

From:

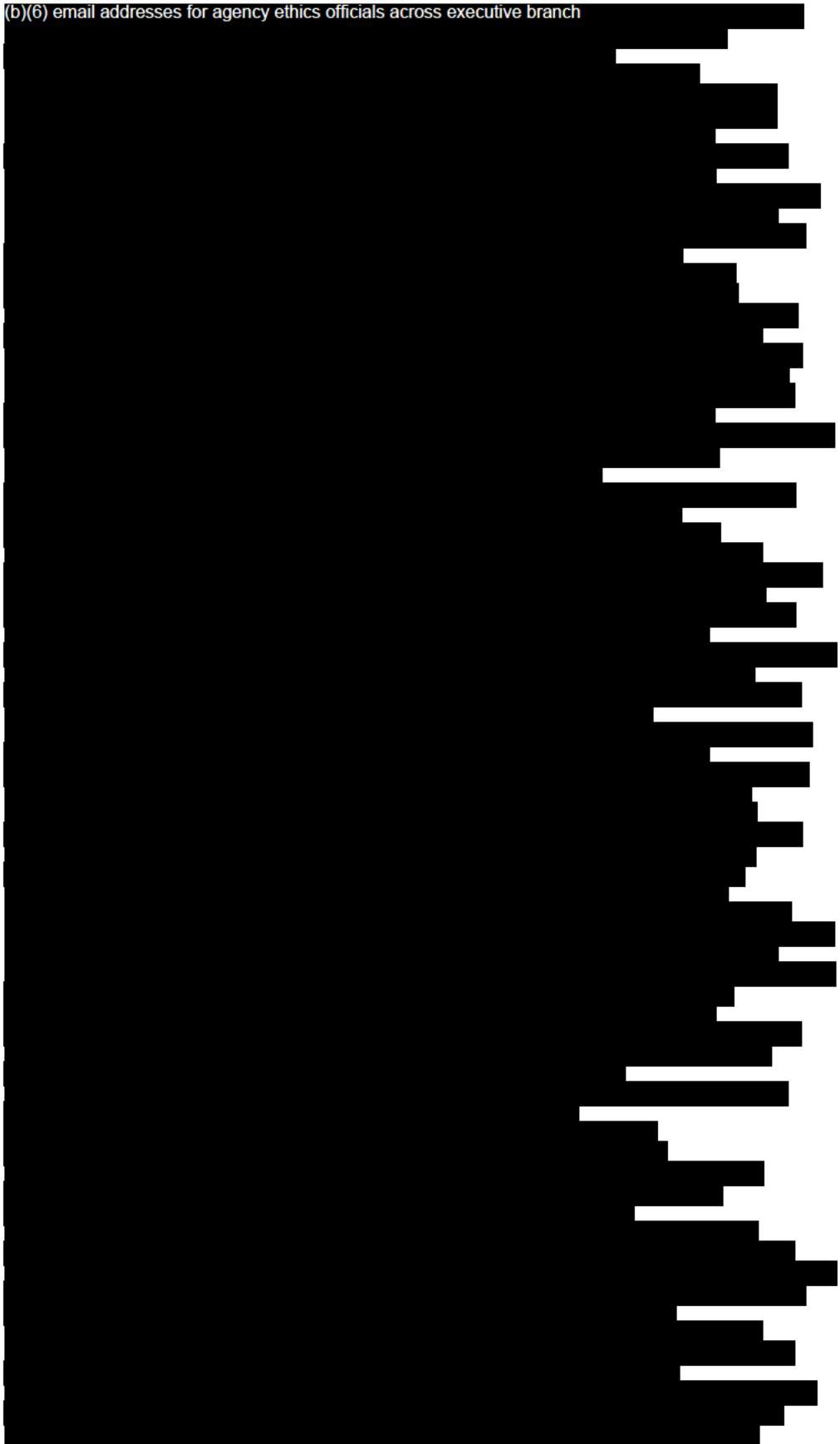
[Nicole Stein](#)

To:

[Nicole Stein](#)

Bcc:

(b)(6) email addresses for agency ethics officials across executive branch



(b)(6) email addresses for agency ethics officials across executive branch

Subject: Save the Date. Quarterly DAEO Meeting: October 23 & Reminders Regarding Summit Session Proposals and the Survey of Ethics Officials

Date: Wednesday, September 18, 2019 9:23:14 AM

Good morning,

Please note that the next Quarterly DAEO Meeting will be held the morning of Wednesday, October 23, 2019 from 10:00 a.m. to 11:15 a.m. at the Pension Benefit Guaranty Corporation (PBGC). You will receive an email at the beginning of next month with instructions for how to register for the event.

Survey of Ethics Officials

To those of you who have already responded to the 2019 Annual Survey of Ethics Officials, thank you! If you have not responded, OGE encourages you to use this opportunity to let us know how we are doing. Your responses help OGE better serve the entire ethics community.

Click the link provided to access the survey: <https://www.surveymonkey.com> (b)(5) survey link

The survey will remain open until **September 20, 2019**.

Summit Proposals

As part of our planning for the upcoming National Government Ethics Summit to be held March 10-12, 2020, we would like to invite all interested parties to submit proposals for Summit sessions. Beyond proposing topics, we encourage you to consider presenting at the National Government Ethics Summit. Presenting an experience-based, content-relevant session alone or as part of a team is an opportunity not only to share knowledge, experiences, and ideas, but to build community.

The Summit program will focus on community-wide shared experiences and challenges: how should we strategically communicate about ethics with leaders throughout our organizations; how can we improve collaboration among those charged with specific roles and responsibilities for the agency ethics program; how do we best manage our ethics programs in a transparent world; what are the most urgent recurring challenges we face in applying ethics laws and regulations to our agencies' work; how can we best plan and prepare for the next presidential election?

To facilitate the proposal process, we ask that you complete this form:

<https://www.surveymonkey.com> (b)(5) survey link

Feel free to circulate to your staff.

You will be asked to:

- provide a session title and a one-paragraph description of the proposed session,
- specify which focus area (see below) the session would address, and
- indicate the manner of delivery (see also below) the session would use.

Deadline: Please submit your proposal(s) by September 20th. OGE will review each proposal and will contact individuals whose proposals have been accepted to present at the Summit.

- I. Potential Focus Areas-- Below are focus areas we are considering with some specific examples of topics that could fall within each.

Focus Area 1: Communicating Strategically About Ethics

- Engaging and enlisting support from leadership across the organization
- Counseling up the chain
- Increasing employee awareness (on-boarding new employees and beyond)
- Creating risk-based/relevant ethics education
- Creating an ethics communication plan
- Communicating with the public

Focus Area 2: Ethics Roles and Responsibilities Enterprise-wide

- Agency head access/involvement/support
- HR collaboration/cooperation
- Supervisors engagement/support
- IG communications /cooperation
- Employees engagement/awareness
- Other (Risk Management/Performance Management/Leg Affairs/Public Affairs/ Whistleblower Protection/ Hatch Act/ Prohibited Personnel Practices/Employee Relations/Labor Relations)

Focus Area 3: Program Management and Transparency

- Using data and evidence (annual questionnaire, EVP survey, etc.)
- Administering self-assessments/internal reviews/employee surveys
- Building, acquiring, accessing tracking systems
- Releasing information (EIGA, FOIA, Privacy Act)
- Resourcing the ethics program (staffing/planning timelines)
- Conducting risk assessments
- Preparing for turnover/succession planning

Focus Area 4: Applying the Laws and Regulations

- Drafting and enforcing recusals and other ethics agreements
- Drafting waivers and authorizations
- Addressing the revolving door (into and out of government and during service)
- Specific challenges
 - Boards and Commissions
 - SGEs and Experts
 - Research scientists/IP
 - Rulemakings
 - Emergency Response
 - Lobbyists/Lobbying

Focus Area 5: Election Readiness

- Resource planning and timelines
- Departing employees (FD filing, records management, seeking and post-employment advising, STOCK Act notifications)
- Hatch Act requirements
- Burrowing in/Vacancies Act
- Transition-related activities (Transition Council/Transition Teams/Cabinet and other nominees)

- On-boarding new leadership

II. Delivery Methods

Facilitated Discussion Session

Discussion sessions are opportunities for presenters to share challenges and solutions through conversational exchange. By actively engaging audience participants in dialogue about hot topics or broad issues, presenters of these sessions will rely on collective community experience among session attendees. This is a chance to have organic, topically relevant, peer-to-peer learning experiences at the conference. Maximum of two facilitators.

Interactive Presentation (45-50 minutes presentation; 25-30 minutes Q&A)

These sessions are opportunities to share topics of interest, lessons learned, foresight, or evidence of impact related to the focus area. These sessions are an opportunity to present in detail on a project, idea, or experience. These can be done solo or have multiple presenters (i.e., panel, moderated interviews, stacked presenters, etc.). Maximum of three presenters plus a moderator.

Workshop: Workshops are ideally designed to allow participants to apply knowledge and/or practice skills.

Demonstration: Demonstrations are an opportunity to showcase a product (tracking system, efilings, training product, etc), a process, or a practice.

Nicole

Nicole Stein
Chief, Agency Assistance Branch
nstein@oge.gov
(202) 482-9255
Follow OGE @OfficeGovEthics

From: [Nicole Stein](#)
To: (b)(6) Bartek-Santiago email
Subject: Summit
Date: Wednesday, August 28, 2019 11:47:33 AM

Got your message, at this time there is no need to modify your proposal. Thanks for submitting one.

Nicole

Nicole Stein
Chief, Agency Assistance Branch
nstein@oge.gov
(202) 482-9255
Follow OGE @OfficeGovEthics

From:

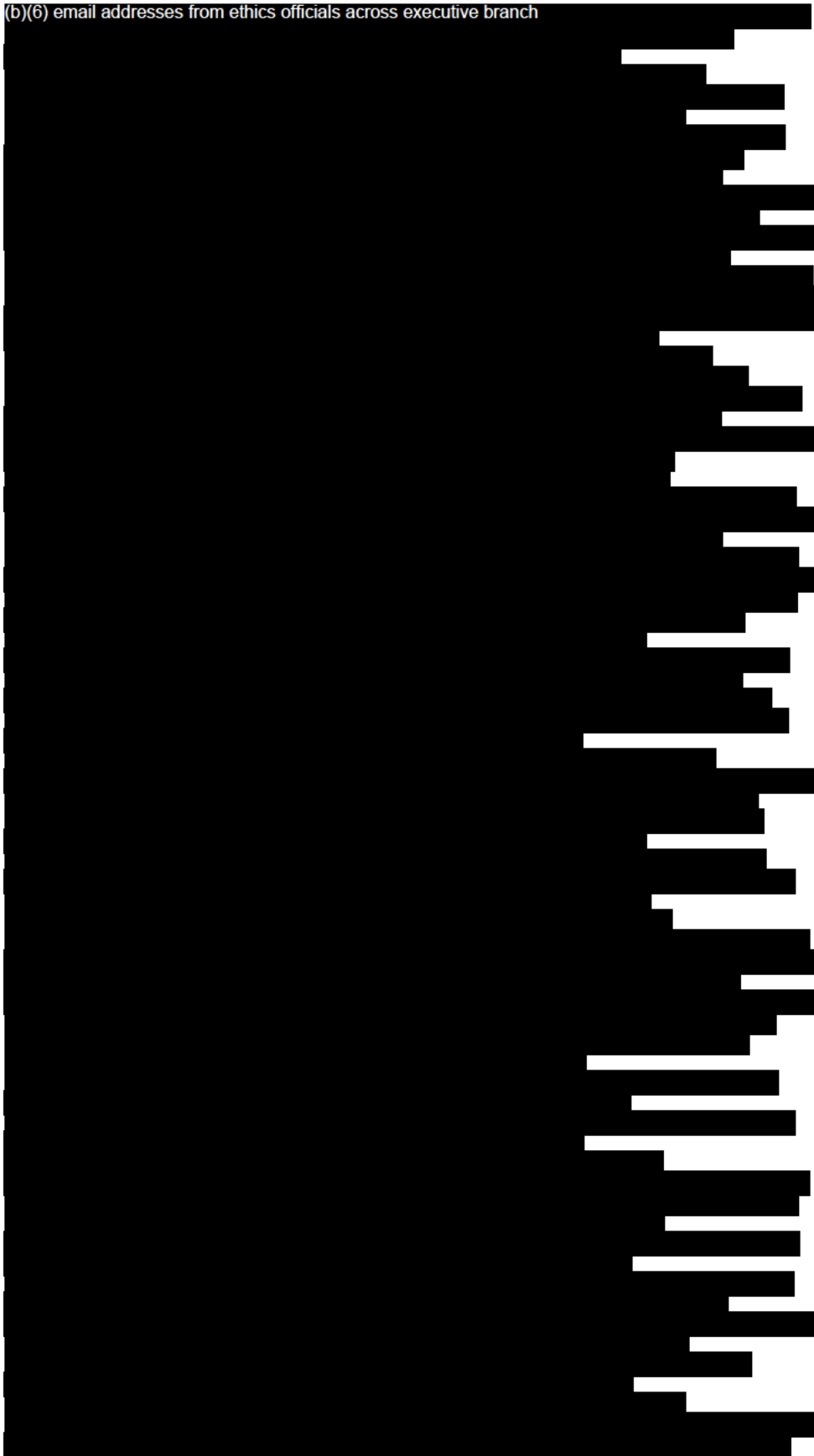
[Nicole Stein](#)

To:

[Nicole Stein](#)

Bcc:

(b)(6) email addresses from ethics officials across executive branch



(b)(6) email addresses from ethics officials across executive branch

Subject: National Government Ethics Summit: Call for Session Proposals
Date: Wednesday, August 21, 2019 4:41:33 PM

Good afternoon DAEOs, ADAEOs, and Points of Contact,

As part of our planning for the upcoming National Government Ethics Summit to be held March 10-12, 2020, we would like to invite all interested parties to submit proposals for Summit sessions. Beyond proposing topics, we encourage you to consider presenting at the National Government Ethics Summit. Presenting an experience-based, content-relevant session alone or as part of a team is an opportunity not only to share knowledge, experiences, and ideas, but to build community.

The Summit program will focus on community-wide shared experiences and challenges: how should we strategically communicate about ethics with leaders throughout our organizations; how can we improve collaboration among those charged with specific roles and responsibilities for the agency ethics program; how do we best manage our ethics programs in a transparent world; what are the most urgent recurring challenges we face in applying ethics laws and regulations to our agencies' work; how can we best plan and prepare for the next presidential election?

To facilitate the proposal process, we ask that you complete this form:

<https://www.surveymonkey.com/> **(b)(5) survey link**

Feel free to circulate to your staff.

You will be asked to:

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Deadline: Please submit your proposal(s) by September 20th. OGE will review each proposal and will contact individuals whose proposals have been accepted to present at the Summit.

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Focus Area 4: Applying the Laws and Regulations

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 - Boards and Commissions
 - SGEs and Experts
 - Research scientists/IP
 - Rulemakings
 - Emergency Response
 - Lobbyists/Lobbying

Focus Area 5: Election Readiness

- Resource planning and timelines
- Departing employees (FD filing, records management, seeking and post-employment advising, STOCK Act notifications)
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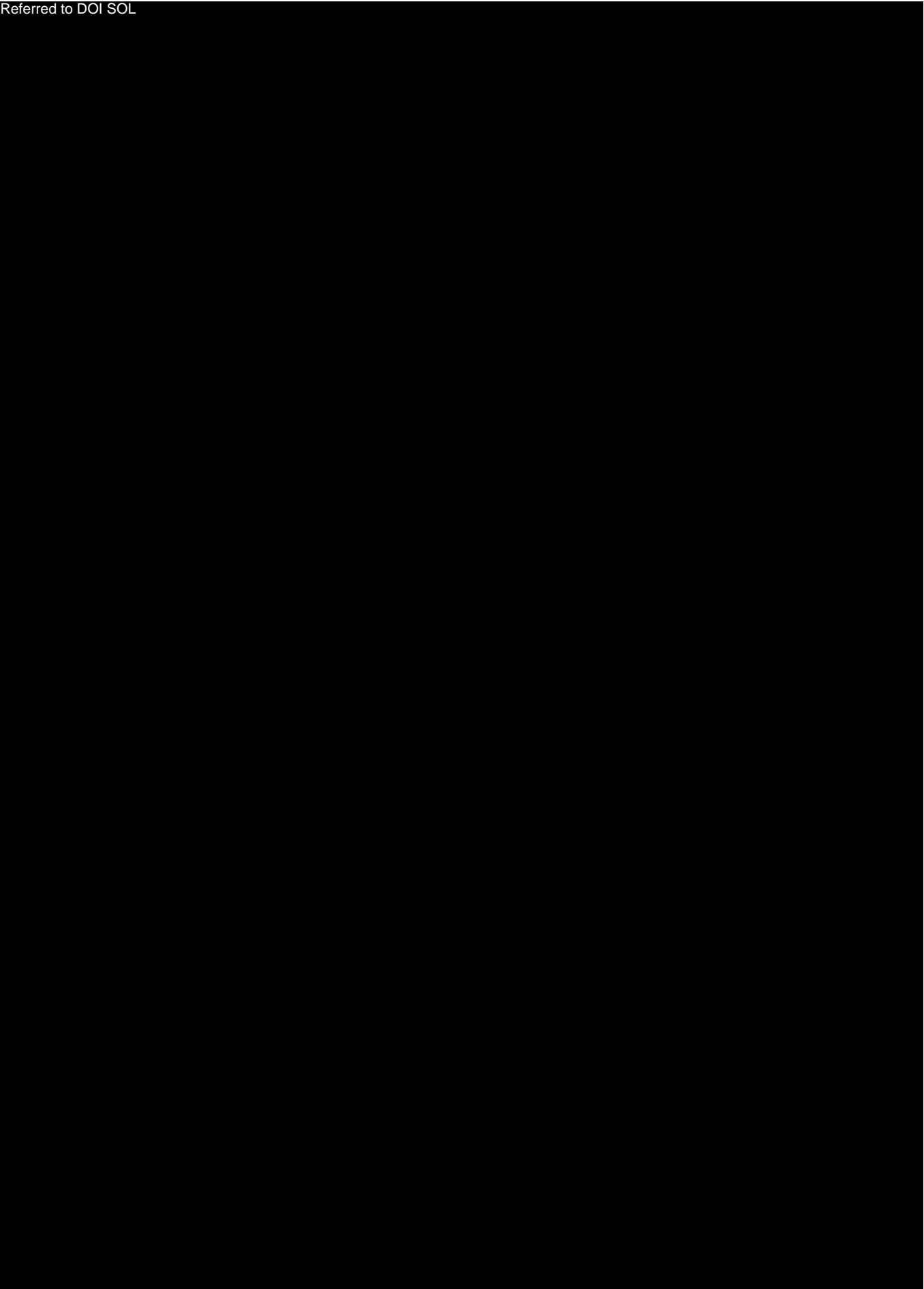
These sessions are opportunities to share topics of interest, lessons learned, foresight, or evidence of impact related to the focus area. These sessions are an opportunity to present in detail on a project, idea, or experience. These can be done solo or have multiple presenters (i.e., panel, moderated interviews, stacked presenters, etc.). Maximum of three presenters plus a moderator.

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Nicole

Nicole Stein
Chief, Agency Assistance Branch
nstein@oge.gov
(202) 482-9255
Follow OGE @OfficeGovEthics



Referred to DOI SOL



On Fri, Aug 2, 2019 at 11:50 AM Jim Robertson <jfrobert@oge.gov> wrote:

CONTROLLED

Questions for DOI re (b) (5)

Heather,

Thanks for your time earlier today.

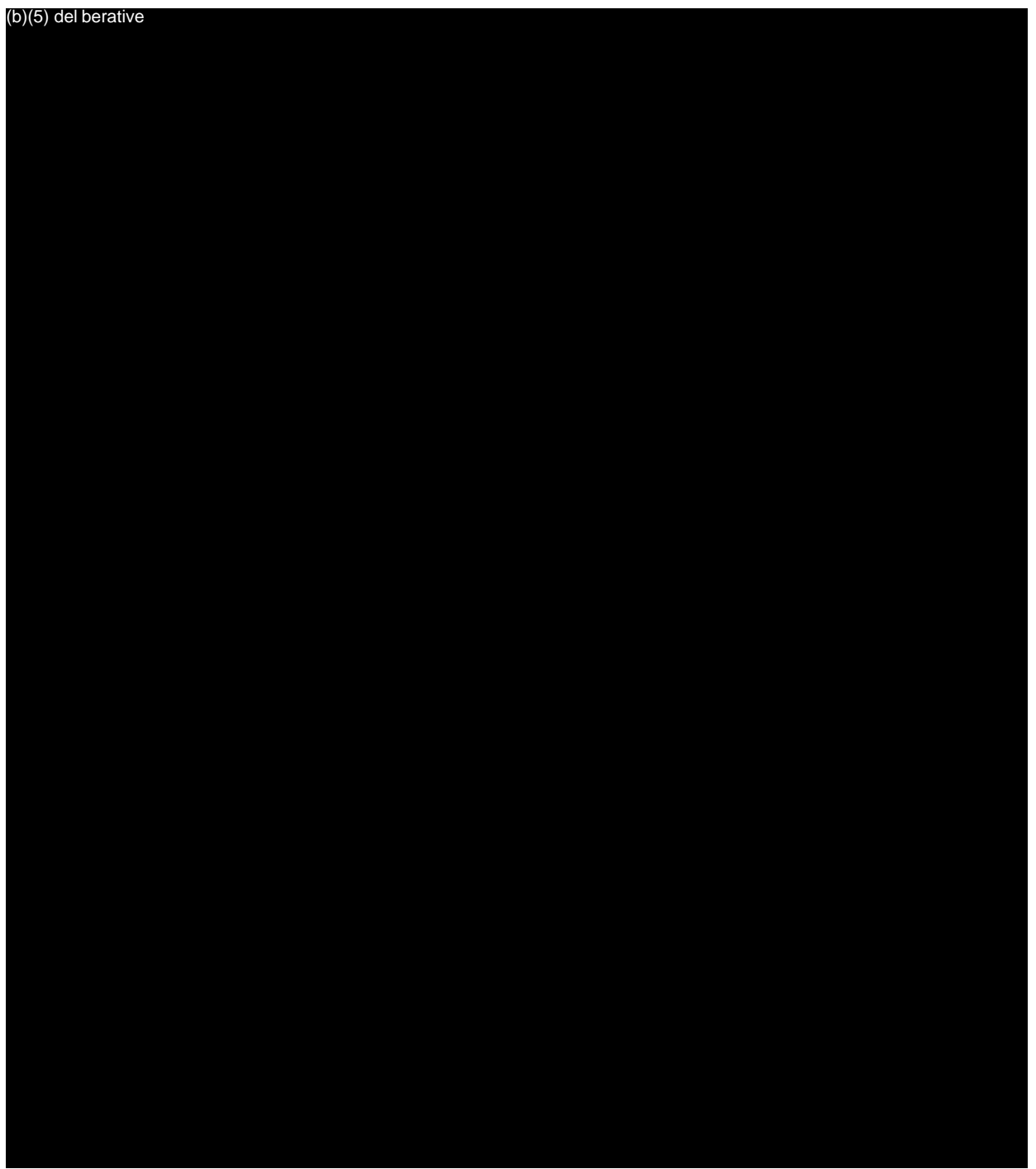
I've provided a number of questions, below, to help us understand the facts around the (b)(5) deliberative

. It is our present understanding that the (b)(5) deliberative

Responses to the questions will provide a better basis for making that determination (b)(5) deliberative

(b)(5) deliberative

(b)(5) del berative



Thanks,

Jim

Jim Robertson

Assistant Counsel


General Counsel & Legal Policy Division

U.S. Office of Government Ethics

James.robertson@oge.gov

202-482-9268

Referred to DOI SOL



On Fri, Aug 2, 2019 at 8:56 AM Jim Robertson <jfrobert@oge.gov> wrote:

CONTROLLED

Good morning, Heather –

Left you a VM yesterday but wanted to follow up with an email.

Kim Kaplan and I talked briefly with Scott late Wednesday regarding a possible (b)(5) deliberative
He mentioned you had greater detail on the matter and we were hoping to talk a bit more about it with you. Would you have time for a quick phone call at some point today? If not today, perhaps we can set up something for early next week.

Thanks,

Jim

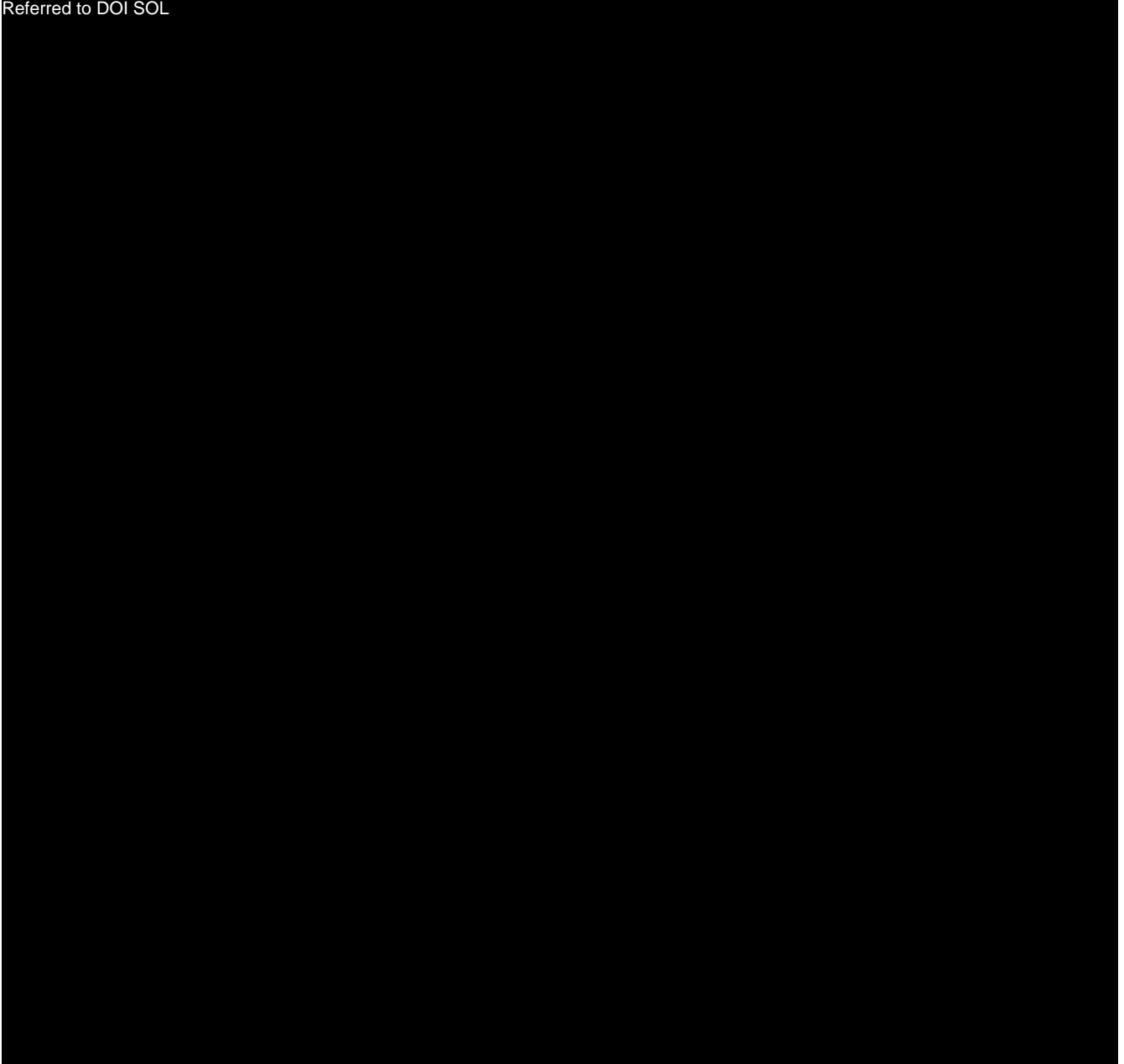
Jim Robertson
Assistant Counsel
General Counsel & Legal Policy Division
U.S. Office of Government Ethics
James.robertson@oge.gov <<mailto:James.robertson@oge.gov>>
202-482-9268

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Referred to DOI SOL



Referred to DOI SOL

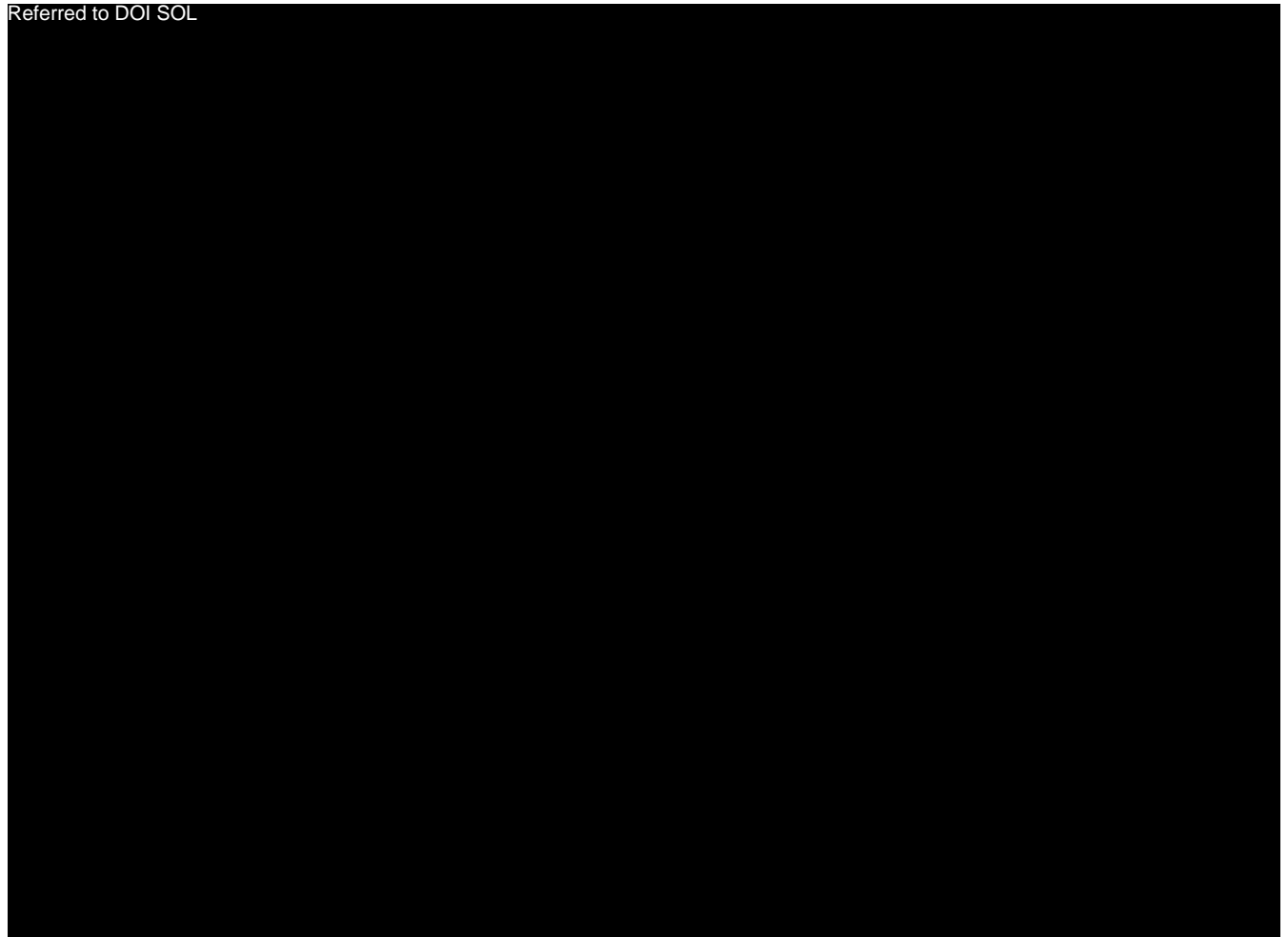


From: [Patrick J. Lightfoot](#)
To: ["Garcia, Monica"](#)
Subject: RE: Simermeyer - NIGC Chairman Nominee - [contains CUI]
Date: Monday, July 22, 2019 1:17:36 PM

CONTROLLED

Thanks!

Referred to DOI SOL



From: [Patrick J. Lightfoot](#)
To: ["Garcia, Monica"](#)
Cc: ["Gottry, Heather"](#); ["curtis.steuber"](#)
Subject: RE: [EXTERNAL] Certificate of Divestiture Request: Combs - [contains CUI]
Date: Thursday, July 18, 2019 8:50:42 AM

CONTROLLED

Thanks, Monica! I've forwarded this for secondary review by our CD Program Manager and will let you know if she has any follow-ups. Re: your question in the third bullet about (b)(5) deliberative [REDACTED], you are absolutely correct. My apologies for the confusion! My brain was apparently stuck in (b)(5) deliberative [REDACTED] when I asked that question.

--Patrick

Referred to DOI SOL



On Tue, Jul 16, 2019 at 9:10 AM Patrick J. Lightfoot <pjlightf@oge.gov> wrote:

CONTROLLED

Hi Heather and Curtis,

I wanted to circle back on this one and see if there were any updates. Also, I believe Monica is back at this point, so copying her for her situational awareness as well.

Thanks!

--Patrick

From: Patrick J. Lightfoot

Sent: Wednesday, July 3, 2019 11:50 AM

To: 'Gottry, Heather' <(b)(6)>

Cc: curtis.steuber <(b)(6)>

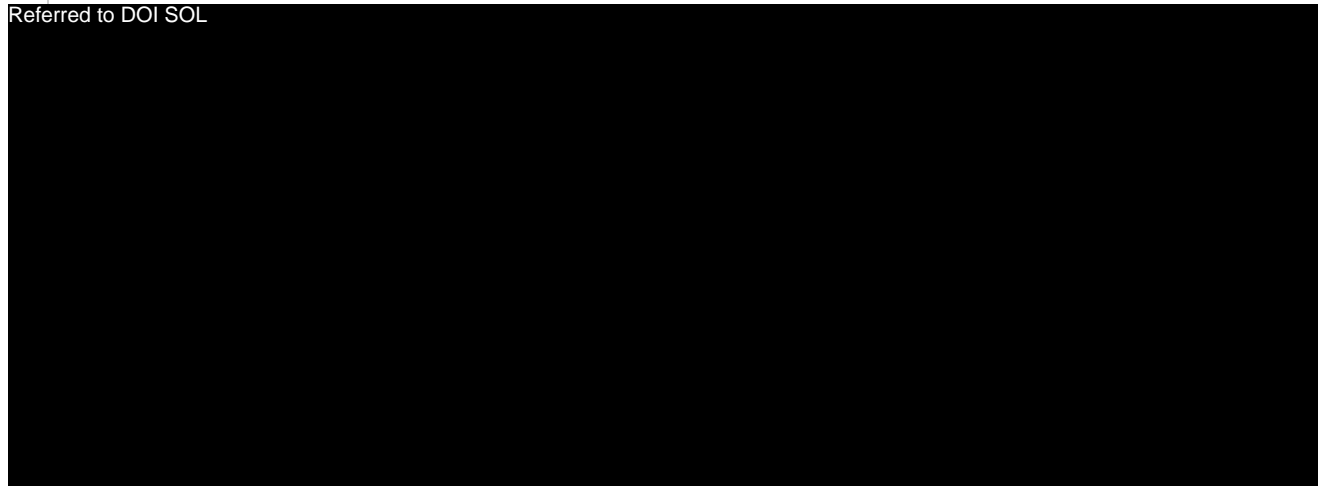
Subject: RE: [EXTERNAL] Certificate of Divestiture Request: Combs - [contains CUI]

CONTROLLED

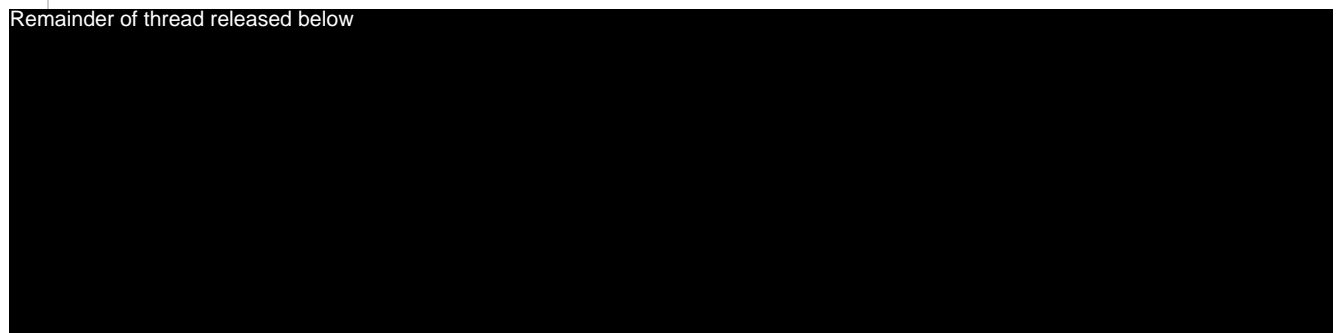
Duly noted! And no problem at all re: early next week; I'll be heading out until Monday in the next ten minutes or so. Happy 4th!

--Patrick

Referred to DOI SOL



Remainder of thread released below

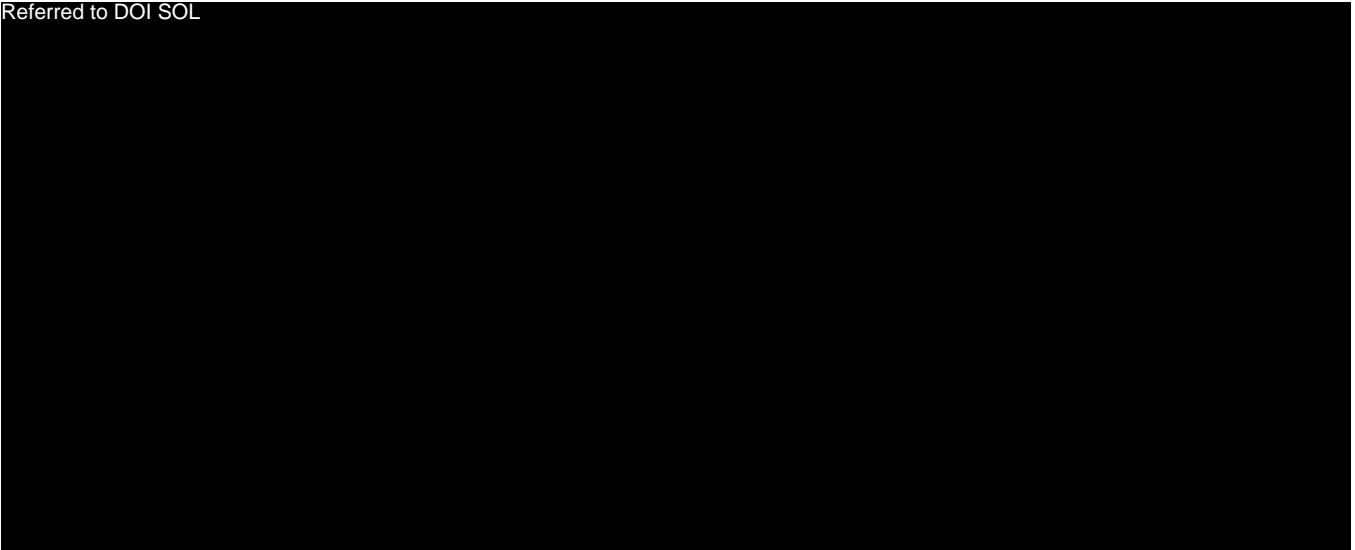


From: [Nicole Stein](#)
To: ["Getto, Leila"](#)
Subject: RE: [EXTERNAL] RE: August 6, 2019 ...
Date: Wednesday, July 17, 2019 2:44:47 PM

Yes, 8/7 at 9:30am works for us. The Director will be accompanied by Dale (Chip) Christopher, OGE's Deputy Director for Compliance.

Nicole


Referred to DOI SOL



On Wed, Jul 17, 2019 at 1:01 PM Nicole Stein <nstein@oge.gov> wrote:

The afternoon is a little harder, what about Wednesday, August 7th?

Referred to DOI SOL



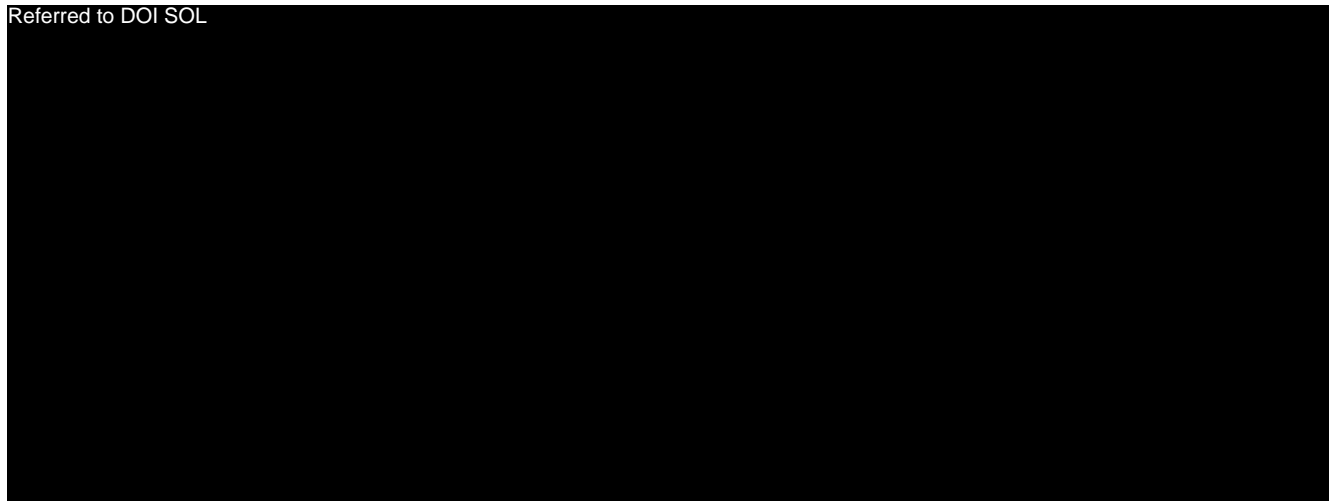
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From: [Patrick J. Lightfoot](#)
To: ["Garcia, Monica"](#)
Cc: ["Gottry, Heather"](#); ["curtis.steuber"](#)
Subject: RE: [EXTERNAL] Certificate of Divestiture Request: Combs - [contains CUI]
Date: Tuesday, July 16, 2019 9:41:34 AM

CONTROLLED

Sounds great. Thanks, Monica!

Referred to DOI SOL



On Tue, Jul 16, 2019 at 9:10 AM Patrick J. Lightfoot <pjlightf@oge.gov> wrote:

CONTROLLED

Hi Heather and Curtis,

I wanted to circle back on this one and see if there were any updates. Also, I believe Monica is back at this point, so copying her for her situational awareness as well.

Thanks!

--Patrick

From: Patrick J. Lightfoot
Sent: Wednesday, July 3, 2019 11:50 AM
To: 'Gottry, Heather' <(b)(6)>
Cc: curtis.steuber <(b)(6)>
Subject: RE: [EXTERNAL] Certificate of Divestiture Request: Combs - [contains CUI]

CONTROLLED

Duly noted! And no problem at all re: early next week; I'll be heading out until Monday in the next ten minutes or so. Happy 4th!

--Patrick

On Wed, Jul 3, 2019 at 11:30 AM Patrick J. Lightfoot <pjlightf@oge.gov> wrote:

CONTROLLED

Hi Curtis,

I've been assigned to review the Certificate of Divestiture request for Ms. Combs. I understand that Heather (b)(6) personal and you are her backup in the interim (cc'ing her here for situational awareness). My follow-up questions are as follows:

- (b)(5) deliberative and some info also (b)(6) and/or (b)(3)

- (b)(5) deliberative

- (b)(5) deliberative and some info also (b)(6) and/or (b)(3)

• (b)(5) del berative

I will be (b)(6) personal, so no rush getting back to me before then if you have competing deadlines.

Thanks!

--Patrick

~~

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

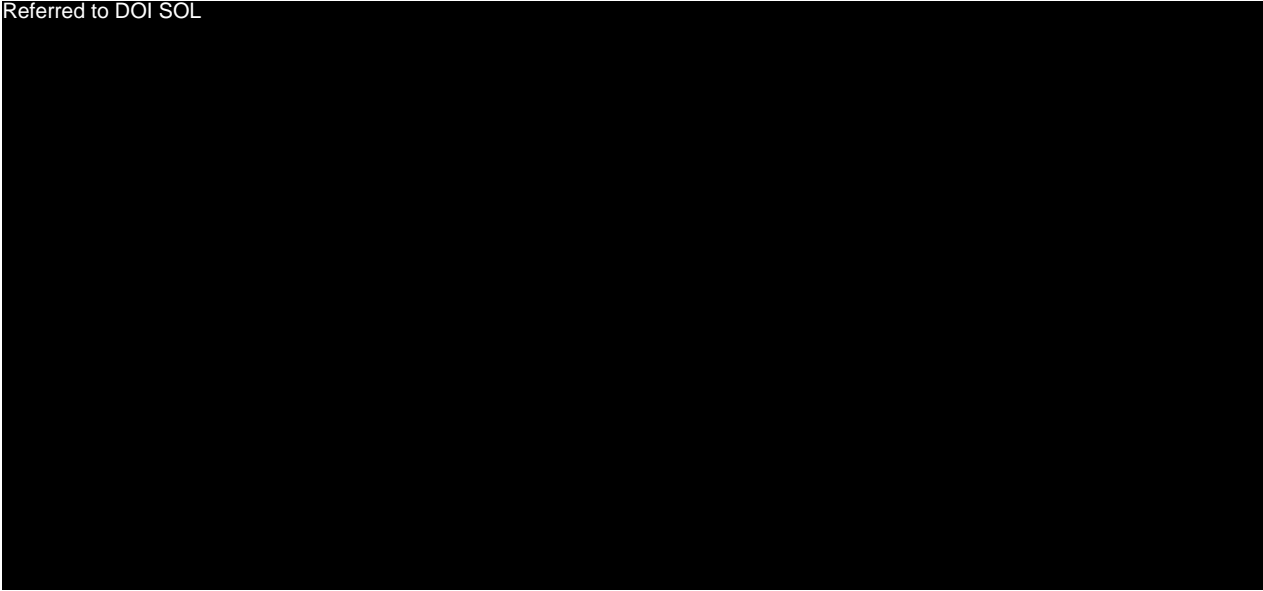
U.S. Office of Government Ethics
1201 New York Ave NW, Suite 500
Washington, DC 20005
Telephone: (202) 482-9271

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Referred to DOI SOL

Referred to DOI SOL



From: [Nicole Stein](#)
To: [Getto, Leila](#)
Cc: [Scheduling SIO](#)
Subject: Re: [EXTERNAL] Meeting between OGE's Director and Secretary Bernhardt
Date: Thursday, June 27, 2019 2:14:08 PM

Leila,

They will not require a parking space. Thank you for the other information.

Nicole

Sent from my Verizon, Samsung Galaxy smartphone

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

Referred to DOI SOL



On Thu, Jun 27, 2019 at 1:14 PM Nicole Stein <nstein@oge.gov> wrote:

Confirmed that the 17th at 10 works for us.

Nicole

Sent from my Verizon, Samsung Galaxy smartphone

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

Referred to DOI SOL

On Wed, Jun 26, 2019 at 12:09 PM Nicole Stein <nstein@oge.gov> wrote:

Yes, that works. Than you. The Director, Emory Rounds, will accompanied by Dale "Chip" Christopher. He is the Deputy Director for Compliance.

Are there specific arrival instructions I should pass along to them.


