I've attached the financial disclosure package for Thomas E. Price. President-Elect Trump has announced his intention to nominate Dr. Price for the position of Secretary, Department of Health and Human Services.

The hard copy of the attached documents will be placed at OGE reception for pick up by a Senate rider page per our agreement. If you have any questions, please contact Teresa Williamson @ 202-482-9283.

**Please respond to this message to confirm receipt of the attached package, and please let me know in your response whether you will send a Senate rider page.**

Thanks!

Sandra Mabry  
Presidential Nominations Branch  
U.S. Office of Government Ethics  
1201 New York Avenue, NW - Suite 500  
Washington, DC 20005  
202-482-9258

From: [Patrick J. Spillane](#)  
To: [Hilary Spillane](#)  
Subject: RE: Form 278e - Update Letter for the OGE Filer of Dr. Tom Price  
Date: Tuesday, January 31, 2017 7:51:00 AM  
Attachments: [image001.png](#)

Hi Randy,

Just wanted to follow up and see if you'd heard back from the filer's attorney.

Thanks!

--Patrick



From: Keane, Benjamin P. (b) (6)  
Sent: Monday, January 23, 2017 3:19 PM  
To: Hilary Spillane (HHS-OIG)  
Subject: FW: Form 278e - Update Letter for the OGE Filer of Dr. Tom Price

Randy,

Thanks for confirming receipt of this document over the phone for me this afternoon. I have a second to send an e-mail confirmation of receipt as well if it would be much appreciated. Sorry to ask you to do that, but I'd feel better having written documentation for my records moving forward.

Thanks again and have a great day,  
Ben

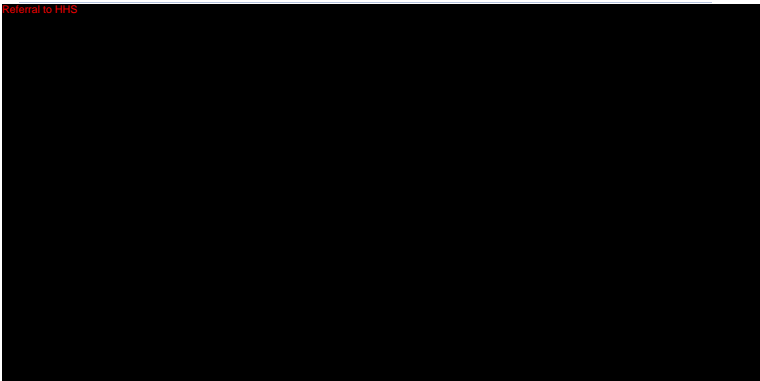
Benjamin P. Keane  
Managing Associate

D (b) (6) | Fax: 1 202 96 7756  
D (b) (6) | Fax: 1 0 527 198  
D (b) (6)

Deniers US LLP  
1900 K Street, NW, Washington, DC 20006  
303 Peachtree Street, NE, Atlanta, GA 30308

大城 Salans FMC SNR Den on McKenna Long

Deniers is a global legal practice providing client services worldwide through its member firms and affiliates. This email may be confidential and protected by legal privilege. If you are not the intended recipient, disclosure, copying, distribution and use are prohibited. Please notify us immediately and delete this copy from your system. Please see [http://deniers.com/privacy-policy](#) for Legal Notices.



**From:** [Patrick J. Lightfoot](#)  
**To:** ["Fischmann, Elizabeth \(HHS/OGC\)"; "Hall, Randall \(HHS/OGC\)"](#)  
**Subject:** Update on Price Report  
**Date:** Tuesday, January 31, 2017 12:44:35 PM

---

Hi Elizabeth and Randy,

In light of Congressman Price's testimony at his confirmation hearing that (b)(3), (5), (6)

[REDACTED]

[REDACTED]

Please feel free to forward those portions above to him/his attorney and send any response you receive my way. Thank you!

--Patrick

**From:** [Patrick J. Lightfoot](#)  
**To:** ["Olesh, Stanley D. \(HHS/OGC\)"](#)  
**Cc:** ["Hall, Randall \(HHS/OGC\)"; Patrick Shepherd](#)  
**Subject:** RE: ADVANCE -- Price CD request  
**Date:** Wednesday, February 01, 2017 10:47:44 AM

---

Stan,

I spoke with the head of our CD program and it appears that the best course of action will be to wait until we've resolved the remaining questions surrounding the amendment of the 278 and EA before moving forward with a CD review in case anything needs to be adjusted on that front. Once we're all clear there, we can start the review of the CD.

