

From: [Deborah J. Bortot](#)
To: [Keith Labedz](#)
Subject: RE: on a mangers meeting call
Date: Friday, April 24, 2020 11:03:13 AM

Still on the call, but I talked to Dave about it.

From: Keith Labedz
Sent: Friday, April 24, 2020 10:30 AM
To: Deborah J. Bortot <djbortot@oge.gov>
Subject: RE: on a mangers meeting call

It was just a check in on the CREW letter/statement regarding Marc Short. I am not sure OGE was a recipient but presumably someone may ask us about the content.

Keith

From: Deborah J. Bortot
Sent: Friday, April 24, 2020 10:28 AM
To: Keith Labedz <klabedz@oge.gov>
Subject: on a mangers meeting call

Keith,

I'm on a managers meeting call. Call will likely go on until noon. I will call you after.

Thanks,
Deb

From: [Grant Anderson](#)
To: [Agency Wide](#); [News Clippings](#)
Subject: Legislative Update for Thursday, May 28, 2020
Date: Thursday, May 28, 2020 11:20:10 AM

The Senate meets in a pro forma session.

The House reconvened at 9:00 a.m.

According to *CQ*, the House reconvened at 9 a.m. for legislative business and is expected to consider measures under suspension of the rules.

Legislative and Related News

Multiple outlets report on the first proxy votes in the House. [House conducts first proxy vote in its 231-year history \(Fox News\)](#); [First proxy votes cast in the House despite GOP opposition, lawsuit \(Roll Call\)](#); [House casts first-ever remote vote as Republicans wage constitutional challenge \(Washington Post\)](#)

Executive Branch Ethics and Related News

NPR reports on conflict of interest concerns related to stock owned by the VP's chief of staff, Marc Short. The article notes that "a source familiar with Short's stock holdings said that earlier this month the Office of Government Ethics reviewed Short's ethics program as it relates to the Coronavirus Task Force with the Vice President's legal counsel." [Pence Chief Of Staff Owns Stocks That Could Conflict With Coronavirus Response](#)

Next Scheduled Recess:

House: May 22-29

Senate: May 25-29

From: [Jacob, Gregory F. EOP/OVP](#)
To: [David J. Apol](#)
Subject: RE: Time to talk?
Date: Tuesday, June 30, 2020 10:07:55 AM

Dave,

Just tried you. I'm at my desk (b) (6)) until 10:30. I'm also open 12:00-1:30, or 4:30-5:00.

Greg

From: David J. Apol <djapol@oge.gov>
Sent: Tuesday, June 30, 2020 9:11 AM
To: Jacob, Gregory F. EOP/OVP <(b) (6)>
Subject: RE: Time to talk?

Greg,

I'm available from now until 10:30. Does that work? The best number for me is (b) (6) .

From: Jacob, Gregory F. EOP/OVP [mailto:(b) (6)]
Sent: Monday, June 29, 2020 7:40 PM
To: David J. Apol <djapol@oge.gov>
Subject: Time to talk?

David,

Would you have 30 minutes tomorrow to follow up on our prior conversation? Perhaps at 9:00 or 12:00?

Greg

Gregory F. Jacob
Counsel to the Vice President
Office of the Vice President
(b) (6)
O: (b) (6)

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responsible for delivering the transmission to the intended recipient, you are hereby notified that any dissemination, distribution, copying or use of this email or its contents is strictly prohibited. If you have received this email in error, please notify the sender by responding to the email and then immediately delete the email.

From: [Shelley K. Finlayson](#)
To: [Director of OGE](#); [Emory A. Rounds III](#)
Cc: [David J. Apol](#); [Seth Jaffe](#)
Subject: FW: Rep. Krishnamoorthi to Director
Date: Monday, July 13, 2020 4:06:07 PM
Attachments: [2020.07.13 Letter to Director Rounds.pdf](#)

Attachment follows

From: Shaben, Zachary [[mailto:\(b\) \(6\)](#)]
Sent: Monday, July 13, 2020 2:44 PM
To: Grant Anderson <ganderso@oge.gov>
Subject: Rep. Krishnamoorthi to Director

Hi Grant,

Rep. Krishnamoorthi has written a letter (attached) to Director Rounds regarding Vice President Pence's Chief of Staff, Marc Short, and his role on the Coronavirus Task Force.

Please let me know if you have any questions.