Nicole

Sent from my Verizon, Samsung Galaxy smartphone

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

Referred to DOI SOL

Referred to DOI SOL



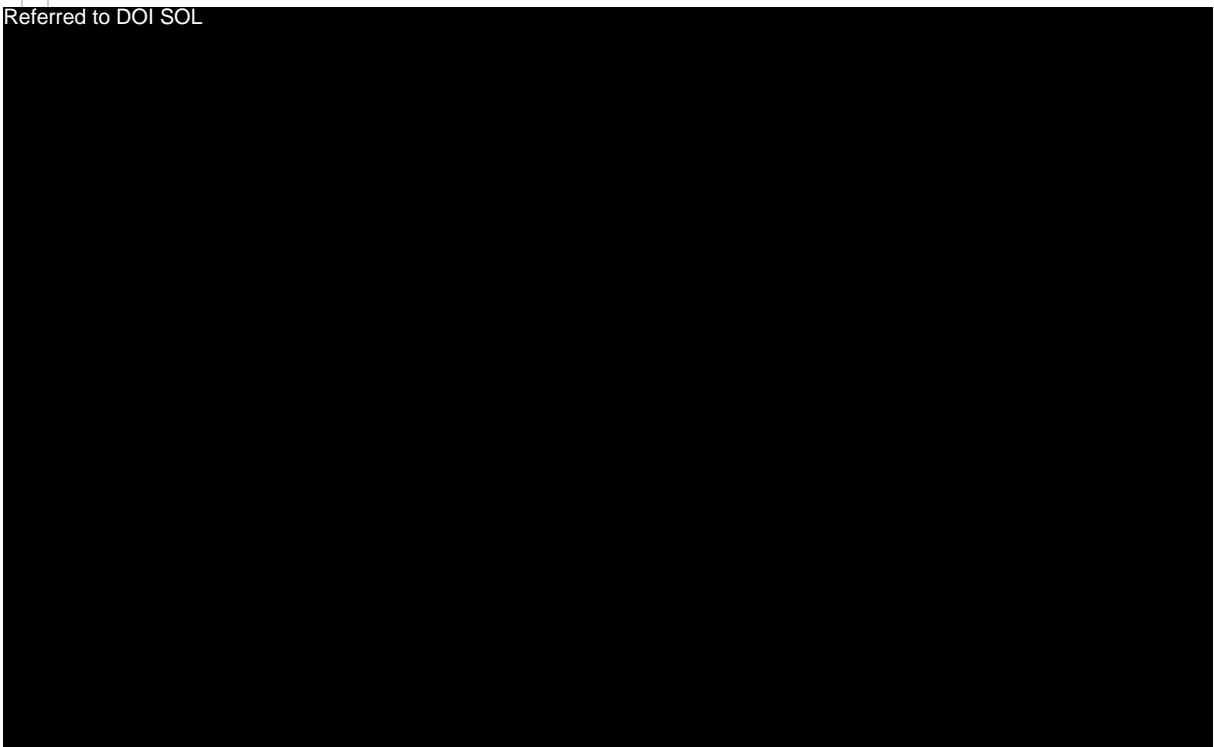
On Tue, Jun 25, 2019 at 6:07 PM Nicole Stein <nstein@oge.gov> wrote:

Hi Leila,

Would it be possible to reschedule the meeting for either July 17th or 18th? If not, we will keep the appointment on the 9th.

Nicole

Referred to DOI SOL



On Jun 24, 2019, at 8:21 AM, Nicole Stein <nstein@oge.gov> wrote:


Good morning Leila,

Unfortunately, the Director is not available on the 8th. How about the 9th or
th

10 ?

Nicole

Referred to DOI SOL



----- Forwarded message -----

From: **Nicole Stein** <nstein@oge.gov>

Date: Tue, Jun 18, 2019 at 5:42 PM

Subject: [EXTERNAL] Meeting between OGE's Director and Secretary
Bernhardt

To: (b)(6) de la Vega

(b)(6)

Cc: (b)(6) Gottry

(b)(6)

Good evening,

As you may be aware, the Director has been conducting meet and greets with the Cabinet Secretaries. We are in the process of scheduling the next round of meetings and would like to find a time to meet with Secretary Bernhardt. Can you or someone in your office assist with scheduling the meeting? Or can you provide a point of contact in the Secretary's office?

As far as who attends the meetings, most of the have included the DAEO and in some cases the General Counsel or Chief of Staff. The Director will be accompanied by one of his executives. After the meeting, the Director has typically met with the DAEO, taken a tour of the office space, and met the ethics team.

Thanks in advance.

Nicole

Nicole Stein

Chief, Agency Assistance Branch

nstein@oge.gov

(202) 482-9255

Follow OGE @OfficeGovEthics

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From: [Patrick J. Lightfoot](#)
To: ["Garcia, Monica"](#)
Subject: NEW NOMINATION: E. Sequoyah Simermeyer - June 26, 2019 - [Message and attachment(s) contain CUI]
Date: Thursday, June 27, 2019 9:06:18 AM
Attachments: [CUI Cover Sheet.pdf](#)
[EA for preclearance - Simermeyer.docx](#)

First attachment is a standard OGE CUI coversheet and nonresponsive. Second attachment is withheld in full (b)(5) draft ethics agreement 2pp.

CONTROLLED

Email and attachment(s) contain CUI.

Hi Monica,

Mr. Simermeyer's nomination was received by the Senate yesterday:

[PN901](#) — 116th Congress (2019-2020) — E. Sequoyah Simermeyer — National Indian Gaming Commission

E. Sequoyah Simermeyer, of Maryland, to be Chairman of the National Indian Gaming Commission for the term of three years, vice Jonodev Osceola Chaudhuri, term expired.

Date Received from President: 06/26/2019

Committee: Indian Affairs

Latest Action: 06/26/2019 - Received in the Senate and referred to the Committee on Indian Affairs. ([All Actions](#))

Please have the filer sign and submit the final version of his report in *Integrity* and sign his ethics agreement (precleared draft attached). If the filer believes any changes are needed on his report, please touch base with me before he makes any changes.

The signed ethics agreement and agency cover letter can either be emailed to me directly or uploaded to the Documents section of *Integrity*.

Thanks!

--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
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From: [Keith Labedz](#)
To: [Deborah J. Bortot](#)
Subject: RE: Skipwith Report: Preclearance review question - [Message contains CUI]
Date: Thursday, June 27, 2019 8:45:32 AM

Added.

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

From: Deborah J. Bortot
Sent: Thursday, June 27, 2019 8:45 AM
To: Keith Labedz <klabedz@oge.gov>
Subject: RE: Skipwith Report: Preclearance review question - [Message contains CUI]

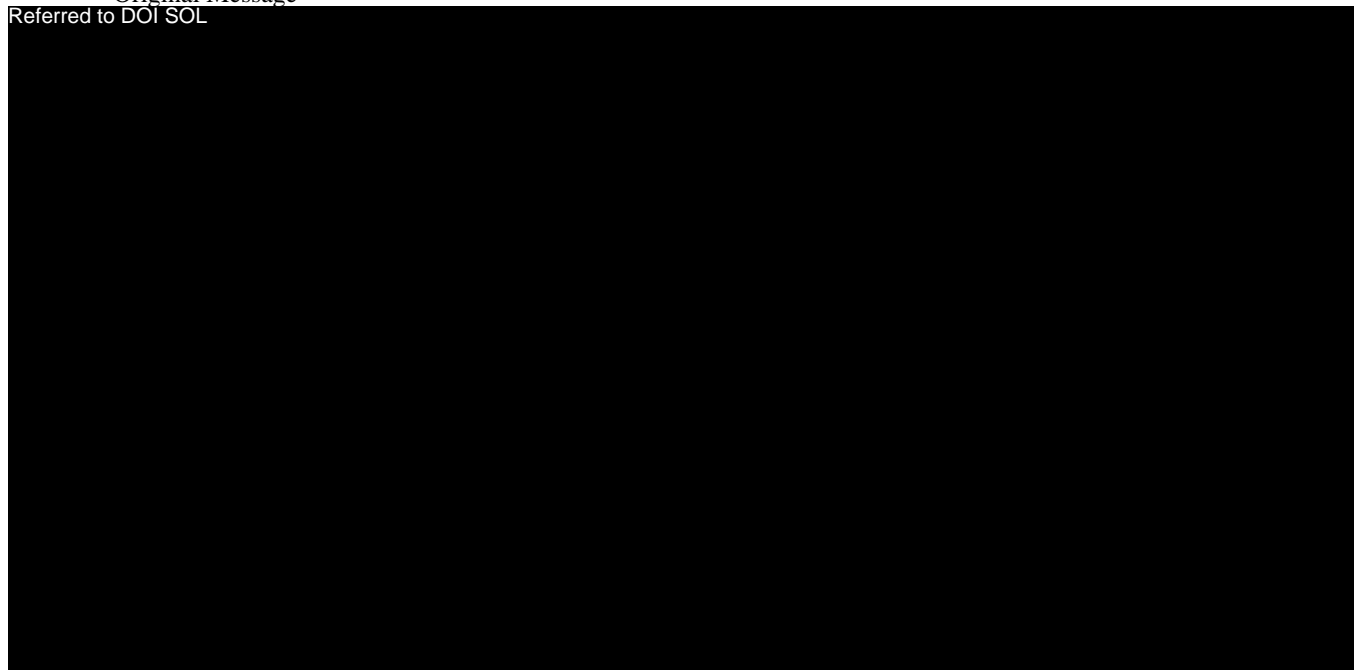
Thanks Keith. Please add that to your notes.

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

From: Keith Labedz
Sent: Thursday, June 27, 2019 8:43 AM
To: Deborah J. Bortot
Subject: Skipwith Report: Preclearance review question - [Message contains CUI]

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

Referred to DOI SOL




On Tue, Jun 25, 2019 at 4:03 PM Keith Labedz <klabedz@oge.gov <<mailto:klabedz@oge.gov>> > wrote:

CONTROLLED

Hello,

As part of the preclearance review, I have been asked to confirm that (b)(5) deliberative and some info also (b)(6)



Thanks.
Keith

Keith Labedz
Senior Program Analyst
Presidential Nominations Branch
U.S. Office of Government Ethics
Telephone: (202) 482-9218

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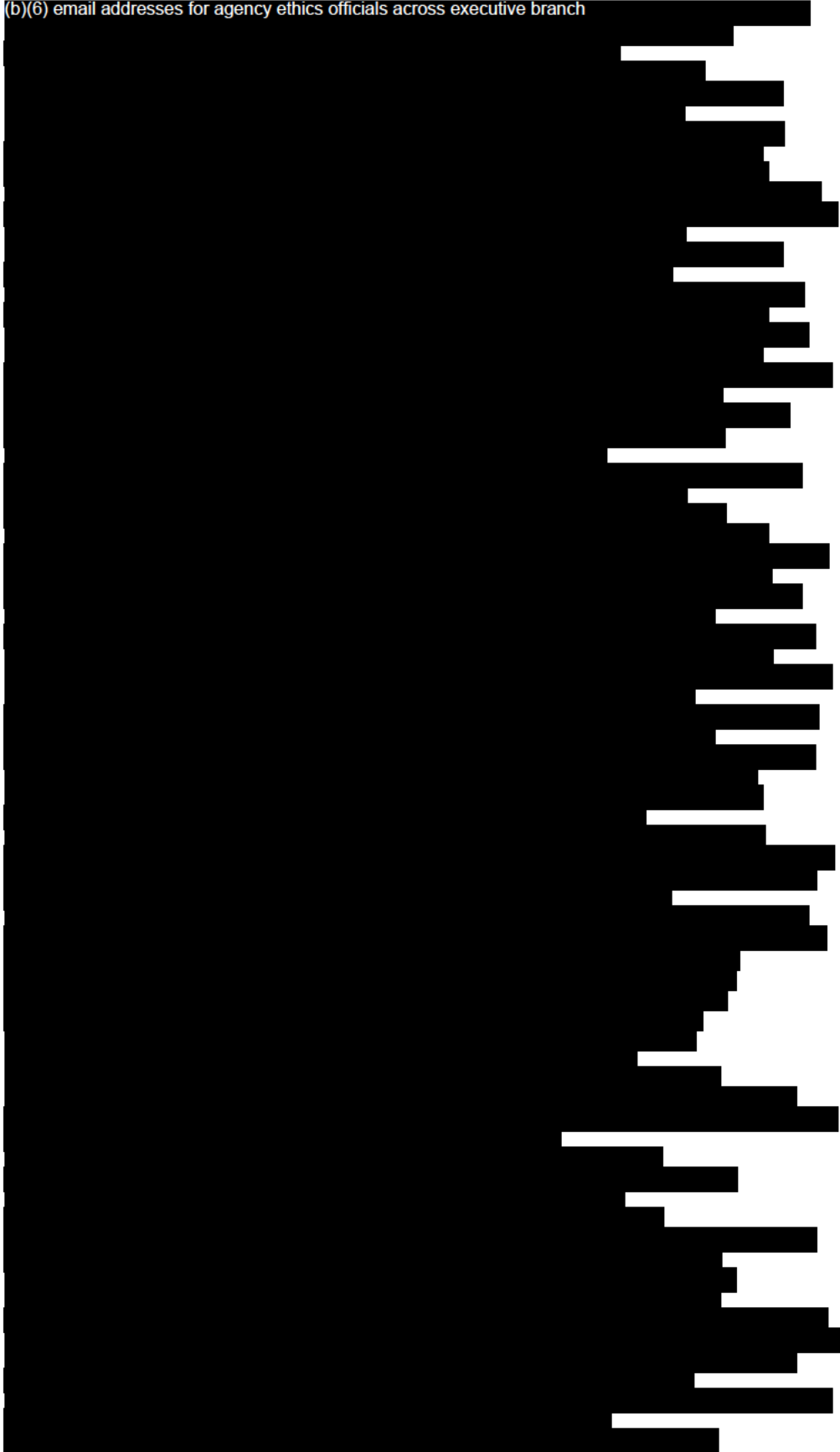
[Nicole Stein](#)

To:


[Nicole Stein](#)

Bcc:

(b)(6) email addresses for agency ethics officials across executive branch



(b)(6) email addresses for agency ethics officials across executive branch



Subject: Save the Date. Quarterly DAEO Meeting: July 24
Date: Monday, June 17, 2019 10:00:32 AM

Good morning,

Please note that the next Quarterly DAEO Meeting will be held the morning of Wednesday, July 24, 2019 from 10:00 a.m. to 11:15 a.m. at the Pension Benefit Guaranty Corporation (PBGC). You will receive an email at the beginning of next month with instructions for how to register for the event.

Nicole

Nicole Stein
Chief, Agency Assistance Branch
nstein@oge.gov
(202) 482-9255
Follow OGE @OfficeGovEthics

From:

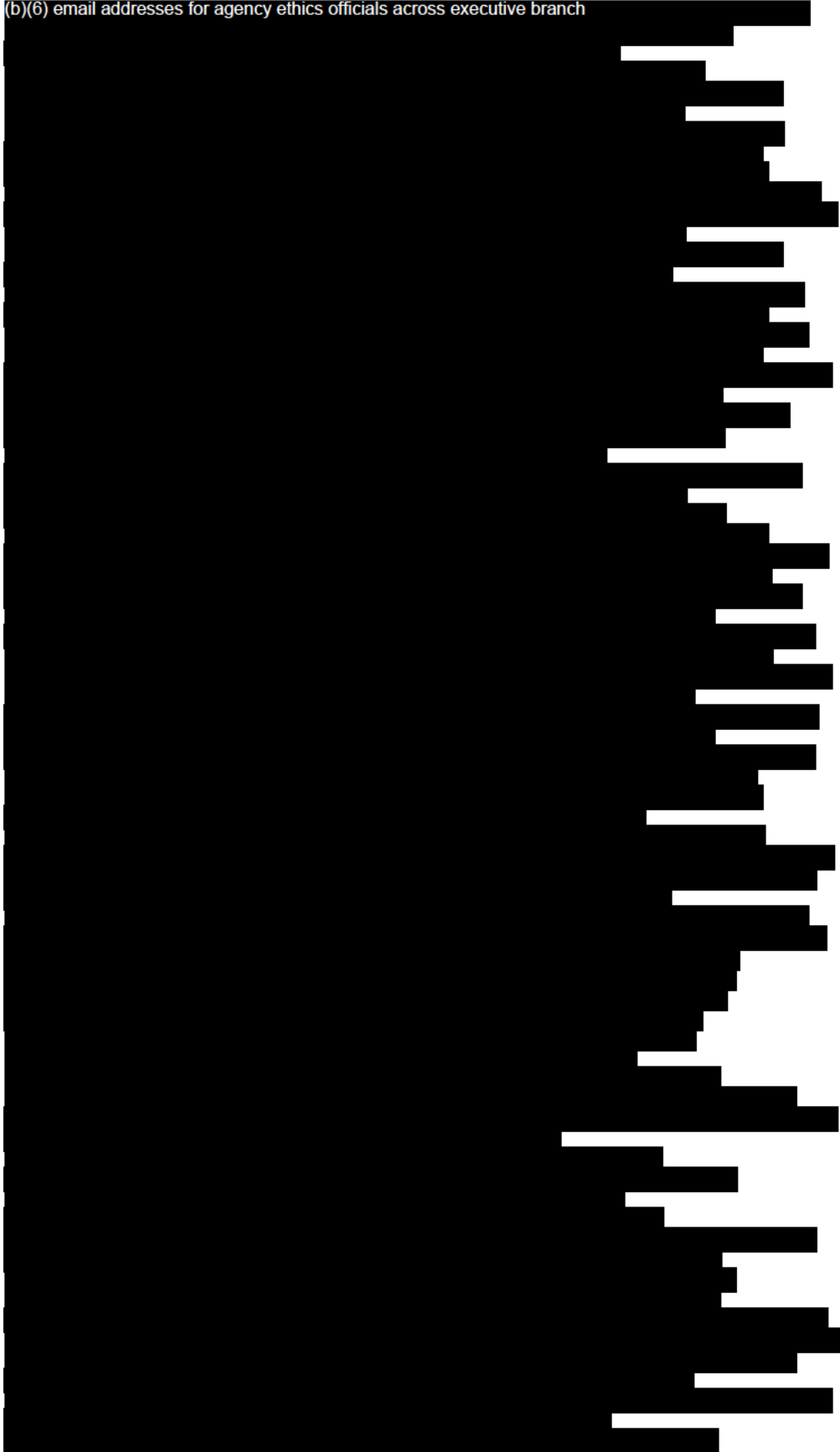
[Nicole Stein](#)

To:


[Nicole Stein](#)

Bcc:

(b)(6) email addresses for agency ethics officials across executive branch



(b)(6) email addresses for agency ethics officials across executive branch



Subject: Memo to Agency Heads
Date: Wednesday, June 5, 2019 5:13:24 PM
Attachments: [PA-19-07 Templates for the Designation of DAEs and ADAEs 20190604.pdf](#)
[image001.png](#)
[oledata.mso](#)

Good evening,

Today, OGE's Director transmitted by mail a memo to each of your agency heads. A copy of the memo is provided below. Attached to this email is a copy of the Program Advisory and templates which were included with the memo. The Memo, Advisory, and templates will be posted to OGE's website tomorrow.

Nicole

Nicole Stein
Chief, Agency Assistance Branch
nstein@oge.gov
(202) 482-9255
Follow OGE @OfficeGoveEthics

From: [Kimberley H. Kaplan](#)
To: (b)(6) Bartek-Santiago email
Subject: FW: Opportunity to Order Mini CFRs and the Compilation
Date: Tuesday, May 28, 2019 11:06:51 AM
Attachments: [SF1 2019 CFR Chapter XVI Rider.pdf](#)
[SF1 2019 Compilation of Federal Ethics Laws Rider.pdf](#)

Hi Alice,

FYI, OGE has opened a rider for agencies to purchase mini CFRs and statute compilations. The deadline for agencies to submit orders is June 12, 2019.

Best,
Kim

Kim H. Kaplan
Senior Government Ethics Specialist
U.S. Office of Government Ethics
(202) 482-9269 phone
(202) 482-9238 fax
khkaplan@oge.gov

Visit OGE's website: www.oge.gov
Follow OGE on Twitter: @OfficeGovEthics

From: Nicole Stein
Sent: Tuesday, May 28, 2019 10:39 AM
To: Nicole Stein
Cc: Tiffany M. Fenix
Subject: Opportunity to Order Mini CFRs and the Compilation

Good morning,

As previously mentioned, OGE is ordering updated copies of 5 C.F.R. Chapter XVI, OGE Regulations and the Compilation of Federal Ethics Law. OGE will be ordering two copies for every agency. We have worked with GPO to set up a rider for agencies that might be interested in ordering more copies. Instructions for participating in the rider are below:

Agencies should complete the highlighted areas on the attached SF1. A separate SF-1 is required for each title. Please ensure all billing information is accurate and be sure to indicate your preferred delivery methods. Unless payment will be made by credit card, the SF1 must be signed by someone who has an authorizing signature letter on file at the Government Publishing Office (GPO).

The SF-1 is due to OGE by **June 12, 2019**. Please email the attached S-F1 to tiffany.fenix@oge.gov, with 5 C.F.R. Chapter XVI, OGE Regulations Book Rider” and/or “The Compilation of Federal Ethics Laws Rider” in the subject line.

The estimated per-copy rider rate for 5 C.F.R. Chapter XVI, OGE Regulations Book is \$7.50 each and \$4.00 each for the Compilation of Federal Ethics Law. Mailing charges, if incurred, will be added.

If you have any questions about the SF-1, please contact GPO. Our points of contact are:

Lorraine Carter

(b) (6)

and/or

Yvette Venable-

ph (b) (6)

SF-1

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Agency
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IdentifierBeginning
Period of
AvailabilityEnding
Period of
AvailabilityAvailability
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Code

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TEXT COATING TYPE

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Only☐ Head to
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1 2 3 4
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POSITION

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PAGE (Inches)
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NO. OF TEXT PAGES

PAPER COVERS
(Self)PAPER COVERS
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(ULC)

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COIL

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SEW

CASE
BOUND

(Material and Color)

PAD/SETS
(Position)(Sheets
in Pad)(Sets
in Pad)(Sheets
in Set)(Chipboard
Required)CARBON
INTERLEAVEPUNCH/
DRILL(No. of
Holes)

(Diam.)

(Inches Center
to Center)

(Position)

STAMP TITLE (Bindery)
Cover ☐ Spine ☐ Foil ☐
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Standard Form 1, February 2014
Title 44 of the U.S. Code Control No. 1-110

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TEXT PAPER (JCP number [If Known] and Grade, Color, Finish and Basis Weight)				TEXT INK(S) (Black, 4-Color Process, Pantone #)		TEXT COATING TYPE	
<input type="checkbox"/> List Other Paper & Ink Materials Below in Additional Information							
DIGITAL PRINT ACCEPTABLE <input type="checkbox"/> Yes <input type="checkbox"/> No PRINT <input type="checkbox"/> One Side Only <input type="checkbox"/> Head to Head <input type="checkbox"/> Head to Foot INDICATE WHICH COVERS PRINT 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> EMBOSS PERFORATE SCORE POSITION NUMBERING (Inclusive) to Ink (Color)							
SIZE FLAT (Inches) FORMS, SETS, PADS X				FOLD TO (Inches) X		SIZE TRIMMED PAGE (Inches) BOOKS/PAMPHLETS X	
STITCH (Side) (Saddle) (ULC) PASTE ON FOLD LOOSELEAF TAPE COMB COIL PERFECT BOUND SEW CASE BOUND (Material and Color)				NO. OF TEXT PAGES PAPER COVERS (Self) (Separate)			
PAD/SETS (Position) (Sheets in Pad) (Sets in Pad) (Sheets in Set) (Chipboard Required) CARBON INTERLEAVE PUNCH/DRILL (No. of Holes) (Diam.) (Inches Center to Center) (Position) STAMP TITLE (Bindery) Cover Spine Foil Ink (Color)				TAB DIVIDERS (Height of Tab) Width of Cut (1/5 etc.) (Position)			
COLLATE (Explain)							
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FOR ADDITIONAL INFORMATION CONTACT (Name)				TELEPHONE		<input type="checkbox"/> PRICE APPROVAL REQUIRED IF EXCEEDS \$	
EMAIL				FAX		ESTIMATE (For GPO Use Only) INCLUDES FREIGHT <input type="checkbox"/> Yes <input type="checkbox"/> No	

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FROM (Department or Government Establishment)	PUBLICATION TITLE
REQUISITION NO.	BILLING ADDRESS CODE (BAC)
ADDITIONAL INFORMATION	

From: [Patrick J. Lightfoot](#)
To: [Scott Gast](#) (b) (6)
Cc: "[Garcia, Monica](#)"
Subject: RE: Precleared: Edward S. Simermeyer - [message and attachment(s) contain CUI]
Date: Thursday, May 2, 2019 3:41:19 PM
Attachments: [CUI Cover Sheet.pdf](#) [EA for preclearance - Simermeyer.docx](#)

First attachment is a standard OGE CUI coversheet and nonresponsive. Second attachment is withheld in full (b) (5) draft ethics agreement 2pp.

CONTROLLED

Email and attachment(s) contain CUI.

Scott,

Mr. Simermeyer's 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

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From: Heather A. Jones
Sent: Thursday, May 02, 2019 3:40 PM
To: Scott Gast (b) (6)
Cc: (b)(6) Garcia; Patrick J. Lightfoot; David J. Apol; Deborah J. Bortot; Heather A. Jones; Keith Labedz; Teresa L. Williamson
Subject: Precleared: Edward S. Simermeyer - (Contains CUI)

CONTROLLED

Scott-

Edward S. Simermeyer has been precleared. Patrick, please send the ethics agreement to the White House.

Thanks,
Heather

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

Visit OGE's website: www.oge.gov

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From: [Patrick J. Lightfoot](#)
To: ["Garcia, Monica"](#)
Subject: RE: Simermeyer - Ethics Agreement - [message and attachment(s) contain CUI]
Date: Thursday, May 2, 2019 2:56:46 PM
Attachments: [CUI Cover Sheet.pdf](#) [EA for preclearance - Simermeyer.docx](#)

First attachment is a standard OGE CUI coversheet and nonresponsive. Second attachment is withheld in full (b)(5) draft ethics agreement 2pp.

CONTROLLED

Email and attachment(s) contain CUI.

Hi Monica,

Thank you for the update! I've made one addition to the (b)(5) paragraph for your review to capture the (b)(5) deliberative and some info also (b)(6)

If that looks good, I'll send a confirmatory email your way shortly and then prepare this for preclearance review.

Thanks!

--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

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From: [Heather A. Jones](#)
To: [Scott Gast](#); (b) (6)
Cc: [Jim Robertson](#); "Gottry, Heather"; (b)(6) Garcia; [David J. Apol](#); [Deborah J. Bortot](#); [Heather A. Jones](#); [Keith Labedz](#); [Teresa L. Williamson](#)
Subject: Precleared: George Robert Wallace - (Contains CUI)
Date: Thursday, May 2, 2019 1:54:29 PM

CONTROLLED

Scott-

George Robert Wallace has been precleared. Jim, please send the ethics agreement to the White House.

Thanks,
Heather

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

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On Wed, May 1, 2019 at 5:55 PM Jim Robertson <jfrobert@oge.gov> wrote:

CONTROLLED


email and attachment contain CUI

Heather, Monica –

I've got several corrections to the report and a fresh EA attached with a couple of small changes.


EA:

(b)(5) deliberative and some info also (b)(6)



Report:

(b)(5) deliberative and some info also (b)(6) and/or (b)(3)



(b)(5) deliberative and some info also (b)(6) and/or (b)(3)

[Redacted]

[Redacted]

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[Redacted]

[Redacted]

[Redacted]

Thanks,

Jim

Jim Robertson

Assistant Counsel

General Counsel & Legal Policy Division

U.S. Office of Government Ethics

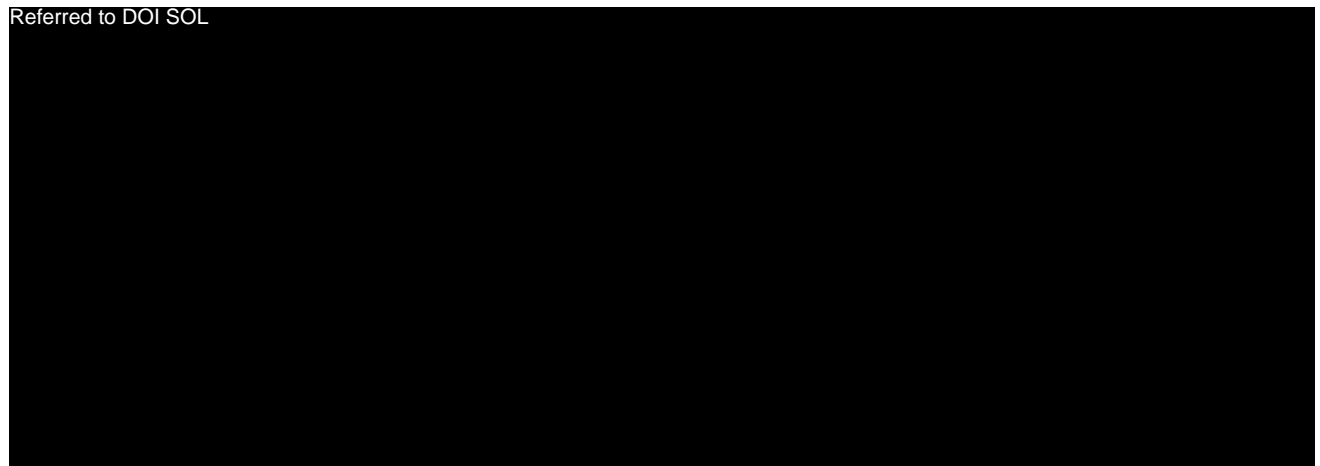
james.robertson@oge.gov

202-482-9268


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From: [Jim Robertson](#)
To: "Gottry, Heather"; [Monica Garcia](#)
Cc: [Deborah J. Bortot](#); [Heather A. Jones](#); [Scott De La Vega](#)
Subject: Wallace report follow-up for preclear- [Message and attachment contain CUI]
Date: Wednesday, May 1, 2019 5:54:09 PM
Attachments: [EA for preclearance, Wallace.docx](#) [OGE_CUI_Coversheet.pdf](#) Second attachment is a standard OGE CUI coversheet and nonresponsive. First attachment is withheld in full (b)(5) draft ethics agreement 6pp.

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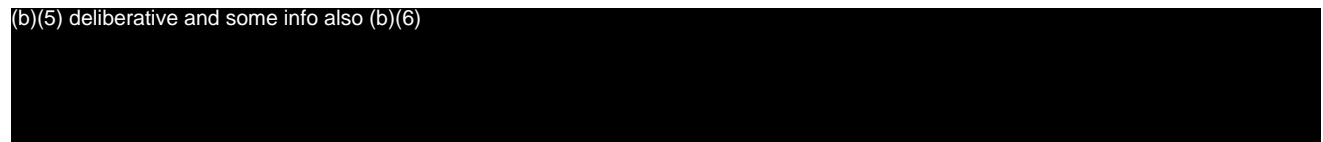
email and attachment contain CUI

Heather, Monica –

I've got several corrections to the report and a fresh EA attached with a couple of small changes.

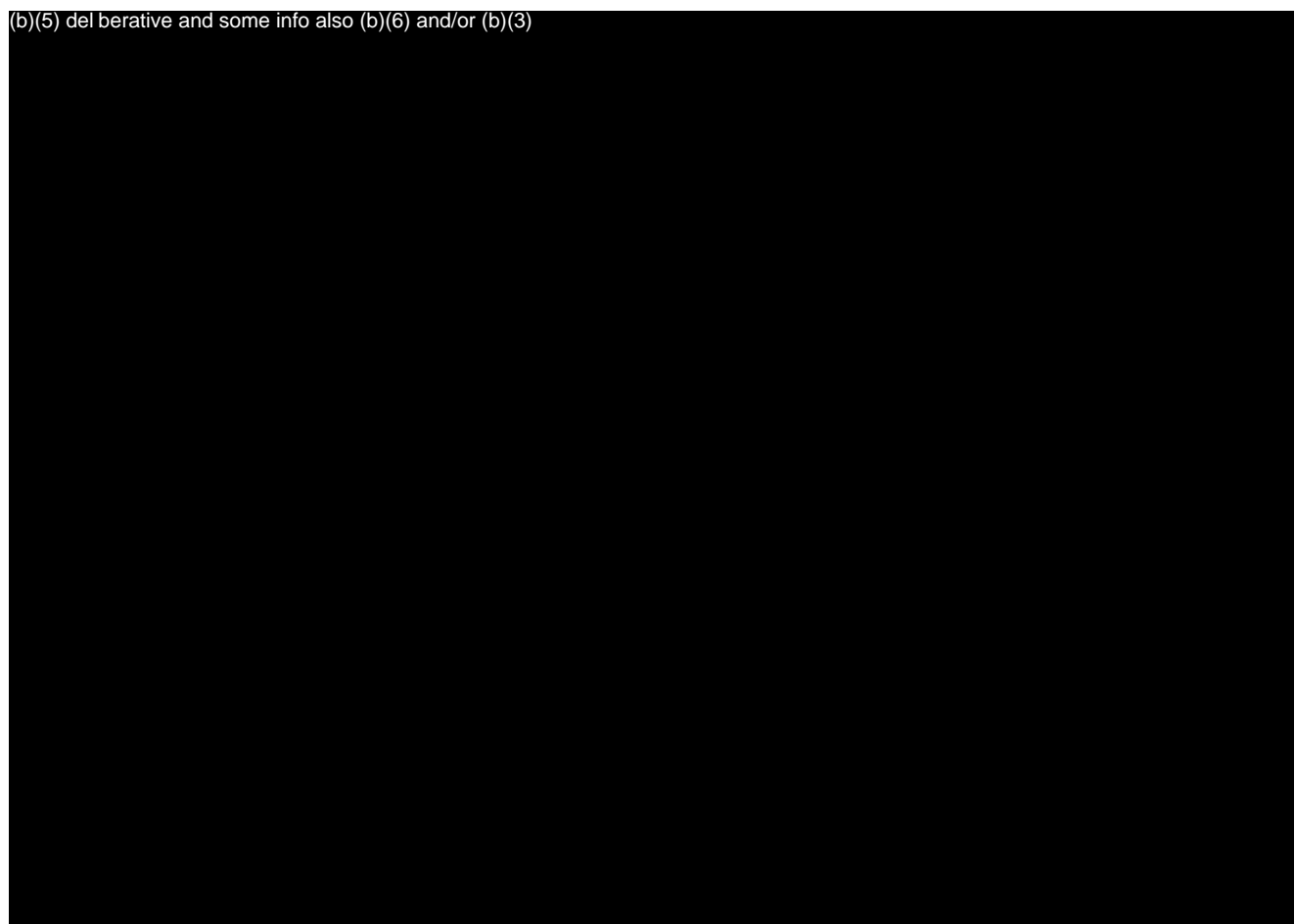
EA:

(b)(5) deliberative and some info also (b)(6)


A large black rectangular redaction box covering the content of the EA section.

Report:

(b)(5) deliberative and some info also (b)(6) and/or (b)(3)

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(b)(5) deliberative and some info also (b)(6) and/or (b)(3)



Thanks,

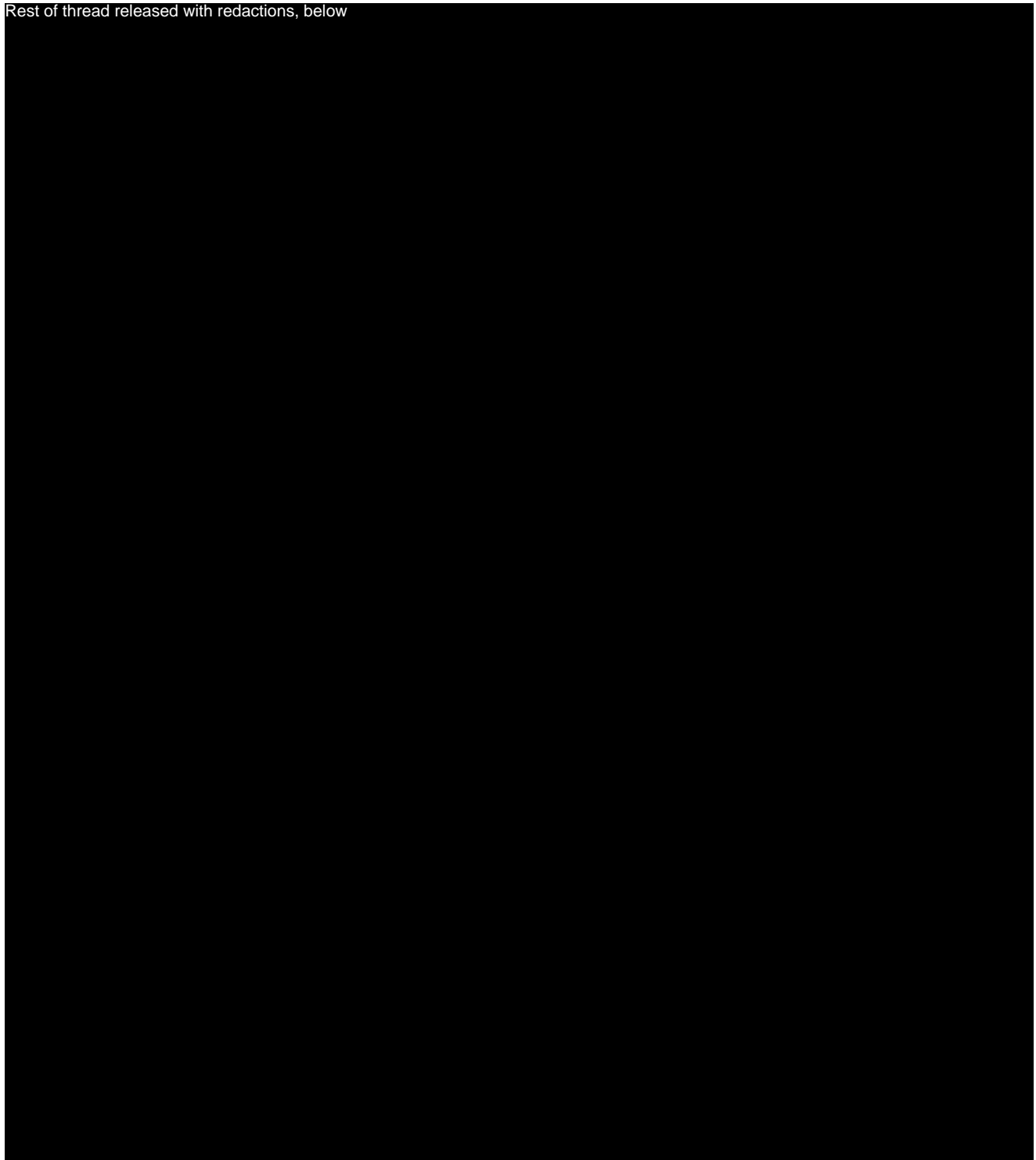
Jim

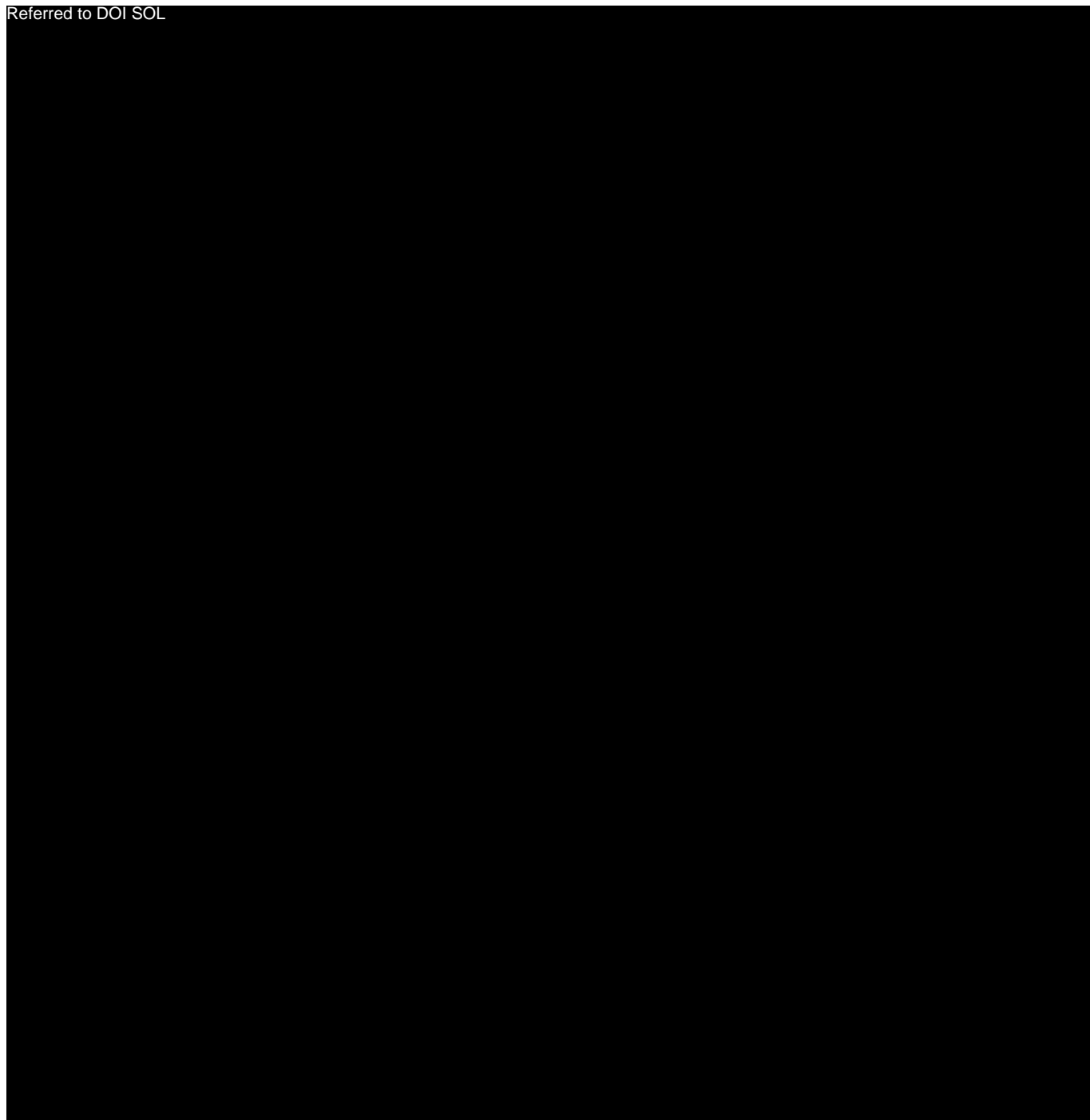
Jim Robertson
Assistant Counsel
General Counsel & Legal Policy Division
U.S. Office of Government Ethics
James.robertson@oge.gov
202-482-9268

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Rest of thread released with redactions, below





On Tue, Apr 30, 2019 at 2:21 PM Jim Robertson <jfrobert@oge.gov> wrote:

CONTROLLED

Heather –


We will need (email) confirmation from you all as to (b)(5) deliberative

[Redacted]

(b)(5) deliberative and some info also (b)(6)

[Redacted]

(b)(5) deliberative and some info also (b)(6)



Preclear has asked for email confirmation on this.

Note: I made adjustments to the EA based on (b)(5) deliberative



Thanks,

Jim

Jim Robertson

Assistant Counsel

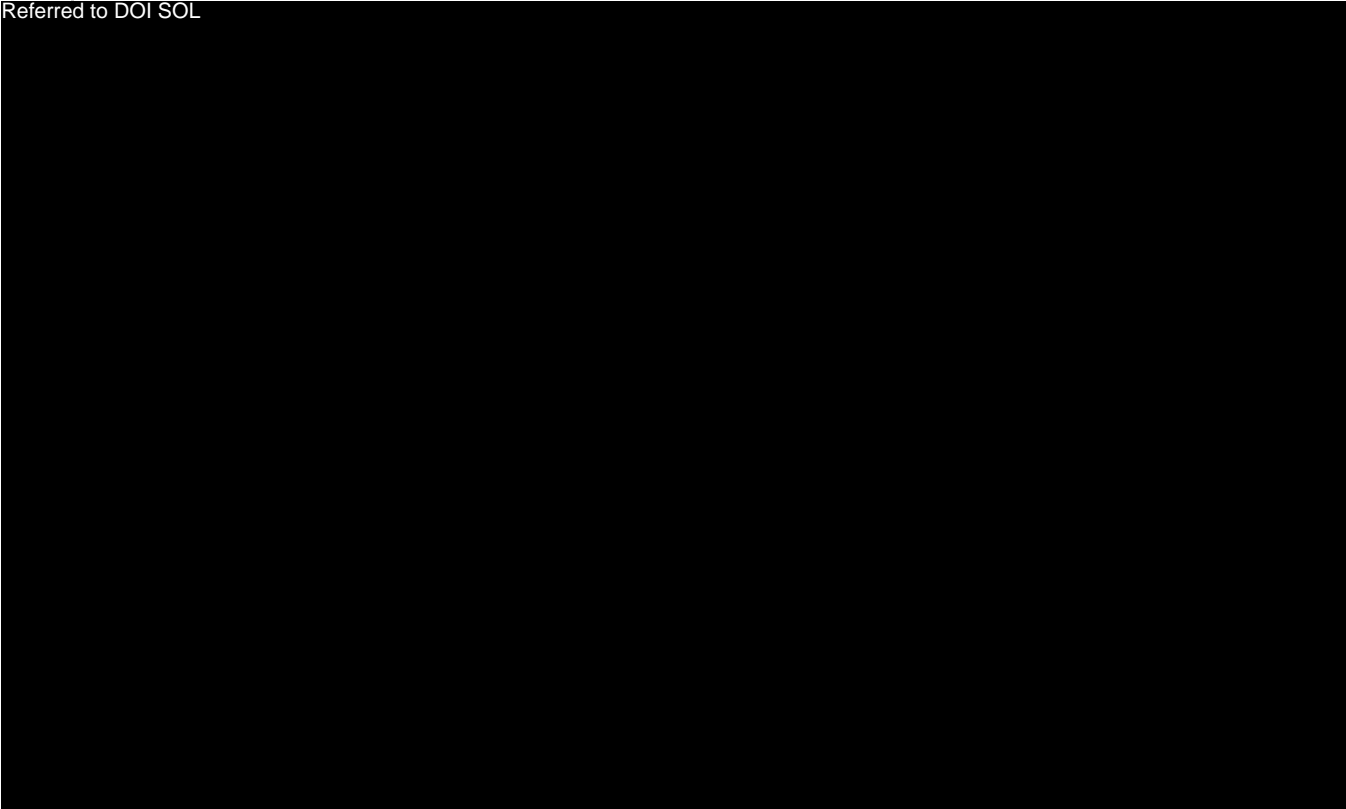
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James.robertson@oge.gov

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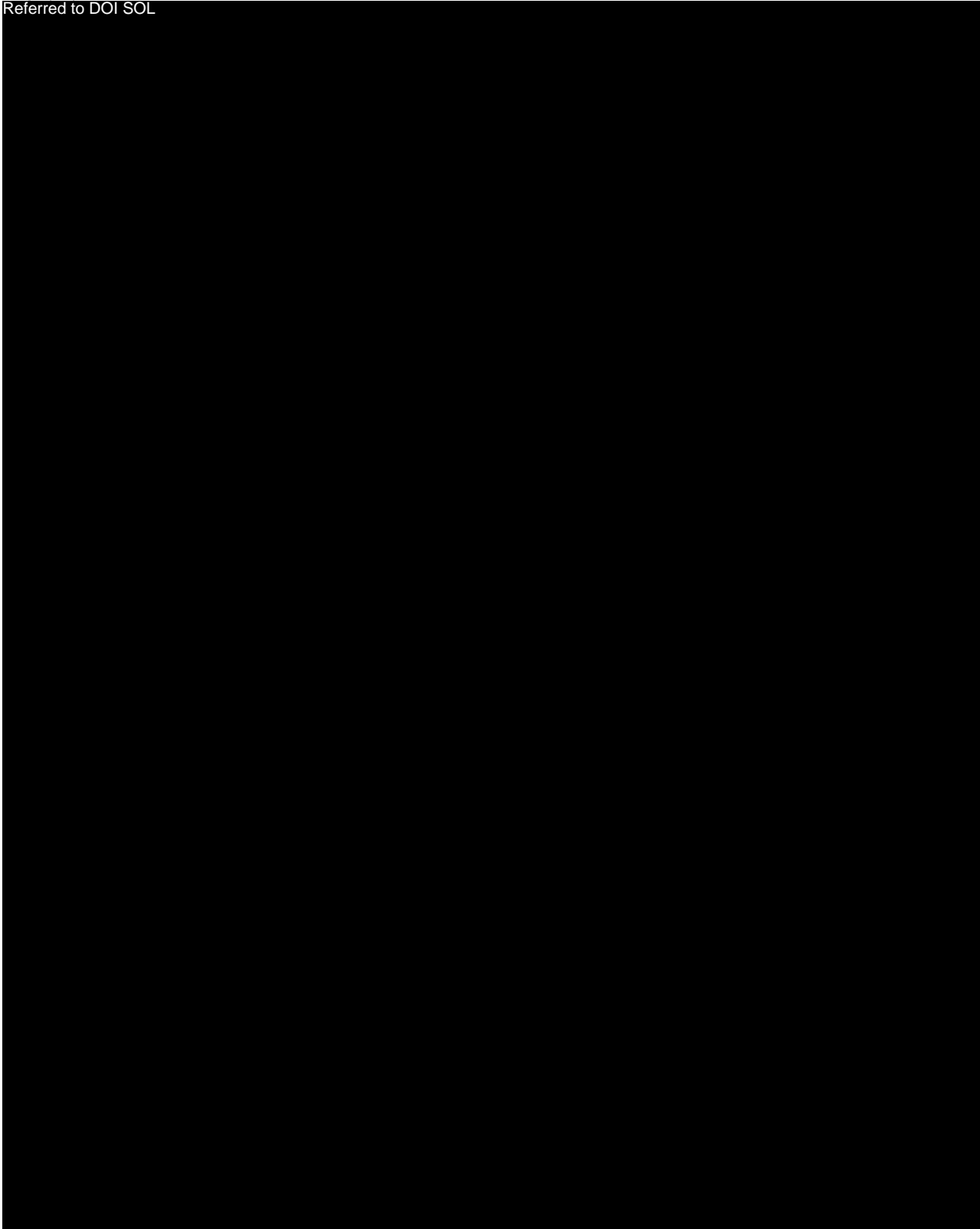
On Fri, Apr 26, 2019 at 4:08 PM Jim Robertson <jfrobert@oge.gov> wrote:

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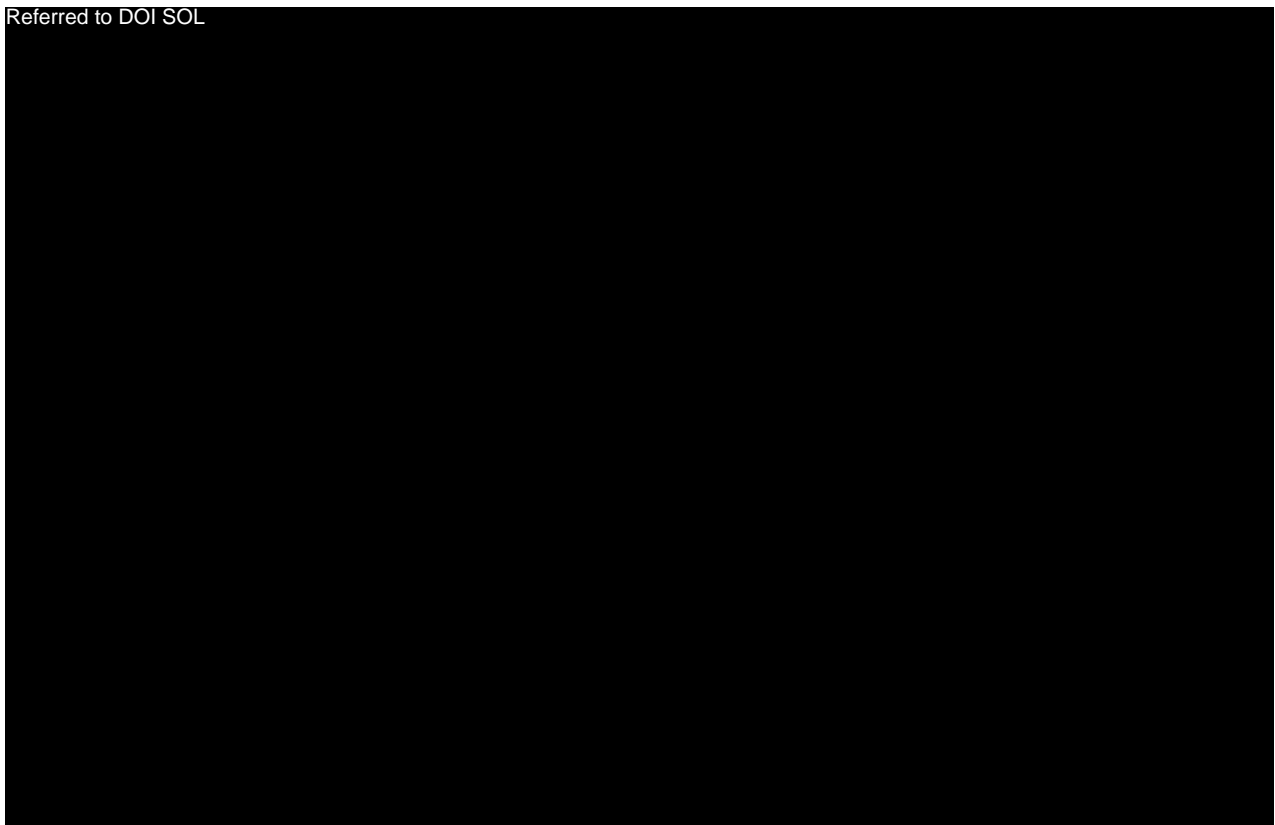
Got it. Thanks.