--Patrick

---

**From:** Patrick J. Lightfoot  
**Sent:** Tuesday, January 31, 2017 12:51 PM  
**To:** 'Olesh, Stanley D. (HHS/OGC)'  
**Cc:** 'Hall, Randall (HHS/OGC)'  
**Subject:** RE: ADVANCE -- Price CD request

Hi Stan,

I can forward this to the manager of our CD program (which might result in the CD being assigned to me anyway), but I'd note that we're still trying to work out the amendment letter and corresponding changes to the ethics agreement, which would prevent the CD from being complete until those are done. I believe Randy was trying to get in touch with his attorney when we spoke about it on Thursday.

--Patrick

Referral to HHS



Referral to HHS



Referral to NHS

**From:** Keane, Benjamin P. (b) (6)  
**Sent:** Wednesday, February 01, 2017 1:33 PM  
**To:** Hall, Randa I (HHS/OGC)  
**Cc:** Olesch, Stanley D. (HHS/OGC); Fischmann, Elizabeth (HHS/OGC)  
**Subject:** RE: Fo m 278e - Update Letter to the OGE File of D. Tom P. ice  
**Importance:** High

Randy,

Thank you for your time today. (b) (3), (4), (5), (6)

Thanks in advance for your assistance. Should you have any questions or concerns, please do not hesitate to let me know.  
Ben

Benjamin P. Keane

D: (b) (6) | Fax: 1 202 496 7756  
C: (b) (6) | Fax: 1 404 527 4198  
(b) (6)

Dentons US LLP  
1900 K Street, NW, Washington, DC 20006  
303 Peachtree Street, NE, Atlanta, GA 30308

Salans FMC SNR Denton McKenna Long

Dentons is a global legal practice providing client services worldwide through its member firms and affiliates. This email may be confidential and protected by legal privilege. If you are not the intended recipient, disclosure, copying, distribution and use are prohibited. Please notify us immediately and delete this copy from your system. Please see [dentons.com](#) for Legal Notices.

Referral to NHS

**From:** Keane, Benjamin P. (b) (6)  
**Sent:** Monday, January 23, 2017 1:13 PM  
**To:** Hall, Randa I (HHS/OGC)  
**Subject:** FW: Fo m 278e - Update Letter to the OGE File of D. Tom P. ice

Randy,

Thanks for confirming receipt of this document over the phone. I am this afternoon. If you have a second to send an e-mail confirmation of receipt as well it would be much appreciated. So I can ask you to do that, but I'd feel better having written documentation for my records moving forward.

Thanks again and have a great day,  
Ben

Benjamin P. Keane

Managing Associate

D: (b) (6) | Fax: 1 202 496 7756  
C: (b) (6) | Fax: 1 404 527 4198  
(b) (6)

Dentons US LLP  
1900 K Street, NW, Washington, DC 20006  
303 Peachtree Street, NE, Atlanta, GA 30308

Salans FMC SNR Denton McKenna Long

Dentons is a global legal practice providing client services worldwide through its member firms and affiliates. This email may be confidential and protected by legal privilege. If you are not the intended recipient, disclosure, copying, distribution and use are prohibited. Please notify us immediately and delete this copy from your system. Please see [dentons.com](#) for Legal Notices.

**From:** Keane, Benjamin P.  
**Sent:** Sunday, January 22, 2017 11:14 PM  
**To:** Hall, Randa I (HHS/OGC); (b) (3), (6)  
**Subject:** Fo m 278e - Update Letter to the OGE File of D. Tom P. ice

Randy,

I hope all is well. The attached letter issues on behalf of D. Tom P. ice - nominee to serve as Secretary of the U.S. Department of Health and Human Services. As per our previous conversations and your verbal guidance, please find attached for inclusion in the file of D. P. ice a copy of an update letter that notes a small number of minor administrative edits that should be made to the Fo m 278e previously submitted through your office. Thanks in advance for your time and assistance as it relates to this matter, and please let us know if you require any additional information.  
Have a great day,  
Ben

Benjamin P. Keane

Managing Associate

D: (b) (6) | Fax: 1 202 496 7756  
C: (b) (6) | Fax: 1 404 527 4198  
(b) (6)

Associate | [LinkedIn](#) | [Website](#)  
Assistant: Ada Oppengren | 1 202 496 7152

Dentons US LLP  
1900 K Street, NW, Washington, DC 20006  
303 Peachtree Street, NE, Atlanta, GA 30308

Salans FMC SNR Denton McKenna Long

Dentons is a global legal practice providing client services worldwide through its member firms and affiliates. This email may be confidential and protected by legal privilege. If you are not the intended recipient, disclosure, copying, distribution and use are prohibited. Please notify us immediately and delete this copy from your system. Please see [dentons.com](#) for Legal Notices.