Best,
Zach

Zach Shaben

Legislative Correspondent
Office of Congressman Raja Krishnamoorthi (IL-08)
115 Cannon House Office Building | Washington, D.C. 20515

(b) (6) | (b) (6)

RAJA KRISHNAMOORTHY
8TH DISTRICT, ILLINOIS

115 CANNON HOUSE OFFICE BUILDING
WASHINGTON, DC 20515

TELEPHONE: (202) 225-3711
FAX: (202) 225-7830

1701 EAST WOODFIELD ROAD, SUITE 704
SCHAUMBURG, IL 60173

TELEPHONE: (847) 413-1959
FAX: (847) 413-1965

www.krishnamoorthi.house.gov

Congress of the United States
House of Representatives
Washington, DC 20515

COMMITTEE ON
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READINESS

July 13, 2020

The Honorable Emory A. Rounds
Director
U.S. Office of Government Ethics
1201 New York Avenue NW, Suite 500
Washington, DC 20005

Dear Director Rounds:

I am writing today regarding an issue of significant relevance to ethical governance at the top of American government: recent revelations that Marc Short, Vice President Pence's Chief of Staff and chief aide determining the Coronavirus Task Force's agenda, owns between \$506,043 and \$1.64 million worth of individual stocks in companies that have been directly involved in or affected by the Task Force's work.¹² Public service demands not only our thorough commitment to putting the needs of the country ahead of ourselves, but also to holding ourselves to the highest ethical standards in eliminating conflicts of interest and complying with the law in doing so.

The Office of Government Ethics (OGE) recently issued guidance reiterating that the primary conflict of interest statute applicable to executive branch employees applies to an employee's stock interests. OGE explained that, under 18 U.S.C. § 208, "executive branch employees are prohibited from participating personally and substantially in any particular matter that they know would have a direct and predictable effect on their own financial interest or financial interests imputed to them."³ With respect to an employee's stock holdings, OGE noted that "[s]tock constitutes ownership rights in a company" and that "as such, OGE has consistently treated financial interests of the company and the financial interests of the shareholders as one and the same."⁴ Thus, OGE advised, "[e]mployees who own stock in a company should be counseled that they may not participate in a particular matter affecting the company even if there is not a probable effect on the company's stock price."

¹ NPR, *For Pence, Coronavirus Task Force Is A High-Profile Assignment With Political Risk*, Tamara Keith, 4/29/20, <https://www.npr.org/2020/04/29/847580759/for-pence-coronavirus-task-force-is-a-high-profile-assignment-with-political-risk>

² Ashley Parker, Yasmee Abutaleb and Josh Dawsey, Trump administration has many task forces — but still no plan for beating covid-19, Washington Post, Apr. 11, 2020, <https://wapo.st/3gv7YgV>

³ U.S. Office of Gov't Ethics, Conflict of Interest Analysis for Stocks under 18 U.S.C. § 208, LA-20-03, May 1, 2020, <https://bit.ly/37V1Bjk>.

⁴ Id.

For this reason, I was disturbed by National Public Radio's (NPR) recent report regarding Marc Short's substantial ownership of individual stocks in companies directly involved in the COVID-19 pandemic relief efforts. Beyond the presence of Mr. Short's conflict of interest through owning stock in companies central to the coronavirus response while holding his position as aide to the chair of the Coronavirus Task Force, Mr. Short has also publicly praised these companies in his official capacity. For example, on March 18th Mr. Short discussed the 3M Company on Fox Business as one of the "primary producers" of respirator masks while owning between \$65,002 and \$150,000 worth of 3M stock.⁵

The Vice President's office indicates that Mr. Short applied for a certificate of divestiture, which would have provided a tax break upon his divesting from his conflicted assets.⁶ However, your agency declined to grant this certificate because he refused to divest from all his potentially conflicted assets. It is important to note that not receiving a certificate of divestiture is not an acceptable reason to fail to divest from stocks deemed a potential conflict of interest. OGE's regulations expressly provide that an employee seeking a certificate of divestiture must agree to divest the asset at issue, whether or not OGE ultimately grants a certificate of divestiture.⁷ Additionally, OGE's regulations provide that, when seeking a certificate of divestiture for an employee, the ethics official for the employing office must submit a written opinion articulating why divestiture is "reasonably necessary" or, stated differently, why the asset poses a conflict of interest for the employee.⁸ This means that Mr. Short was still required to resolve the conflict of interest caused by his stock ownership, whether or not OGE granted him a certificate of divestiture, and that the ethics official for the Office of the Vice President was required to explain why Mr. Short's stock holdings posed a conflict of interest with his official duties.

The Office of the Vice President told NPR that Mr. Short was managing these conflicts of interest by recusing from matters affecting the companies whose stock he held. But, as discussed above, Mr. Short has not refrained from praising 3M publicly, despite holding 3M stocks. He has also participated in meetings regarding the administration's pandemic response with companies whose stocks he holds. Each of these meetings appears to have focused on the interests of a specific industry, which implicates the conflict of interest law.⁹ While waivers from the conflict of interest law are sometimes provided, Mr. Short is not listed on the White House's website as receiving a waiver as of this date.¹⁰

In response to these disturbing revelations, please provide the following information:

1. What is OGE doing to address Mr. Short's apparent violations?

⁵ NPR, *Pence Chief of Staff Owns Stocks that Could Conflict with Coronavirus Response*, Tim Mak, 5/28/20, <https://www.npr.org/2020/05/28/860927054/pence-chief-of-staff-owns-stocks-that-could-conflict-with-coronavirus-response>

⁶ NPR, *Pence Chief of Staff Owns Stocks that Could Conflict with Coronavirus Response*, Tim Mak, 5/28/20, <https://www.npr.org/2020/05/28/860927054/pence-chief-of-staff-owns-stocks-that-could-conflict-with-coronavirus-response>

⁷ 5 C.F.R. § 2634.1005(a)(3); U.S. Office of Gov't Ethics, Procedures for Requesting a Certificate of Divestiture, DO-06-30 (2006), <https://bit.ly/2A5xBVu>; U.S. Office of Gov't Ethics, Release of OGE's Certificate of Divestiture Reference Guide, PA-16-04 (2016) ("The person requesting a Certificate of Divestiture (i.e., you, your spouse, your dependent or minor child, or a trustee) must commit in writing to divesting the asset even if a Certificate of Divestiture is not issued."), <https://bit.ly/37WtuHy>.