Jim

Referred to DOI SOL

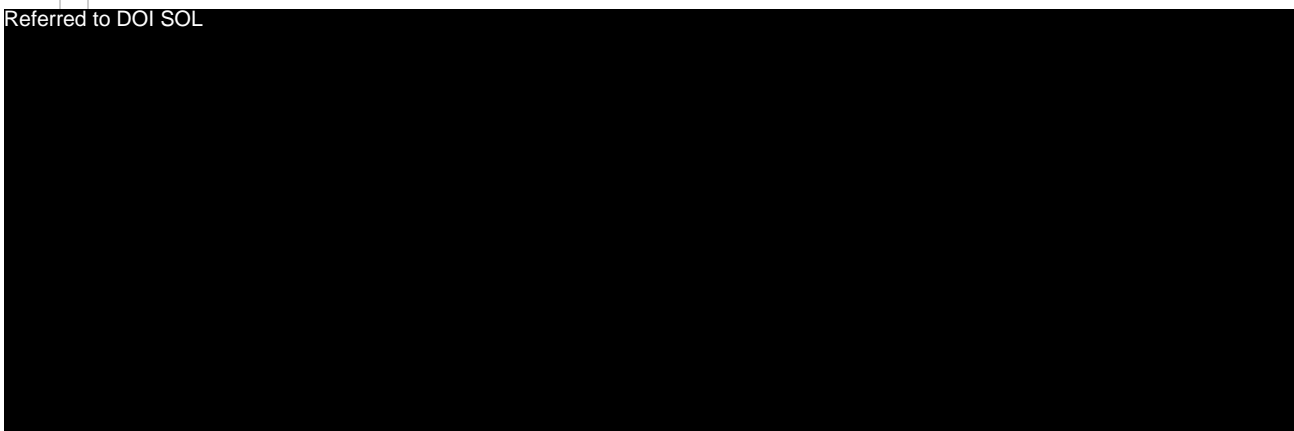


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From: [Jim Robertson](#)
To: ["Gottry, Heather"](#)
Cc: [Scott De La Vega](#); [Monica Garcia](#); [Heather A. Jones](#); [Deborah J. Bortot](#)
Subject: RE: [EXTERNAL] Re: (b)(5) deliberative [message contains CUI]
Date: Wednesday, May 1, 2019 3:56:23 PM

CONTROLLED

Heather,

The committee for Mr. Wallace has reached out and informed us they will need his final package by Friday.

This puts a bit of rush on things. I've included Heather Jones and Deb Bortot on cc in case they will need to review things later this evening. Please included them on any emails.

We will need to preclear early tomorrow (Thursday), so whatever you can do to move things this way, would greatly appreciate.

Agency DAEO/ADAEO and filer will need to be available to sign after we preclear (and after WH nominates, of course).

Thanks,

Jim

Jim Robertson

Assistant Counsel

General Counsel & Legal Policy Division

U.S. Office of Government Ethics

James.robertson@oge.gov

202-482-9268

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On Wed, May 1, 2019 at 2:50 PM Jim Robertson <jfrobert@oge.gov> wrote:

CONTROLLED

Heather,

Discussed with preclearance.

There are two issues here: 1) (b)(5) deliberative



(b)(5) del berative and some info also (b)(6)



(b)(5) del berative



(b)(5) deliberative

Let me know.

Thanks,

Jim

Jim Robertson

Assistant Counsel

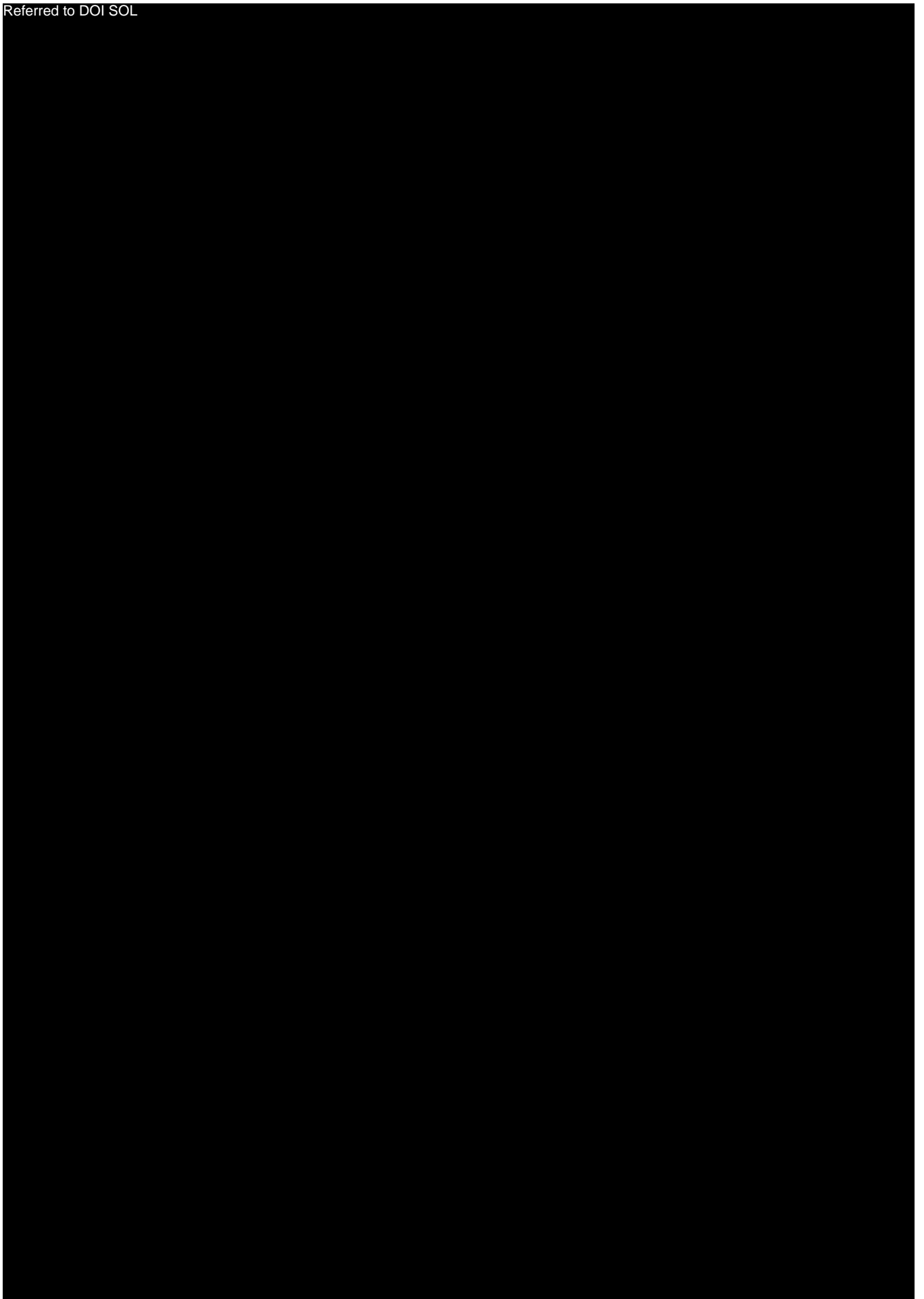
General Counsel & Legal Policy Division

U.S. Office of Government Ethics

James.robertson@oge.gov

202-482-9268

Referred to DOI SOL



Referred to DOI SOL



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From: [Nicole Stein](#)
To: [Nicole Stein](#)
Bcc: (b)(6) email addresses for ethics officials across the executive branch

Subject: Reminder to complete Data Call for Agency Ethics Program Contact Information by May 1st.
Date: Tuesday, April 23, 2019 8:48:26 AM

DAEOs, ADAEOs, and POCs,

If you have already completed this data call, thank you. Otherwise, this email is to remind you that OGE issued a Program Advisory on March 26th announcing a call for information related to the DAEO List on OGE's website. See PA 19x04. [https://www.oge.gov/web/OGE.nsf/All%20Advisories/210CC9F77D24B686852583C9004F6E34/\\$FILE/Program%20Advisory19x04.pdf?open](https://www.oge.gov/web/OGE.nsf/All%20Advisories/210CC9F77D24B686852583C9004F6E34/$FILE/Program%20Advisory19x04.pdf?open). This email provides instructions for responding to the data call as well as more specific information about each data field.

To populate the new list, OGE is asking each agency to add the requested information to MAX (b)(5) internal government website by May 1, 2019.

Agency Name: Please make any necessary edits.

DAEO: Please make any necessary edits.

Appointment Date (DAEOs): Please provide the day you were appointed in XX/XX/XX date format.

ADAEO: Please make any necessary edits.

How can an employee at this agency contact the ethics office for advice (phone or email)? Provide your preferred method for receiving questions from employees. OGE often receives emails from federal employees. This information will be used to redirect them.

How can someone request public financial disclosure reports from your agency? Please provide a monitored email address, mailing address, and/or fax number for individuals wishing to submit an OGE Form 201 request to your agency. OGE will provide this contact information when directing requestors to your agency.

Agency Ethics Webpage (Public): Please add a link, if you have a publicly available ethics webpage.

As a reminder this will information will be posted on OGE's website.

Please reach out to me at (202) 482-9255 or by email atnstein@oge.gov if you have additional questions. I

Nicole

Nicole Stein
Chief, Agency Assistance Branch
nstein@oge.gov
(202) 482-9255
Follow OGE @OfficeGoveEthics

From: [Patrick J. Lightfoot](#)
To: ["Garcia, Monica"](#)
Subject: RE: Simermeyer - [message and attachment(s) contain CUI]
Date: Thursday, April 18, 2019 8:44:46 AM
Attachments: [CUI Cover Sheet.pdf](#)
[Most recent EA - Simermeyer \(4.18.19\).docx](#)

First attachment is a standard OGE CUI coversheet and nonresponsive. Second attachment is withheld in full (b)(5) draft ethics agreement 2pp.

CONTROLLED

Email and attachment(s) contain CUI.

Thanks, Monica! I've attached an updated EA for your reference that accepts the various changes and deletes the comments that have now been answered.

One remaining edit to the 278 (b)(5) deliberative and some info also (b)(6)

[REDACTED]

• (b)(5) deliberative and some info also (b)(6)

[REDACTED]

I'll be in the office tomorrow, but will then be out of the office Monday through Wednesday next week on official travel. In the event the filer receives that final update while I am out, my out of office reply will have the contact information for my backup reviewer so we can keep this one moving.

Thanks!

--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
Follow OGE on Twitter: [@OfficeGovEthics](https://twitter.com/OfficeGovEthics)

Referred to DOI SOL

[REDACTED]

From: [Nicole Stein](#)
To: [Nicole Stein](#)
Bcc: (b)(6) email addresses for ethics officials across the executive branch

[REDACTED]

Subject: Survey: Desk Officer Support
Date: Tuesday, April 16, 2019 1:33:53 PM
Attachments: [Survey Questions.docx](#)

Good afternoon,

OGE views the Desk Officer program as a vital communications and support link to the ethics community. Recognizing the important role that this program plays, OGE continuously strives to maintain and enhance the services that our Desk Officers provide. In furtherance of these

efforts, OGE conducts a short survey each spring to evaluate the ethics community's level of satisfaction with the program. I understand that you contacted an OGE Desk Officer within the past six months. Therefore, I am asking you to participate in this year's survey, which is designed to help OGE ensure that the assistance provided by your Desk Officer continues to meet the standard of providing top-notch guidance and support.

All responses to the survey will be anonymous. The survey will close on April 26, 2019.

Please click the following link to take the survey:

(b)(5) survey link

A word version is attached in case you are unable to access the survey via Survey Monkey.

Thank you in advance. As always, please do not hesitate to contact me with specific concerns.

Nicole

Nicole Stein
Chief, Agency Assistance Branch
nstein@oge.gov
(202) 482-9255
Follow OGE @OfficeGoveEthics

FY19 Desk Officer Survey

1. OGE Desk Officer assistance helps me perform my job duties.

Strongly Agree

Agree

Neither Agree nor Disagree

Disagree

Strongly Disagree

N/A

Comments:

2. OGE Desk Officers are responsive to my requests for assistance.

Strongly Agree

Agree

Neither Agree nor Disagree

Disagree

Strongly Disagree

N/A

Comments:

Overall Comments

From: [Patrick J. Lightfoot](#)
To: ["Garcia, Monica"](#)
Subject: RE: Simemeyer Nomination - [contains CUI]
Date: Monday, April 15, 2019 4:14:24 PM

CONTROLLED

Hi Monica,

I got your voicemail from Friday; thank you for the updates re: (b)(5) deliberative and some info also (b)(6). I'll be sure to add that to my notes.

You mentioned that the filer is confirming that (b)(5) deliberative and some info also (b)(6). I believe, other than that, the only remaining questions were a couple of things included in the last draft of the EA:

- (b)(5) deliberative and some info also (b)(6)
- (b)(5) deliberative

Thanks!

--Patrick

From: Patrick J. Lightfoot
Sent: Wednesday, April 10, 2019 8:11 AM
To: 'Garcia, Monica'
Subject: RE: Simemeyer Nomination - [contains CUI]

CONTROLLED

Hi Monica,

Circling back for a weekly status update.

Thanks!

--Patrick


From: Patrick J. Lightfoot
Sent: Thursday, April 04, 2019 8:44 AM
To: 'Garcia, Monica'
Subject: RE: Simemeyer Nomination - [contains CUI]


CONTROLLED

Hi Monica,

Thanks for the update. A few follow-up questions:


(b)(5) deliberative



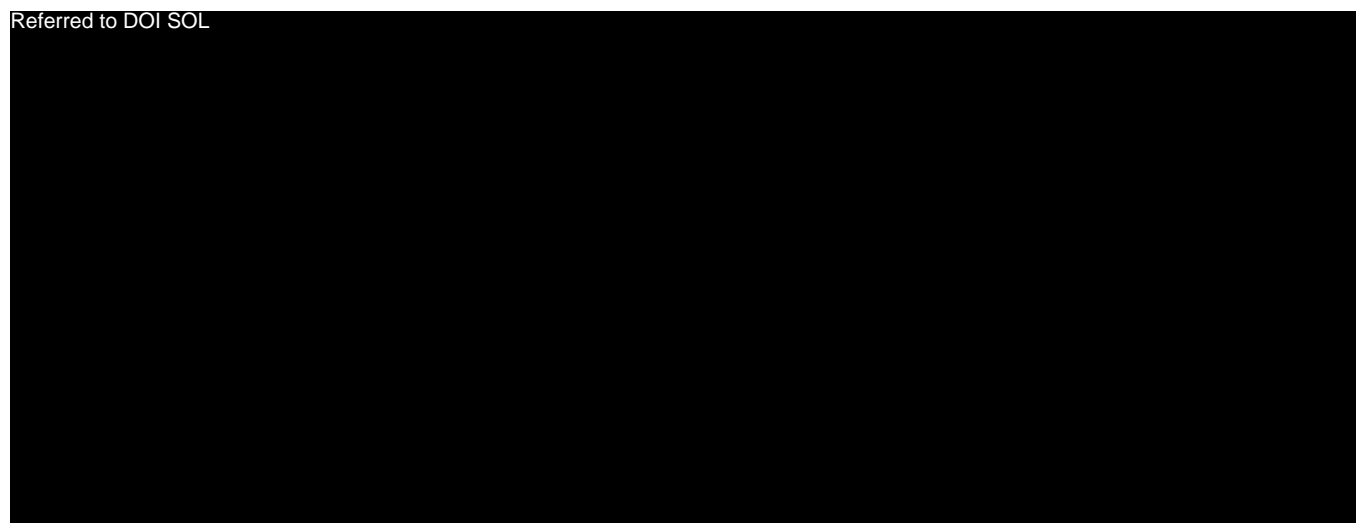
- (b)(5) deliberative and some info also (b)(6)
- 

--Patrick

Referred to DOI SOL



Referred to DOI SOL



From: [Jim Robertson](#)
To: [Deborah J. Bortot](#); [Heather A. Jones](#)
Subject: FW: [EXTERNAL] RE: Call on Wallace? [message contains CUI]
Date: Tuesday, March 26, 2019 1:48:56 PM

In advance of the Interior call.

This is basically where we left off with (b)(5) deliberative

Jim

From: Jim Robertson
Sent: Thursday, January 31, 2019 9:12 AM
To: 'Gottry, Heather'
Subject: RE: [EXTERNAL] RE: Call on Wallace? [message contains CUI]

CONTROLLED

Heather,

Discussed with preclear. (b)(5) deliberative

Available to chat throughout the day and tomorrow.

Thanks,

Jim

Jim Robertson
Assistant Counsel
General Counsel & Legal Policy Division
U.S. Office of Government Ethics
James.robertson@oge.gov
202-482-9268


From: Jim Robertson
Sent: Thursday, January 31, 2019 8:35 AM
To: 'Gottry, Heather'
Subject: RE: [EXTERNAL] RE: Call on Wallace? [message contains CUI]

CONTROLLED

Pre 9:00 is going to be close. I'm pretty sure (b)(5) deliberative and some info also (b)(6)

But ultimately a preclearance team call, so will try to steal a few minutes with them this AM.

Also (b)(5) deliberative and some info also (b)(6)

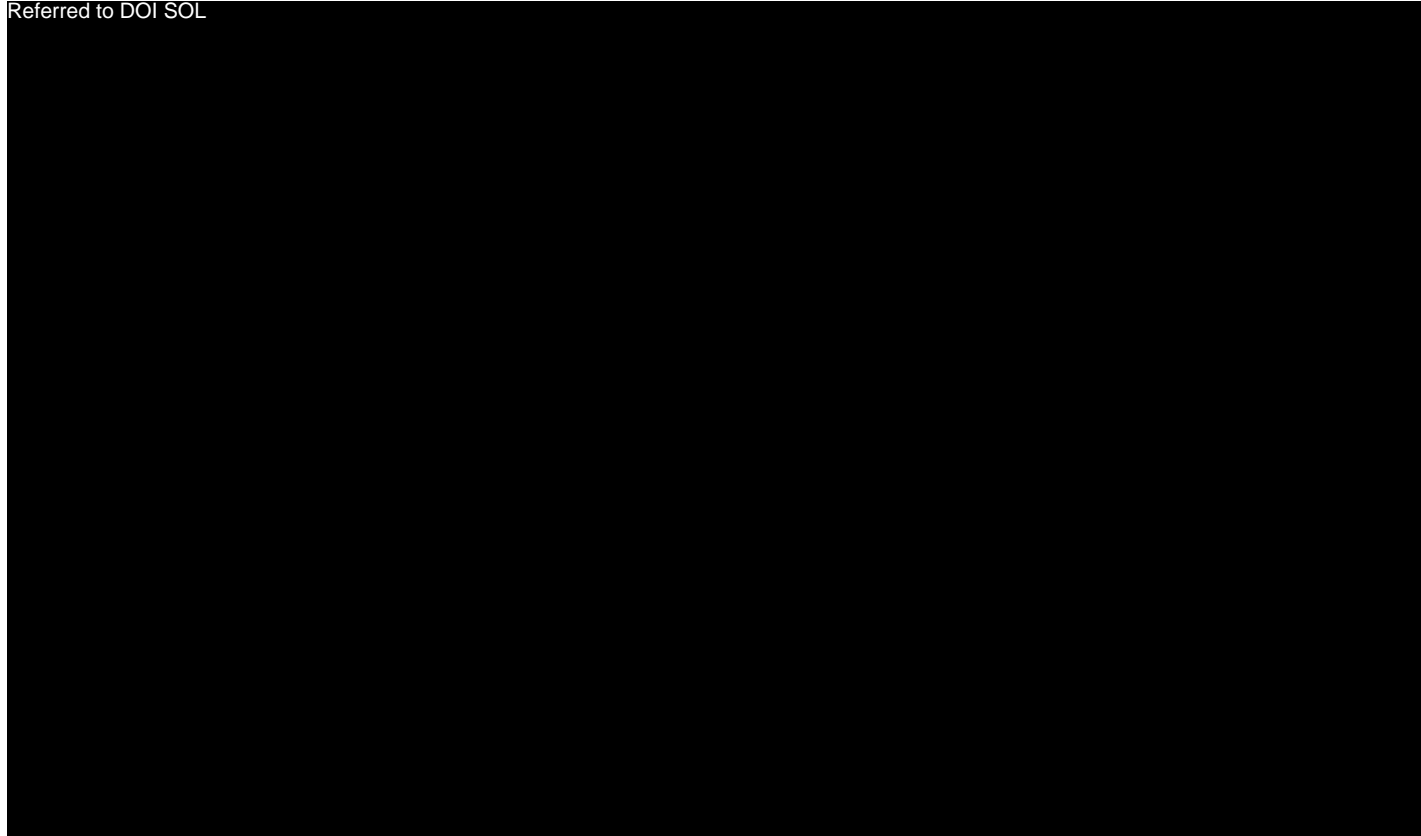


Will let you know what I find out.

Thanks,
Jim

Jim Robertson
Assistant Counsel
General Counsel & Legal Policy Division
U.S. Office of Government Ethics
James.robertson@oge.gov
202-482-9268

Referred to DOI SOL



On Wed, Jan 30, 2019 at 2:16 PM Jim Robertson <jfrobert@oge.gov> wrote:

CONTROLLED

Heather,

Thanks for your patience.


Wanted to see if we could set up some time to discuss Mr. Wallace's report.
Let me know what time would work for you. I'm relatively flexible through the end of the week.

Thanks.

Jim

Jim Robertson
Assistant Counsel
General Counsel & Legal Policy Division
U.S. Office of Government Ethics
james.robertson@oge.gov
202-482-9268

Referred to DOI SOL



On Jan 25, 2019, at 8:10 AM, Jim Robertson <jfrobert@oge.gov> wrote:

CONTROLLED

Heather –

Apologies – was hoping to catch a break in the weather but I believe I will need to pick this up at a later date. Thanks for your understanding.

Jim

Referred to DOI SOL



On Thu, Jan 24, 2019 at 3:21 PM Jim Robertson <jfrobert@oge.gov> wrote:

CONTROLLED

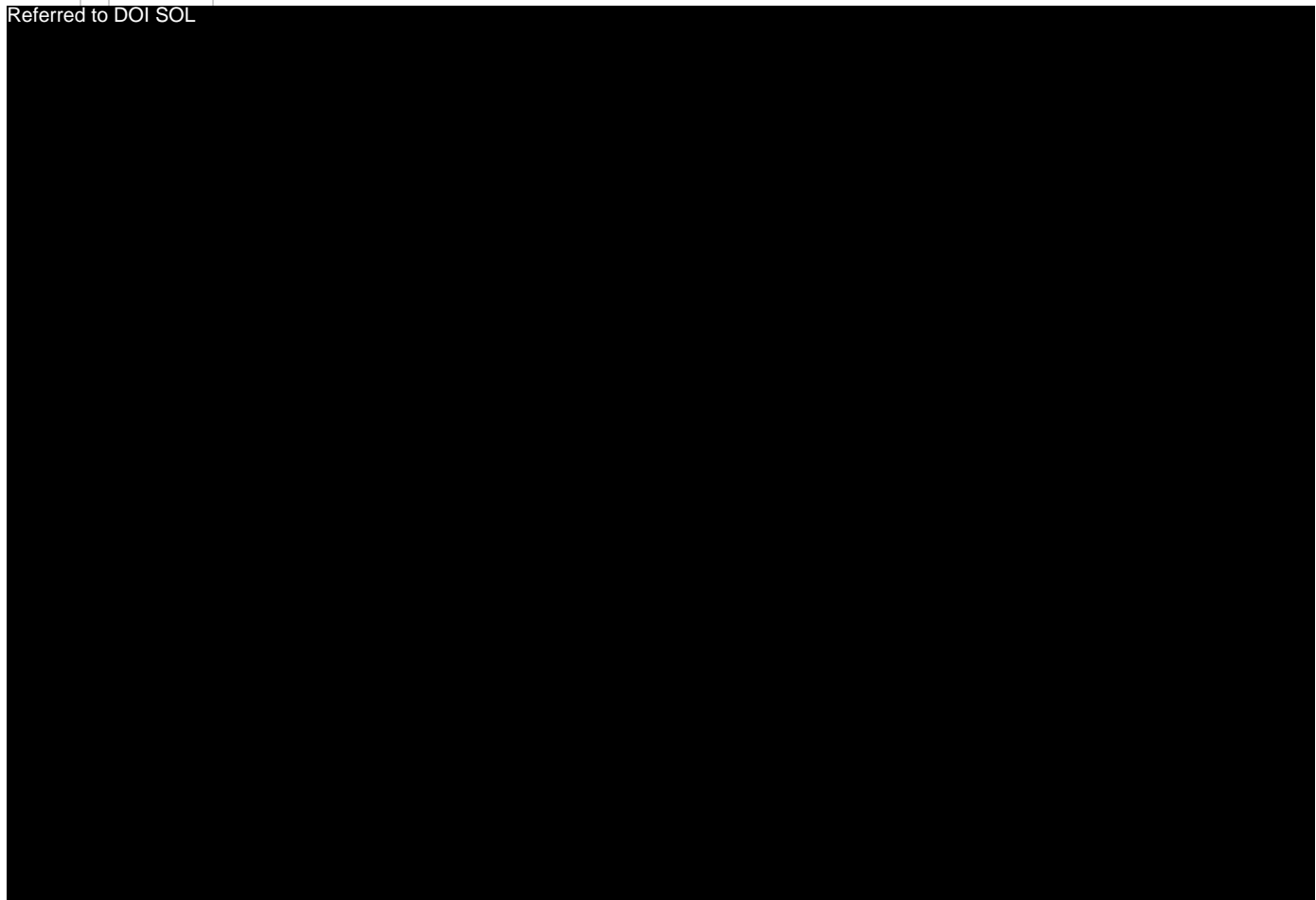
Yep – in but I’m slammed with WH priority reports. I will make an effort to touch base tomorrow morning since I will again be furloughed after tomorrow.

Is 9:00 OK?

Jim

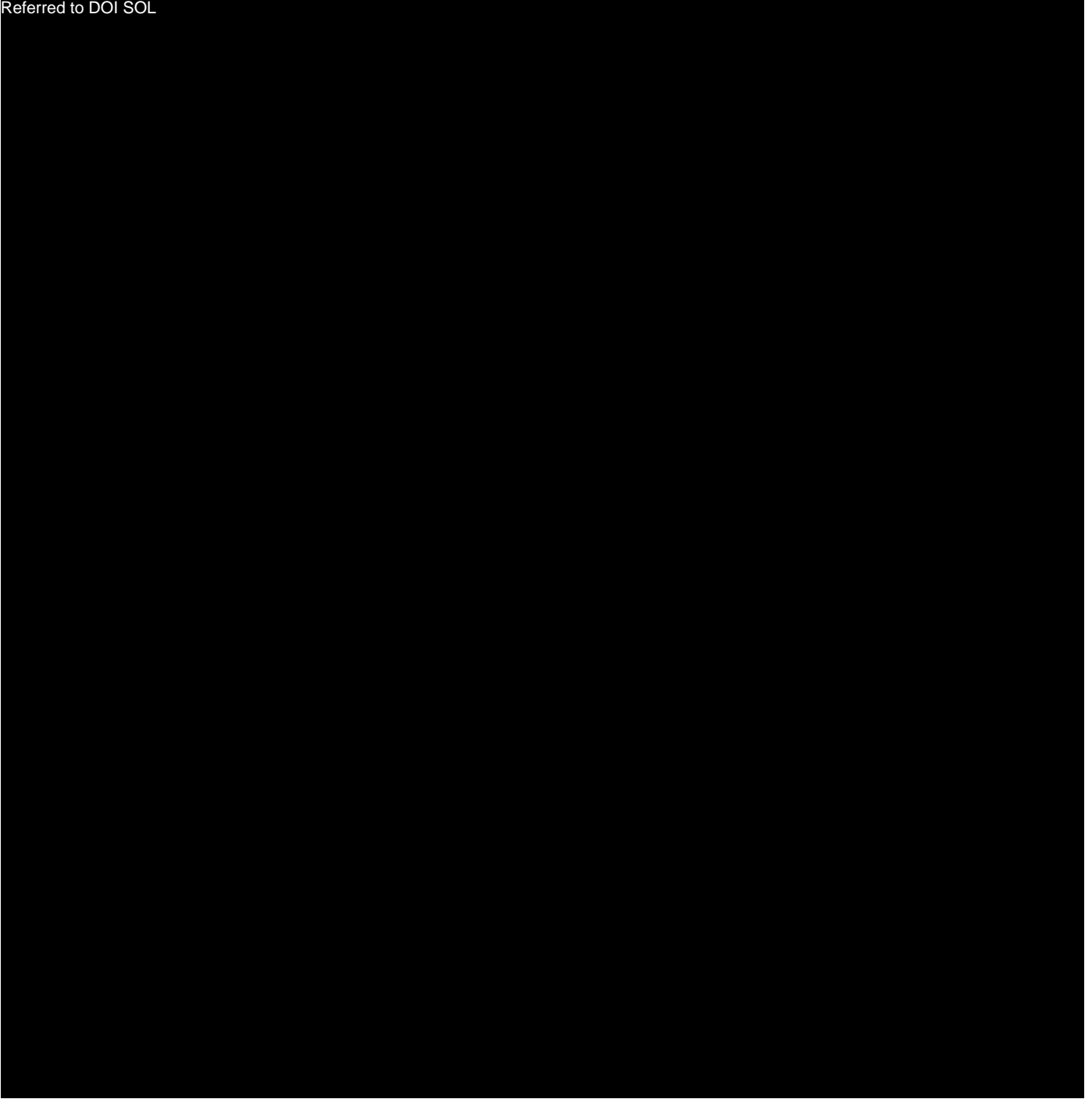
Jim Robertson
Assistant Counsel
General Counsel & Legal Policy Division
U.S. Office of Government Ethics
James.robertson@oge.gov
202-482-9268

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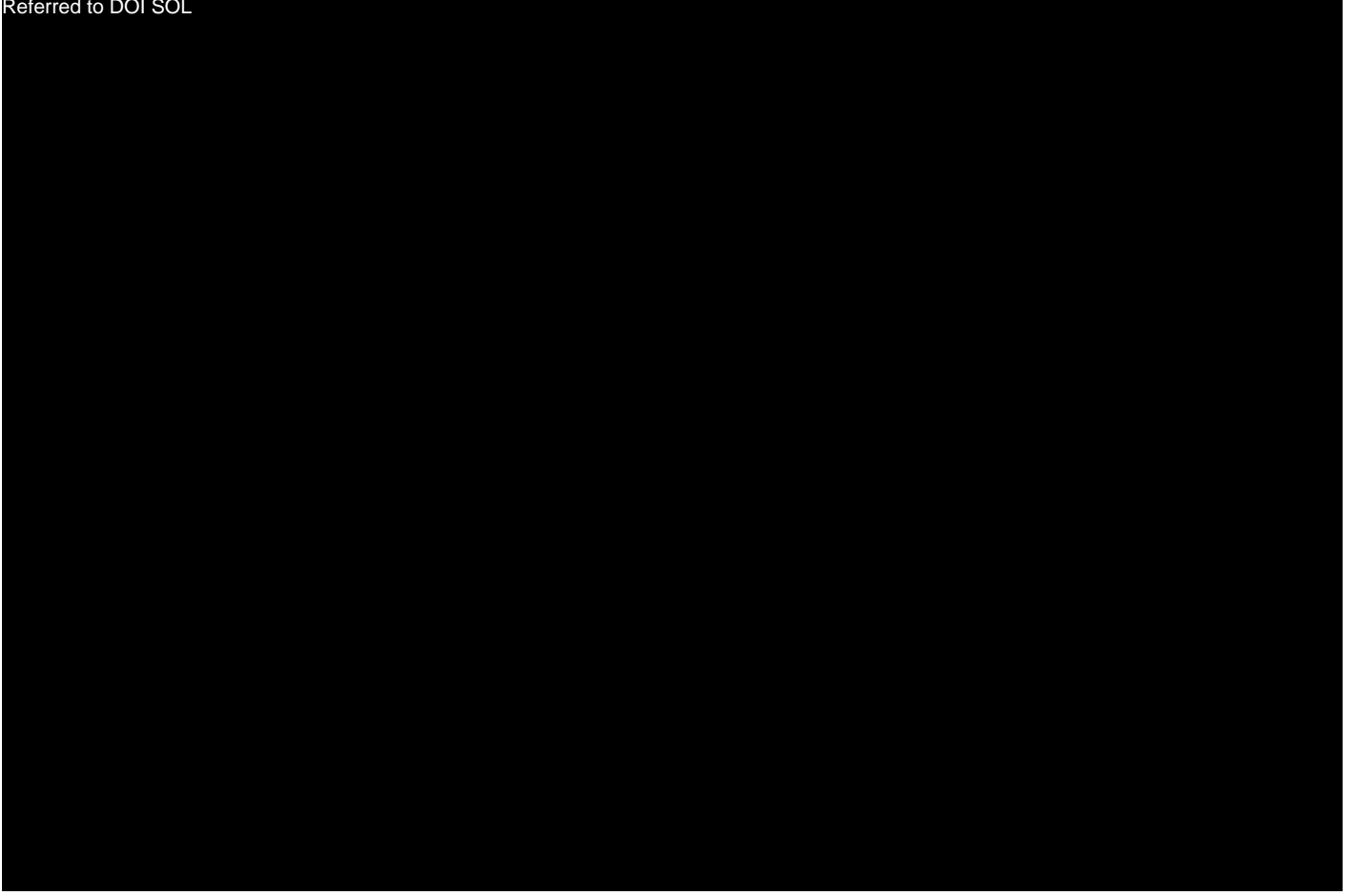
From: [Jim Robertson](#)
To: [Deborah J. Bortot](#); [Heather A. Jones](#)
Subject: FW: Wallace Call on Tuesday 3/26 at 3:00 pm EST
Date: Sunday, March 24, 2019 8:30:50 PM

FYI – I sent out an invite to you both for 3pm Tuesday to block the time slot. Doing this tonight b/c

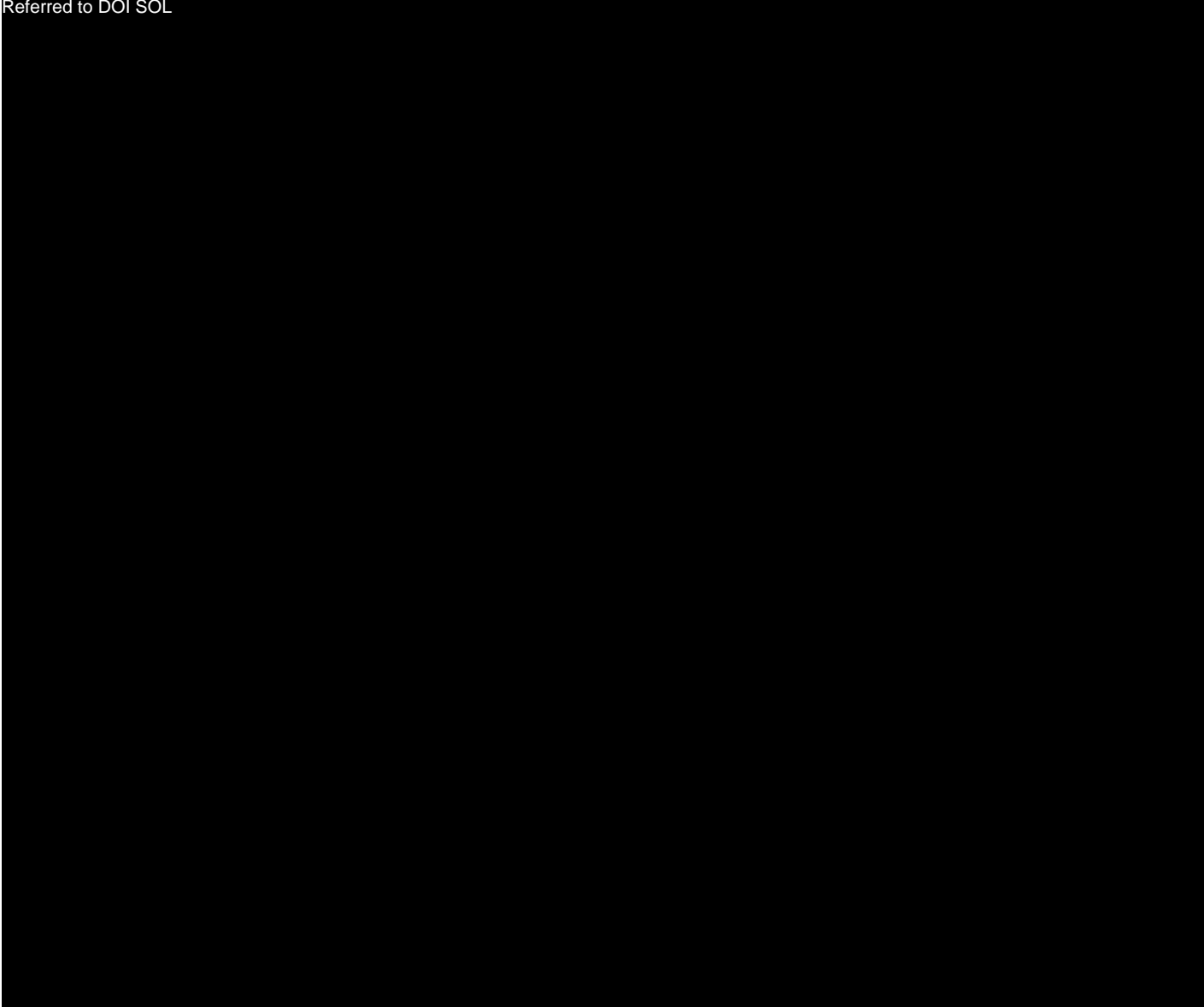
(b)(6) Personal to J Robertson

Jim

Referred to DOI SOL



Referred to DOI SOL



On Fri, Mar 1, 2019 at 4:21 PM Deborah J. Bortot <djbortot@oge.gov> wrote:

From: Deborah J. Bortot
Sent: Thursday, February 28, 2019 5:13 PM
To: 'Gast, Scott F. EOP/WHO'
Cc: David J. Apol; Heather A. Jones; Keith Labedz; Teresa L. Williamson; Jack MacDonald; (b)(6) Garcia email [REDACTED]; (b)(6) Currie email [REDACTED]; 'Gottry, Heather'
Subject: PRECLEASED: Susan Combs - [Message contains CUI]

CONTROLLED

Scott,

Susan Combs is precleared. Jack, please send the ethics agreement to the White House.

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

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From: [Deborah J. Bortot](#)
To: (b)(6) de la Vega email
Subject: FW: PRECLEARED: Susan Combs - [Message contains CUI]
Date: Friday, March 1, 2019 4:20:36 PM

From: Deborah J. Bortot
Sent: Thursday, February 28, 2019 5:13 PM
To: 'Gast, Scott F. EOP/WHO'
Cc: David J. Apol; Heather A. Jones; Keith Labedz; Teresa L. Williamson; Jack MacDonald;
(b)(6) Garcia email; (b)(6) Currie email; 'Gottry, Heather'
Subject: PRECLEARED: Susan Combs - [Message contains CUI]

CONTROLLED

Scott,

Susan Combs is precleared. Jack, please send the ethics agreement to the White House.

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

From: [Heather A. Jones](#)
To: [Scott Gast](#) (b) (6)
Cc: [Rachel K. McRae](#); "[Gottry, Heather](#)"; [David J. Apol](#); [Deborah J. Bortot](#); [Heather A. Jones](#); [Keith Labedz](#); [Teresa L. Williamson](#)
Subject: Precleared: David Bernhardt - (Contains CUI)
Date: Monday, February 25, 2019 4:31:53 PM

CONTROLLED

Scott-

David Bernhardt has been precleared. Rachel, please send the ethics agreement to the White House.