No attachment found in search

Referral to HHS



**From:** Keane, Benjamin P. (b) (6)  
**Sent:** Thursday, February 02, 2017 11:22 AM  
**To:** Hall, Randall (HHS/OGC)  
**Cc:** Olesh, Stanley D. (HHS/OGC); Fischmann, Elizabeth (HHS/OGC)  
**Subject:** RE: Questions for Dr. Price  
**Importance:** High

Randy,

Thanks for your assistance with these matters. Please find below the nominee's responses to both inquiries.

Sincerely,  
Ben Keane

-----

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



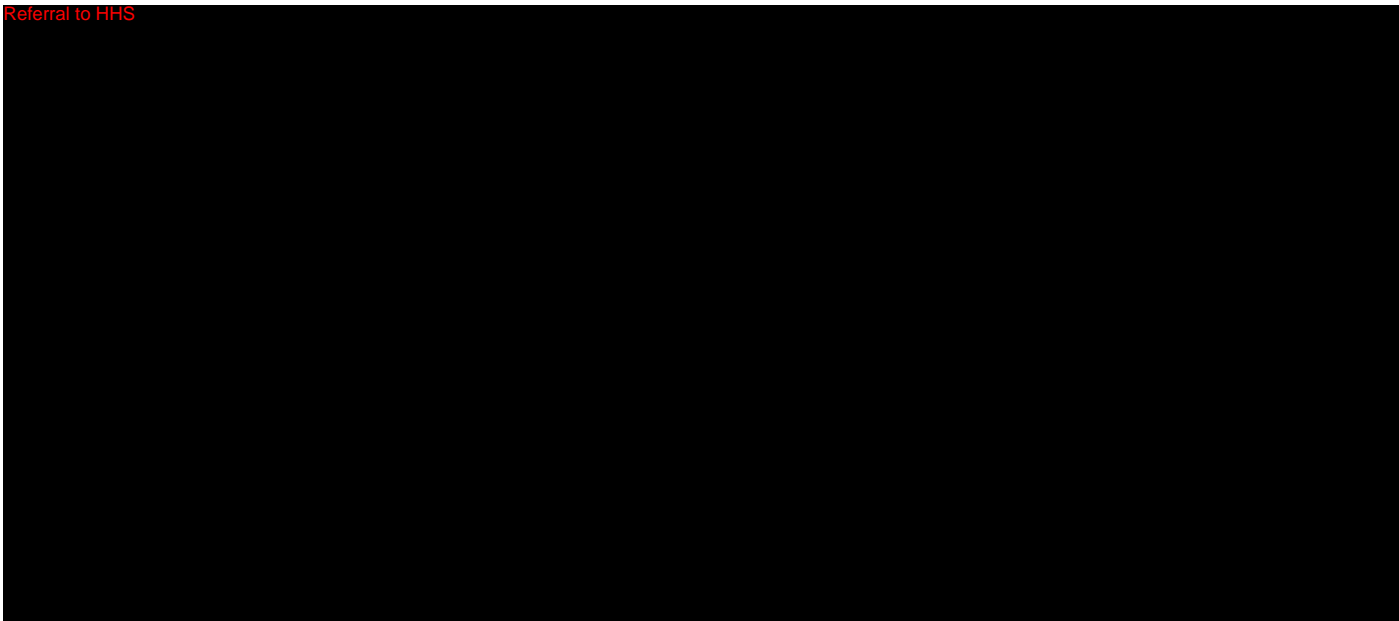
Referral to HHS



Referral to HHS







Referral to HHS

From: Patrick J. Lightfoot [mailto:pjl@hhs.gov]  
Sent: Tuesday, February 07, 2017 1:38 PM  
To: Ha | Randai (HHS/OGC); Deborah J. Bortol; Heather A. Jones  
Cc: Olesch Stanley D. (HHS/OGC); Fischmann Elizabeth (HHS/OGC)  
Subject: RE: Amendment Letter

Thanks Randy! Now we just need the cover letter from Elizabeth.

Referral to HHS

From: Keane Benjamin P. (b) (6)  
Sent: Tuesday, February 07, 2017 1:22 PM  
To: Ha | Randai (HHS/OGC)  
Cc: Olesch Stanley D. (HHS/OGC); Fischmann Elizabeth (HHS/OGC)  
Subject: RE: Amendment Letter  
Importance: High

No attachment found in search

Randy,

Please find attached a signed copy of the Ethics Agreement Amendment letter. The original version will be hand delivered to your offices.