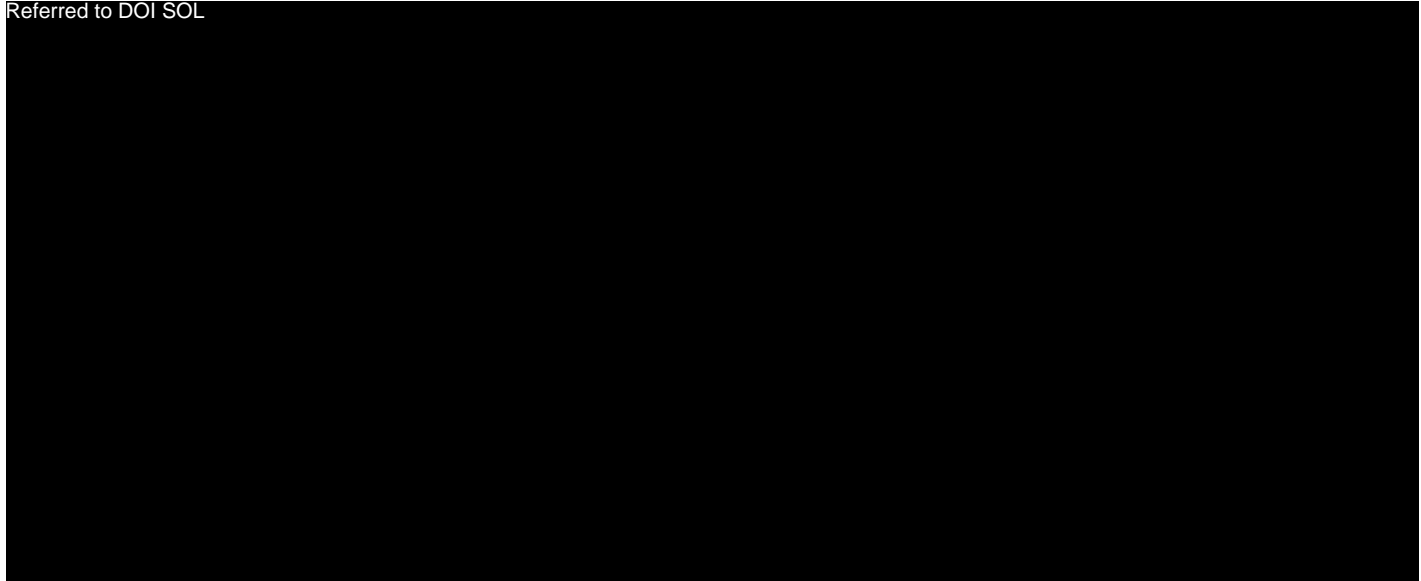
Thanks,
Heather

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

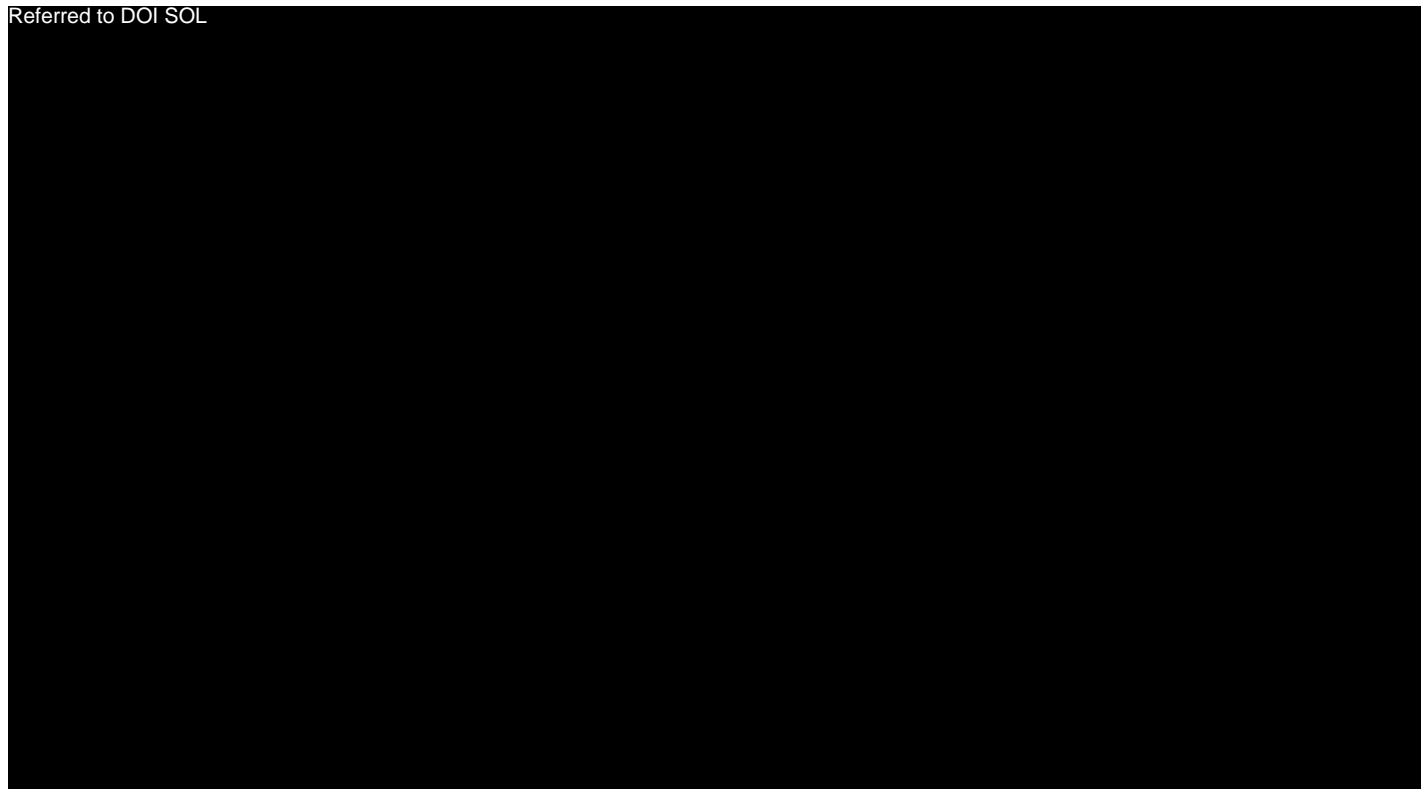
Visit OGE's website: www.oge.gov
Follow OGE on Twitter: [@OfficeGovEthics](#)

From: [Deborah J. Bortot](#)
To: [Stephanie Nonluecha](#)
Subject: FW: Fw: Re: [EXTERNAL] New Nominee Report: Katharine MacGregor [Message and attachment(s) contain CUI] - [Message and any attachment(s) contain CUI]
Date: Monday, January 28, 2019 3:25:02 PM
Attachments: [Draft Ethics Agreement for Katharine MacGregor 12.21.18.docx](#) (b)(5) draft ethics agreement 2pp withheld in full

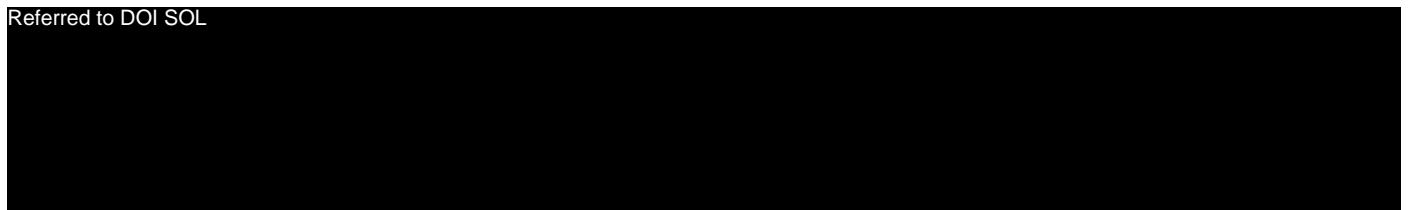
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Referred to DOI SOL



On Thu, Dec 13, 2018 at 11:35 AM Stephanie Nonluecha <snonlue@oge.gov> wrote:

CONTROLLED

Email and any attachment(s) contain CUI.

Hi Monica,

I'm just checking in to see whether you have any updates on Ms. MacGregor's nominee report. Please let me know if I can be of any assistance.

Best,

Stephanie Nonluecha

Program Analyst

Presidential Nominations Branch

U.S. Office of Government Ethics


(202) 482-9243

snonlue@oge.gov

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On Fri, Dec 7, 2018 at 2:14 PM Stephanie Nonluecha <[HYPERLINK "mailto:snonlue@oge.gov" snonlue@oge.gov](mailto:snonlue@oge.gov)> wrote:

CONTROLLED

Email and attachment(s) contain CUI.

Dear Scott:

I am the OGE reviewer for Katharine MacGregor's nominee report for the position of Director of the Bureau of Land Management, Department of the Interior. I'm attaching the first round review questions/comments for her report. Please let me know who will be the agency reviewer for this report.

Regards,
Stephanie Nonluecha

Program Analyst
Presidential Nominations Branch
U.S. Office of Government Ethics
(202) 482-9243
HYPERLINK "<mailto:snonlue@oge.gov>"HYPERLINK
"<mailto:snonlue@oge.gov>"snonlue@oge.gov


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On Tue, Jan 22, 2019 at 12:12 PM Lorna A. Syme <lasyme@oge.gov> wrote:

CONTROLLED

Good Afternoon Heather:

Mr. Greenblatt has been formally nominated. Please forward the final documents at your earliest convenience. The filer will need to resubmit his report in Integrity and the report will need to be certified by the agency. We will also need the signed/dated ethics agreement and agency transmittal letter. You may email me the signed ethics agreement/agency letter or you may upload into Integrity.

Let me know if you have any questions.

Lorna

NOMINATION - OGE Reviewer: Jack (INTEGRITY)

PN201 — 116th Congress (2019-2020) — Mark Lee Greenblatt — Department of the Interior

Mark Lee Greenblatt, of Maryland, to be Inspector General, Department of the Interior, vice Earl E. Devaney, resigned.

Date Received from President: 01/17/2019

Committee: Energy and Natural Resources

Latest Action: 01/17/2019 - Received in the Senate and referred to the Committee on Energy and Natural Resources; when reported by the Committee on Energy and Natural Resources, pursuant to an order of January 7, 2009, to be sequentially referred to the Committee on Homeland Security and Governmental Affairs for 20 calendar days. (All Actions)

Lorna Syme
Presidential Nominations Branch
U.S. Office of Government Ethics
1201 New York Ave., NW, Suite 500
Washington, DC 20005-3917
Telephone: (202) 482-9277
Facsimile: (202) 482-9237

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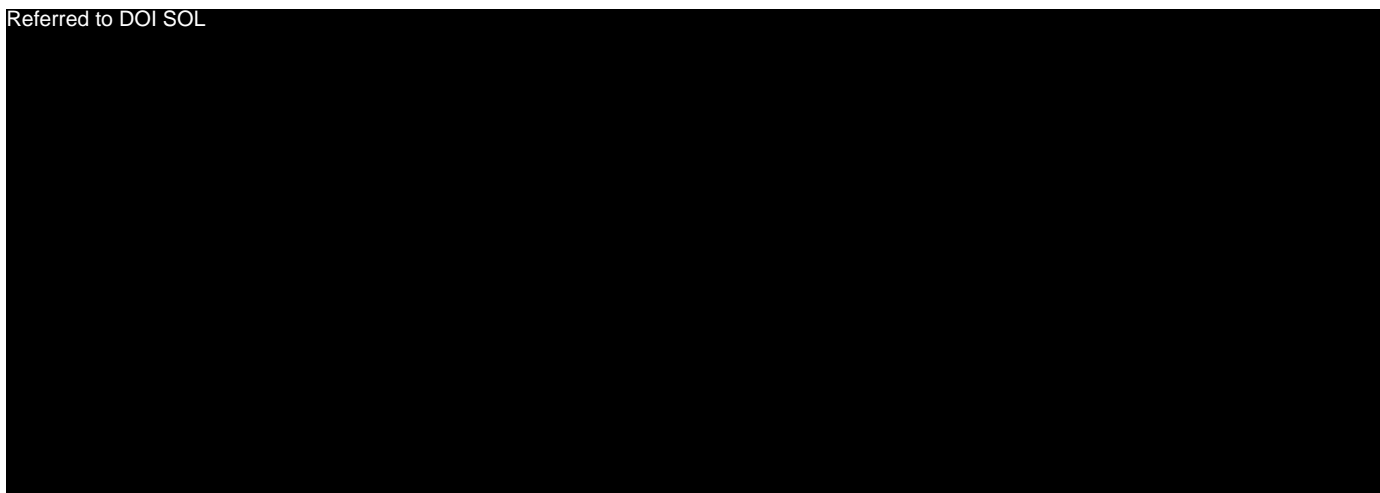
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On Thu, Dec 13, 2018 at 11:35 AM Stephanie Nonluecha <snonlue@oge.gov> wrote:

CONTROLLED

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Hi Monica,

I'm just checking in to see whether you have any updates on Ms. MacGregor's nominee report. Please let me know if I can be of any assistance.

Best,

Stephanie Nonluecha

Program Analyst

Presidential Nominations Branch

U.S. Office of Government Ethics


(202) 482-9243

snonlue@oge.gov

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On Fri, Dec 7, 2018 at 2:14 PM Stephanie Nonluecha <[HYPERLINK "mailto:snonlue@oge.gov"snonlue@oge.gov](mailto:snonlue@oge.gov)> wrote:

CONTROLLED

Email and attachment(s) contain CUI.

Dear Scott:


I am the OGE reviewer for Katharine MacGregor's nominee report for the position of Director of the Bureau of Land Management, Department of the Interior. I'm attaching the first round review questions/comments for her report. Please let me know who will be the agency reviewer for this report.

Regards,
Stephanie Nonluecha
Program Analyst
Presidential Nominations Branch
U.S. Office of Government Ethics
(202) 482-9243
HYPERLINK "<mailto:snonlue@oge.gov>"HYPERLINK
"<mailto:snonlue@oge.gov>"snonlue@oge.gov

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From: [Deborah J. Bortot](#)
To: ["Gottry, Heather"](#)
Subject: Re: [EXTERNAL] Re-nominations - [Message contains CUI] - [Message contains CUI] - [Message contains CUI]
Date: Tuesday, January 22, 2019 1:07:24 PM

CONTROLLED

(b)(6) Scott Gast email address

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

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On Tue, Jan 22, 2019 at 11:12 AM Deborah J. Bortot <[HYPERLINK "mailto:djbortot@oge.gov"](mailto:djbortot@oge.gov)> wrote:

CONTROLLED

Heather,

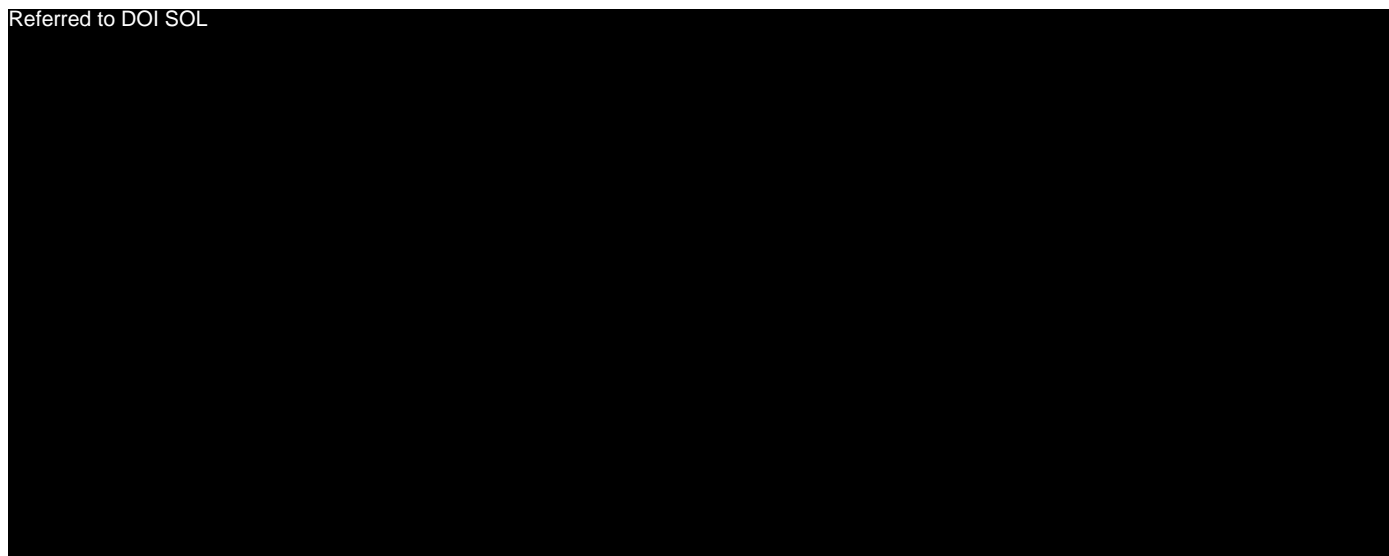
I can talk at 1:00. Call me at 202-482-9227.

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

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On Fri, Jan 18, 2019 at 2:33 PM Deborah J. Bortot <[HYPERLINK "mailto:djbortot@oge.gov"](mailto:djbortot@oge.gov)> wrote:

CONTROLLED

A number of filers for PAS positions have been re-nominated. If the original paperwork was signed by the filer after July 16, 2018, OGE will send the original paperwork to the Senate. This email addresses some of the steps that will need to be taken with respect to reports signed prior to July 16, 2018.

1. Filers will need to file new reports if their original paperwork was signed prior to July 16, 2018.
2. For 450 reports and confidential 278 reports, please work with the filer to update their previous report. Please make sure the filer starts with the final version of their previous report.

For 278 reports filed in Integrity, the filer should prepopulate the new report using the final version of the prior nominee report or the most recent annual report.

3. When you receive the new report, your first step is to make sure the report was updated. Here are some of the questions OGE will be asking you:

- Please have the filer confirm the report reflects the new reporting periods:
 - o For reports filed in 2019, the Part 1 and Part 4 reporting period is January 1, 2017 to present.
 - o For reports filed in 2019, the Part 2, Part 5, Part 6, and Part 8 reporting period is January 1, 2018 to present.
- Please confirm the filer has updated the value and income amounts.
- Please confirm the filer has updated their earned income.
- Please confirm the filer has reported any new assets.
- Please confirm any new or additional positions are reported.
- Please confirm any new sources of earned income for the filer and the spouse are reported.
- Please confirm the filer has updated the liabilities.
- Please confirm any new agreements or arrangements have been added.
- Please confirm any agreements or arrangements that have changed have been updated.
- Please confirm any new sources of compensation exceeding \$5,000 have been added.

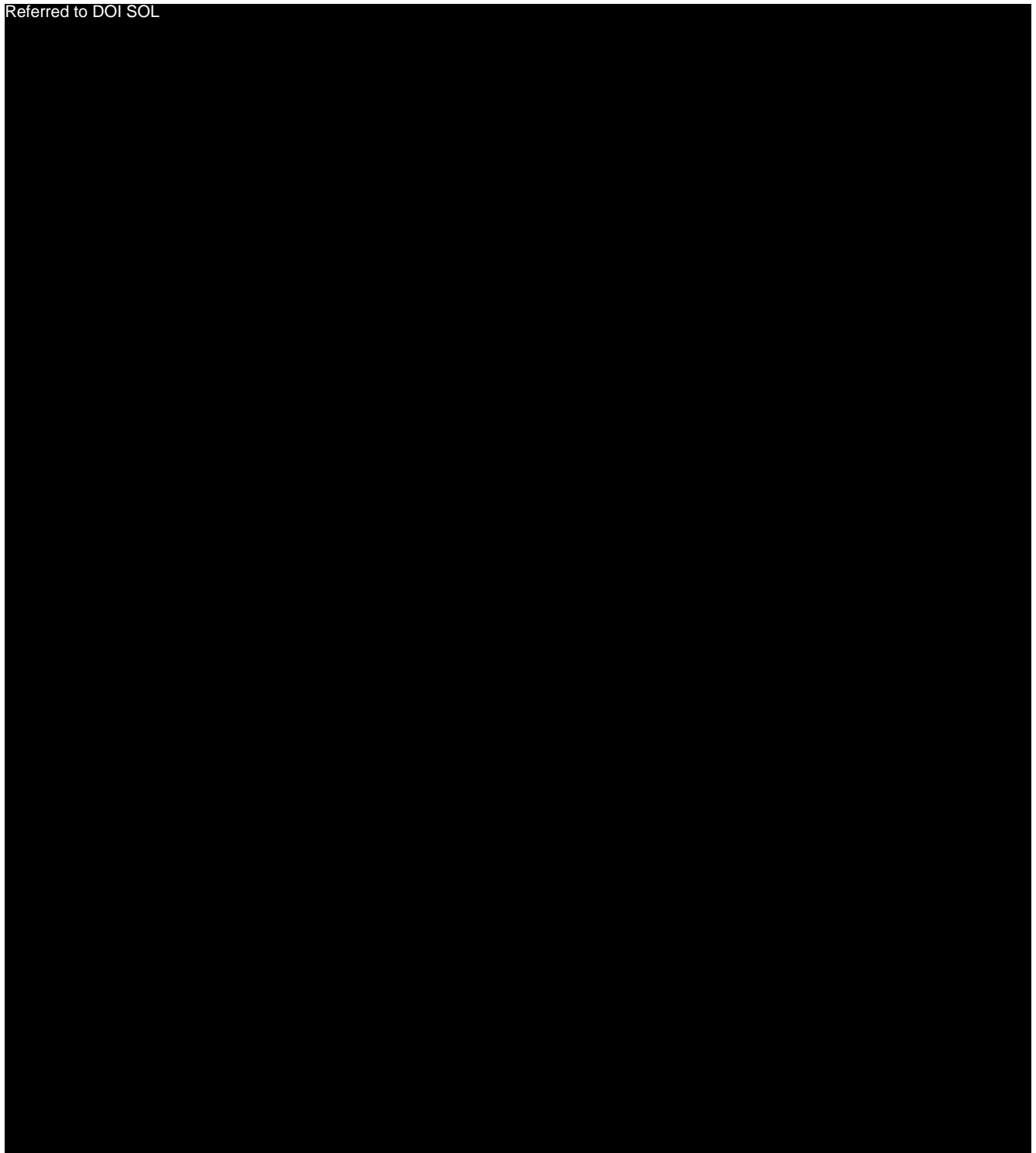
Thanks,
Deb

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

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Referred to DOI SOL



On Tue, Jan 22, 2019 at 11:12 AM Deborah J. Bortot <djbortot@oge.gov> wrote:

CONTROLLED

Heather,

I can talk at 1:00. Call me at 202-482-9227.

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

On Fri, Jan 18, 2019 at 2:33 PM Deborah J. Bortot <[HYPERLINK "mailto:djbortot@oge.gov" djbortot@oge.gov](mailto:djbortot@oge.gov)> wrote:

CONTROLLED

A number of filers for PAS positions have been re-nominated. If the original paperwork was signed by the filer after July 16, 2018, OGE will send the original paperwork to the Senate. This email addresses some of the steps that will need to be taken with respect to reports signed prior to July 16, 2018.

1. Filers will need to file new reports if their original paperwork was signed prior to July 16, 2018.
2. For 450 reports and confidential 278 reports, please work with the filer to update their previous report. Please make sure the filer starts with the final version of their previous report.

For 278 reports filed in Integrity, the filer should prepopulate the new report using the final version of the prior nominee report or the most recent annual report.

3. When you receive the new report, your first step is to make sure the report was updated. Here are some of the questions OGE will be asking you:

- Please have the filer confirm the report reflects the new reporting periods:
 - o For reports filed in 2019, the Part 1 and Part 4 reporting period is January 1, 2017 to present.
 - o For reports filed in 2019, the Part 2, Part 5, Part 6, and Part 8 reporting period is January 1, 2018 to present.
- Please confirm the filer has updated the value and income amounts.
- Please confirm the filer has updated their earned income.
- Please confirm the filer has reported any new assets.
- Please confirm any new or additional positions are reported.
- Please confirm any new sources of earned income for the filer and the spouse are reported.
- Please confirm the filer has updated the liabilities.
- Please confirm any new agreements or arrangements have been added.
- Please confirm any agreements or arrangements that have changed have been updated.
- Please confirm any new sources of compensation exceeding \$5,000 have been added.

Thanks,

Deb

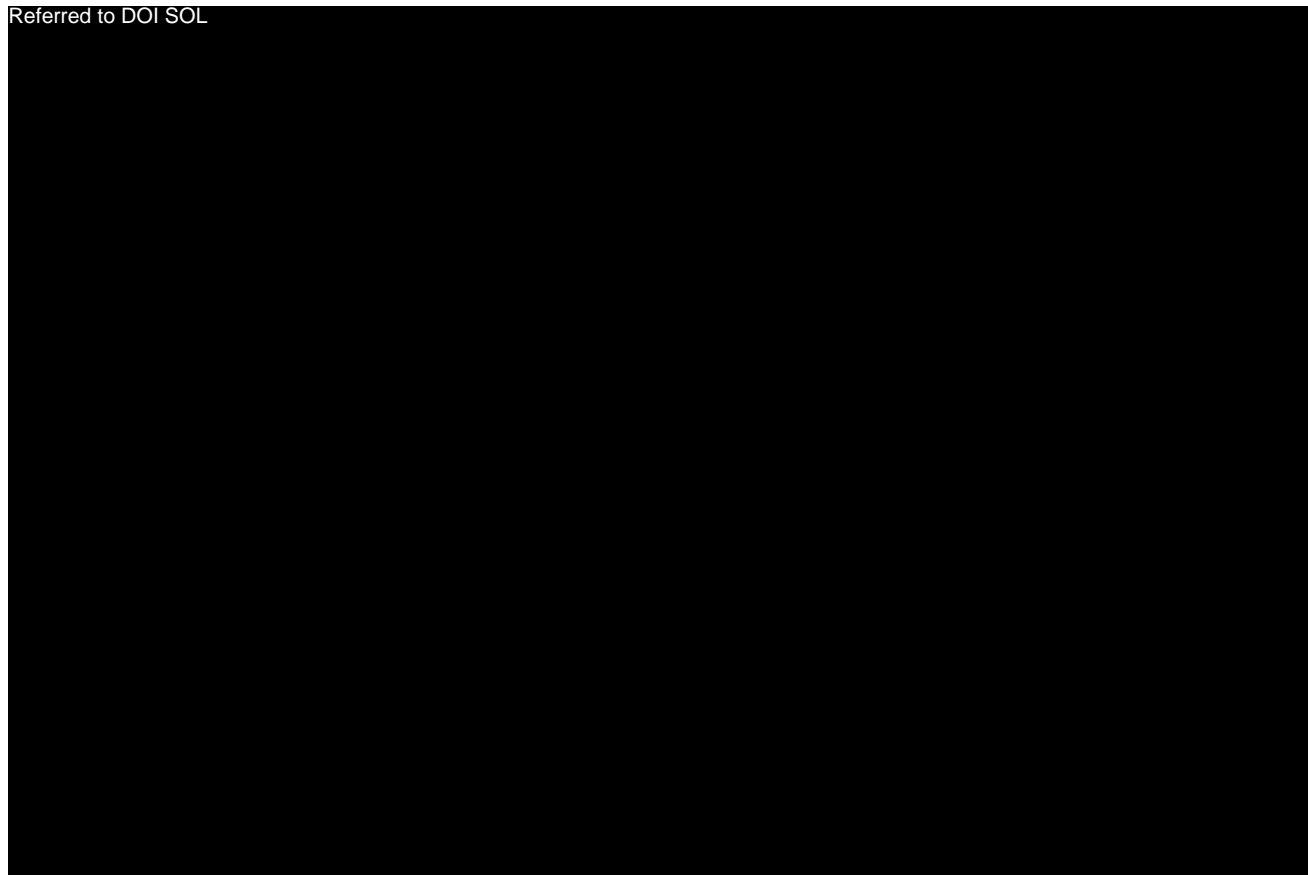
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Referred to DOI SOL



Referred to DOI SOL



From: [Deborah J. Bortot](#)
To: [Deborah J. Bortot](#)
Cc: [David J. Apol](#); [Teresa L. Williamson](#); [Heather A. Jones](#)
Bcc: (b)(6) contact information for ethics officials across the executive branch

Subject: Re-nominations - [Message contains CUI]
Date: Friday, January 18, 2019 2:32:02 PM

CONTROLLED

A number of filers for PAS positions have been re-nominated. If the original paperwork was signed by the filer after July 16, 2018, OGE will send the original paperwork to the Senate. This email addresses some of the steps that will need to be taken with respect to reports signed prior to July 16, 2018.

1. Filers will need to file new reports if their original paperwork was signed prior to July 16, 2018.
2. For 450 reports and confidential 278 reports, please work with the filer to update their previous report. Please make sure the filer starts with the final version of their previous report.

For 278 reports filed in *Integrity*, the filer should prepopulate the new report using the final version of the prior nominee report or the most recent annual report.

3. When you receive the new report, your first step is to make sure the report was updated. Here are some of the questions OGE will be asking you:
 - Please have the filer confirm the report reflects the new reporting periods:
 - For reports filed in 2019, the Part 1 and Part 4 reporting period is January 1, 2017 to present.
 - For reports filed in 2019, the Part 2, Part 5, Part 6, and Part 8 reporting period is January 1, 2018 to present.

- Please confirm the filer has updated the value and income amounts.
- Please confirm the filer has updated their earned income.
- Please confirm the filer has reported any new assets.
- Please confirm any new or additional positions are reported.
- Please confirm any new sources of earned income for the filer and the spouse are reported.
- Please confirm the filer has updated the liabilities.
- Please confirm any new agreements or arrangements have been added.
- Please confirm any agreements or agreements that have changed have been updated.
- Please confirm any new sources of compensation exceeding \$5,000 have been added.

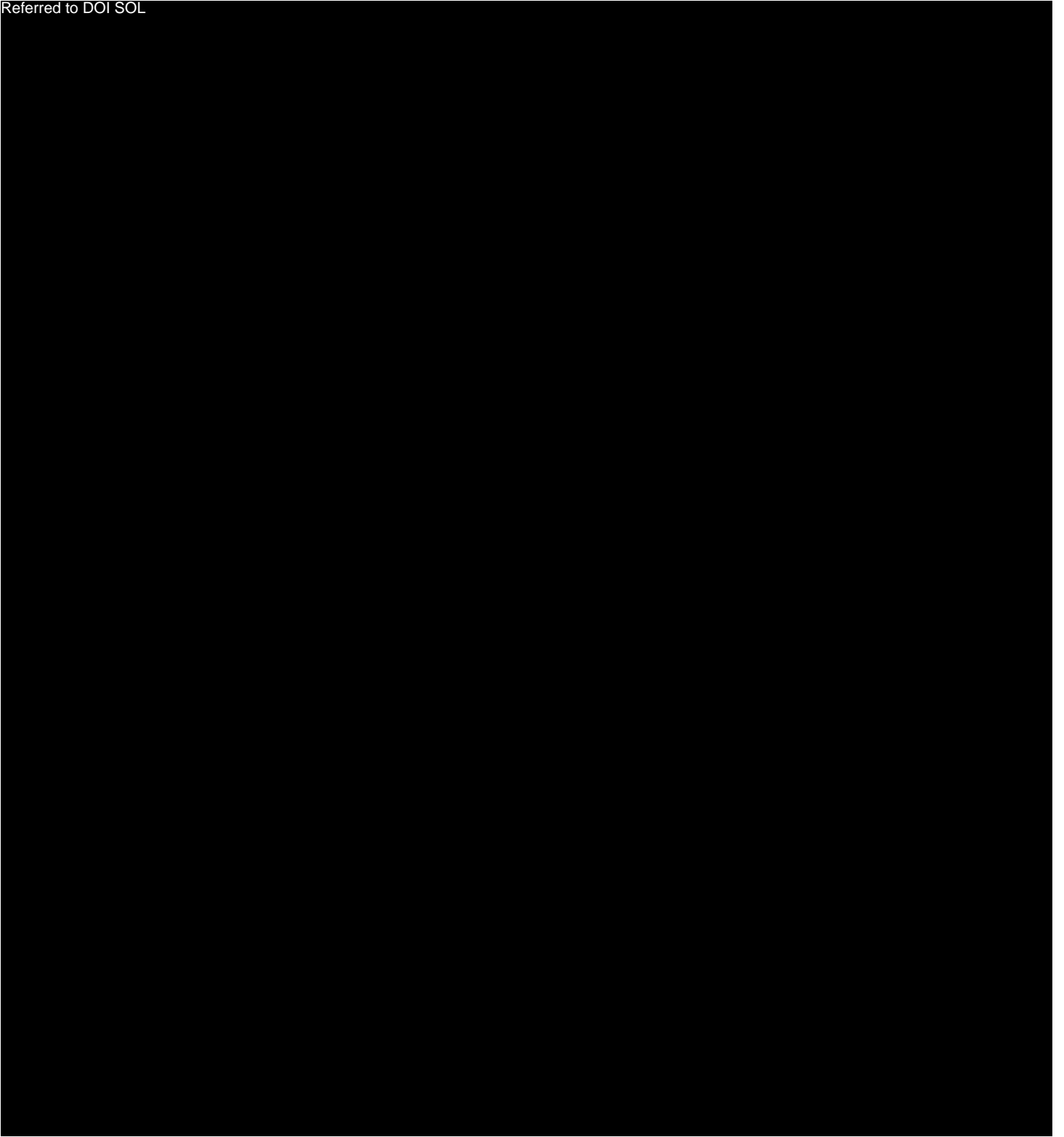
Thanks,

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

From: [Deborah J. Bortot](#)
To: [Monica M. G. Ashar](#)
Subject: FW: Contact information
Date: Thursday, January 3, 2019 9:56:21 AM

Referred to DOI SOL



From: [Deborah J. Bortot](#)
To: ["Gottry, Heather"](#)
Subject: Contact information - [Message contains CUI]
Date: Thursday, December 20, 2018 6:22:25 PM

CONTROLLED

Thanks and hope you have a great holiday.

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

Referred to DOI SOL



Referred to DOI SOL



From: [Heather A. Jones](#)
To: [Scott Gast](#) (b) (6)
Cc: [Jack MacDonald](#); ["Gottry, Heather"](#); [David J. Apol](#); [Deborah J. Bortot](#); [Heather A. Jones](#); [Keith Labedz](#); [Teresa L. Williamson](#)
Subject: Precleared: Mark Greenblatt- (Contains CUI)
Date: Wednesday, November 7, 2018 4:38:55 PM

CONTROLLED

Scott-

Mark Greenblatt has been precleared. Jack, please send the ethics agreement to the White House.

Thanks,
Heather

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

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Follow OGE on Twitter: [@OfficeGovEthics](https://twitter.com/OfficeGovEthics)

Referred to DOI SOL

On Wed, Aug 7, 2019 at 5:54 PM Kimberley H Kaplan <khkaplan@oge.gov> wrote:

Hi Alice,

Yes, we did have these on hand in the past and would give them out at OGE training (it's possible, also, that we may have given them out in greater quantities – but, if so, that pre-dates me). We don't do that anymore, but DOI would certainly be welcome to print its own version. We do have a different version of the 14 General Principles, albeit less compact, available as a printer-ready file: [https://www.oge.gov/web/OGE/nsl/Education%20Resources%20for%20Federal%20Employees/590C8EAD828EC8D48525810F0052D626/\\$FILE/14%20General%20Principles%20508%20Compliant.pdf?open](https://www.oge.gov/web/OGE/nsl/Education%20Resources%20for%20Federal%20Employees/590C8EAD828EC8D48525810F0052D626/$FILE/14%20General%20Principles%20508%20Compliant.pdf?open). Also, I attached a poster version from a few years ago (the OGE website address is incorrect and it uses OGE's seal rather than our current logo) just in case it is helpful as a formatting idea if you're designing your own.

Best,

Kim

Kim H Kaplan

Senior Government Ethics Specialist

U.S. Office of Government Ethics

(202) 482-9269 phone

(202) 482-9238 fax

khkaplan@oge.gov

Visit OGE's website: www.oge.gov

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From: [Kimberley H. Kaplan](#)
To: ["Gottry, Heather"](#)
Subject: OGE Listserv
Date: Tuesday, June 4, 2019 1:50:24 PM

Hi Heather,

I spoke with OGE's Listserv administrator, and here are two ways for your ethics officials to register:

- (1) If there will be many ethics officials registering at once, OGE would prefer a chart (such as an Excel spreadsheet or table in Word) with:

Name (First Name Last Name)	E-mail address
Jane Moral	moralj@testagency.gov

We have to manually register each employee for the Listserv. The above format tracks the system fields so that our staff will be able to quickly copy and paste in the information for each employee. If your office can't efficiently produce a chart with that name format, we can work with what you can provide – but, the above format is preferred. You would then send the completed chart to (b)(5) deliberative (internal email address), and we will get the employees registered.

- (2) Alternatively, if you have only a few employees who need to register, the individual employees may e-mail (b)(5) deliberative (internal email address) with their name and government e-mail address, and we will individually register them. Going forward, you are welcome to include in any SOPs you have for on-boarding new ethics officials that they e-mail (b)(5) deliberative (internal email address) with their name and government e-mail address to sign up.

Best,
Kim

Kim H. Kaplan
Senior Government Ethics Specialist
U.S. Office of Government Ethics
(202) 482-9269 phone
(202) 482-9238 fax
khkaplan@oge.gov

Visit OGE's website: www.oge.gov
Follow OGE on Twitter: @OfficeGovEthics

From: [Kimberley H. Kaplan](#)
To: (b)(6) Bartek-Santiago
Subject: RE: Printed ethics compilations
Date: Tuesday, April 16, 2019 2:53:55 PM

Hi Alice,

Diana Veilleux forwarded your message to me.

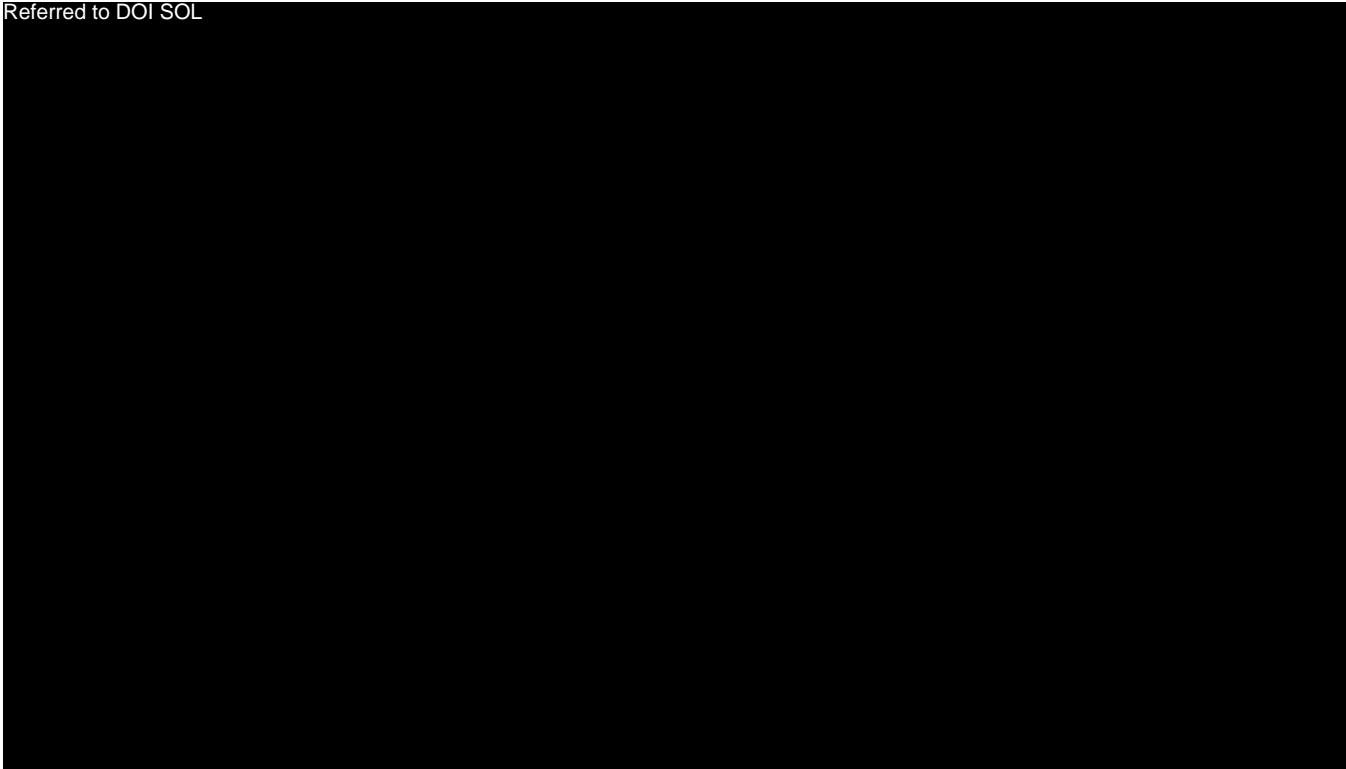
We are currently in the process of getting bound copies of the Compilation of Federal Ethics Laws printed. We anticipate that we will be able to make a limited number of copies available to each agency, although we have not yet determined the exact number. Additionally, we are exploring whether we have the option to open a rider to allow agencies to purchase additional copies. If we are able to open a rider, we will send notice to the ethics community.

Best,
Kim


Kim H. Kaplan
Senior Government Ethics Specialist
U.S. Office of Government Ethics
(202) 482-9269 phone
(202) 482-9238 fax
khkaplan@oge.gov

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Referred to DOI SOL



Referred to DOI SOL



From: [Kimberley H. Kaplan](#)
To: ["Genter, Constance"](#)
Subject: RE: (b)(5) [REDACTED]
Date: Wednesday, October 9, 2019 8:25:47 AM

Hi Constance,

It's this one:

(b)(5) deliberative [REDACTED]

Best,
Kim

Kim H. Kaplan
Senior Government Ethics Specialist
U.S. Office of Government Ethics
(202) 482-9269 phone
(202) 482-9238 fax
khkaplan@oge.gov

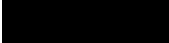
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Referred to DOI SOL



On Tue, Sep 24, 2019 at 11:29 AM Kimberley H. Kaplan <khkaplan@oge.gov> wrote:

Hi Deb,

Here's the video I mentioned (in my phone message) on (b)(5) deliberative


Start at approx. (b)(5) deliberative


Best,

Kim

Kim H. Kaplan

Senior Government Ethics Specialist

U.S. Office of Government Ethics

(202) 482-9269 phone

(202) 482-9238 fax

khkaplan@oge.gov

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From: [Kimberley H. Kaplan](#)
To: ["Genter, Constance"](#)
Subject: RE: (b)(5) deliberative
Date: Friday, September 20, 2019 9:45:50 AM

Hi Constance,

That's correct (and a nice succinct summary of it, too!).

One item I will add, that we didn't discuss, are (b)(5) deliberative

[REDACTED]

[REDACTED] Here's a training archived on OGE's Institute for Ethics in Government site that a colleague and I did last December on the (b)(5) deliberative

[REDACTED]

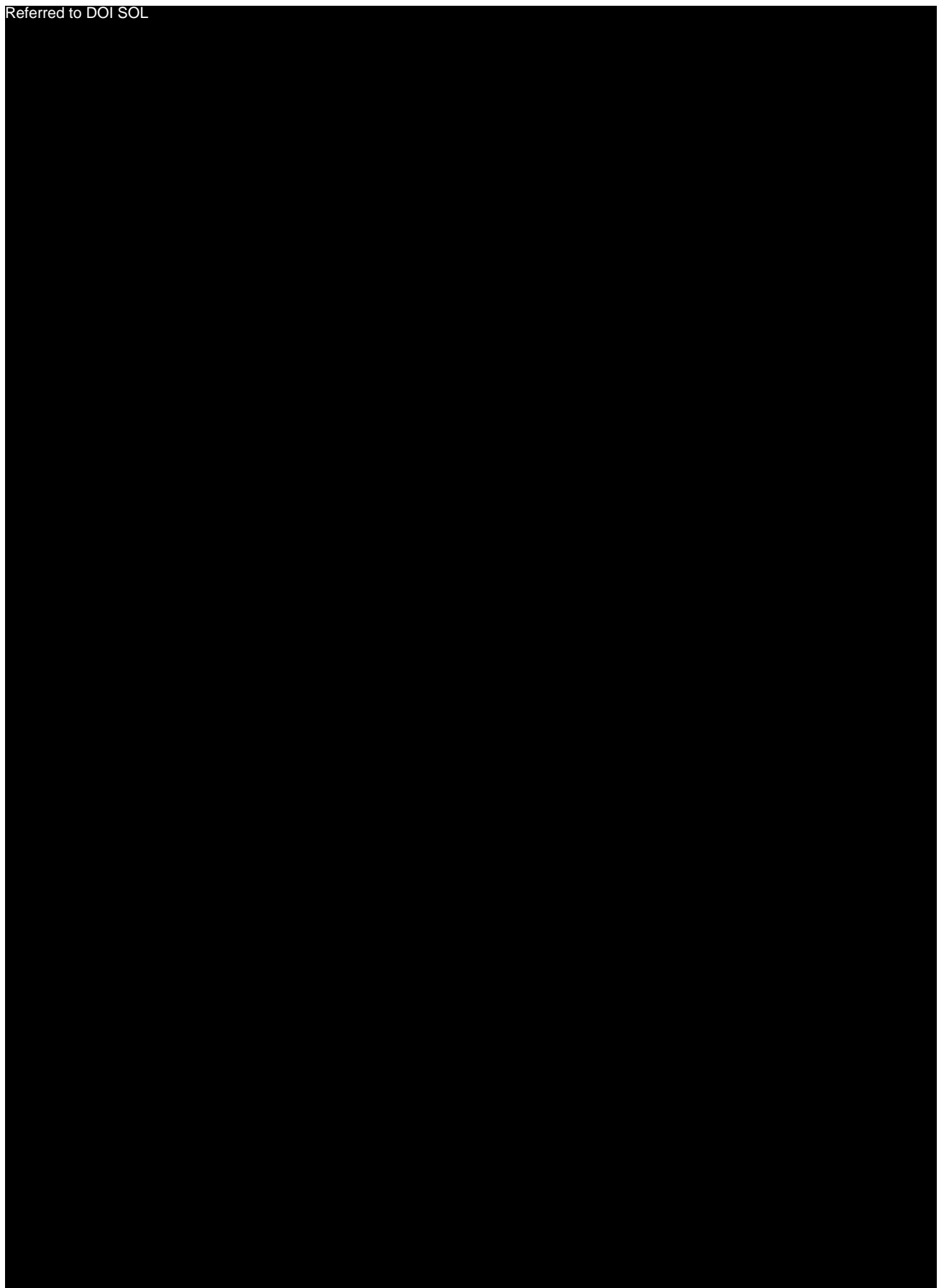
Best,
Kim

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(202) 482-9238 fax
khkaplan@oge.gov

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Referred to DOI SOL

[REDACTED]



On Thu, Sep 12, 2019 at 9:48 AM Kimberley H. Kaplan <khkaplan@oge.gov> wrote:

Hi Kimberly,

I tried to give you a call but the number I called, (b) (6), went to the voice mail for Tia Barnard. What is your current phone number?

I'm following up on a financial disclosure reporting question you had back in May regarding (b)(5) deliberative. We discussed then that (b)(5) deliberative. You were going to ask the filers for more information, but you also asked if OGE had any recommendations on the reporting format.

I've had a chance since then to raise your question within OGE. We think there are likely a (b)(5) deliberative

Also, my colleague who coordinates updates to OGE's Online Public Financial Disclosure Guide thanked you for raising the question and has added it to his list of items for consideration in future rounds of updates. Ultimately, we may or we may not update the guide to include more guidance (b)(5) del berative

– but we appreciate the suggestion.

Best,

Kim

Kim H. Kaplan

Senior Government Ethics Specialist

U.S. Office of Government Ethics

(202) 482-9269 phone

(202) 482-9238 fax

khkaplan@oge.gov

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From: [Wendy G. Pond](#)
To: ["Parsons, Matthew"](#)
Subject: RE: [EXTERNAL] phone call today?
Date: Friday, August 30, 2019 9:00:13 AM

Hi Matt – just gave you a ring but got your voicemail. I'm at 202-482-9285. Give me a ring when you're free.

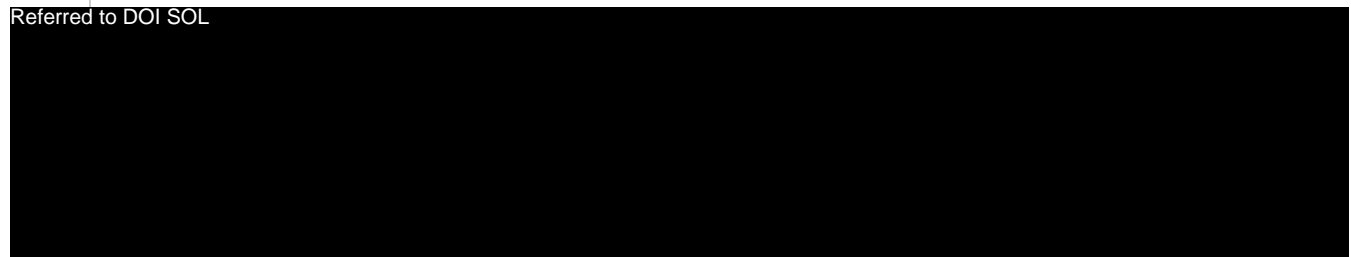
Referred to DOI SOL



On Thu, Aug 29, 2019 at 4:23 PM Wendy G. Pond <wgpond@oge.gov> wrote:

Hi Matt – sorry to bait and switch. Could we do 9:30? If not 9am works.

Referred to DOI SOL

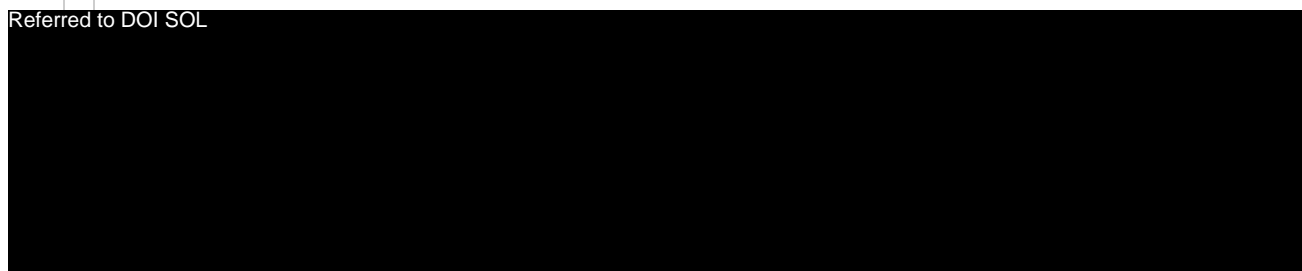


On Thu, Aug 29, 2019 at 2:01 PM Wendy G. Pond <wgpond@oge.gov> wrote:

Tomorrow works. My schedule is wide open until 3:30.

So we can do 3pm, unless you'd like to talk earlier. Just let me know.

Referred to DOI SOL



On Thu, Aug 29, 2019 at 1:34 PM Wendy G. Pond <wgpond@oge.gov> wrote:

Hi Matt:

I have some thoughts regarding your (b)(5)
deliberat question. Are you available to talk today at 4pm?

Wendy

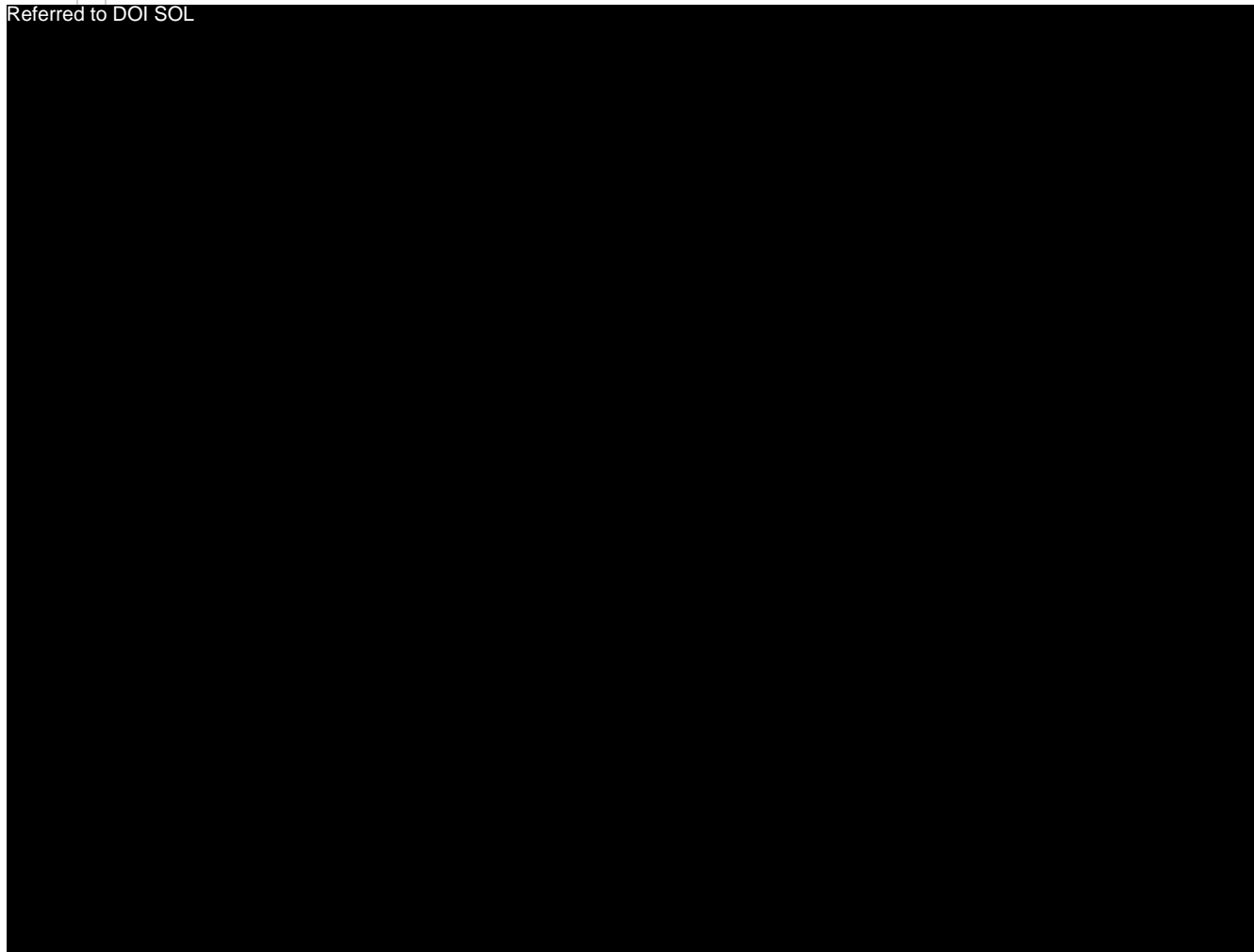
Wendy Pond

Senior Desk Officer
U.S. Office of Government Ethics (OGE)
202-482-9285
wgpond@oge.gov

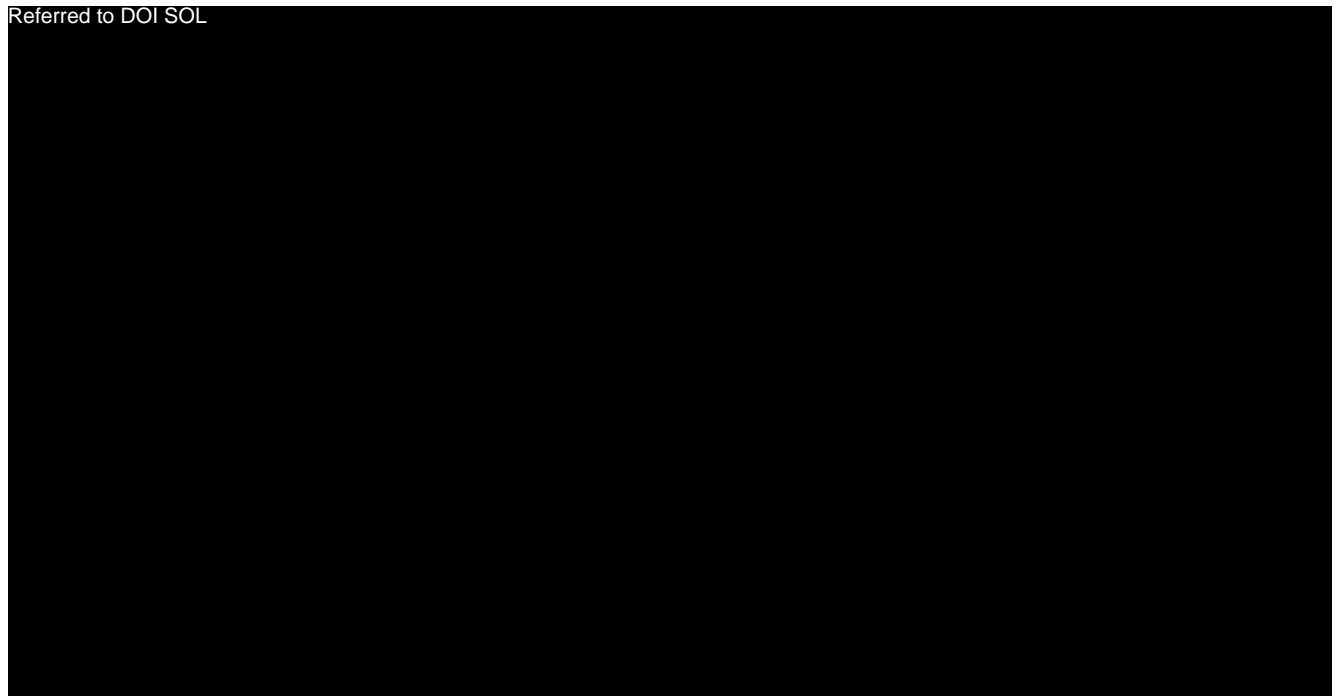
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Referred to DOI SOL



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From: [Wendy G. Pond](#)
To: ["Parsons, Matthew"](#)
Subject: RE: [EXTERNAL] phone call today?
Date: Friday, August 30, 2019 8:21:57 AM

Good morning. Not a problem. I'll call you at 9am.

Referred to DOI SOL



On Thu, Aug 29, 2019 at 4:23 PM Wendy G. Pond <wgpond@oge.gov> wrote:

Hi Matt – sorry to bait and switch. Could we do 9:30? If not 9am works.

Referred to DOI SOL

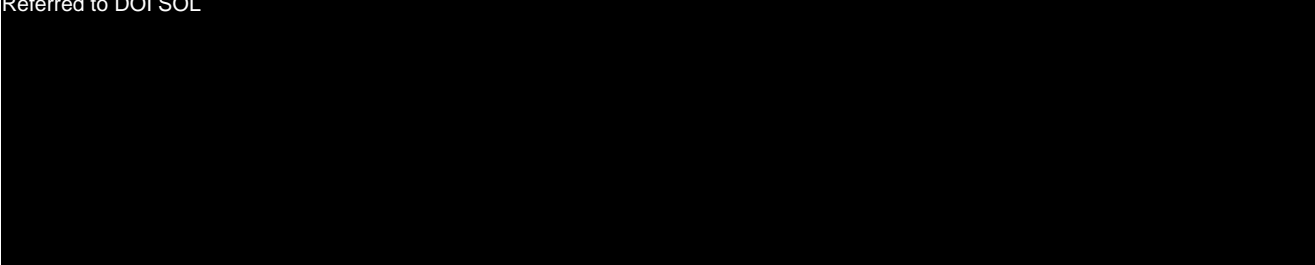


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Tomorrow works. My schedule is wide open until 3:30.

So we can do 3pm, unless you'd like to talk earlier. Just let me know.

Referred to DOI SOL



On Thu, Aug 29, 2019 at 1:34 PM Wendy G. Pond <wgpond@oge.gov> wrote:

Hi Matt:

I have some thoughts regarding your (b)(5) delibera question. Are you available to talk today at 4pm?

Wendy

Wendy Pond
Senior Desk Officer

U.S. Office of Government Ethics (OGE)
202-482-9285
wgpond@oge.gov

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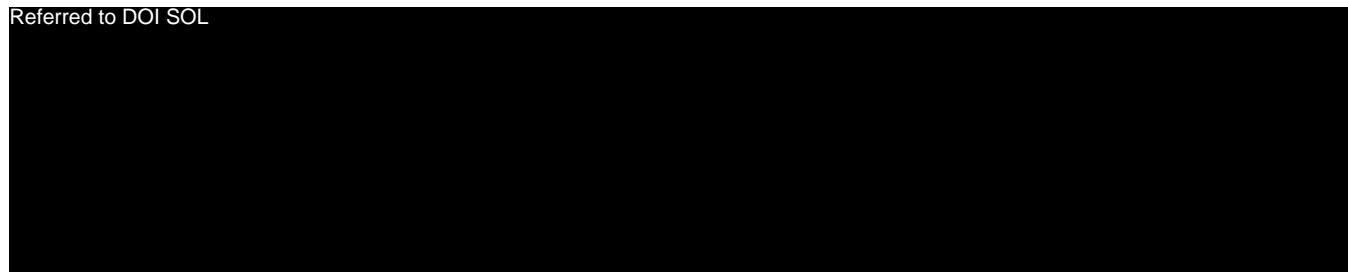
Referred to DOI SOL



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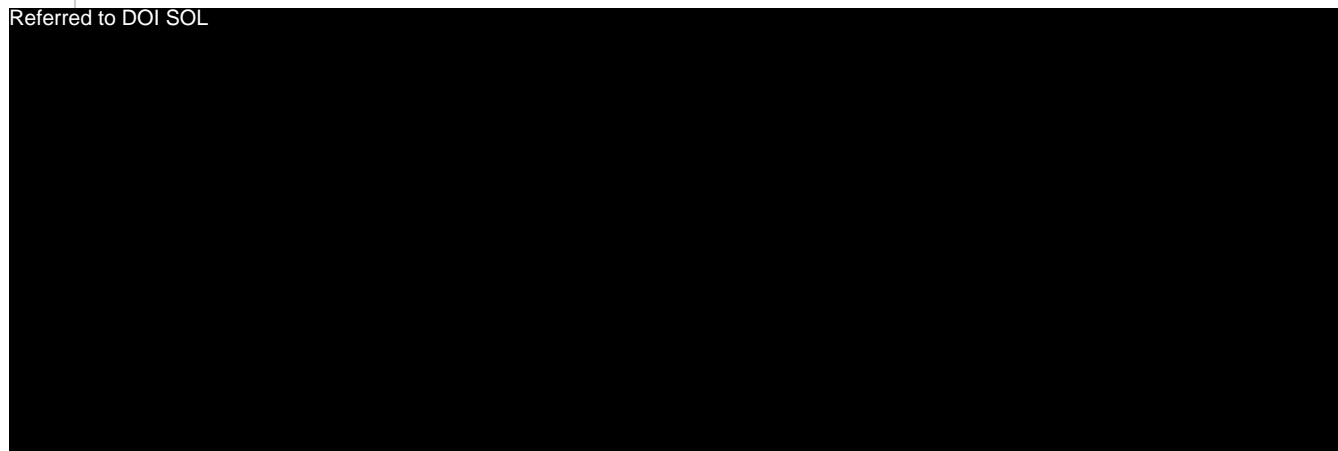
Referred to DOI SOL



On Thu, Aug 29, 2019 at 4:28 PM Wendy G. Pond <wgpond@oge.gov> wrote:

Hi Heather. Would 12 noon tomorrow work for you?

Referred to DOI SOL



On Wed, Aug 28, 2019 at 10:21 AM Wendy G. Pond <wgpond@oge.gov> wrote:

Hi Heather:

I got your voicemail. I'm a little swamped today and tomorrow. Could set up a time on Friday to talk? My schedule is wide open that day, so let me know what works for you.

Wendy

Wendy Pond

Senior Desk Officer

U.S. Office of Government Ethics (OGE)


202-482-9285

wgpond@oge.gov

Follow OGE on Twitter @OfficeGovEthics

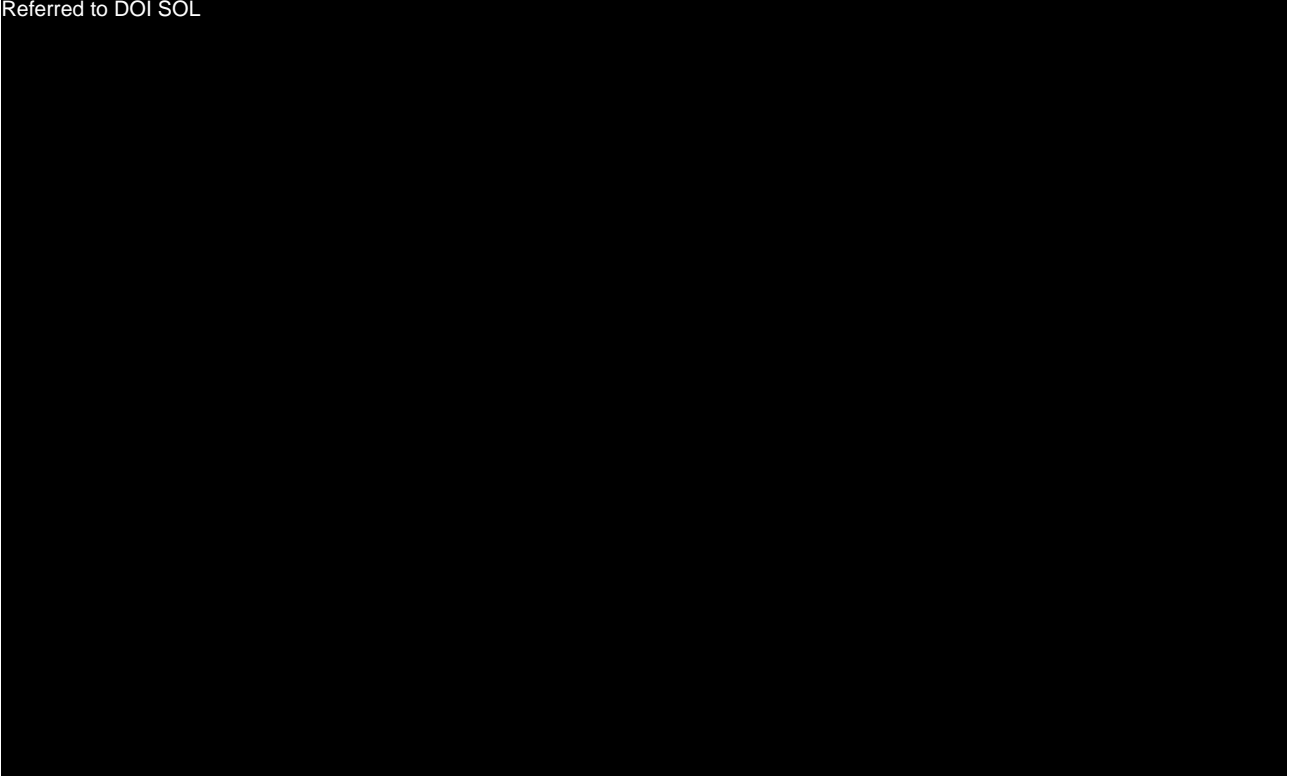
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--

Referred to DOI SOL



From: [Kimberley H. Kaplan](#)
To: ["de la Vega, Scott"](#)
Subject: RE: A Message to Public Financial Disclosure Report Filers
Date: Wednesday, August 7, 2019 2:58:31 PM

Hi Scott,

Thanks very much for sharing this message, and I've shared it with my colleague Kim Sikora-Panza in OGE's Ethics Law and Policy Branch. She puts in a lot of effort each year to keep on top of potential cases as they are reported in the news, following up with DOJ, and condensing all of the collected information into a useable format.

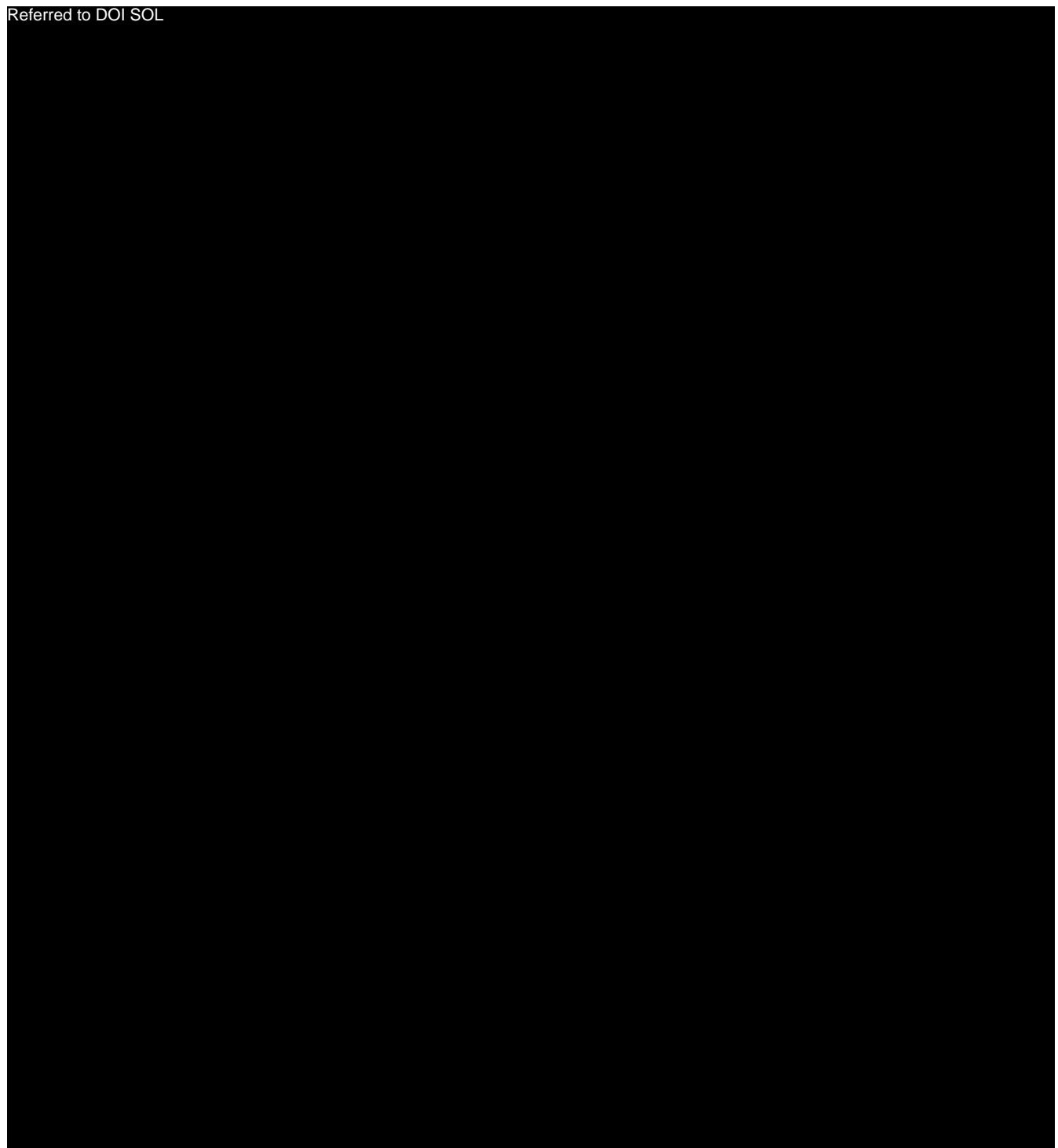
Best,
Kim

Kim H. Kaplan
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U.S. Office of Government Ethics
(202) 482-9269 phone
(202) 482-9238 fax
khkaplan@oge.gov

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Follow OGE on Twitter: [@OfficeGovEthics](https://twitter.com/OfficeGovEthics)

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From: [Kimberley H. Kaplan](#)
To: ["Bartek-Santiago, Alice"](#)
Subject: RE: [EXTERNAL] RE: (b)(5) deliberative ?
Date: Friday, July 26, 2019 4:44:52 PM

You're welcome, and you too!

Referred to DOI SOL



On Fri, Jul 26, 2019 at 4:39 PM Kimberley H. Kaplan <khkaplan@oge.gov> wrote:

Hi Alice,

Just a quick follow up to our discussion earlier this week –

As we discussed, (b)(5) del berative



You asked about Annual Questionnaire reporting. (b)(5) deliberative




Best,
Kim

Kim H. Kaplan
Senior Government Ethics Specialist
U.S. Office of Government Ethics
(202) 482-9269 phone
(202) 482-9238 fax
khkaplan@oge.gov

Visit OGE's website: www.oge.gov

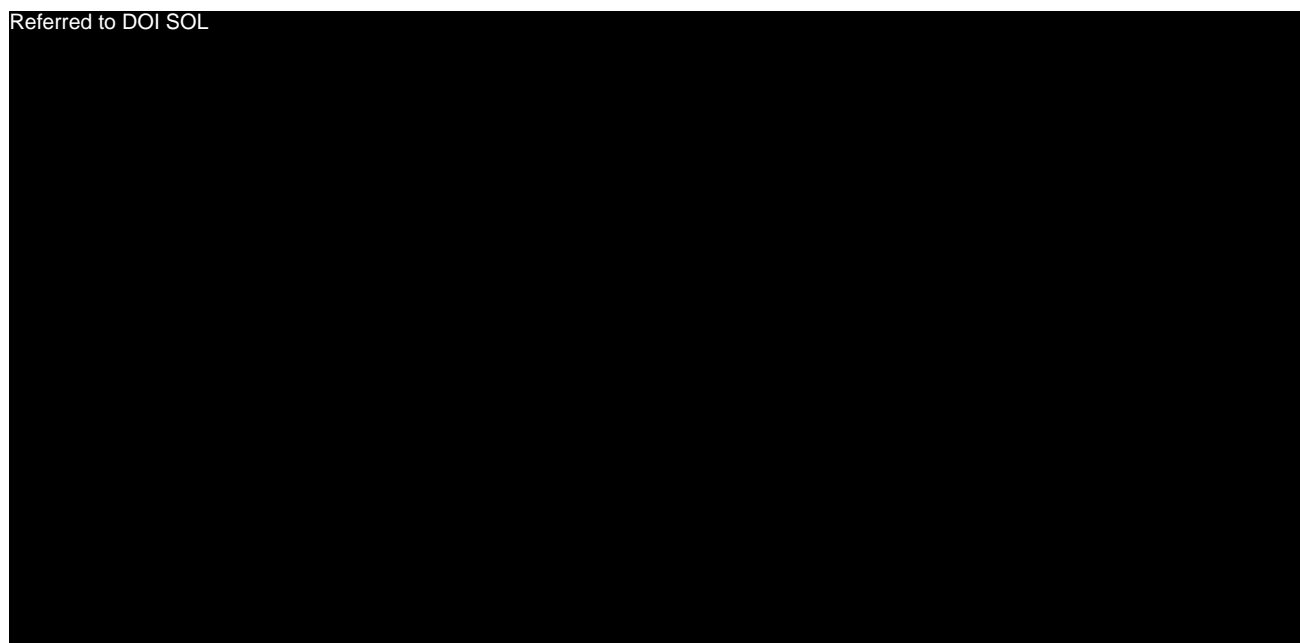
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From: [Kimberley H. Kaplan](#)
To: ["Steuber, Curtis"](#)
Subject: Re: [EXTERNAL] Fwd: 278 Financial Disclosure - (b)(5) del berative - [Message contains CUI] - [Message contains CUI]
Date: Wednesday, July 17, 2019 3:30:25 PM

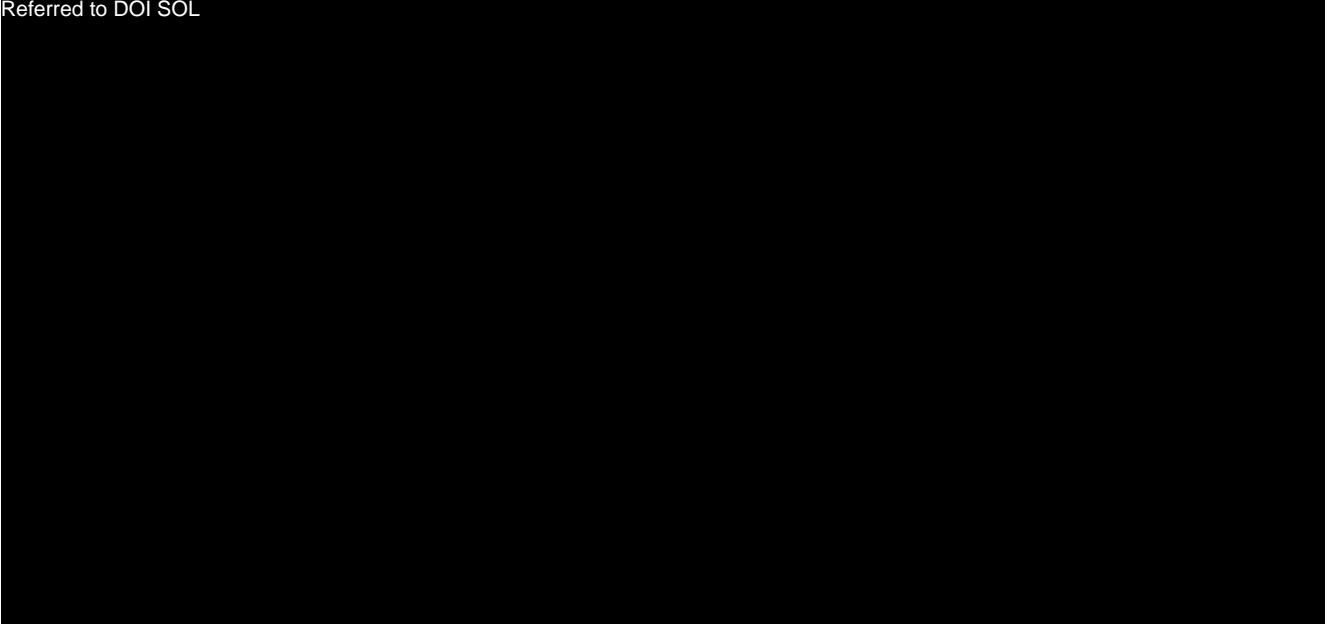
CONTROLLED

You're welcome, Curtis!

Best,

Kim

Referred to DOI SOL






On Wed, Jul 17, 2019 at 1:13 PM Kimberley H. Kaplan <khkaplan@oge.gov>
<<mailto:khkaplan@oge.gov>> > wrote:

CONTROLLED

Hi Curtis,

The filer needs to report (b)(5) deliberative



(b)(5) deliberative



(b)(5) deliberative

A series of seven horizontal black bars of varying lengths, redacting the top portion of the document.

Best,

Kim

Kim H. Kaplan

Senior Government Ethics Specialist

U.S. Office of Government Ethics

(202) 482-9269 phone

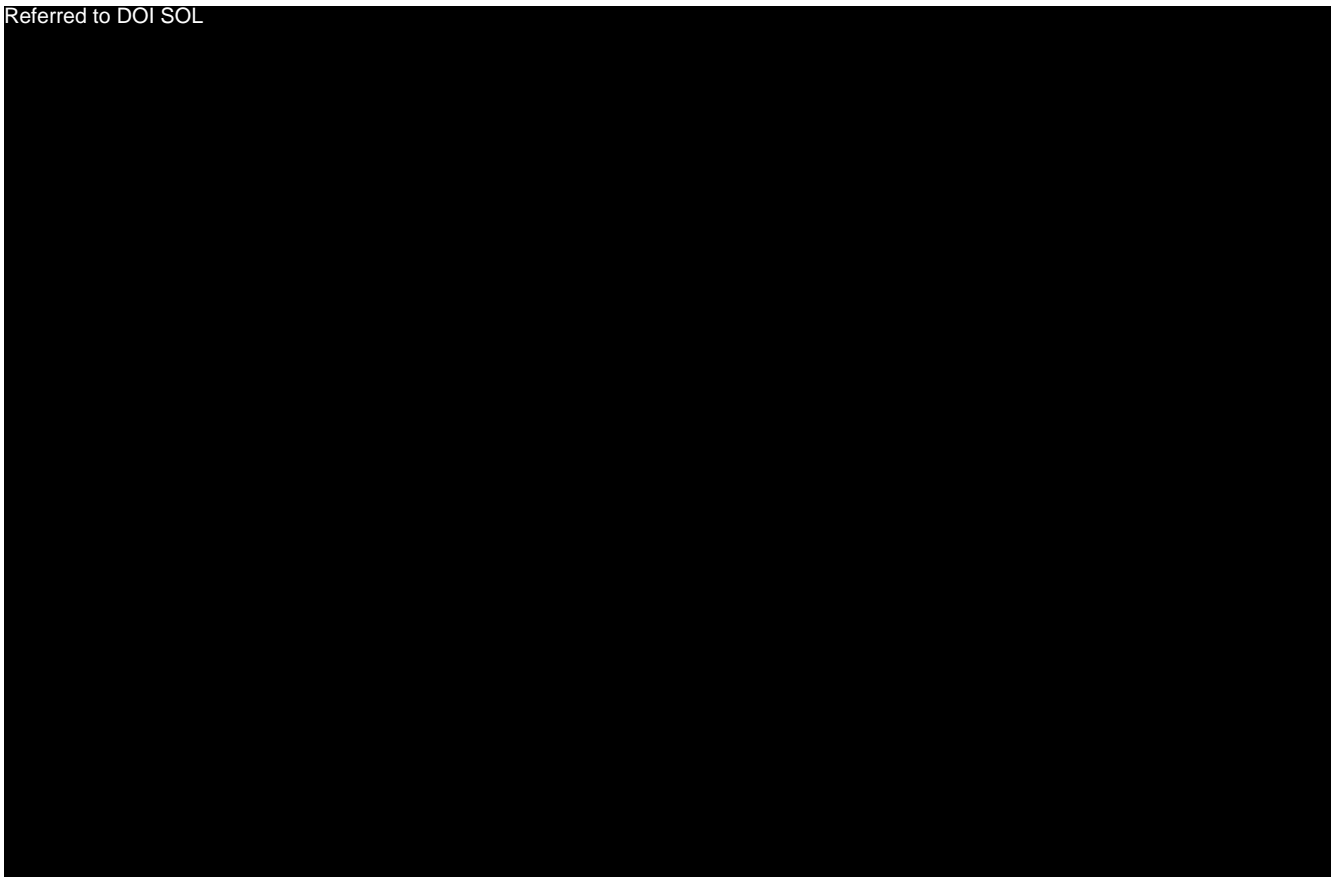
(202) 482-9238 fax

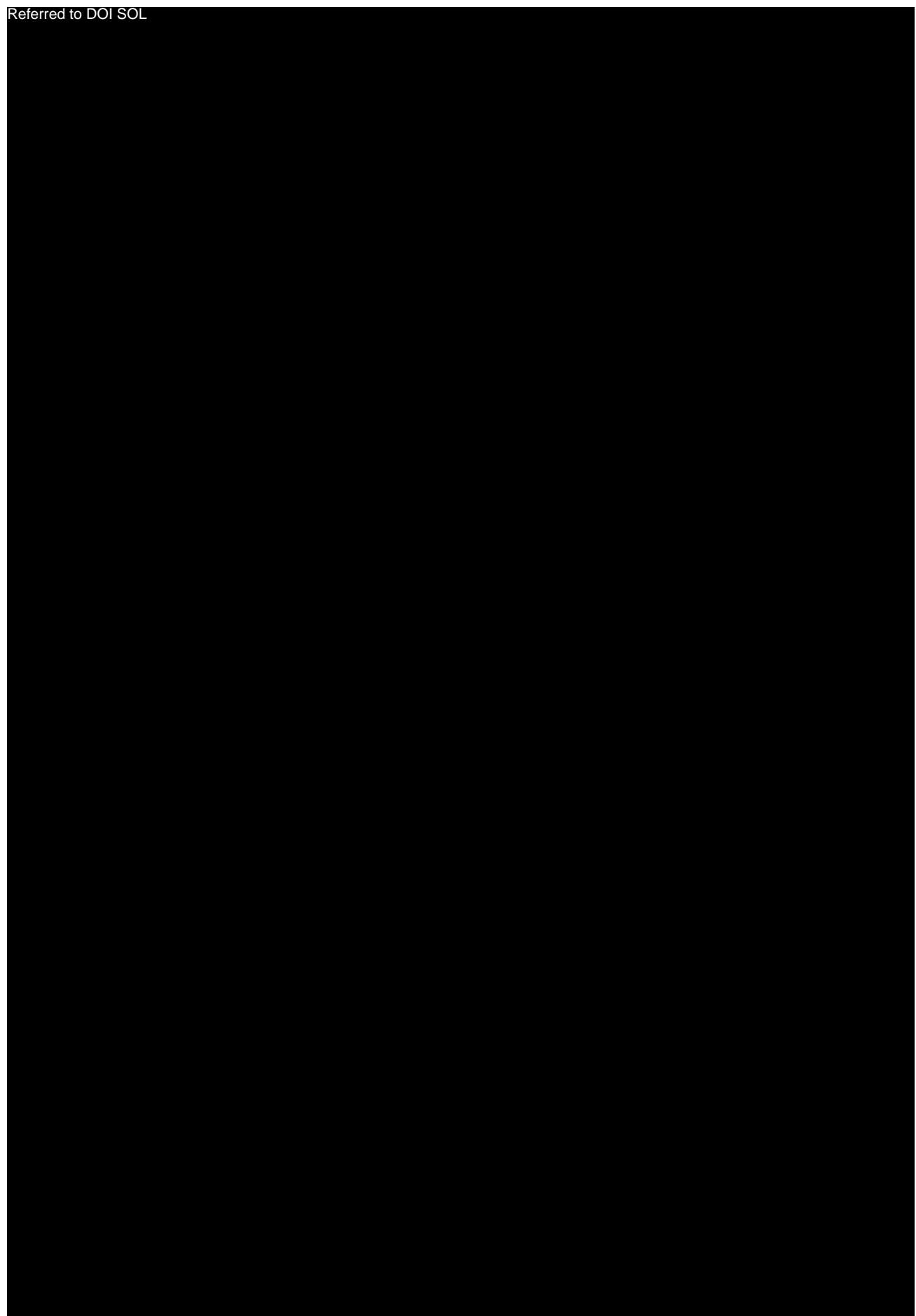
khkaplan@oge.gov <<mailto:khkaplan@oge.gov>>

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A large rectangular black box covering the bottom half of the page, redacting the main body of the document.



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From: [Kimberley H. Kaplan](#)
To: ["Charette, Deborah"](#)
Subject: (b)(5)
Date: Thursday, April 25, 2019 1:56:43 PM

Hi Deb,

Here is the (b)(5) I mentioned (b)(5)
(b)(5) deliberative

Also, here is the advisory opinion on (b)(5) del berative":
(b)(5) deliberative

Best,
Kim

Kim H. Kaplan
Senior Government Ethics Specialist
U.S. Office of Government Ethics
(202) 482-9269 phone
(202) 482-9238 fax
khkaplan@oge.gov

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From: [EA Compliance](#)
To: ["Garcia, Monica"](#)
Cc: [EA Compliance](#)
Subject: RE: Combs, Susan - EA Certification
Date: Thursday, August 15, 2019 2:04:39 PM

Dear Ms. Garcia,

Thank you for the EA Certification for Assistant Secretary Combs.

Sincerely,

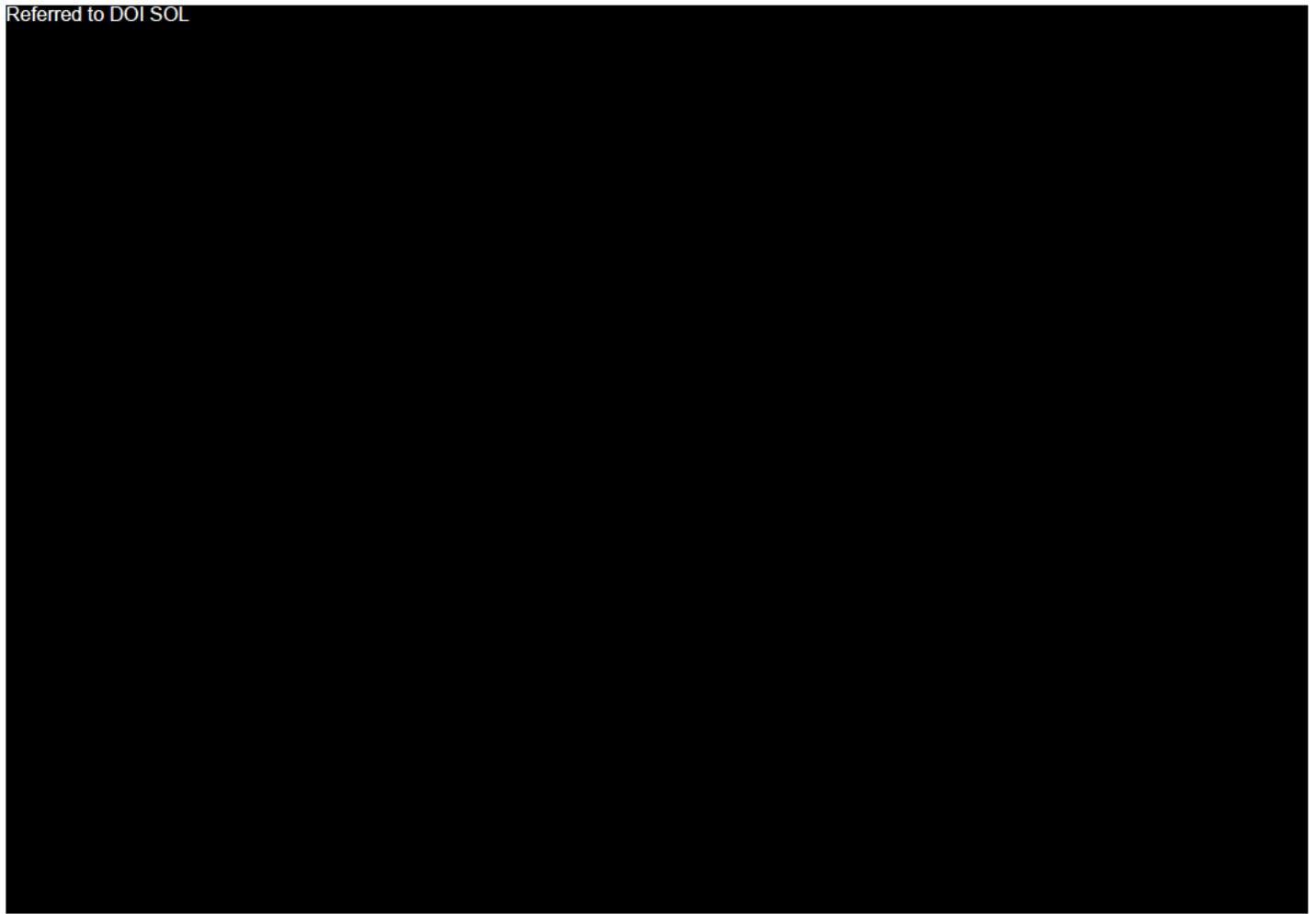
The Compliance Division

United States Office of Government Ethics
1201 New York Avenue NW
Suite 500
Washington, DC 20005

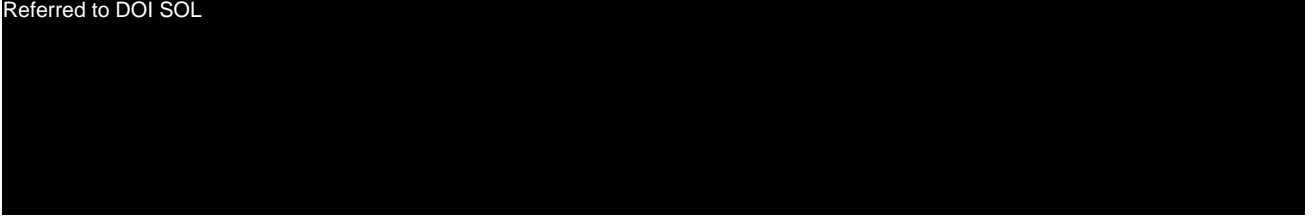
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From: [EA Compliance](#)
To: ["Gottry, Heather"](#)
Cc: [EA Compliance](#)
Subject: RE: [EXTERNAL] 90 Day Ethics Agreement (EA) Reminder EA Certification Attached--BERNHARDT
Date: Friday, July 12, 2019 3:34:45 PM

Dear Ms. Gottry,

Thank you for the EA Certification for Secretary Bernhardt.

Sincerely,

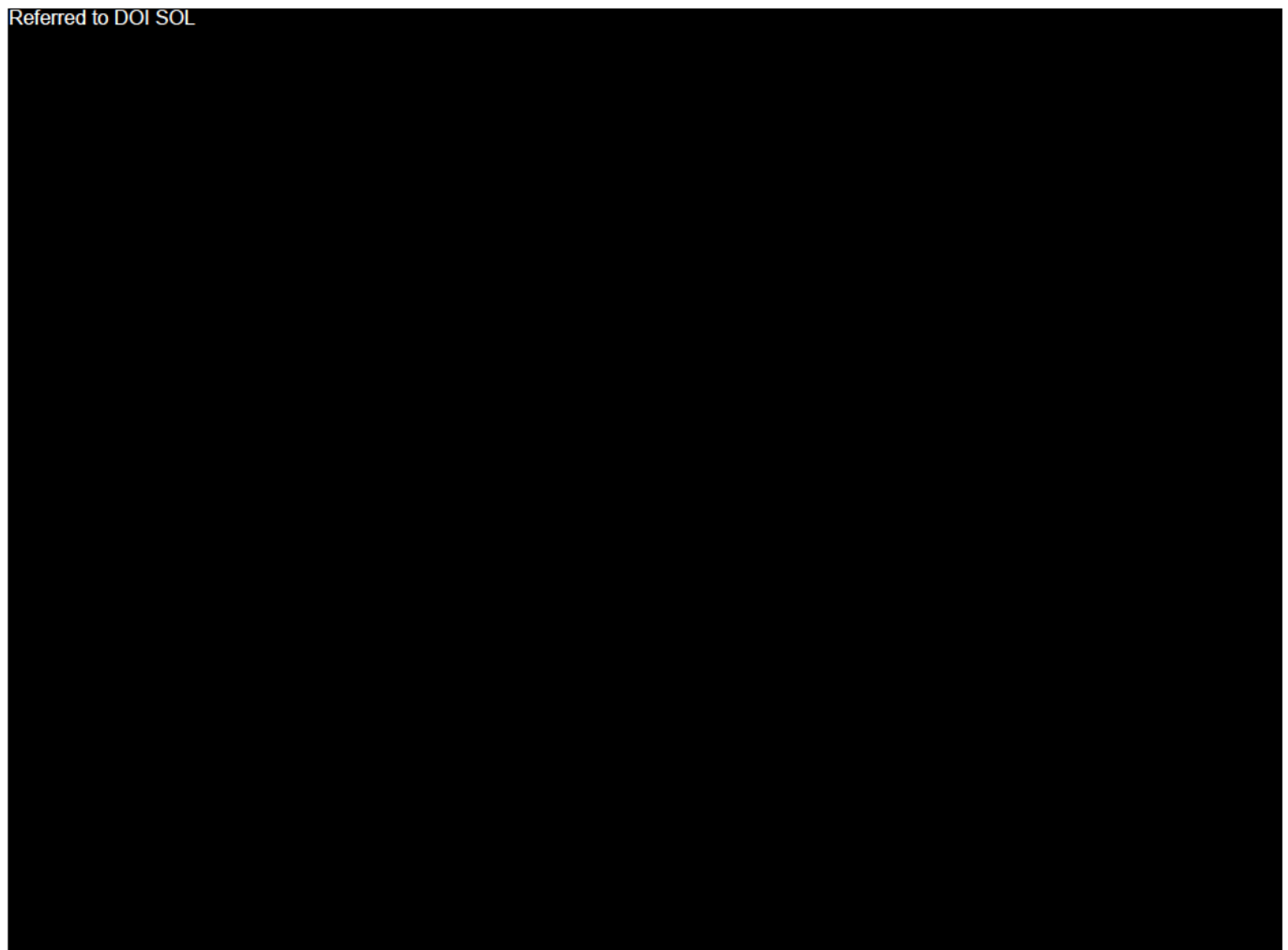
The Compliance Division

United States Office of Government Ethics
1201 New York Avenue NW
Suite 500
Washington, DC 20005

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Referred to DOI SOL



On Mon, Apr 15, 2019 at 2:24 PM EA Compliance <(b)(6) internal OGE email address> wrote:

Dear Ms. Gottry:

Mr. David Bernhardt was confirmed as the Secretary of the Interior at the Department of the Interior on April 11, 2019. This is a reminder that Secretary Bernhardt has 90 days from the date of confirmation (April 11, 2019) to comply with the terms of his ethics agreement, unless an extension is granted by the Office of Government Ethics (OGE). Agency ethics officials do not have the authority to extend the compliance deadline; in cases of unusual hardship, OGE may decide to extend the deadline. See 5 C.F.R. § 2634.802(b). Please advise OGE via (b)(6) internal OGE email address as soon as possible if an extension will be requested.

Secretary Bernhardt is required to complete and sign the attached Certification of Ethics Agreement Compliance (See OGE's Program Advisory [PA 17-03](#)). The Secretary should provide the completed and signed Certification to ethics officials as soon as possible but not later than July 10, 2019. The Certification should then be submitted to OGE no later than July 17, 2019, via email to (b)(6) internal OGE email address.

Please Note:

OGE is aware that some PAS officials have had questions about the appropriate response to Item 6a. "I am recusing from particular matters in which I know I have a personal or imputed financial interest directly and predictably affected by the matter, unless I have received a waiver or qualify for a regulatory exemption." Selecting the "yes" response indicates that the official is complying with and agrees to remain in compliance with what is usually the first requirement of any standard ethics agreement, "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..." Therefore, the anticipated response is "yes." Officials selecting a "no" response would generally be expected to provide a comment in Item 11. "Comments of Appointee."

Thank you for your assistance in this matter, and please contact (b)(6) internal OGE email address if you have any questions. If you are not the point of contact for this matter, please advise (b)(6) internal OGE email address and forward this email to the appropriate ethics official.