Thanks,  
Ben

Benjamin P. Keane

D (b) (6) | Fax 1 202 96 7756  
O (b) (6) | Fax 1 0 527 198  
M (b) (6)

Dentons US LLP  
1900 K Street, NW, Washington, DC 20006  
303 Peachtree Street, NE, Atlanta, GA 30308

Salama FMC SNR Den on McKenna Long

Dentons is a global legal practice providing client services worldwide through its member firms and all cases. This email may be confidential and protected by legal privilege. If you are not the intended recipient, disclosure, copying, distribution and use are prohibited; please notify us immediately and delete this copy from your system. Please see [den.com](#) for Legal Notices.

Referral to HHS

From: Deborah J. Bortol [mailto:dbortol@hhs.gov]  
Sent: Tuesday, February 07, 2017 11:36 AM  
To: Ha | Randai (HHS/OGC); Heather A. Jones  
Cc: Fischmann Elizabeth (HHS/OGC)  
Subject: RE: Amendment Letter

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

Randy

(b) (6) provide the filer with the attached letter.

Thanks  
Deb

Referral to HHS

From: Keane Benjamin P. (b) (6)  
Sent: Monday, February 06, 2017 3:17 PM  
To: Ha | Randai (HHS/OGC)  
Cc: Olesch Stanley D. (HHS/OGC); Fischmann Elizabeth (HHS/OGC)  
Subject: RE: Amendment Letter

Thanks for the letter, Randy, and for the low-up conversation on these issues. We are generally comfortable with all the language in the amendment. The only requested change we would ask OGE to consider is to tweak the last sentence on pg. 1 to read as follows:

(b) (6)

If you believe OGE would be amenable to that small change, please pass it along to them and we can sign a new version once it is completed. If you don't believe they would be willing to make that change, please confirm that as well.

Thanks for your assistance,  
Ben

Benjamin P. Keane

D (b) (6) | Fax 1 202 96 7756  
O (b) (6) | Fax 1 0 527 198  
M (b) (6)

Dentons US LLP  
1900 K Street, NW, Washington, DC 20006  
303 Peachtree Street, NE, Atlanta, GA 30308

Salama FMC SNR Den on McKenna Long

Dentons is a global legal practice providing client services worldwide through its member firms and all cases. This email may be confidential and protected by legal privilege. If you are not the intended recipient, disclosure, copying, distribution and use are prohibited; please notify us immediately and delete this copy from your system. Please see [den.com](#) for Legal Notices.

Referral to HHS

**From:** [Patrick J. Lightfoot](#)  
**To:** [Elaine Newton](#)  
**Subject:** ADVANCE -- Price CD request  
**Date:** Wednesday, February 08, 2017 8:31:52 AM  
**Attachments:** [PriceSec-CD-ogecdtransm.doc](#)  
[TEP HHS Certificate of Divestiture Request Letter.pdf](#)  
[Ethics Agreement Dr. Thomas E. Price FINAL 1.11.17.pdf](#)  
[Price Thomas E. final278.pdf](#)  
[Price, Thomas final278EAsupplement.pdf](#)

---

Attachments referred to HHS; 278 not available under  
FOIA; Final EA released below

Elaine,

Attached are the materials for Dr. Price's CD request. HHS is requesting a review in advance of his confirmation so that he can then send us official versions of the docs and divest ASAP.

Thanks!

--Patrick

Referral to HHS

**From:** [Patrick J. Lightfoot](#)  
**To:** ["Olesh, Stanley D. \(HHS/OGC\)"](#)  
**Cc:** [Patrick Shepherd](#); [Hall, Randall \(HHS/OGC\)](#); [Fischmann, Elizabeth \(HHS/OGC\)](#)  
**Subject:** RE: ADVANCE -- Price CD request  
**Date:** Wednesday, February 08, 2017 12:17:24 PM