Sincerely,

Compliance Division
United States Office of Government Ethics
1201 New York Avenue NW
Suite 500
Washington, DC 20005

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From: [EA Compliance](#)
To: ["McDonnell, Edward"](#)
Cc: [EA Compliance](#)
Subject: RE: [EXTERNAL] 80 Day Ethics Agreement (EA) Reminder--SWEENEY
Date: Thursday, September 27, 2018 1:50:34 PM

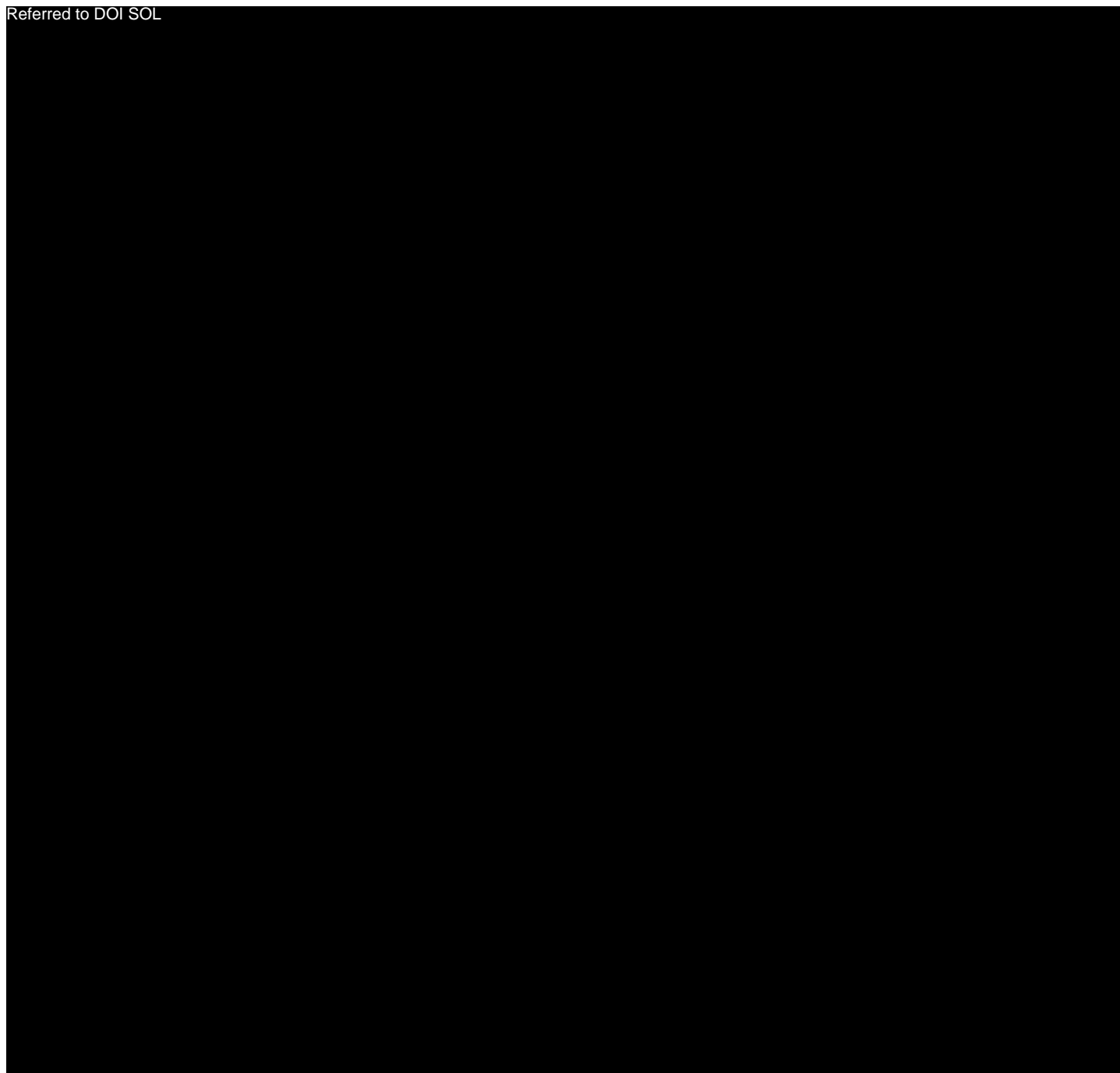
Dear Mr. McDonnell,

Thank you for Assistant Secretary Sweeney's Certificate of Ethics Agreement Compliance.

Sincerely,

The Compliance Division

Referred to DOI SOL



On Mon, Sep 17, 2018 at 2:36 PM EA Compliance <(b)(6) internal OGE email address> wrote:

Dear Mr McDonnell:

Ms. Tara Sweeney was confirmed as the Assistant Secretary of the Interior at the Department of Interior on June 28, 2018. This is a reminder that Assistant Secretary Sweeney has 90 days from the date of confirmation to comply with the terms of her ethics agreement, unless an extension is granted by the Office of Government Ethics (OGE). Agency ethics officials do not have the authority to extend the compliance deadline; in rare circumstances of unusual hardship, OGE may decide to extend the deadline. See 5 C.F.R. § 2634.802(b). Please advise OGE via (b)(6) internal OGE email address as soon as possible if an extension will be requested.

Assistant Secretary Sweeney is required to complete and sign the previously provided Certification of Ethics Agreement Compliance (Certification) to confirm that all ethics agreement requirements have been met. The Certification is due to OGE no later than seven calendar days after the expiration of the 90-day deadline. If the due date falls on a weekend or holiday, the Certification will be due the next business day. The Assistant Secretary should provide the completed and signed Certification to ethics officials as soon as possible but not later than **September 26, 2018**. The Certification should then be submitted to OGE no later than **October 3, 2018**, via email to: (b)(6) internal OGE email address. The Certification will be posted on OGE's website and available to the public. Please consult OGE's Program Advisory [PA-17-03 Certification of Ethics Agreement Compliance by Senate-confirmed Presidential Appointees](#) for additional guidance.

Please send the Certification to OGE at (b)(6) internal OGE email address. Thank you for your assistance in this matter, and please contact (b)(6) internal OGE email address if you have any questions. If you are not the point of contact for this matter, please advise (b)(6) internal OGE email address and forward this email to the appropriate ethics official.


Sincerely,

Compliance Division

United States Office of Government Ethics
1201 New York Avenue NW
Suite 500
Washington, DC 20005

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Referred to DOI SOL



On Tue, Jul 10, 2018 at 4:04 PM, EA Compliance <(b)(6) internal OGE email address> wrote:
Dear Mr. McDonnell:

Ms. Tara Sweeney was confirmed as Assistant Secretary of the Interior on June 28, 2018. This is a reminder that Assistant Secretary Sweeney has 90 days from the date of confirmation (June 28, 2018) to comply with the terms of her ethics agreement, unless an extension is granted by the Office of Government Ethics (OGE). Agency ethics officials do not have the authority to extend the compliance deadline; in cases of unusual hardship, OGE may decide to extend the deadline. See 5 C.F.R. § 2634.802(b). Please advise OGE via (b)(6) internal OGE email address as soon as possible if an extension will be requested.

Assistant Secretary Sweeney is required to complete and sign the attached Certification of Ethics Agreement Compliance (See OGE's Program Advisory [PA 17-03](#)). The Assistant Secretary should provide the completed and signed Certification to ethics officials as soon as possible but not later than **September 26, 2018**. The Certification should then be submitted to OGE no later than **October 3, 2018**, via email to (b)(6) internal OGE email address.

Thank you for your assistance in this matter, and please contact (b)(6) internal OGE email address if you have any questions. If you are not the point of contact for this matter, please advise (b)(6) internal OGE email address and forward this email to the appropriate ethics official.

Sincerely,

Compliance Division
United States Office of Government Ethics
1201 New York Avenue NW
Suite 500
Washington, DC 20005

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From: [David J. Apol](#)
To: (b)(6) Judy Kaleta; Danica Irvine Kobylski; Erica Dornburg; Angela White; Adam Greenstone; Cary Williams; Eugenia Ellison; Bernice Ammon; D Davis; David Hu
Elizabeth Fischmann; Elizabeth Horton; Stuart Bender; Cynthia Shaw
[de la Vega, Scott](#)
Cc: [Heather A. Jones](#)
Subject: FW: Draft Legal Advisory on Annual Reports file by employees changing agencies or branches
Date: Monday, August 13, 2018 1:53:33 PM

OGE is planning to issue a legal advisory on the filing of annual reports by employees who change agencies or branches before they file their annual reports, including the requirements for people who also filed nominee reports for the positions they moved into. If you would like to review and comment on the draft legal advisory, please email Heater Jones at OGE by Wednesday and she will send you a copy. We will set up a conference call on the advisory after we send out the drafts. (FYI Treasury, Agriculture, and the Federal Reserve are mentioned in the examples.)

David J. Apol
General Counsel
U.S. Office of Government Ethics
1201 New York Ave., NW, Suite 500
Washington, DC 20005-3917
(202) 482-9292

From: [EA Compliance](#)
To: "Hintz, Kimberly"
Cc: [EA Compliance](#)
Subject: RE: [EXTERNAL] FW: 90 Day Ethics Agreement (EA) Reminder -- EA Certification Attached REILLY
Date: Friday, July 13, 2018 4:03:07 PM

Dear Ms. Hintz,

Thank you for the EA Certification for Director Reilly.

Sincerely,

The Compliance Division

United States Office of Government Ethics
1201 New York Avenue NW
Suite 500
Washington, DC 20005

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Referred to DOI SOL



On Tue, Apr 10, 2018 at 3:04 PM, EA Compliance <(b)(6) internal OGE email address> wrote:

From: EA Compliance

Sent: Tuesday, April 10, 2018 2:34 PM

To: (b)(6) Hintz

Cc: EA Compliance

Subject: 90 Day Ethics Agreement (EA) Reminder -- EA Certification Attached REILLY

Dear Ms. Hintz:

Mr. James F. Reilly, II was confirmed as the Director of the U.S. Geological Survey at the Department of Interior on April 9, 2018. This is a reminder that Director Reilly has 90 days from the date of confirmation (April 9, 2018) to comply with the terms of his ethics agreement, unless an extension is granted by the Office of Government Ethics (OGE). Agency ethics officials do not have the authority to extend the compliance deadline; in cases of unusual hardship, OGE may decide to extend the deadline. See 5 C.F.R. § 2634.802(b). Please advise OGE via (b)(6) internal OGE email address as soon as possible if an extension will be requested.

Director Reilly is required to complete and sign the attached Certification of Ethics Agreement Compliance (See OGE's Program Advisory [PA 17-03](#)). Director Reilly should provide the completed and signed Certification to ethics officials as soon as possible but not later than **July 9, 2018**. The Certification should then be submitted to OGE no later than **July 16, 2018**, via email to (b)(6) internal OGE email address.

Thank you for your assistance in this matter, and please contact (b)(6) internal OGE email address if you have any questions. If you are not the point of contact for this matter, please advise (b)(6) internal OGE email address and forward this email to the appropriate ethics official.

Sincerely,

Compliance Division
United States Office of Government Ethics
1201 New York Avenue NW
Suite 500
Washington, DC 20005

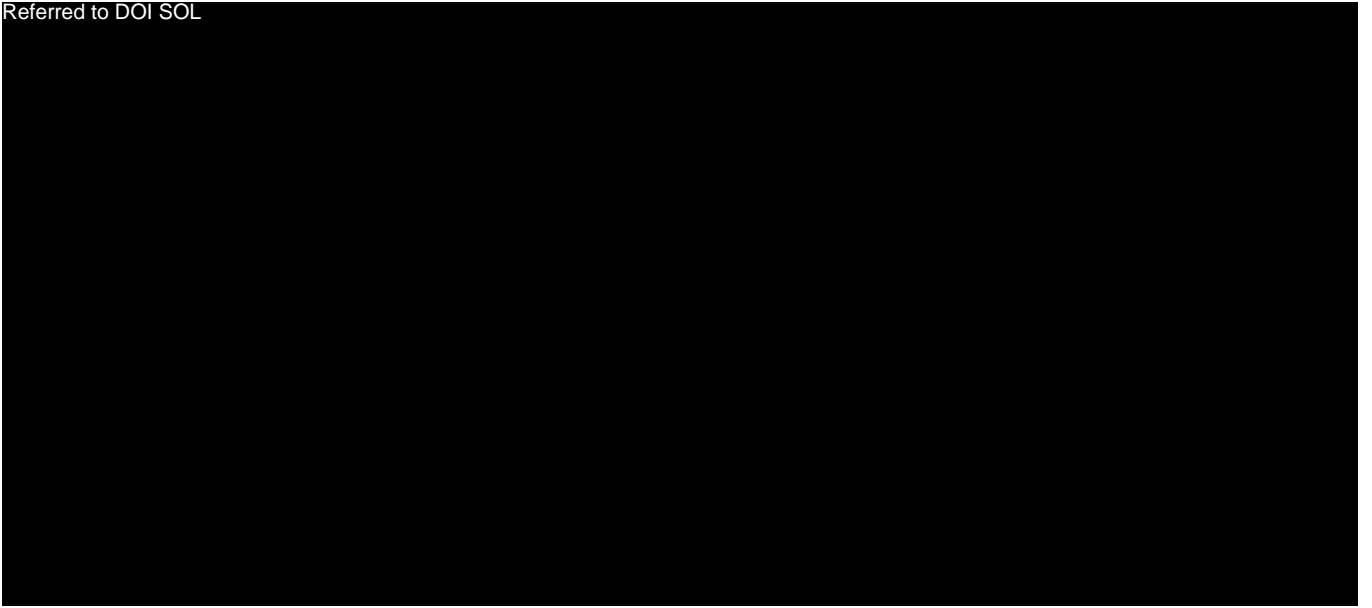
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From: [EA Compliance](#)
To: ["Currie, Scott"](#)
Cc: [EA Compliance](#)
Subject: RE: Joseph Balash -- Signed Certification of Ethics Agreement Compliance
Date: Thursday, March 1, 2018 2:37:30 PM

Dear Mr. Currie,

Thank you for the Ethics Agreement Compliance Certification of Assistant Secretary Balash.

Sincerely,

The Compliance Division

Referred to DOI SOL



From: [EA Compliance](#)
To: ["Currie, Scott"](#)
Cc: [EA Compliance](#)
Subject: RE: 90 Day Ethics Agreement (EA) Reminder - EA Certification Attached - PETTY
Date: Thursday, February 15, 2018 3:36:45 PM

Dear Mr. Currie,

Thank you for the Ethics Agreement Compliance Certification for Assistant Secretary Petty.

Sincerely,

The Compliance Division

Referred to DOI SOL



On Fri, Dec 29, 2017 at 3:53 PM, EA Compliance <(b)(6) internal OGE email address> wrote:
Dear Mr. Currie:

Mr. Timothy R. Petty was confirmed as Assistant Secretary for Water and Science on December 21, 2017. This is a reminder that Assistant Secretary Petty has 90 days from the date of confirmation (December 21, 2017) to comply with the terms of his ethics agreement, unless an extension is granted by the Office of Government Ethics (OGE). Agency ethics officials do not have the authority to extend the compliance deadline; in cases of unusual hardship, OGE may decide to extend the deadline. See 5 C.F.R. § 2634.802(b). Please advise OGE via (b)(6) internal OGE email address as soon as possible if an extension will be requested.

Assistant Secretary Petty is required to complete and sign the attached Certification of Ethics Agreement Compliance (See OGE's Program Advisory [PA 17-03](#)). Assistant Secretary Petty should provide the completed and signed Certification to ethics officials as soon as possible but not later than **March 21, 2018**. The Certification should then be submitted to OGE no later than **March 28, 2018**, via email to (b)(6) internal OGE email address.

Thank you for your assistance in this matter, and please contact (b)(6) internal OGE email address if you have any questions. If you are not the point of contact for this matter, please advise

(b)(6) internal OGE email
address

and forward this email to the appropriate ethics official.

Sincerely,

Compliance Division

United States Office of Government Ethics

1201 New York Avenue NW

Suite 500

Washington, DC 20005

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From: [EA Compliance](#)
To: ["Currie, Scott"](#)
Cc: [EA Compliance](#)
Subject: RE: 90 Day EA Reminder- EA Certification Attached - Burman
Date: Wednesday, February 14, 2018 3:55:15 PM

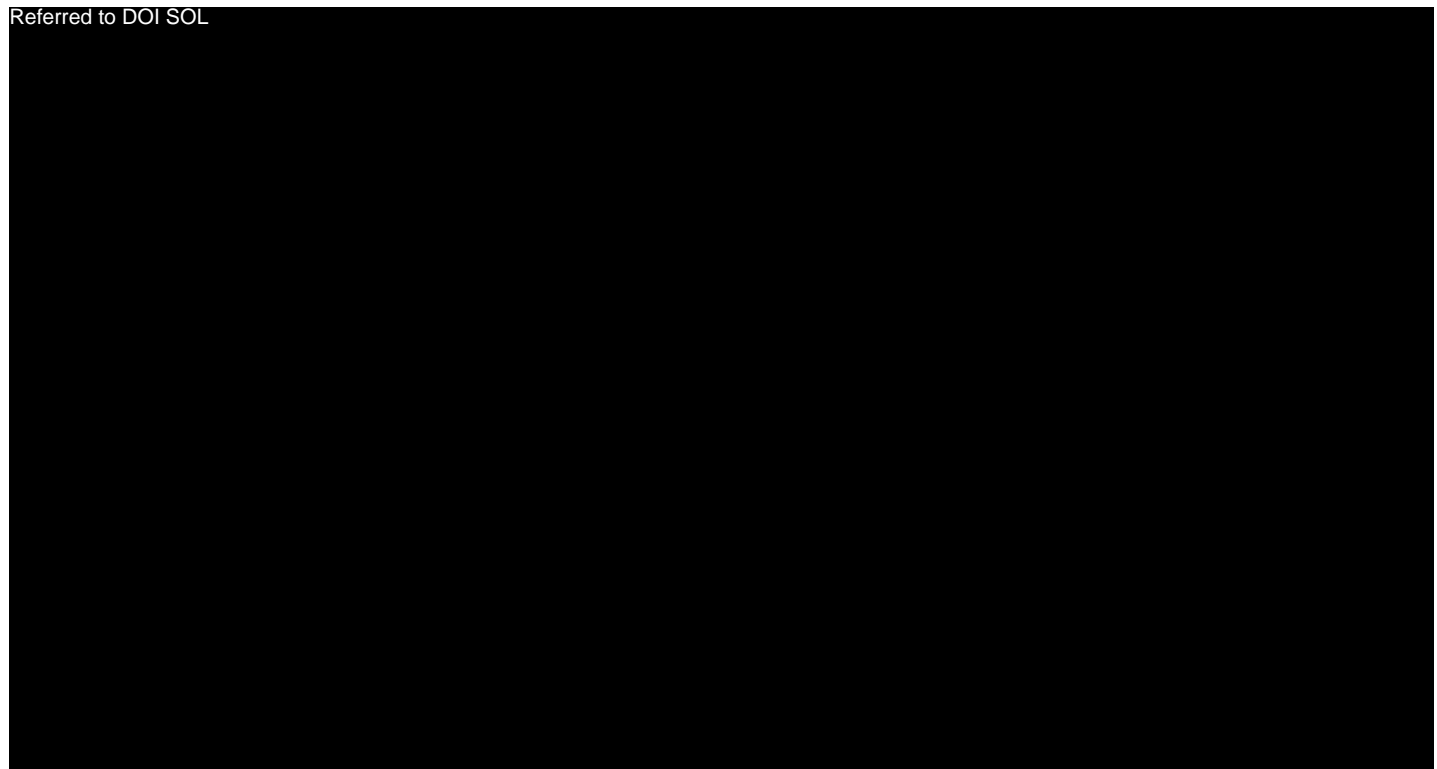
Dear Mr. Currie,

Thank you for the Ethics Agreement Compliance Certification for Commissioner Burman.

Sincerely,

The Compliance Division

Referred to DOI SOL



On Tue, Jan 23, 2018 at 3:33 PM, EA Compliance <(b)(6) internal OGE email address> wrote:
Dear Mr. Currie:

We were advised today that you did not receive the Certification of Ethics Agreement Compliance form (attached) for Commissioner Burman. We attempted to send the form to you on November 21, 2017, as indicated in the email below. We apologize if technical issues prevented you from receiving the email and form. Please respond to this email to confirm receipt.

Sincerely,

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*

From: EA Compliance
Sent: Tuesday, November 21, 2017 1:48 PM
To: (b)(6) Currie email address
Cc: EA Compliance
Subject: 90 Day EA Reminder- EA Certification Attached - Burman

Dear Mr. Currie:

Ms. Brenda Burman was confirmed as Commissioner, Bureau of Reclamation on November 16, 2017. This is a reminder that Commissioner Burman has 90 days from the date of confirmation (November 16, 2017) to comply with the terms of her ethics agreement, unless an extension is granted by the Office of Government Ethics (OGE). Agency ethics officials do not have the authority to extend the compliance deadline; in rare circumstances of unusual hardship, OGE may decide to extend the deadline. See 5 C.F.R. § 2634.802(b). Please advise OGE via (b)(6) internal OGE email address as soon as possible if an extension will be requested.

Commissioner Burman is required to complete and sign the attached Certification of Ethics Agreement Compliance (See OGE's Program Advisory [PA 17-03](#)). Commissioner Burman should provide the completed and signed Certification to ethics officials as soon as possible but not later than February 14, 2018. The Certification should then be submitted to OGE no later than February 21, 2018, via email (b)(6) internal OGE email address

Thank you for your assistance in this matter, and please contact (b)(6) internal OGE email address if you have any questions. If you are not the point of contact for this matter, please advise (b)(6) internal OGE email address and forward this email to the appropriate ethics official.

Sincerely,

Compliance Division
United States Office of Government Ethics
1201 New York Avenue NW
Suite 500
Washington, DC 20005

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From: [EA Compliance](#)
To: ["McDonnell, Edward"](#)
Cc: [EA Compliance](#)
Subject: RE: Domenech, Douglas - Certificate of Ethics Agreement Compliance
Date: Monday, December 11, 2017 2:22:02 PM

Dear Mr. McDonnell:

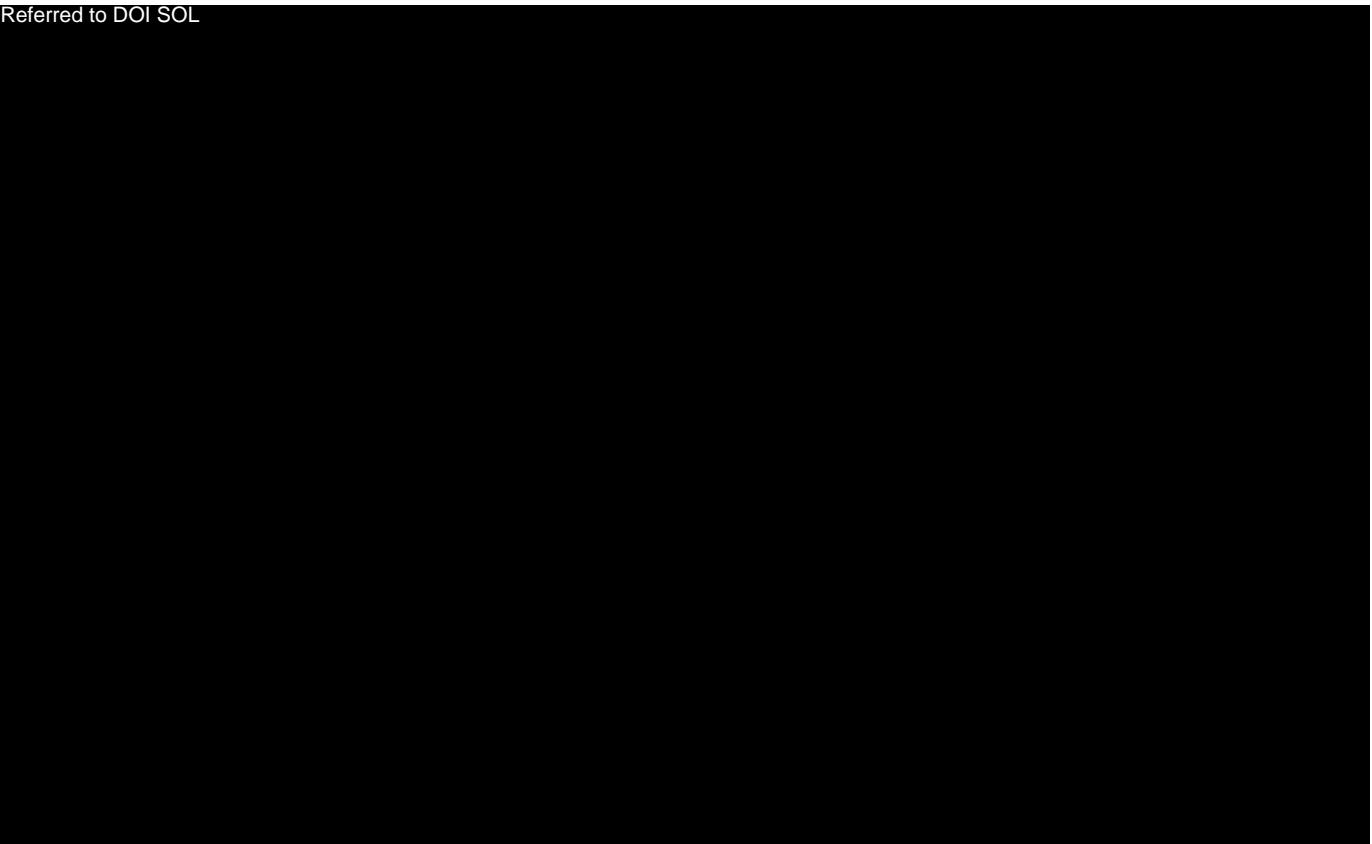
Thank you for the ethics agreement certification of compliance from Assistant Secretary Domenech.

Sincerely,

The Compliance Division

Referred to DOI SOL





From: [EA Compliance](#)
To: ["McDonnell, Edward"](#)
Cc: [EA Compliance](#)
Subject: RE: EA Certification - Deputy Secretary Bernhardt - DOI
Date: Tuesday, October 17, 2017 12:09:25 PM

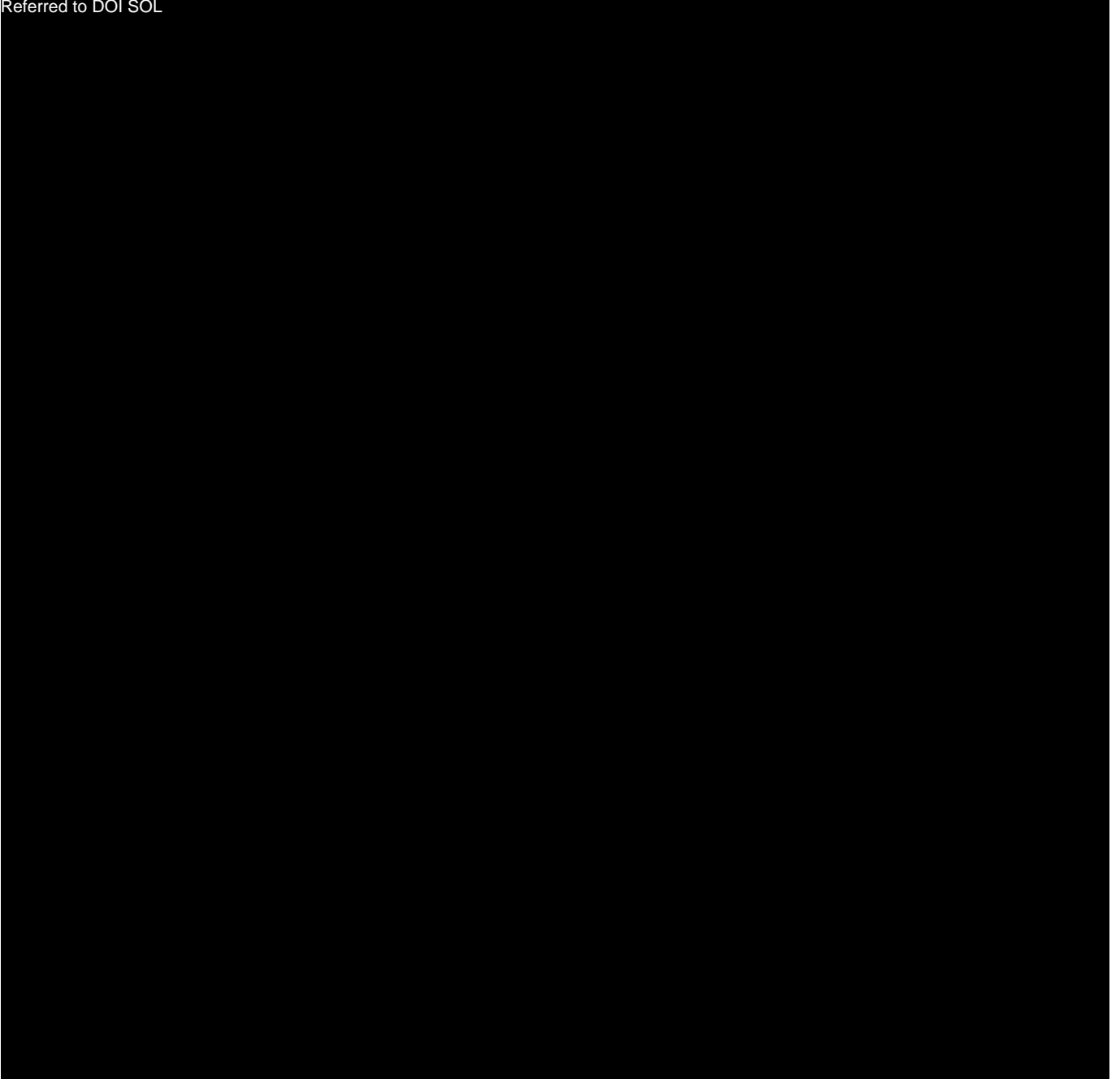
Dear Mr. McDonnell,

Thank you for the ethics agreement certification compliance from Deputy Secretary Bernhardt-DOI.

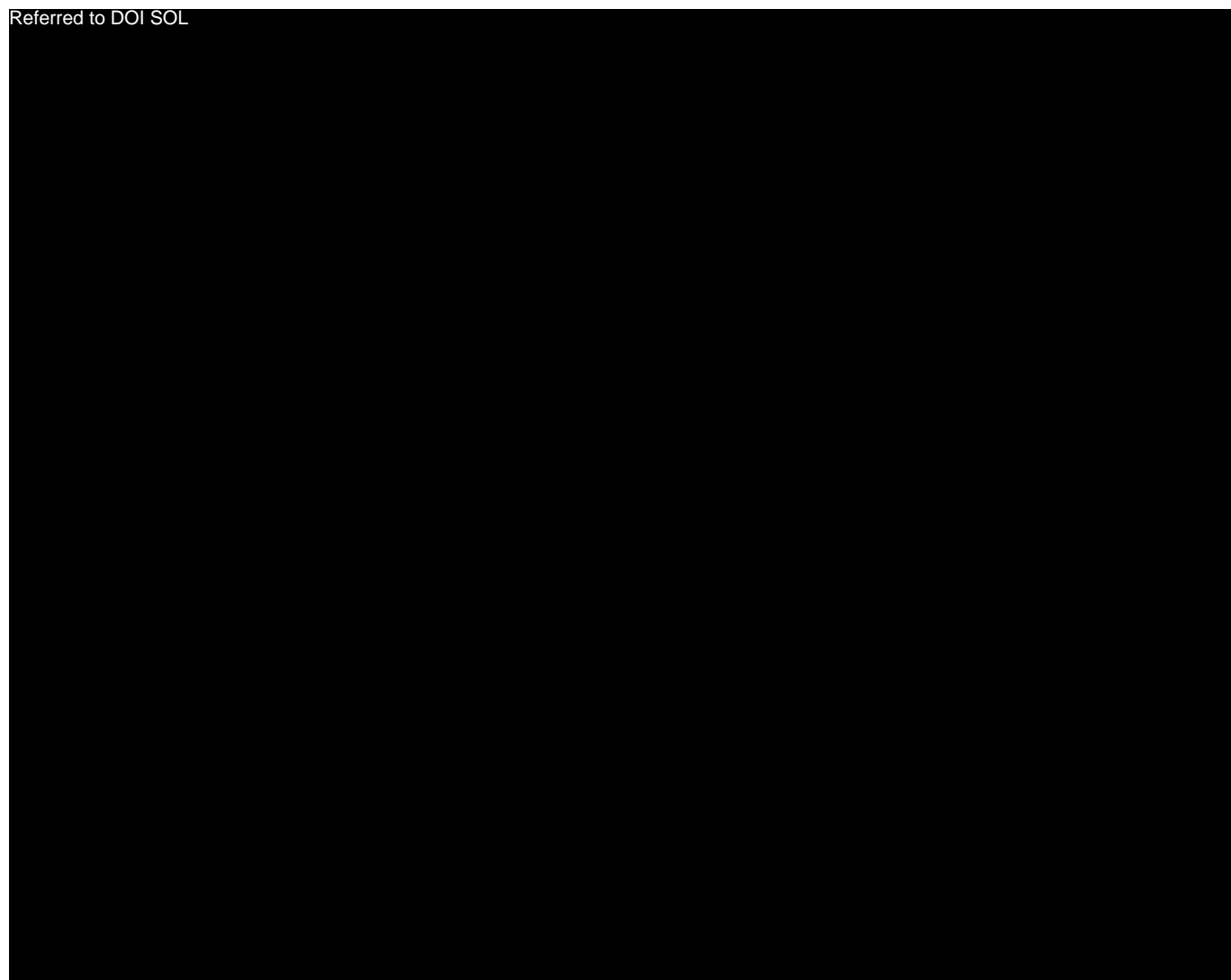
Sincerely,

The Compliance Division

Referred to DOI SOL



Referred to DOI SOL



From: [Christopher J. Swartz](#)
To: [Christopher J. Swartz](#)
Bcc: (b)(6) Vetter, Huitema, Croston, Currie, Spencer, Bender, Maggi, Fischmann, Riesen email addresses
[Seth Jaffe](#) [David J. Apol](#)
Subject: OGE Discretionary Trust Meeting--Thursday, Aug. 31, 2017
Date: Friday, August 25, 2017 3:18:05 PM
Attachments: [Discretionary Trust Discussion Questions.pdf](#)
[OGE.DRAFT.LA.DISCRETIONARY TRUSTS.AGENCY CIRCULATION COPY \(8.25.17\).pdf](#)
[LA-13-04.pdf](#)
[DO-08-024 \(2\).pdf](#)

(b)(5) First two attachments are deliberative drafts withheld in full. First is 2pp. Second is 5pp. The other two are available on OGE's website here <https://www.oge.gov/web/oge.nsf/Legal%20Research%20Search%20Collection?OpenForm>

Good Afternoon,

First, thank you for making yourselves available to meet with us on the topic of discretionary trusts. As a reminder, we will meet at OGE's offices next Thursday, August 31, 2017, at 2:00 PM. If you need any information on logistics, please feel free to reach out to me.

Second, I am circulating four documents for use in our discussion, two previously issued legal advisories (OGE DO-08-024 and LA-13-04) and two non-public documents.

Regarding the non-public documents:

- The first is a set of questions that we are planning to use at the meeting to help guide the discussion;
- The second is a draft legal advisory.

Both of these documents are NON-PUBLIC and CLOSE HOLD. Please be aware that proposed conclusions in these documents are PREDECISIONAL and DELIBERATIVE, and therefore are subject to change. As a result, please DO NOT share the information in these documents or the documents themselves.

Again, we really appreciate your time and interest in this matter, and look forward to a fruitful conversation.

Have a good weekend,

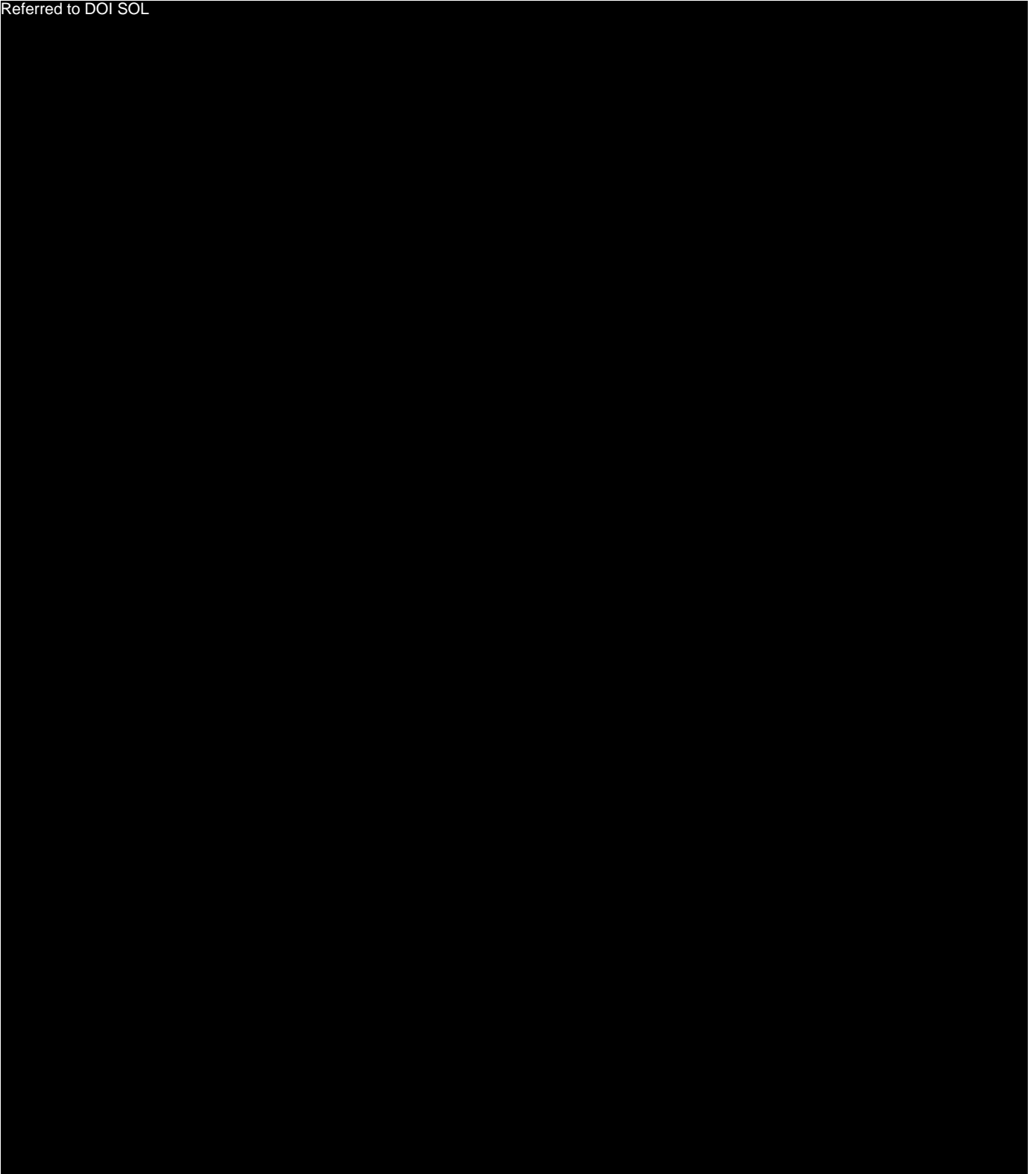
Christopher J. Swartz
Assistant Counsel, Ethics Law and Policy Branch
General Counsel & Legal Policy Division
U.S. Office of Government Ethics
Telephone: 202-482-9266

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From: [Wendy G. Pond](#)
To: ["McDonnell, Edward"](#)
Cc: [Patrick Shepherd](#)
Subject: RE: Nelson
Date: Thursday, August 3, 2017 5:11:43 PM

Hi Ed – as discussed, we can talk tomorrow (Friday) at 9:30am. If you get into the office and you find you need to change the time, just let me know. My schedule is open.

Referred to DOI SOL



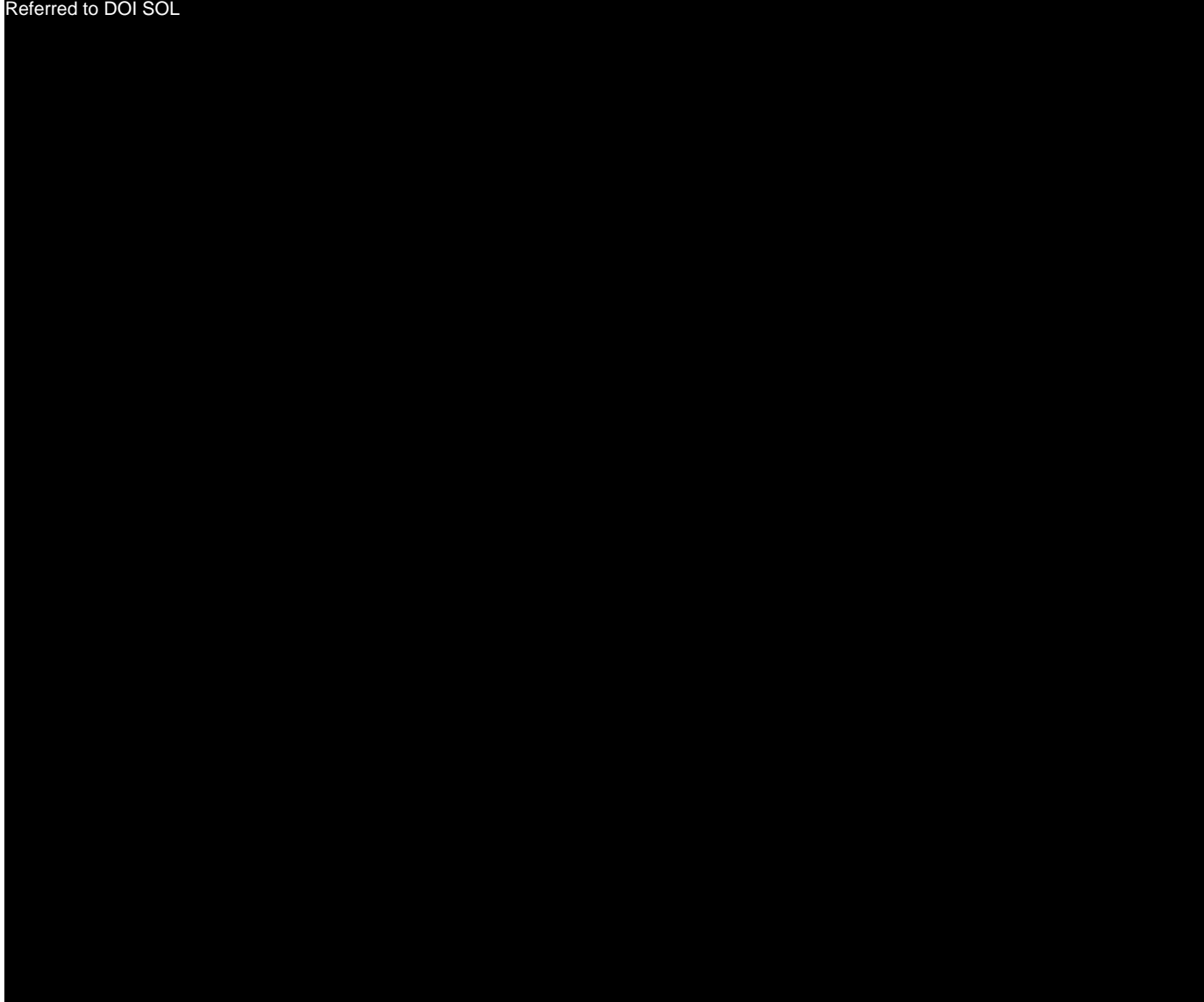
Referred to DOI SOL




On Thu, Aug 3, 2017 at 4:14 PM, Megan V. Granahan <mvgranah@oge.gov> wrote:

Hey Ed,
Wendy is going to help you on this one.
Thanks, Wendy!
mg

Referred to DOI SOL

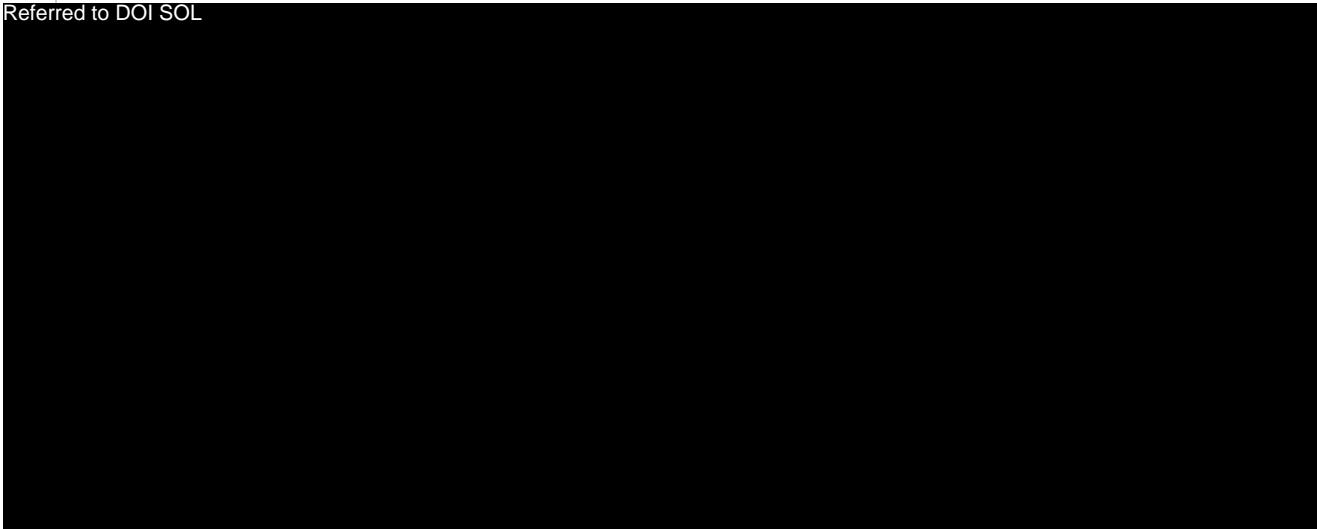


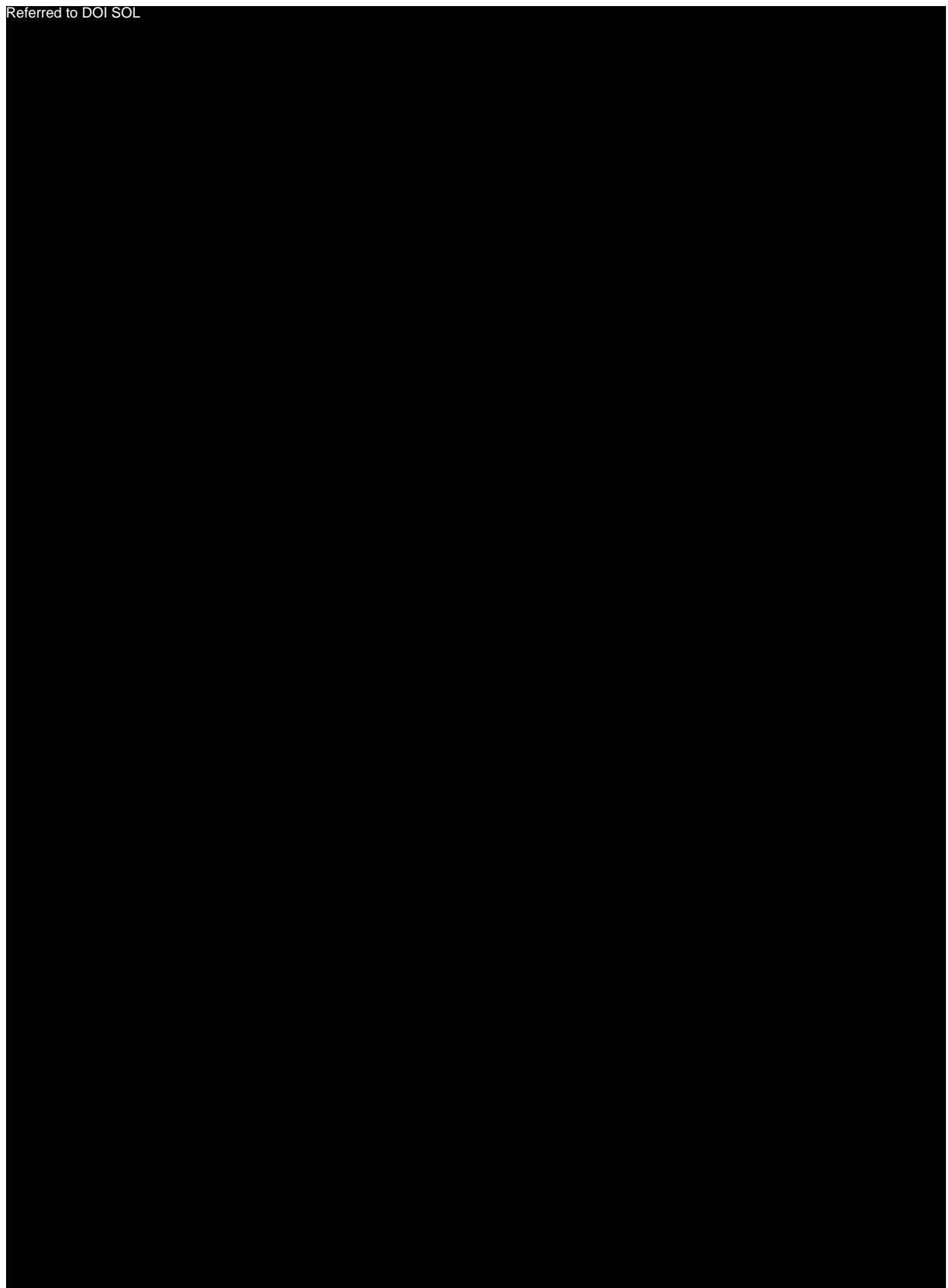
Referred to DOI SOL



On Thu, Aug 3, 2017 at 3:30 PM, Megan V. Granahan <mvgranah@oge.gov> wrote:
Sorry guys, I just listened to your voicemail. My bad not getting back to you – but you did it correctly!