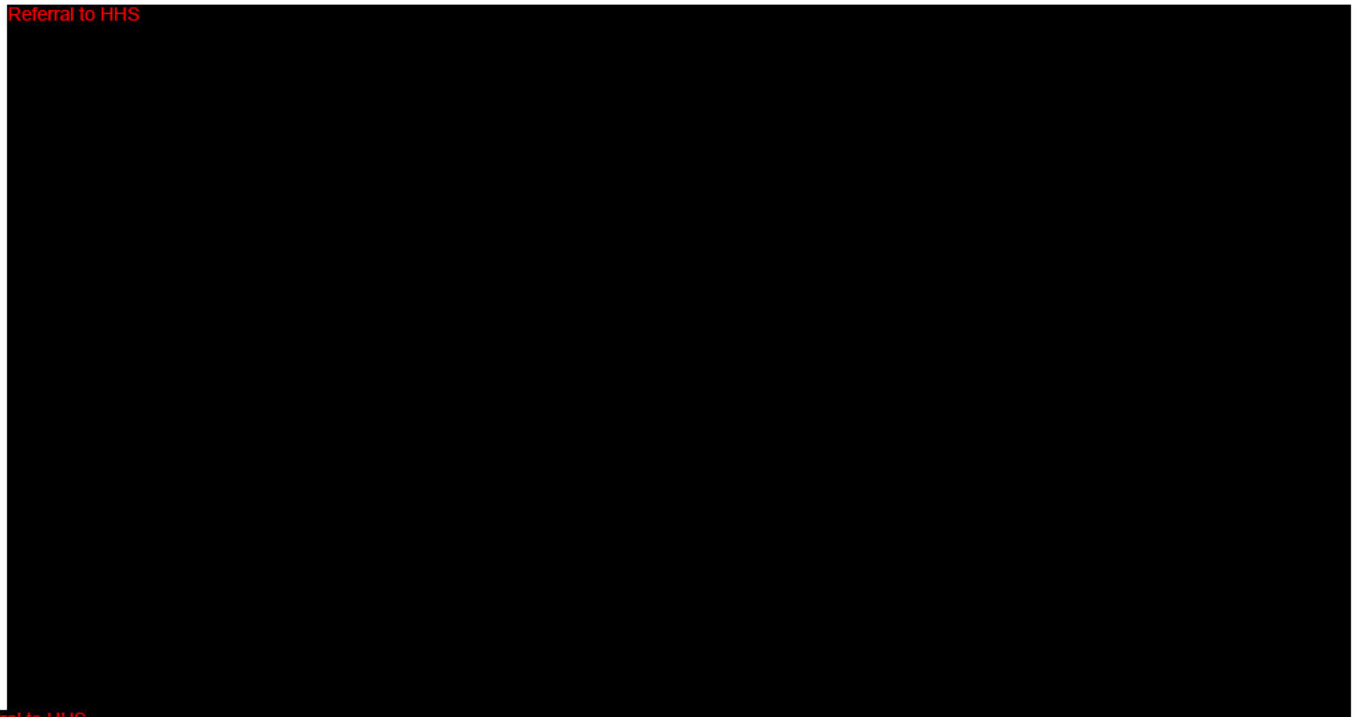
---

Hi Stan,

Unfortunately, there isn't a set estimate on turn-around time I can give because every CD package is different.

--Patrick

Referral to HHS



Referral to HHS



---

**From:** Patrick J. Lightfoot [<mailto:pilightf@oge.gov>]  
**Sent:** Wednesday, February 08, 2017 8:29 AM  
**To:** Olesh, Stanley D. (HHS/OGC)  
**Cc:** Patrick Shepherd; Hall, Randall (HHS/OGC)  
**Subject:** RE: ADVANCE -- Price CD request

Hi Stan,

Now that we've got the signed amendment letter from Dr. Price, I'll forward the CD package for pre-

review.

Thanks!

--Patrick

Referral to HHS



**From:** [Teresa L. Williamson](#)  
**To:** [Patrick J. Lightfoot](#); (b)(6) - Randall Hall's email address; (b)(6) - Orlan Stanley's email address  
**Subject:** Amendment to Public Financial Disclosure Report of Thomas E. Price  
**Date:** Thursday, February 09, 2017 7:57:31 AM  
**Attachments:** [Price, Thomas finalagencyltr.pdf](#)  
[Price, Thomas OGEcoverletteramendment.pdf](#)  
[Price, Thomas final278EAsupplement.pdf](#)  
[Price, Thomas senateAmendFINANCEltr.pdf](#)

Agency letter referred to HHS; other attachments released below

---

Good Morning,

The attached is an amendment to the final report that was submitted to the committee by letter dated January 11, 2017.

Thanks!

Teresa Williamson  
US Office of Government Ethics  
1201 New York Avenue, NW - Suite 500  
Washington, DC 20005  
202-482-9283

UNITED STATES OFFICE OF  
GOVERNMENT ETHICS



February 8, 2017

The Honorable Orrin Hatch  
Chairman  
Committee on Finance  
United States Senate  
Washington, DC 20510

Dear Mr. Chairman:

By letter dated January 11, 2017, the Office of Government Ethics (OGE) transmitted to the Committee the financial disclosure report and ethics agreement of Thomas E. Price in connection with his nomination for the position of Secretary, Department of Health and Human Services. Enclosed are a letter from the Department of Health and Human Services and a letter from Dr. Price amending his financial disclosure report and supplementing his ethics agreement.

Dr. Price's enclosed letter amends the following four items that he previously disclosed in his financial disclosure report: (1) "Chattahoochee Associates" ("Organization Name" and "Position Held" columns amended in Part 1, Line 2); (2) "Chattahoochee Associates" ("Description" column amended in Part 2, Line 1); (3) "Amazon Com Inc" ("Value" column amended in Part 6, Line 14.55); and (4) "Innate Immunotherapeutics Ltd." ("Income Type" and "Income Amount" columns amended in Part 6, Line 15.1). Dr. Price's enclosed letter also adds the following new line item entry that he previously omitted from his financial disclosure report: "Innate Immunotherapeutics Ltd." (stock valued at \$100,001-\$250,000 in Part 6, Line 28). Finally, the letter supplements his January 11, 2017, ethics agreement with additional commitments.

We have reviewed this additional submission and have obtained advice from the Department of Health and Human Services concerning any possible conflict in light of its functions and Dr. Price's proposed duties. Based on the information provided, OGE and the Department of Health and Human Services continue to believe that there will be no unresolved conflicts of interest between his financial interests and the duties that he will be expected to perform as Secretary.

Sincerely,

Walter M. Shaub, Jr.  
Director

Enclosures



UNITED STATES OFFICE OF  
GOVERNMENT ETHICS



February 7, 2017

The Honorable Lamar Alexander  
Chairman  
Committee on Health, Education,  
Labor, and Pensions  
United States Senate  
Washington, DC 20510

Dear Mr. Chairman:

By letter dated January 11, 2017, the Office of Government Ethics (OGE) transmitted to the Committee the financial disclosure report and ethics agreement of Thomas E. Price in connection with his nomination for the position of Secretary, Department of Health and Human Services. Enclosed are a letter from the Department of Health and Human Services and a letter from Dr. Price amending his financial disclosure report and supplementing his ethics agreement.

Dr. Price's enclosed letter amends the following four items that he previously disclosed in his financial disclosure report: (1) "Chattahoochee Associates" ("Organization Name" and "Position Held" columns amended in Part 1, Line 2); (2) "Chattahoochee Associates" ("Description" column amended in Part 2, Line 1); (3) "Amazon Com Inc" ("Value" column amended in Part 6, Line 14.55); and (4) "Innate Immunotherapeutics Ltd." ("Income Type" and "Income Amount" columns amended in Part 6, Line 15.1). Dr. Price's enclosed letter also adds the following new line item entry that he previously omitted from his financial disclosure report: "Innate Immunotherapeutics Ltd." (stock valued at \$100,001-\$250,000 in Part 6, Line 28). Finally, the letter supplements his January 11, 2017, ethics agreement with additional commitments.

We have reviewed this additional submission and have obtained advice from the Department of Health and Human Services concerning any possible conflict in light of its functions and Dr. Price's proposed duties. Based on the information provided, OGE and the Department of Health and Human Services continue to believe that there will be no unresolved conflicts of interest between his financial interests and the duties that he will be expected to perform as Secretary.

Sincerely,

Walter M. Shaub, Jr.  
Director

Enclosures





UNITED STATES OFFICE OF  
GOVERNMENT ETHICS



JAN 12 2017

The Honorable Lamar Alexander  
Chairman  
Committee on Health, Education,  
Labor, and Pensions  
United States Senate  
Washington, DC 20510

Dear Mr. Chairman:

In accordance with the Ethics in Government Act of 1978, I enclose a copy of the financial disclosure report filed by Thomas E. Price. President-Elect Trump has announced his intention to nominate Dr. Price for the position of Secretary, Department of Health and Human Services.

We have reviewed the report and have obtained advice from the agency concerning any possible conflict in light of its functions and the nominee's proposed duties. Also enclosed is an ethics agreement outlining the actions that the nominee will undertake to avoid conflicts of interest. Unless a date for compliance is indicated in the ethics agreement, the nominee must fully comply within three months of confirmation with any action specified in the ethics agreement.

Based thereon, we believe that this nominee is in compliance with applicable laws and regulations governing conflicts of interest.

Sincerely,

A handwritten signature in blue ink, appearing to read "Walter M. Shaub, Jr.", written over a horizontal line.

Walter M. Shaub, Jr.  
Director

Enclosures

January 11, 2017

Ms. Elizabeth J. Fischmann  
Associate General Counsel for Ethics  
Designated Agency Ethics Official  
U.S. Department of Health and Human Services  
Room 710-E, Hubert H. Humphrey Building  
200 Independence Avenue, SW  
Washington, DC 20201

Dear Ms. Fischmann:

The purpose of this letter is to describe the steps that I will take to avoid any actual or apparent conflict of interest in the event that I am confirmed for the position of Secretary, U.S. Department of Health and Human Services.