Referred to DOI SOL





On Thu, Aug 3, 2017 at 8:57 AM, Megan V. Granahan <mvgranah@oge.gov> wrote:

Good Morning,

Mr. Nelson's nomination has been posted. Please get the report signed/certified in Integrity and send me the signed ea and DAEO transmittal letter (note that the transmittal letter should be addressed to David J. Apol, Acting Director).

Thanks!

mg

Megan Granahan

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From: [Wendy G. Pond](#)
To: ["Heather Gottry"](#)
Cc: [Nicole Stein](#)
Subject: RE: [EXTERNAL] RE: Benchmarking Follow Up
Date: Monday, September 9, 2019 9:28:19 AM
Attachments: [data for Interior .xlsx](#)
[3. Handout 8.30.18.pdf](#)

Hi Heather:

Attached please find a spreadsheet with 2 sheets. The first sheet has questions 2, 5, 15, 16, 20, and 35. The second sheet has question 24.

Let me know if you have any questions about the row headings; if you look at the questionnaire itself, the headings should make sense, but I'm happy to clarify if needed.

Finally, see page 2 of the attached PDF for the formula I used in 2017 to calculate the number of full-time equivalent ethics officials at each agency. Again, happy to discuss that formula, if you like.

Best,
Wendy

Referred to DOI SOL



On Sep 6, 2019, at 8:16 AM, Wendy G. Pond <wgpond@oge.gov> wrote:

Good morning, Heather. Got your email. I should be able to pull this together by Monday.

Enjoy your time off!
Wendy

Referred to DOI SOL



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Agency/Dept

Department of Agriculture

Department of Commerce

Department of Defense - Department of the Air Force

Department of Defense - Department of the Army

Department of Defense - Department of the Navy

Department of Defense - Office of the Secretary of Defense

Department of Education

Department of Energy

Department of Health and Human Services

Department of Homeland Security

Department of Housing and Urban Development

Department of Justice

Department of Labor

Department of State

Department of the Interior

Department of Transportation

Department of Treasury

Department of Veterans Affairs

Environmental Protection Agency

National Aeronautics and Space Administration

Social Security Administration

Selection 1 Topic

Financial Disclosure Reporting
Gift acceptance

Gift acceptance
Gift acceptance
Gift acceptance
Gift acceptance
Conflicting financial interests
Conflicting financial interests
Financial Disclosure Reporting
Outside employment/activities
Gift acceptance
Outside employment/activities
Financial Disclosure Reporting
Gift acceptance
Outside employment/activities
Gift acceptance
Conflicting financial interests
Travel, subsistence, and related expenses from non-
Outside employment/activities
Conflicting financial interests
Financial Disclosure Reporting

Selection 2 Topic

Outside employment/activities
Travel, subsistence, and related expenses from non-
Other: Outside employment/activities polls at
essentially the same level as post-employment
restrictions. Wanted to include both to paint a
Financial Disclosure Reporting
Financial Disclosure Reporting
Post-employment restrictions
Gift acceptance
Outside employment/activities
Outside employment/activities
Gift acceptance
Outside employment/activities
Financial Disclosure Reporting
Post-employment restrictions
Misuse of position, Government resources and
Financial Disclosure Reporting
Outside employment/activities
Financial Disclosure Reporting
Outside employment/activities
Misuse of position, Government resources and
Post-employment restrictions
Misuse of position, Government resources and

Selection 3 Topic

Travel, subsistence, and related expenses from non-
Outside employment/activities

Misuse of position, Government resources and
information

Misuse of position, Government resources and
Travel, subsistence, and related expenses from non-
Financial Disclosure Reporting

Outside employment/activities

Post-employment restrictions

Post-employment restrictions

Financial Disclosure Reporting

Conflicting financial interests

Gift acceptance

Gift acceptance

Post-employment restrictions

Gift acceptance

Post-employment restrictions

Post-employment restrictions

Conflicting financial interests

Travel, subsistence, and related expenses from non-
Outside employment/activities

Outside employment/activities

Presentation Handout

CY17 Annual Agency Ethics Program Questionnaire: *Benchmarking Your Agency*

August 30, 2018

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CY17 Annual Agency Ethics Program Questionnaire: Benchmarking Your Agency

Notes on Data and Methodology

Notes Source Data

- The charts in this document are based on agency responses to the 2017 Annual Agency Ethics Program Questionnaire. Individual agency responses are available [here](#), and the summary report, which aggregates the data, is available [here](#).
- The charts do not include agencies for which the relevant information was classified.

Notes on Data Quality

- OGE reviews agency responses to selected questions within the Questionnaire to identify potential anomalies. If an anomaly is found, OGE follows up with the agency; however, OGE does not independently verify the submitted information.

Notes on Methodology

- The charts in this document illustrate the ratios of certain data points per **one full time equivalent ethics official**:
 - Ratio of full time employees per one full-time equivalent ethics official
 - Ratio of required 278 reports per one full-time equivalent ethics official
 - Ratio of required 450 reports per one full-time equivalent ethics official
 - Ratio of employees required to receive initial ethics training per one equivalent full-time ethics official
 - Ratio of employees required to receive annual ethics training per one full-time ethics official
- OGE calculated the **full time equivalent ethics official** based on an agency's response to question #5 in the Questionnaire.

Example: The table below provides an example of an agency with 13 employees who performed ethics program duties in 2017.

	Approximate amount of time spent each week performing ethics duties					
Duty Station	Less than 1 hour per week (up to .025 FTE*)	1-10 hours per week (up to .25 FTE*)	11-20 hours per week (up to .5 FTE*)	21-30 hours per week (up to .75 FTE*)	31-40 hours per week (up to 1 FTE*)	TOTAL
D.C. Metro area	1	0	2	2	1	6
Outside the D.C. Metro area	1	3	3	0	0	7
TOTAL	2	3	5	2	1	13

In this example, the agency has the equivalent of 5.8 full time ethics officials:

$$(2 \times .025) + (3 \times .25) + (5 \times .5) + (2 \times .75) + (1 \times 1) = 5.8$$

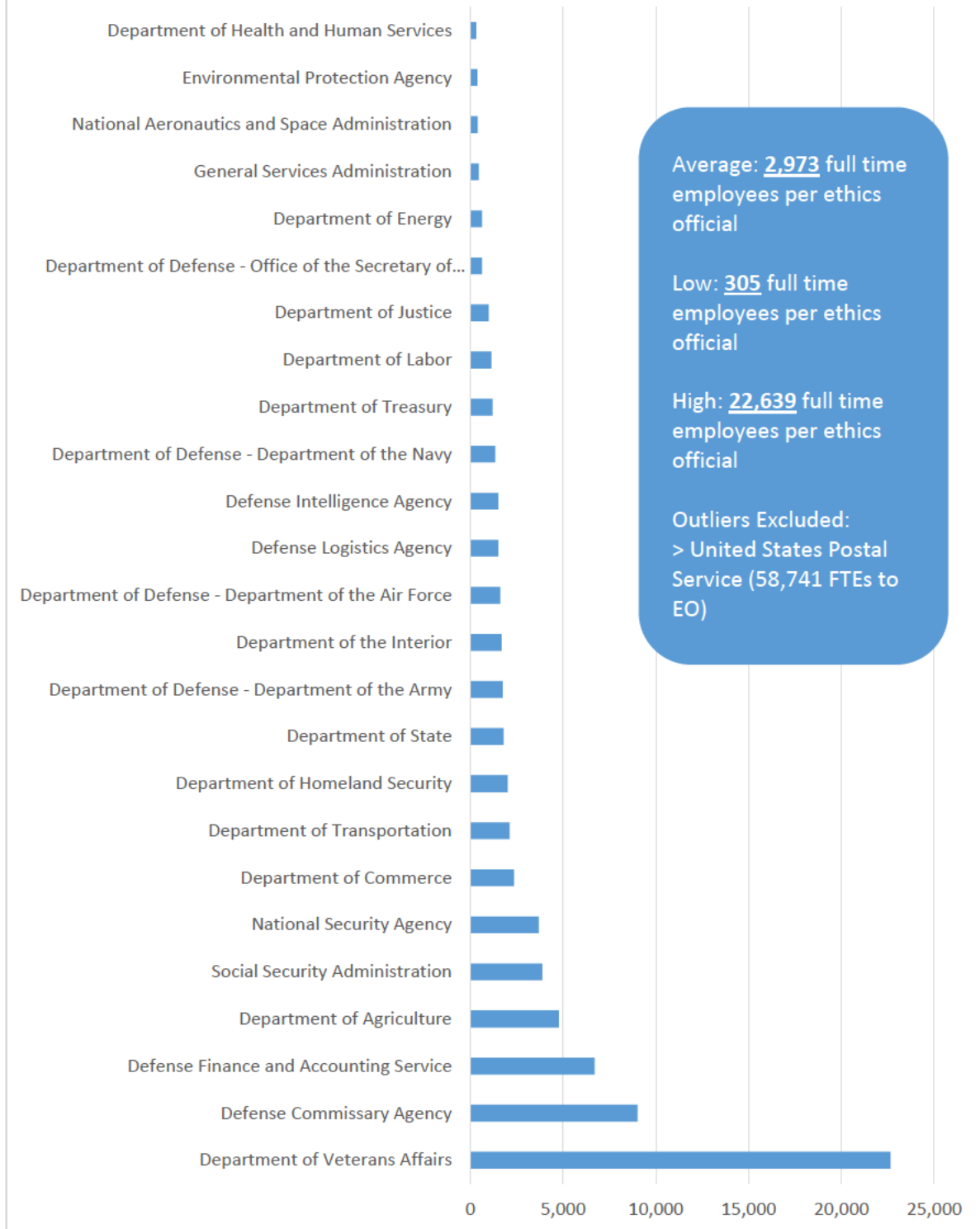
- The ratios are based on agency responses to the following Questionnaire questions:
 - full time employees, as of 12/31/17: question #2
 - public financial disclosure filers (OGE Form 278e): question #46
 - confidential financial disclosure filers: question #61
 - initial ethics training: question #24
 - annual ethics training: question #34
- Keep in mind that some agencies have the equivalent of less than one full time ethics official. In those cases, the ratio does *not* reflect the *actual* number of full time employees per FTE ethics official, but rather the *proportional* amount, were the agency to have one FTE ethics official.
- If an agency reported zero ethics officials for 2017, then there is no ratio for that agency, and they are not included in the charts or the averages.
- “Outliers” are defined as agencies whose ratio is more than two standard deviations from the mean.

Ethics Program Self-Assessment Worksheet

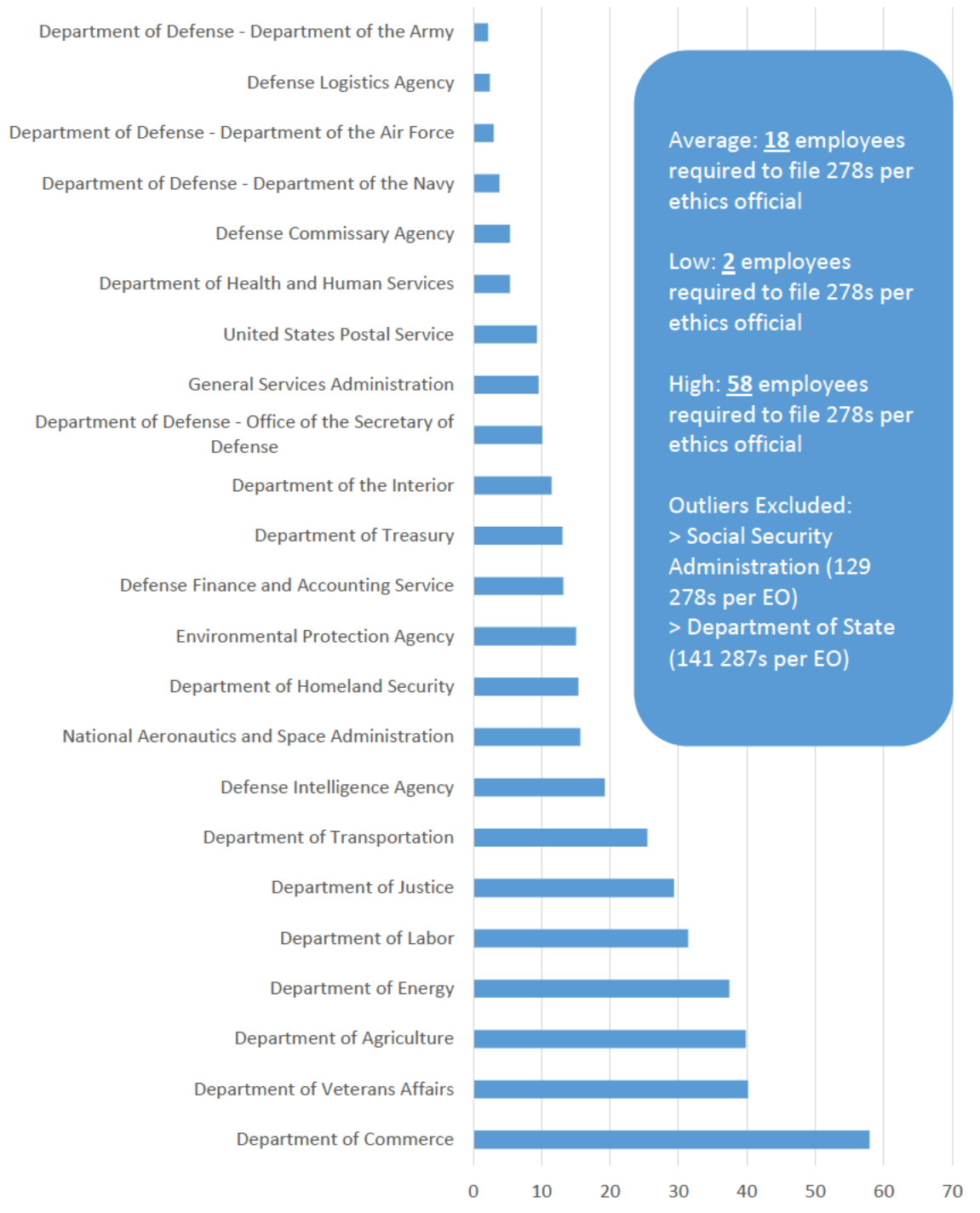
Program Element	Benchmark Ratios (Source: Annual Questionnaire)	Compliance Indicators (Source: Annual Questionnaire and Agency Records)	Other Indicators (Source: Agency Records)	Assessment & Action Item
Example: Initial Ethics Training	<p><i>Our ratio: ~260 IET trainees per FTE ethics official</i></p> <p><i>Average ratio for our cohort: 97</i></p> <p><i>Our rank in the cohort: 38</i></p>	<p><i>Percentage trained within 3-month deadline: 85%</i></p> <p><i>Exec branch percentage: 91%</i></p> <p><i>Percentage of employees trained after 3 months: 15%</i></p>	<p><i>70% of employees report better understanding their ethics obligations after taking training</i></p>	<p><i>Increase 3-month compliance rate: Identify and address the reasons for late training</i></p> <p><i>Increase the training comprehension: Follow up with those who reported they didn't have a better understanding after training and ask for feedback</i></p>
Initial Ethics Training	<p>Our ratio_____</p> <p>Average ratio for our cohort_____</p> <p>Our rank in the cohort_____</p>	<p>Percentage trained within 3-months_____</p> <p>Percentage of employees trained after 3 months_____</p>	<p>Examples:</p> <ul style="list-style-type: none"> * Percent of employees who better understanding their ethics obligations after taking training * Number of questions received after training 	
Annual Ethics Training	<p>Our ratio_____</p> <p>Average ratio for our cohort_____</p> <p>Our rank in the cohort_____</p>	<p>Compliance rate_____</p>	<p>Examples (see above)</p>	
Confidential Financial Disclosure	<p>Our ratio_____</p> <p>Average ratio for our cohort_____</p> <p>Our rank in the cohort_____</p>	<p>Filing compliance rate_____</p> <p>Percentage reviewed within 60 days_____</p> <p>Percentage certified within 60 days _____</p>	<p>Examples:</p> <ul style="list-style-type: none"> * Typical complexity of 450s * # of counseling memos issued * Use of alternative 450 form * Use of intermediate review * Experience level of reviewers * Ability to allocate more reviewers during filing season 	
Public Financial	<p>Our ratio_____</p>	<p>Filing compliance rate_____</p>	<p>Examples (see above)</p>	

Disclosure	Average ratio for our cohort____ Our rank in the cohort____	Percentage reviewed within 60 days____ Percentage certified within 60 days ____		
Advice and Counsel	Our ratio____ Average ratio for our cohort____ Our rank in the cohort____		* Average # of requests for guidance each year____ * Timeliness of guidance ____ * Experience level of ethics staff * Counselor satisfaction data	

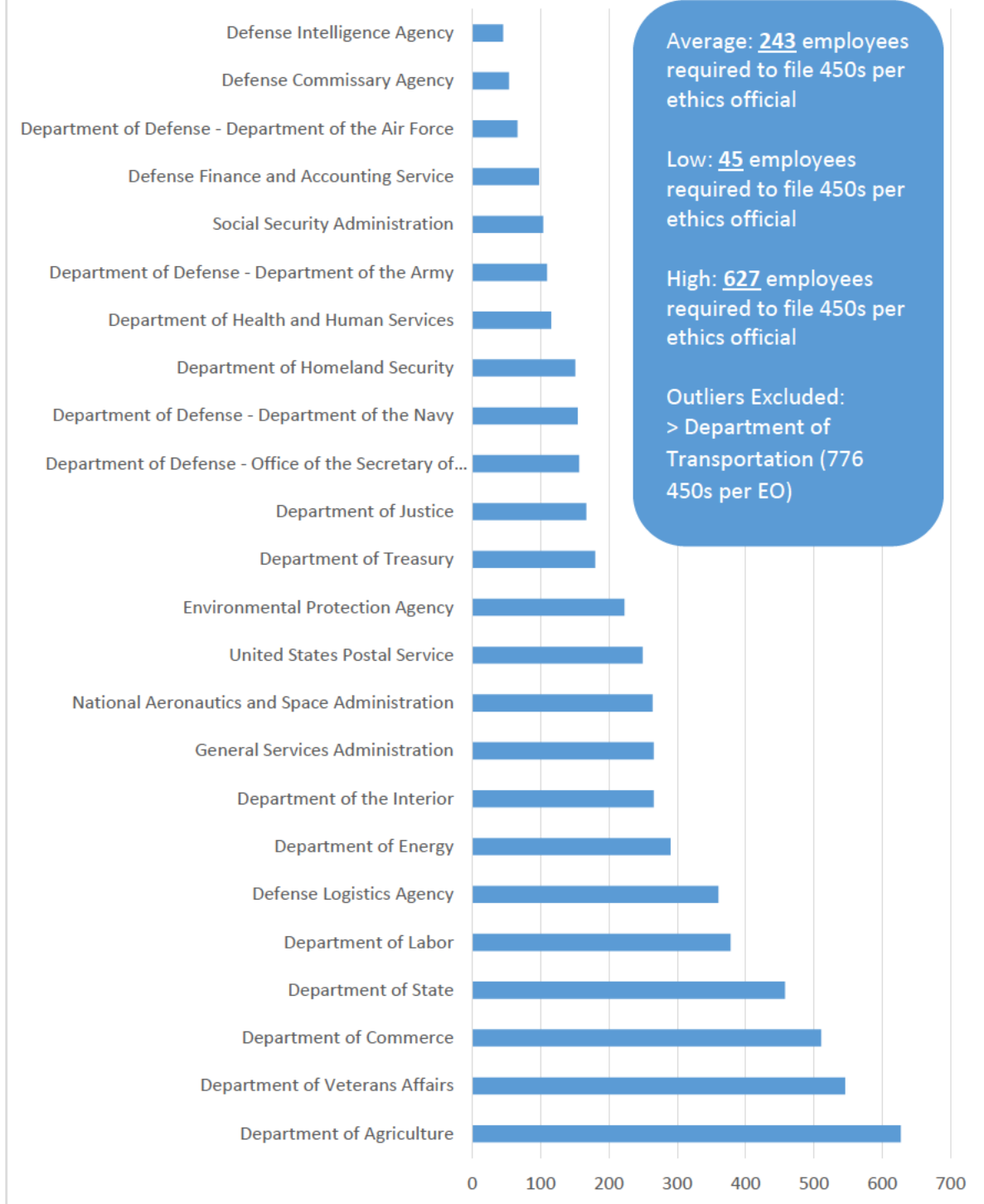
Agencies with 10,000 or More Full Time Employees: Ratio of Full Time Employees per Ethics Official



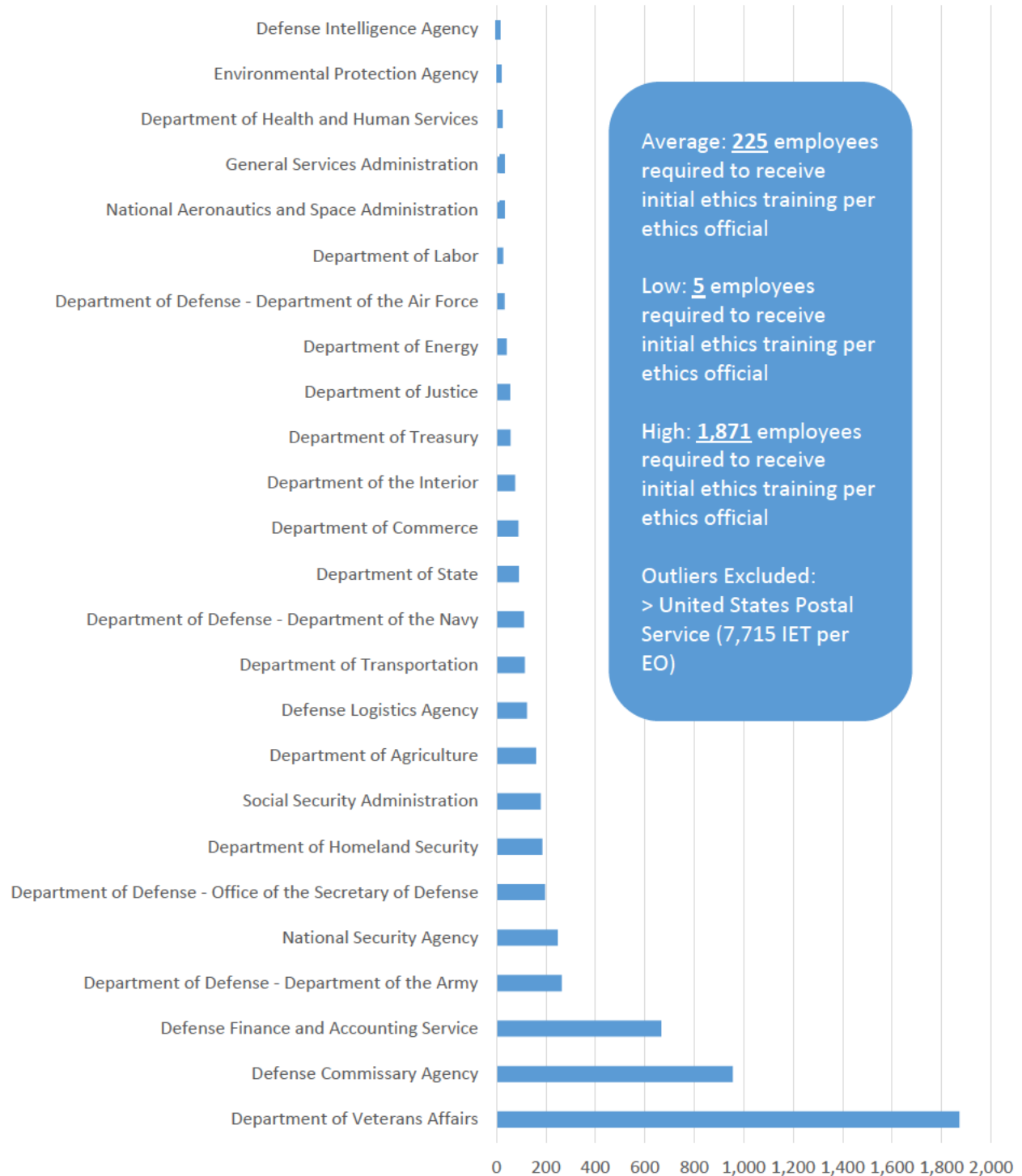
Agencies with 10,000 or More Full Time Employees: Ratio of Required Public Financial (278) Reports per Ethics Official



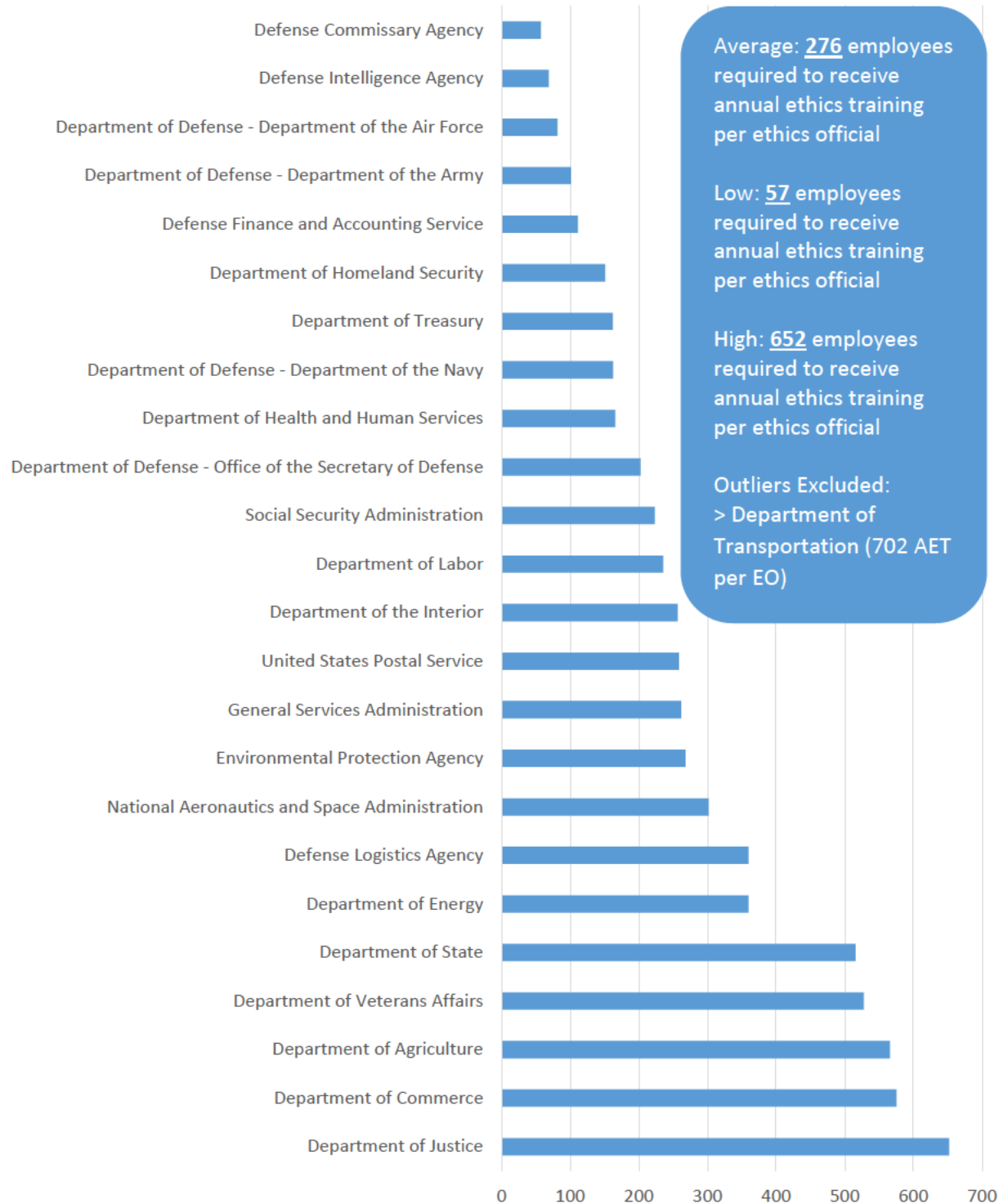
Agencies with 10,000 or More Full Time Employees: Ratio of Required Confidential Financial (450) Reports per Ethics Official



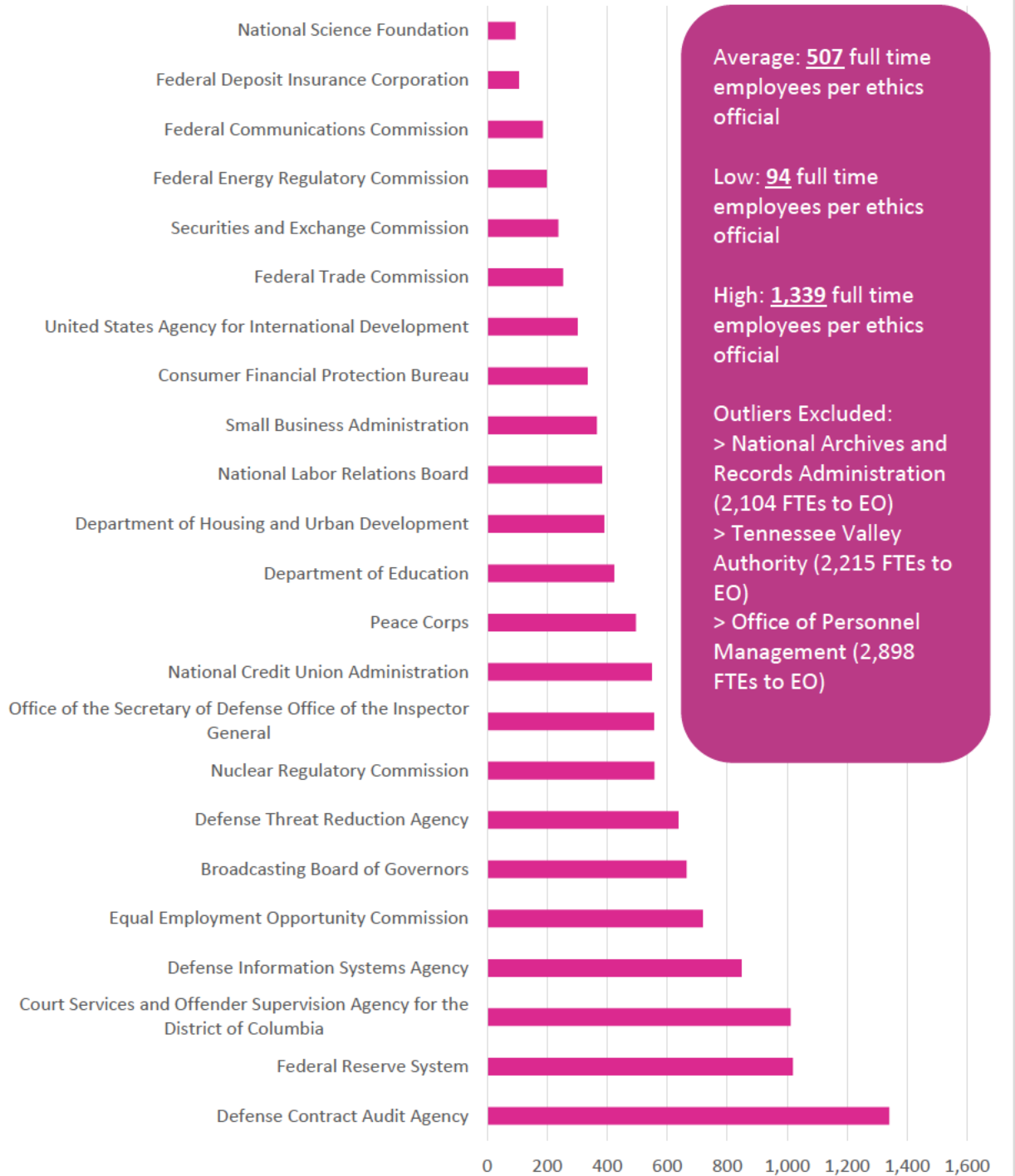
Agencies with 10,000 or More Full Time Employees: Ratio of Employees Required to Receive Initial Ethics Training per Ethics Official



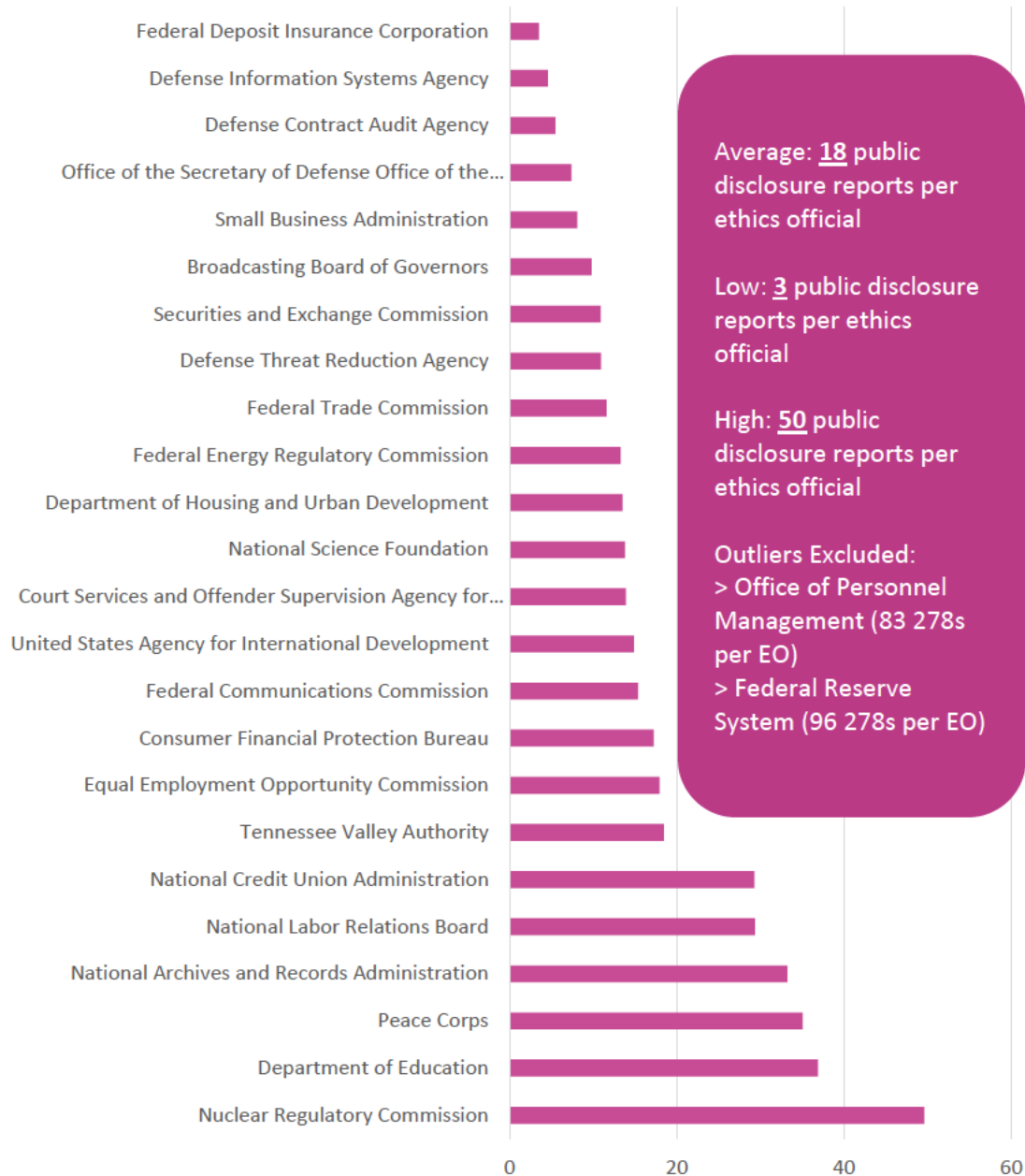
Agencies with 10,000 or More Full Time Employees: Ratio of Employees Required to Receive Annual Ethics Training per Ethics Official



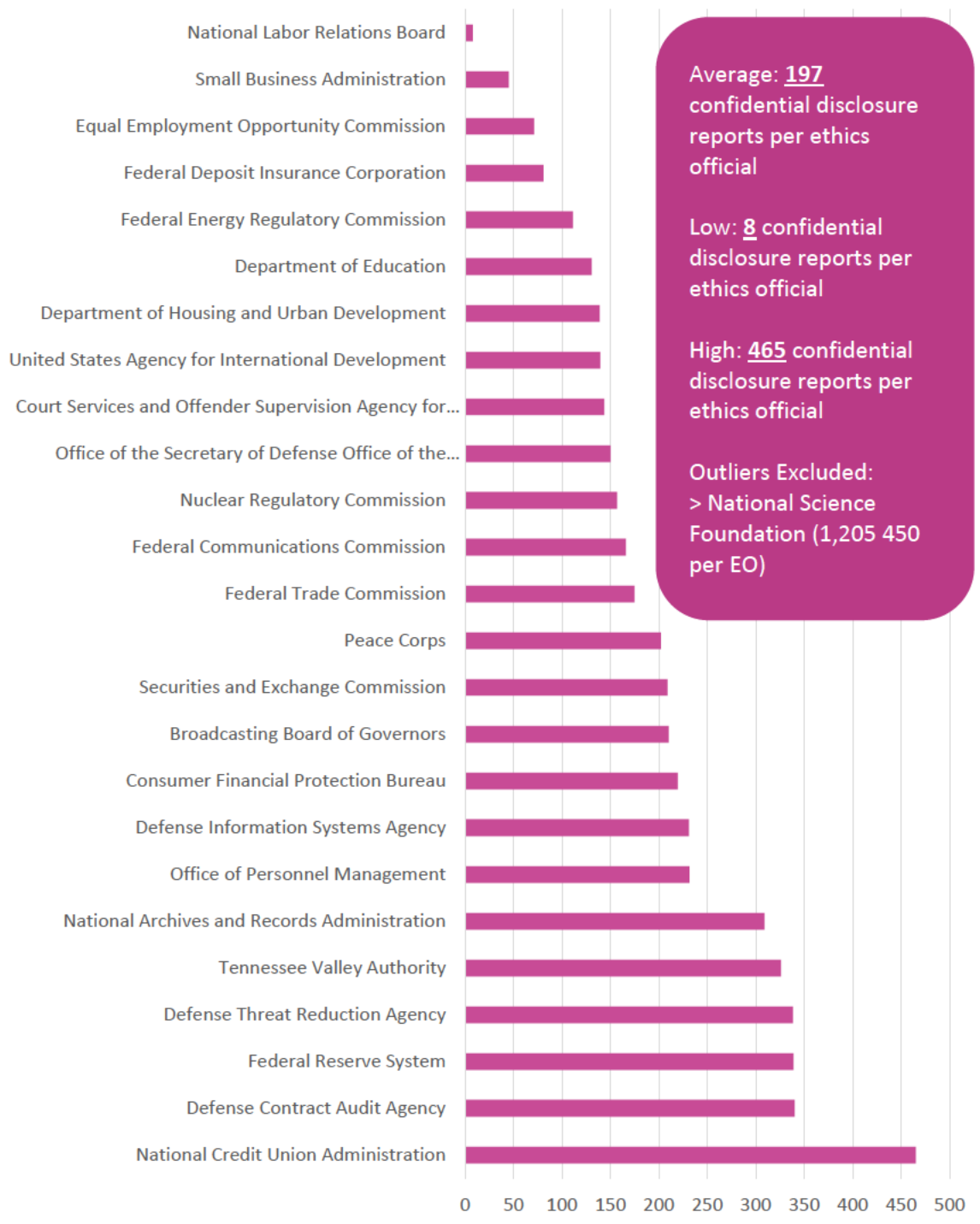
Agencies with 1,000 to 9,999 Full Time Employees: Ratio of Full Time Employees per Ethics Official



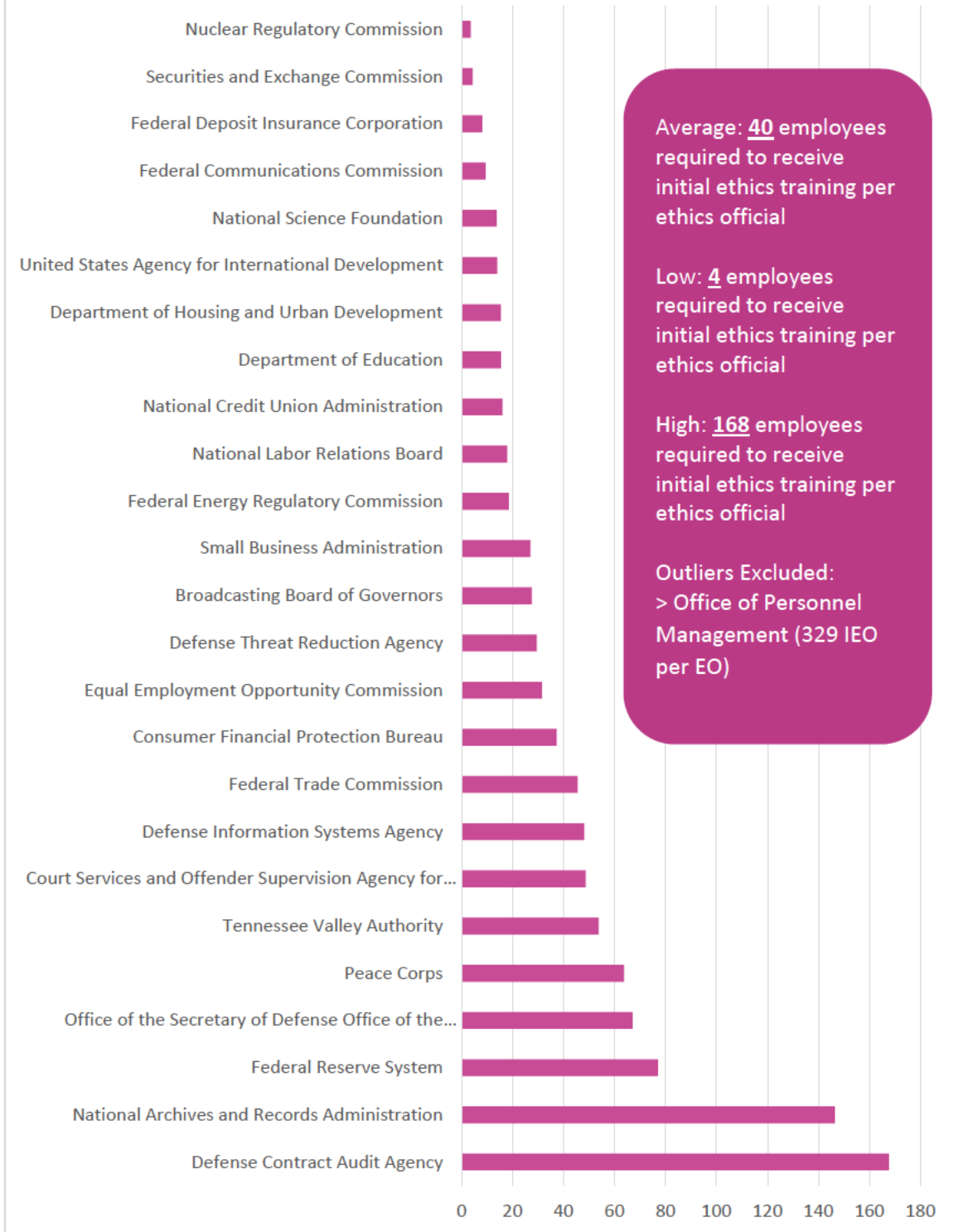
Agencies with 1,000 to 9,999 Full Time Employees: Ratio of Required Public Financial (278) Reports per Ethics Official



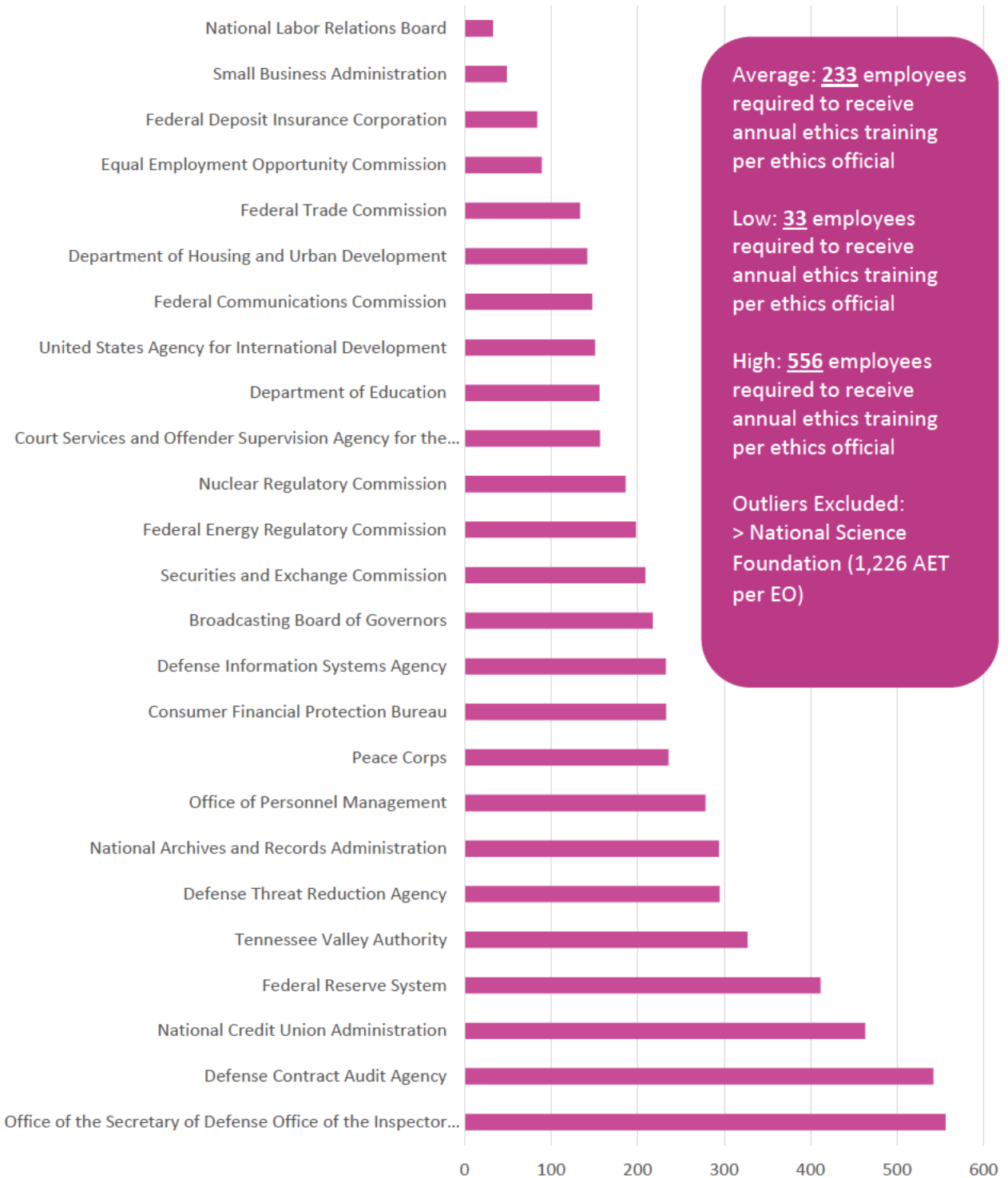
Agencies with 1,000 to 9,999 Full Time Employees: Ratio of Required Confidential Disclosure (450) Reports per Ethics Official



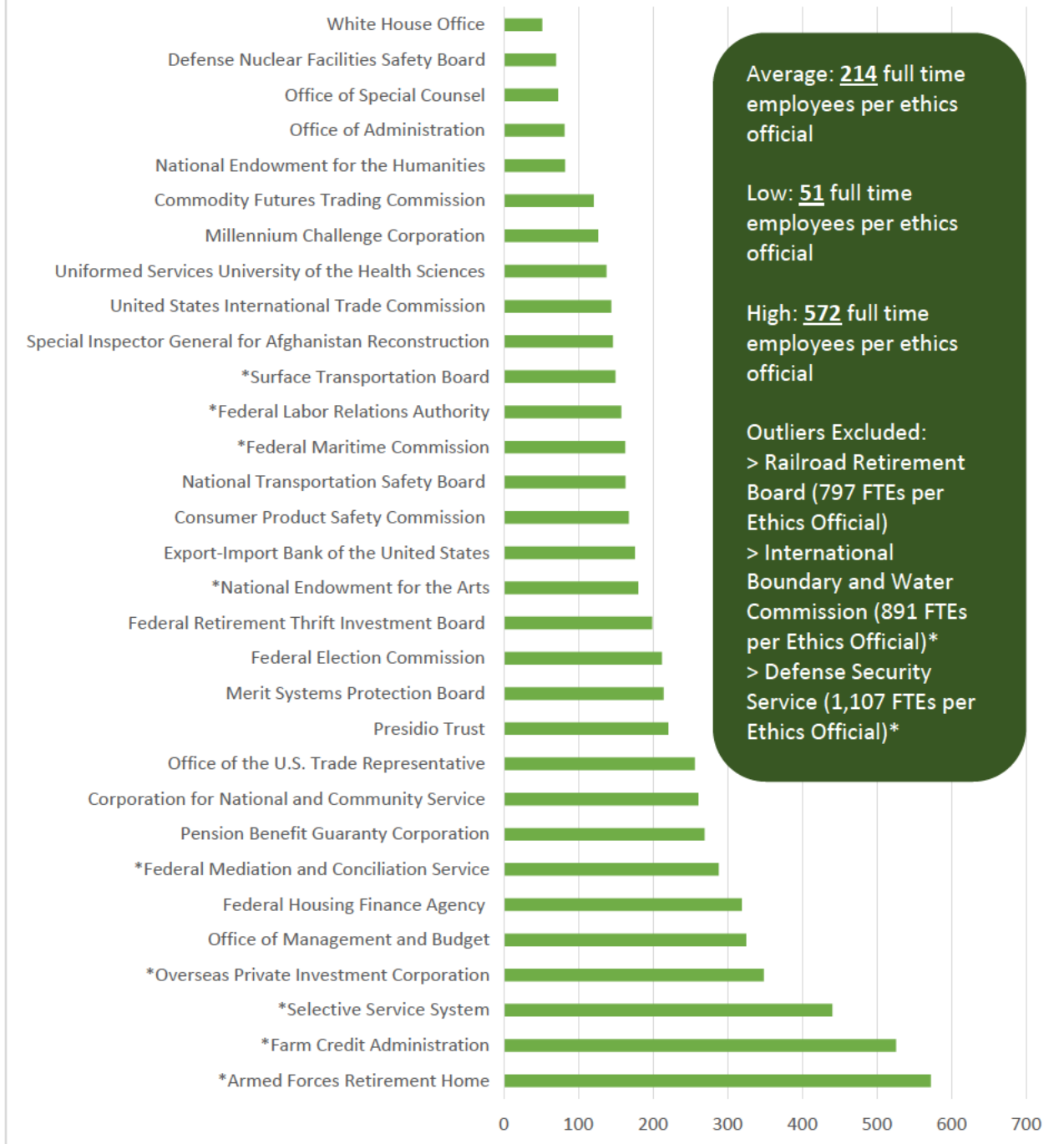
Agencies with 1,000 to 9,999 Full Time Employees: Ratio of Employees Required to Receive Initial Ethics Training per Ethics Official



Agencies with 1,000 to 9,999 Full Time Employees: Ratio of Employees Required to Receive Annual Ethics Training per Ethics Official



Agencies with 100 to 999 Full Time Employees: Ratio of Full Time Employees per Ethics Official



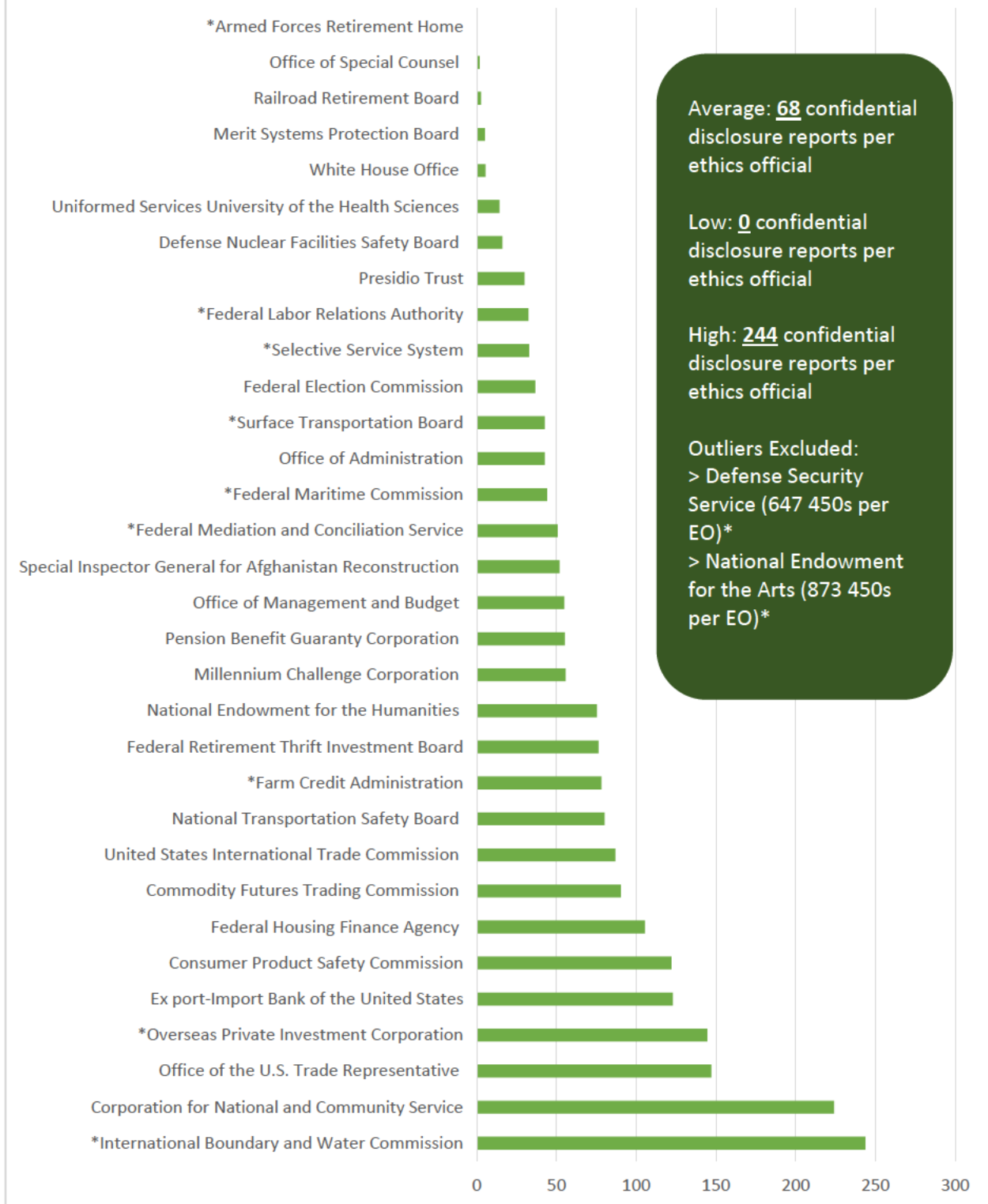
* Agency has less than one full time equivalent (FTE) ethics official. Accordingly, the ratio does not reflect the *actual* number of full time employees per FTE ethics official, but rather the *proportional* amount, were the agency to have one FTE ethics official.

Agencies with 100 to 999 Full Time Employees: Ratio of Required Public Financial (278) Reports per Ethics Official



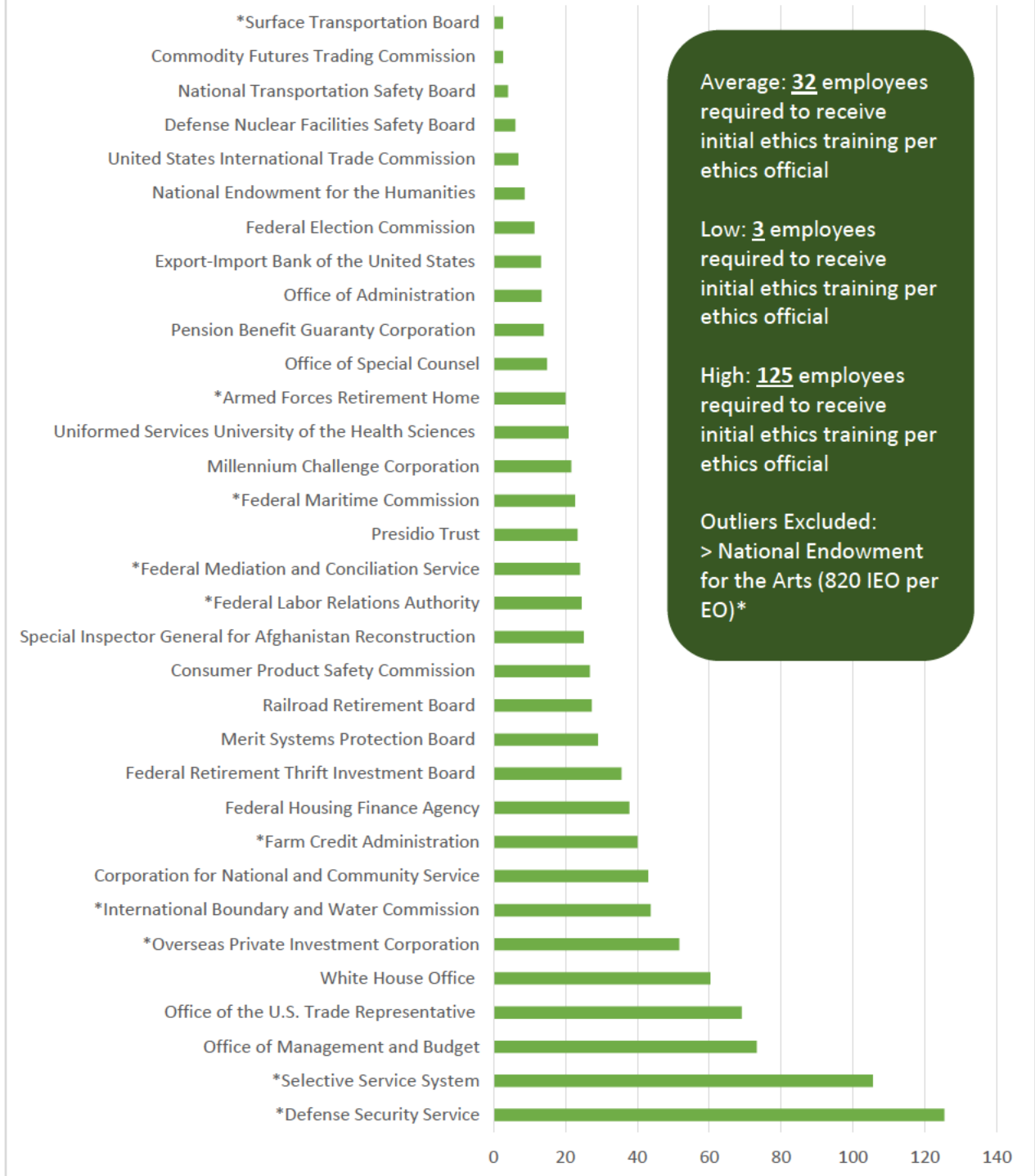
* Agency has less than one full time equivalent (FTE) ethics official. Accordingly, the ratio does not reflect the *actual* number of 278 reports per FTE ethics official, but rather the *proportional* amount, were the agency to have one FTE ethics official

Agencies with 100 to 999 Full Time Employees: Ratio of Required Confidential Disclosure (450) Reports per Ethics Official



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Agencies with 100 to 999 Full Time Employees: Ratio of Employees Required to Receive Initial Ethics Training per Ethics Official



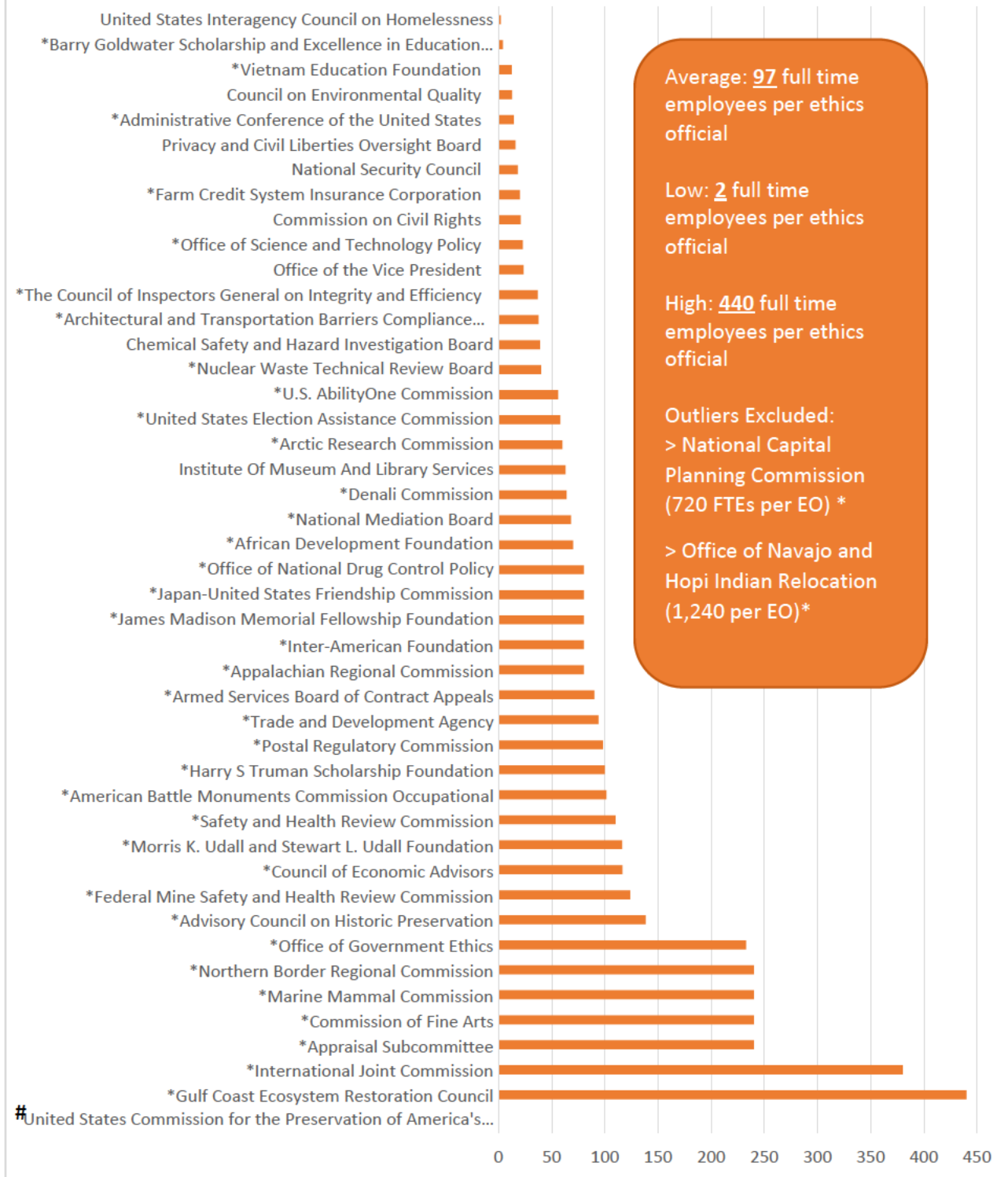
* Agency has less than one full time equivalent (FTE) ethics official. Accordingly, the ratio does not reflect the *actual* number of employees required to receive initial ethics training per FTE ethics official, but rather the *proportional* amount, were the agency to have one FTE ethics official

Agencies with 100 to 999 Full Time Employees: Ratio of Employees Required to Receive Annual Ethics Training per Ethics Official



* Agency has less than one full time equivalent (FTE) ethics official. Accordingly, the ratio does not reflect the *actual* number of employees required to receive annual ethics training per FTE ethics official, but rather the *proportional* amount, were the agency to have one FTE ethics official

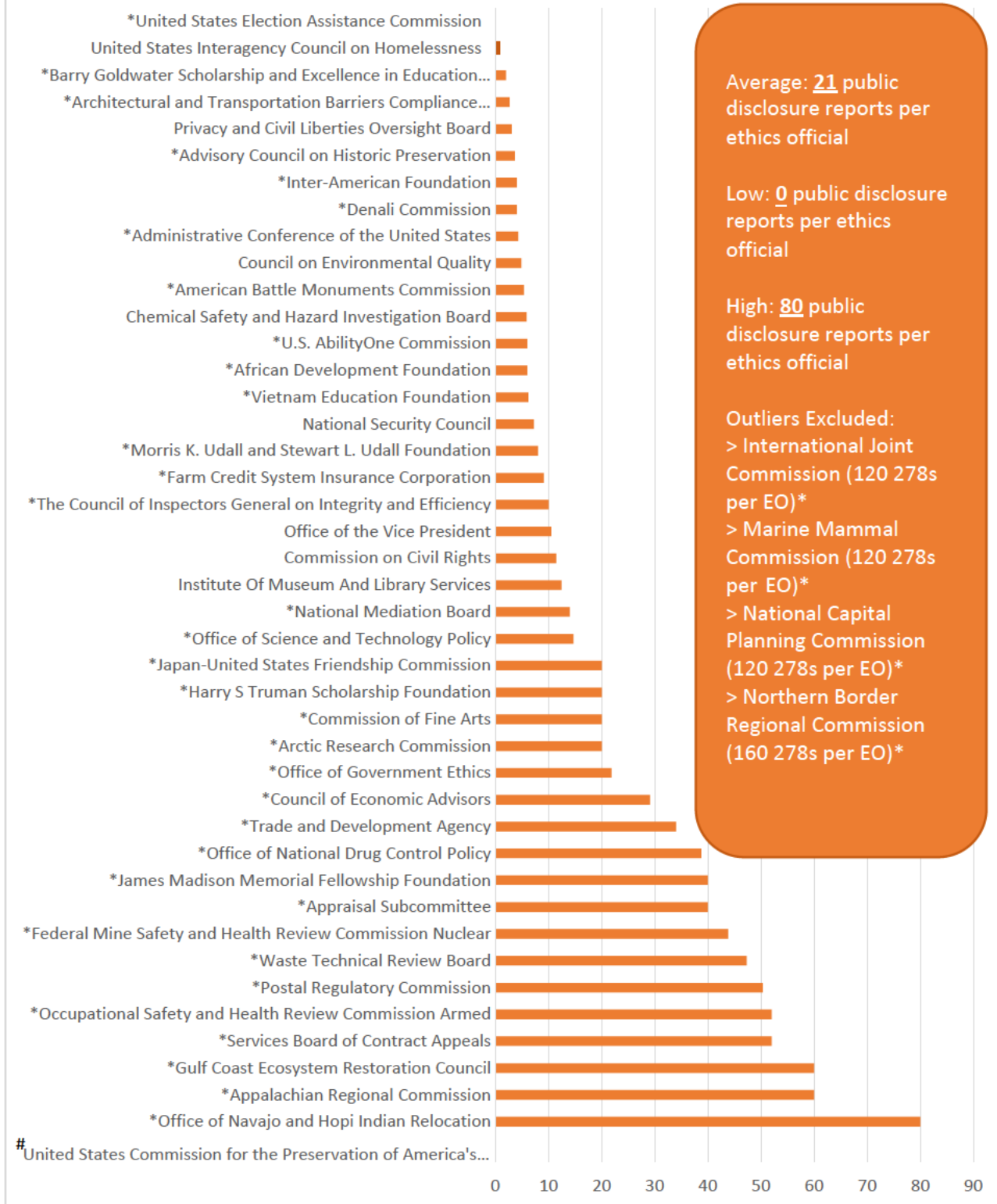
Agencies with Less Than 100 Full Time Employees: Ratio of Full Time Employees per Ethics Official



* Agency has less than one full time equivalent (FTE) ethics official. Accordingly, the ratio does not reflect the *actual* number of full time employees per FTE ethics official, but rather the *proportional* amount, were the agency to have one FTE ethics official

Agency reported zero ethics officials in 2017.

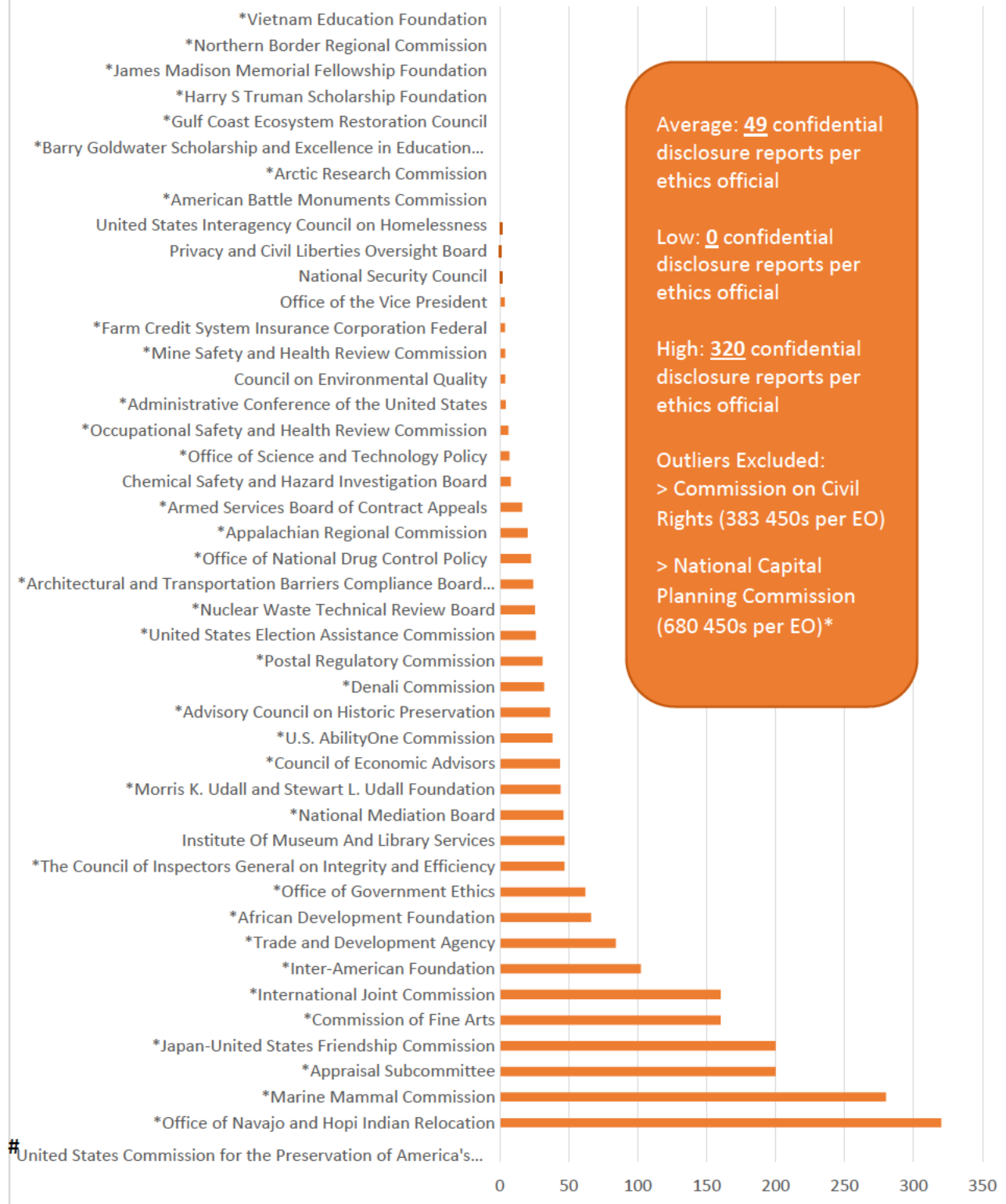
Agencies with Less Than 100 Full Time Employees: Ratio of Required Public Financial (278) Reports per Ethics Official



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Agency reported zero ethics officials in 2017.

Agencies with Less Than 100 Full Time Employees: Ratio of Required Confidential Disclosure (450) Reports per Ethics Official



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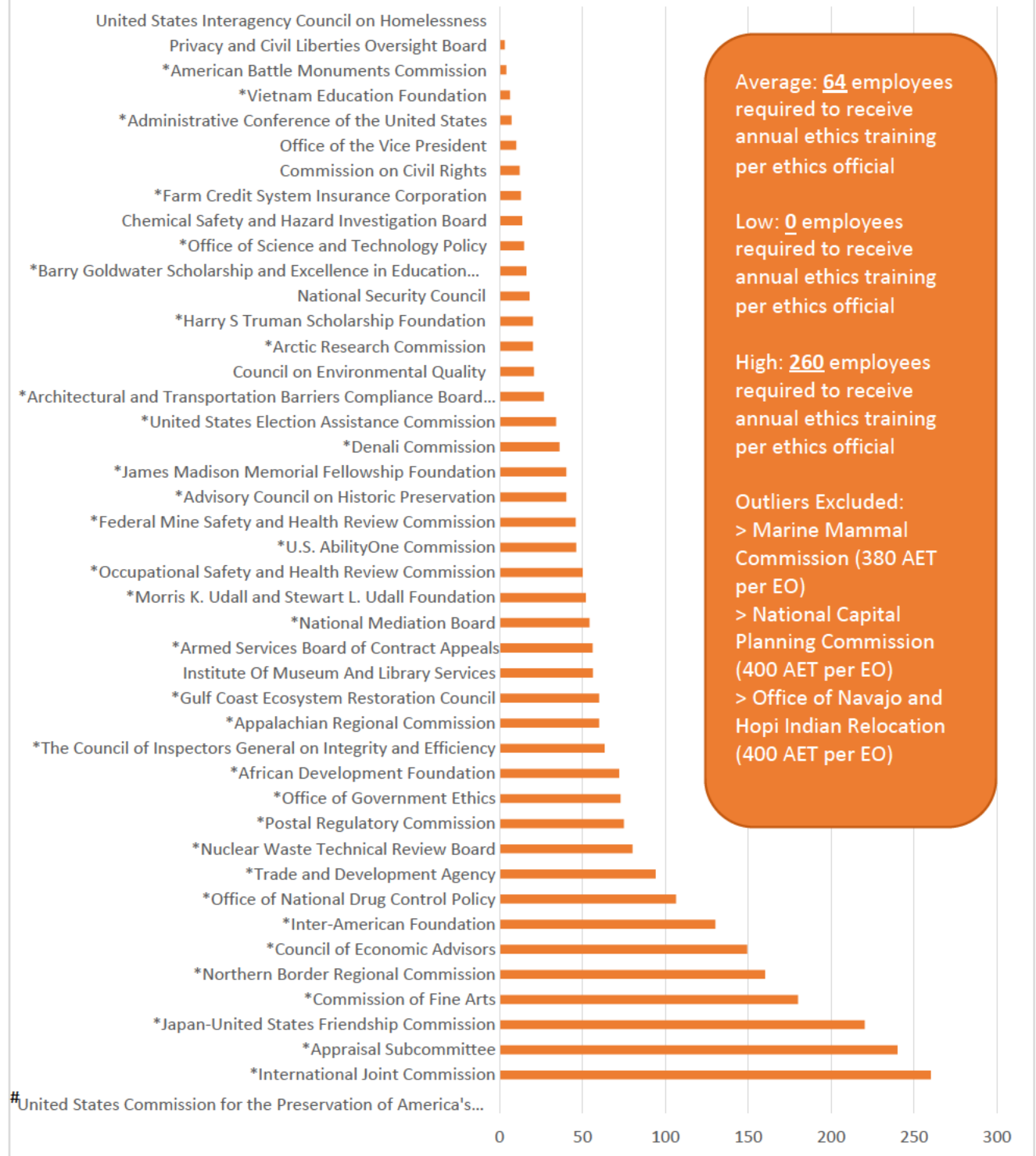
Agencies with Less Than 100 Full Time Employees: Ratio of Employees Required to Receive Initial Ethics Training per Ethics Official



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Agency reported zero ethics officials in 2017.

Agencies with Less Than 100 Full Time Employees: Ratio of Employees Required to Receive Annual Ethics Training per Ethics Official



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Agency reported zero ethics officials in 2017.

Ethics Official Full Time Equivalent for All Agencies

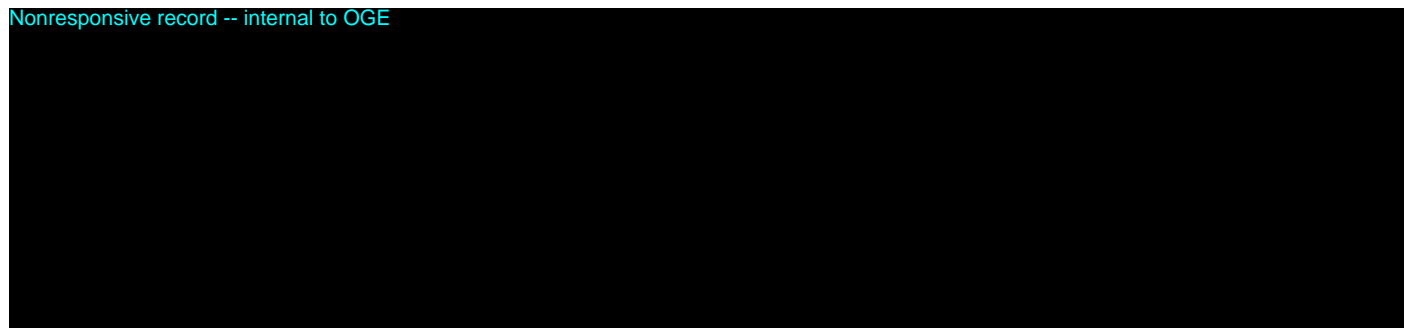
Agency	Ethics Official Full Time Equivalent	Number of Full Time Employees
Administrative Conference of the United States	0.7000	0 to 99
Advisory Council on Historic Preservation	0.2750	0 to 99
African Development Foundation	0.5000	0 to 99
American Battle Monuments Commission	0.7500	0 to 99
Appalachian Regional Commission	0.0500	0 to 99
Appraisal Subcommittee	0.0500	0 to 99
Architectural and Transportation Barriers Compliance Board (United States Access Board)	0.7500	0 to 99
Arctic Research Commission	0.0500	0 to 99
Armed Forces Retirement Home	0.5000	100 to 999
Armed Services Board of Contract Appeals	0.5000	0 to 99
Barry Goldwater Scholarship and Excellence in Education Foundation	0.5000	0 to 99
Broadcasting Board of Governors	2.2500	1,000 to 9,999
Central Intelligence Agency	16.7500	classified
Chemical Safety and Hazard Investigation Board	1.0250	0 to 99
Commission of Fine Arts	0.0500	0 to 99
Commission on Civil Rights	1.7500	0 to 99
Commodity Futures Trading Commission	5.7500	100 to 999
Consumer Financial Protection Bureau	4.8750	1,000 to 9,999
Consumer Product Safety Commission	3.2500	100 to 999
Corporation for National and Community Service	2.0000	100 to 999
Council of Economic Advisors	0.2750	0 to 99
Council on Environmental Quality	1.0250	0 to 99
Court Services and Offender Supervision Agency for the District of Columbia	1.1500	1,000 to 9,999
Defense Commissary Agency	1.5000	10,000 and above
Defense Contract Audit Agency	3.5000	1,000 to 9,999
Defense Finance and Accounting Service	1.7500	10,000 and above
Defense Information Systems Agency	7.0250	1,000 to 9,999
Defense Intelligence Agency	11.0000	10,000 and above
Defense Logistics Agency	16.2500	10,000 and above
Defense Nuclear Facilities Safety Board	1.5000	100 to 999
Defense Security Service	0.7500	100 to 999
Defense Threat Reduction Agency	2.7500	1,000 to 9,999
Denali Commission	0.2500	0 to 99

Agency	Ethics Official Full Time Equivalent	Number of Full Time Employees
Department of Agriculture	21.0000	10,000 and above
Department of Commerce	20.0000	10,000 and above
Department of Defense - Department of the Air Force	417.1250	10,000 and above
Department of Defense - Department of the Army	412.2000	10,000 and above
Department of Defense - Department of the Navy	240.9750	10,000 and above
Department of Defense - Office of the Secretary of Defense	108.8500	10,000 and above
Department of Education	9.0000	1,000 to 9,999
Department of Energy	25.8250	10,000 and above
Department of Health and Human Services	296.3000	10,000 and above
Department of Homeland Security	101.4750	10,000 and above
Department of Housing and Urban Development	21.3000	1,000 to 9,999
Department of Justice	116.8750	10,000 and above
Department of Labor	13.1250	10,000 and above
Department of State	13.5000	10,000 and above
Department of the Interior	41.7250	10,000 and above
Department of Transportation	27.9250	10,000 and above
Department of Treasury	66.4750	10,000 and above
Department of Veterans Affairs	17.5000	10,000 and above
Environmental Protection Agency	38.4250	10,000 and above
Equal Employment Opportunity Commission	2.8500	1,000 to 9,999
Export-Import Bank of the United States	2.5000	100 to 999
Farm Credit Administration	0.5500	100 to 999
Farm Credit System Insurance Corporation	0.5500	0 to 99
Federal Communications Commission	8.0000	1,000 to 9,999
Federal Deposit Insurance Corporation	58.2500	1,000 to 9,999
Federal Election Commission	1.5000	100 to 999
Federal Energy Regulatory Commission	7.2500	1,000 to 9,999
Federal Housing Finance Agency	2.2750	100 to 999
Federal Labor Relations Authority	0.7750	100 to 999
Federal Maritime Commission	0.7500	100 to 999
Federal Mediation and Conciliation Service	0.7500	100 to 999
Federal Mine Safety and Health Review Commission	0.5250	0 to 99
Federal Reserve System	2.7500	1,000 to 9,999
Federal Retirement Thrift Investment Board	1.3500	100 to 999
Federal Trade Commission	4.5000	1,000 to 9,999
General Services Administration	24.9000	10,000 and above
Gulf Coast Ecosystem Restoration Council	0.0500	0 to 99

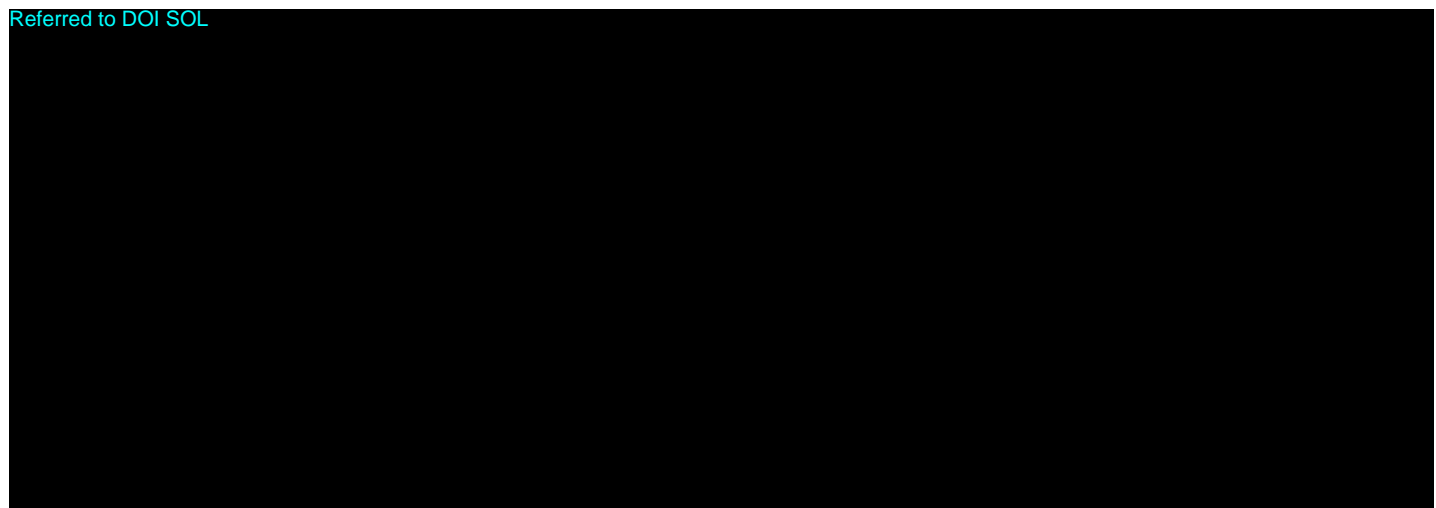
Agency	Ethics Official Full Time Equivalent	Number of Full Time Employees
Harry S Truman Scholarship Foundation	0.0500	0 to 99
Institute Of Museum And Library Services	1.0500	0 to 99
Inter-American Foundation	0.5000	0 to 99
International Boundary and Water Commission	0.2750	100 to 999
International Joint Commission	0.0500	0 to 99
James Madison Memorial Fellowship Foundation	0.0250	0 to 99
Japan-United States Friendship Commission	0.0500	0 to 99
Marine Mammal Commission	0.0500	0 to 99
Merit Systems Protection Board	1.0000	100 to 999
Millennium Challenge Corporation	2.5000	100 to 999
Morris K. Udall and Stewart L. Udall Foundation	0.2500	0 to 99
National Aeronautics and Space Administration	43.8250	10,000 and above
National Archives and Records Administration	1.3250	1,000 to 9,999
National Capital Planning Commission	0.0500	0 to 99
National Credit Union Administration	2.0500	1,000 to 9,999
National Endowment for the Arts	0.7500	100 to 999
National Endowment for the Humanities	1.5000	100 to 999
National Geospatial Intelligence Agency	4.0250	classified
National Labor Relations Board	3.7500	1,000 to 9,999
National Mediation Board	0.5000	0 to 99
National Science Foundation	15.2500	1,000 to 9,999
National Security Agency	6.0000	10,000 and above
National Security Council	2.5000	0 to 99
National Transportation Safety Board	2.5000	100 to 999
Northern Border Regional Commission	0.0125	0 to 99
Nuclear Regulatory Commission	5.5250	1,000 to 9,999
Nuclear Waste Technical Review Board	0.2750	0 to 99
Occupational Safety and Health Review Commission	0.5000	0 to 99
Office of Administration	3.0000	100 to 999
Office of Government Ethics	0.2750	0 to 99
Office of Management and Budget	1.7500	100 to 999
Office of National Drug Control Policy	0.8000	0 to 99
Office of Navajo and Hopi Indian Relocation	0.0250	0 to 99
Office of Personnel Management	1.8750	1,000 to 9,999
Office of Science and Technology Policy	0.7500	0 to 99
Office of Special Counsel	1.7500	100 to 999
Office of the Director of National Intelligence	3.2500	classified

Agency	Ethics Official Full Time Equivalent	Number of Full Time Employees
Office of the Secretary of Defense Office of the Inspector General	2.8500	1,000 to 9,999
Office of the U.S. Trade Representative	1.0000	100 to 999
Office of the Vice President	2.0000	0 to 99
Overseas Private Investment Corporation	0.7750	100 to 999
Peace Corps	2.0250	1,000 to 9,999
Pension Benefit Guaranty Corporation	3.5000	100 to 999
Postal Regulatory Commission	0.7750	0 to 99
Presidio Trust	1.5000	100 to 999
Privacy and Civil Liberties Oversight Board	1.0000	0 to 99
Railroad Retirement Board	1.1000	100 to 999
Securities and Exchange Commission	19.0000	1,000 to 9,999
Selective Service System	0.2750	100 to 999
Small Business Administration	19.0000	1,000 to 9,999
Social Security Administration	16.0000	10,000 and above
Special Inspector General for Afghanistan Reconstruction	1.2750	100 to 999
Surface Transportation Board	0.7750	100 to 999
Tennessee Valley Authority	4.5000	1,000 to 9,999
The Council of Inspectors General on Integrity and Efficiency	0.3000	0 to 99
Trade and Development Agency	0.5000	0 to 99
U.S. AbilityOne Commission	0.5000	0 to 99
Uniformed Services University of the Health Sciences	5.0000	100 to 999
United States Agency for International Development	30.7500	1,000 to 9,999
United States Commission for the Preservation of America's Heritage Abroad	0.0000	0 to 99
United States Election Assistance Commission	0.5000	0 to 99
United States Interagency Council on Homelessness	9.0000	0 to 99
United States International Trade Commission	2.7500	100 to 999
United States Postal Service	8.5000	10,000 and above
Vietnam Education Foundation	0.3250	0 to 99
White House Office	7.0000	100 to 999

Nonresponsive record -- internal to OGE



Referred to DOI SOL



On Fri, Sep 6, 2019 at 8:17 AM Wendy G. Pond <wgpond@oge.gov> wrote:

Good morning, Heather. Got your email. I should be able to pull this together by Monday.

Enjoy your time off!

Wendy

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On Thu, Jun 27, 2019 at 4:46 PM Douglas L. Chapman <dlchapma@oge.gov> wrote:

Hi Scott,


I apologize for not returning your call. I talked to Kim Kaplan who gave me a quick briefing on the status of your program structure changes. I would like to talk to you about how that's progressing: time lines (to the extent you can predict them), implications for our next review, etc. I'm leaving the office for the day and I'm out tomorrow, but would be happy to set a time next week that's convenient. I know it's busy over there even when you're not reinventing ethics at Interior. I don't need an elaborate briefing but would appreciate hearing about some of the basics and what to expect.

Talk to you next week,
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

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On Wed, Jun 5, 2019 at 3:19 PM Christopher J. Swartz <cjswartz@oge.gov> wrote:

Heather,

Do you have a conference line you could circulate? Seth and I are working in different locations today. If not, then I will call at 4:30 and Seth may try to call Scott's line later. I will be calling from a (b) (6) # in case there isn't a conference line (so you don't screen me!)

Thanks!

Christopher J. Swartz

Associate Counsel, Ethics Law and Policy Branch &

Team Leader, International Assistance and Outreach Program


U.S. Office of Government Ethics

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On Jun 5, 2019, at 1:21 PM, Seth Jaffe <sjaffe@oge.gov> wrote:

Scott & Heather,

Can you do a call at 4:30pm today?

Thanks,


Seth

From: Seth Jaffe

Sent: Wednesday, June 05, 2019 9:24 AM

To: 'de la Vega, Scott'

Cc: 'heather.gottry@sol.doi.gov'; Christopher J. Swartz; David J. Apol

Subject: RE: (b) (5) 

Hi Scott,

Chris Swartz and I are currently reviewing and we will try to get up with you and/or Heather before COB Thursday.

Thanks,

Seth

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From: [Seth Jaffe](#)
To: "Heather Gottry"
Cc: [de la Vega, Scott](#); [Christopher J. Swartz](#)
Subject: RE: [EXTERNAL] FW: (b) (5)
Date: Wednesday, June 5, 2019 3:14:11 PM

Heather,

Great. Currently Chris can call you at 4:30pm and I will join depending on whether a new meeting I have will allow me to.

Thanks,
Seth

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On Jun 5, 2019, at 1:21 PM, Seth Jaffe <sjaffe@oge.gov> wrote:

Scott & Heather,

Can you do a call at 4:30pm today?

Thanks,
Seth

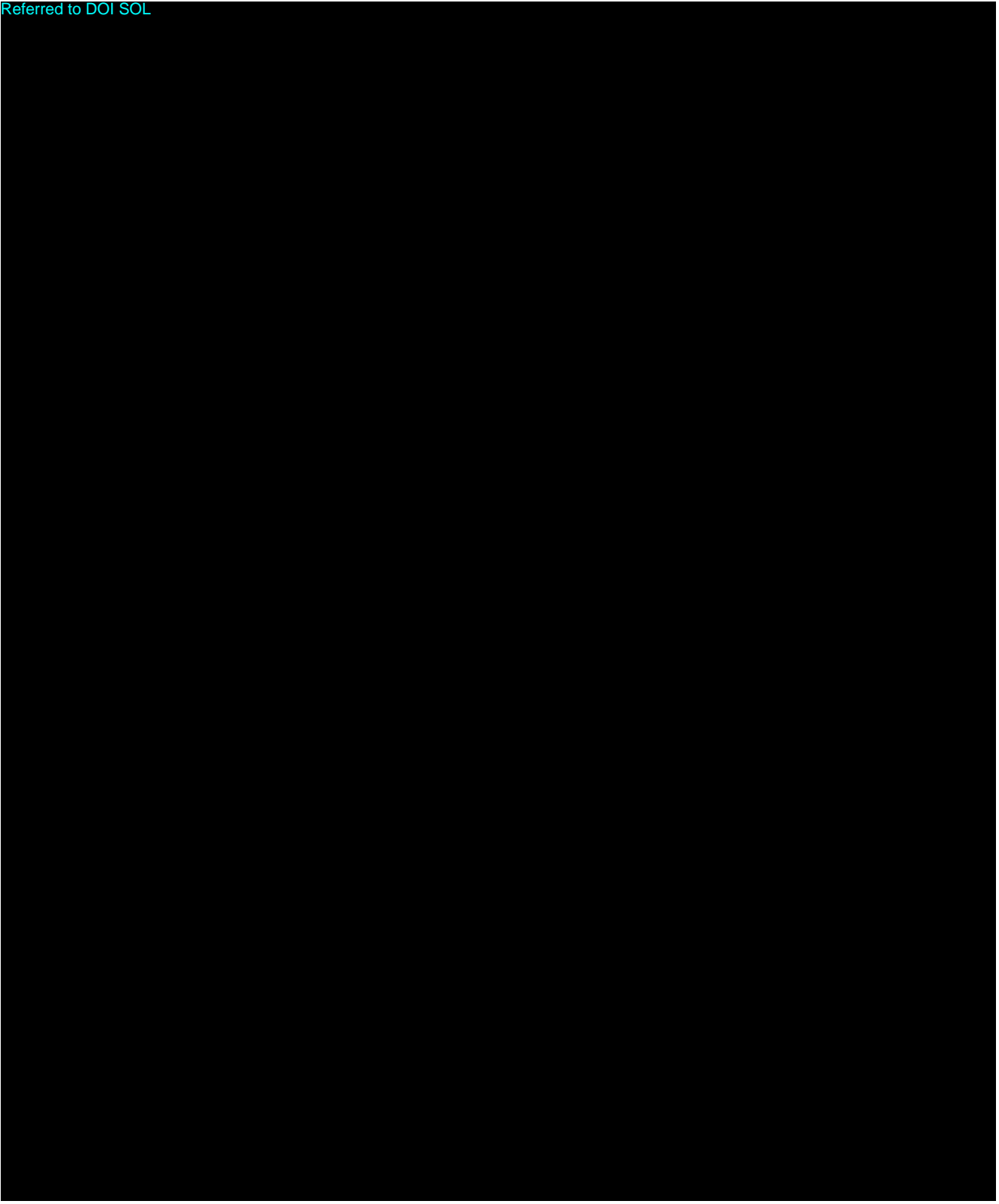
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Cc: 'heather.gottry@sol.doi.gov'; Christopher J. Swartz; David J. Apol
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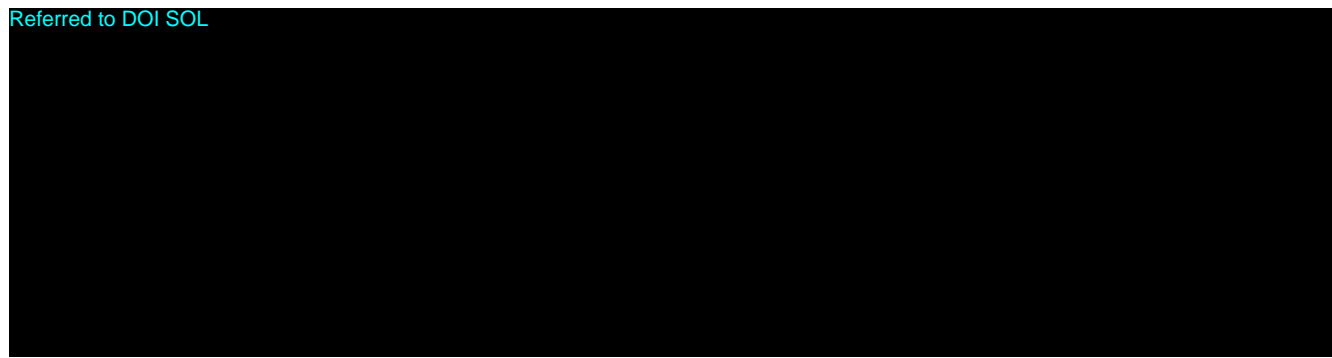
Thanks,
Seth

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From: [David J. Apol](#)
To: ["de la Vega, Scott"](#)
Cc: [Seth Jaffe](#); [Heather Gottry](#)
Subject: RE: (b) (5)
Date: Tuesday, June 4, 2019 6:50:57 PM

Thanks Scott. We will take a look at it soon.

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