As required by 18 U.S.C. § 208(a), I will not participate personally and substantially in any particular matter in which I know that I have a financial interest directly and predictably affected by the matter, or in which I know that a person whose interests are imputed to me has a financial interest directly and predictably affected by the matter, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2). I understand that the interests of the following persons are imputed to me: any spouse or minor child of mine; any general partner of a partnership in which I am a limited or general partner; any organization in which I serve as officer, director, trustee, general partner or employee; and any person or organization with which I am negotiating or have an arrangement concerning prospective employment.

Upon confirmation, I will resign from my position as Managing Partner of Chattahoochee Associates LP. I will continue to have a financial interest in this entity, but I will not provide services material to the production of income. Instead, I will receive only passive investment income from it. I will not participate personally and substantially in any particular matter that to my knowledge has a direct and predictable effect on the financial interests of Chattahoochee Associates LP, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1).

Upon confirmation, I will resign from my position as Delegate of the American Medical Association. For a period of one year after my resignation, I will not participate personally and substantially in any particular matter involving specific parties in which I know the American Medical Association is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

Within 90 days of my confirmation, I will divest my interests in the following entities:

AETNA Inc.  
Alphabet Inc.  
Amazon.com Inc.

American Tower REIT  
Amgen Inc.  
Apple Inc.  
Arch Capital Group Ltd.  
Arris International PLC  
Athena Health Inc.  
Biogen Inc.  
Bristol Myers Squibb Co.  
Calpine Corp.  
CBS Corp.  
Cognizant Tech Solutions  
Crown Castle Intl Corp.  
CVS Health Corp.  
DanaHER Corp.  
Delta Airlines, Inc.  
Eli Lilly & Co.  
Facebook Inc.  
Hewlett Packard, Inc.  
Honeywell Corp.  
Innate Immunotherapeutics Ltd.  
Jazz Pharmaceuticals PLC  
Kansas City Southern  
L Brands Inc.  
Lyondellbasell Industries NV  
McKesson Corp.  
Nextera Energy Inc.  
Northrop Grumman Corp.  
PG&E Corp.  
Pfizer Inc.  
Qihoo 360 Technology Co. Ltd.  
Semptra Energy  
Starbucks Corp.  
Thermo Fisher Scientific, Inc.  
Union Pacific Corp.  
United Technologies Corp.  
Verizon Communications Inc.  
Whitewave Foods Corp.  
Xerox Corp.  
XL Group PLC  
Zimmer Biomet Holdings Inc.

With regard to each of these entities, I will not participate personally and substantially in any particular matter that to my knowledge has a direct and predictable effect on the financial interests of the entity

Ms. Elizabeth J. Fischmann

Page 3

until I have divested it, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2).

I will retain limited partnership interests in the following entities that own property rented to healthcare-related tenants (in addition to Chattahoochee Associates, discussed above):

- 1) Diagnostic Ventures of Roswell LLC;
- 2) RMC3, LLC

With regard to each of these entities, I will not participate personally and substantially in any particular matter that to my knowledge has a direct and predictable effect on the financial interests of the entity, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1).

My spouse is employed as a representative in the Georgia state legislature, a position for which she receives a fixed annual salary. I will not participate personally and substantially in any particular matter involving specific parties in which I know the state of Georgia is a party or represents a party, unless, on a case-by-case basis, I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d). I will abide by any limitations that are placed on that authorization.

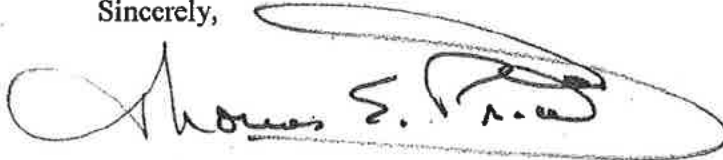
I understand that I may be eligible to request a Certificate of Divestiture for qualifying assets and that a Certificate of Divestiture is effective only if obtained prior to divestiture. Regardless of whether I receive a Certificate of Divestiture, I will ensure that all divestitures discussed in this agreement occur within the agreed upon timeframes and that all proceeds are invested in non-conflicting assets.

In order to avoid potential conflicts of interest during my appointment as Secretary, I, my spouse, or any minor children of mine will not acquire any direct financial interest in entities listed on the FDA prohibited holdings list or in entities involved, directly or through subsidiaries, in the following industries: (1) research, development, manufacture, distribution, or sale of pharmaceutical, biotechnology, or medical devices, equipment, preparations, treatment, or products; (2) veterinary products; (3) healthcare management or delivery; (4) health, disability, or workers compensation insurance or related services; (5) food and/or beverage production, processing or distribution; (6) communications media; (7) computer hardware, computer software, and related internet technologies; (8) wireless communications; (9) social sciences and economic research organizations; (10) energy or utilities; (11) commercial airlines, railroads, shiplines, and cargo carriers; or (12) sector mutual funds that concentrate their portfolios on one country other than the United States. In addition, we will not acquire any interests in sector mutual funds that concentrate in any of these sectors.

Ms. Elizabeth J. Fischmann  
Page 4

I have been advised that this ethics agreement will be posted publicly, consistent with 5 U.S.C. § 552, on the website of the U.S. Office of Government Ethics with ethics agreements of other Presidential nominees who file public financial disclosure reports.

Sincerely,

A handwritten signature in black ink, appearing to read "Thomas E. Price, M.D.", enclosed within a large, loopy oval flourish.

Thomas E. Price, M.D.

February 7, 2017

Ms. Elizabeth J. Fischmann  
Associate General Counsel for Ethics  
Designated Agency Ethics Official  
U.S. Department of Health and Human Services  
Room 710-E, Hubert H. Humphrey Building  
200 Independence Avenue, SW  
Washington, DC 20201

Dear Ms. Fischmann:

The purposes of this letter are to amend the financial disclosure report that I signed on December 15, 2016, and to supplement the ethics agreement that I signed on January 11, 2017.

**A) Financial Disclosure Report**

To correct inadvertent errors in my December 15, 2016, financial disclosure report, the items identified below are amended, as follows:

**Part 1**

#	Organization Name	City/State	Organization Type	Position Held	From	To
2	Chattahoochee Associates	Atlanta, Georgia	General Partnership	Managing and General Partner	11/1993	Present

**Part 2**

#	Description	EIF	Value	Income Type	Income Amount
1	Chattahoochee Associates	no	\$100,001-\$250,000		None (or less than \$201)

**Part 6**

#	Description	EIF	Value	Income Type	Income Amount
14.55	Amazon Com Inc	n/a	None (or less than \$1,001)	Capital Gains	\$2,501-\$5,000
15.1	Innate Immunotherapeutics Ltd. (INNMF)	n/a	\$15,001-\$50,000		None (or less than \$201)

To correct an inadvertent error in my December 15, 2016, financial disclosure report, the following item is added to that financial disclosure report:

**Part 6**

#	Description	EIF	Value	Income Type	Income Amount
28	Innate Immunotherapeutics Ltd. (INNMF)	n/a	\$100,001-\$250,000		None (or less than \$201)

Ms. Elizabeth J. Fischmann  
Page 2

With regard to the assets disclosed in my December 15, 2016, financial disclosure report other than those listed above, the U.S. Office of Government Ethics has asked me to confirm that I disclosed the current value at the time of reporting. By this letter, I am confirming that I used current value with regard to those assets. This letter makes no changes to the value categories disclosed in that financial disclosure report other than those indicated above.

**B) Supplement to January 11, 2017, Ethics Agreement**

The new item listed above (Innate Immunotherapeutics Ltd./\$100,001-\$250,000) is covered by the commitment I made in my January 11, 2017, ethics agreement to divest all interests in Innate Immunotherapeutics Ltd. within 90 days of confirmation. In addition, the following commitments supplement my ethics agreement dated January 11, 2017.

In February 2017, I resigned from my position as Managing and General Partner of Chattahoochee Associates and transferred my ownership interest to my spouse. I will not participate personally and substantially in any particular matter that to my knowledge has a direct and predictable effect on the financial interests of Chattahoochee Associates, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1).

If I have a managed account or otherwise use the services of an investment professional during my appointment, I will ensure that the account manager or investment professional obtains my prior approval on a case-by-case basis for the purchase of any assets other than cash, cash equivalents, investment funds that qualify for the exemption at 5 C.F.R. § 2640.201(a), obligations of the United States, or municipal bonds.

I understand that as an appointee I will be required to sign the Ethics Pledge (Exec. Order no. 13770) and that I will be bound by the requirements and restrictions therein in addition to the commitments I made in the ethics agreement I signed on January 11, 2017.

I have been advised that this supplement to my ethics agreement will be posted publicly, consistent with 5 U.S.C. § 552, on the website of the U.S. Office of Government Ethics with ethics agreements of other Presidential nominees who file public financial disclosure reports. I understand that this letter will also be released as an attachment to my public financial disclosure report.

Sincerely,

A handwritten signature in blue ink, appearing to read "Thomas E. Price", with a large, sweeping flourish extending from the end of the signature.

Thomas E. Price, M.D.