⁸ 5 C.F.R. § 2634.1005(b)(2).

⁹ Letter to the Federal Bureau of Investigation from Citizens for Responsibility and Ethics in Washington, June 3, 2020, <https://go.aws/31jEHkt>.

¹⁰ *Citizens for Ethics and Responsibility in Washington, Does the Vice President's Chief of Staff have a Coronavirus Conflict of Interest?*, Walter Shaub and Meredith Lerner, 4/23/20, <https://www.citizensforethics.org/marc-short-coronavirus-stocks-conflict-of-interest/>

2. Does OGE plan to certify Mr. Short's annual financial disclosure despite these apparent violations?
3. Does OGE plan to refer this matter to the Public Integrity Section of DOJ? Why or why not?
4. Has OGE taken steps to ensure that these violations do not continue to occur in the future?
5. Has OGE obtained a list of meetings regarding the pandemic response in which Mr. Short participated with companies whose stock he held? If not, why not?
6. What justification did the Office of the Vice President or the White House offer for considering a certificate of divestiture for Mr. Short and, specifically, what was the basis for concluding that Mr. Short had a conflict of interest?
7. What guidance has OGE provided Mr. Short, the White House or the Office of the Vice President regarding the management of Mr. Short's conflicts of interest?
8. Was Mr. Short required to complete government ethics training during his recent service at the White House or during his current service at the Office of the Vice President, and did any such training cover conflicts of interest?

On the broader issue of OGE's stated duty to prevent conflicts of interest in the executive branch and to address similar issues, I also ask:

1. What measures does OGE take in response to individuals disclosing conflicts of interest but refusing to divest from them?
2. How does OGE evaluate the thoroughness of recusals proposed in ethics agreements or other arrangements, and how does it ensure continued compliance with those agreements or arrangements?
3. Can a recusal function as an acceptable substitute for divestment in the absence of an approved ethics agreement and, if so, what measures does OGE take to ensure compliance with the alleged recusal?
4. How many individuals in the administration have been denied certificates of divestiture for reasons other than OGE determining a conflict did not exist?
5. How many of these individuals have failed to divest under such circumstances, and have any done so without completing an ethics agreement or implementing a recusal arrangement?
6. Has the OGE undertaken any efforts to ensure individuals who have failed to divest have adhered to the terms of their ethics agreements or, in their absence, to federal ethics law?

Finally, please provide us with copies of the following records:

1. Any written request for a certificate of divestiture for Mr. Short or, if none exists, all records of communications regarding the possibility of Mr. Short seeking or obtaining a certificate of divestiture.
2. All guidance provided by OGE to the White House, the Office of the Vice President and/or Mr. Short regarding the management of his conflicts of interest.
3. Any referral of Mr. Short that you have made to the Public Integrity Section or any other component of the Department of Justice.

4. Any ethics agreement, recusal arrangement or waiver for Mr. Short pertaining to his service in the Office of the Vice President.
5. All documents demonstrating that OGE has taken affirmative steps to address revelations of Mr. Short's possible violation of the conflict of interest law.

Please provide answers to my offices no later than July 27th. It is unethical to have senior members of the executive branch abusing positions of power and violating public trust, and we urge you to do everything in your power to hold individuals accountable to the law.

Sincerely,



Raja Krishnamoorthi
Member of Congress

From: [Seth Jaffe](#)
To: [David J. Apol](#)
Subject: FW: Draft response letter
Date: Monday, July 27, 2020 4:18:35 PM
Attachments: [Draft response letter to Rep. Krishnamoorthi \(v12\).docx](#)

(b)(5) 3 page draft letter withheld in full.
Final version available on OGE website
under Congressional Correspondence.

Dave,

Per our discussion, (b) (5). Also, could you
copy me once you respond to Diana?

Thanks,
Seth

From: Diana Veilleux
Sent: Monday, July 27, 2020 2:51 PM
To: Seth Jaffe <sjaffe@oge.gov>
Subject: Draft response letter

Same attachment as email
immediately above.

Hi Seth

As discussed, attached is the Krishnamoorthi response letter for your review. Please let me know if you have any questions or concerns about the contents, or recommend any changes.

Thanks!

Diana

From: [David J. Apol](#)
To: [Seth Jaffe](#)
Subject: Draft response letter to Rep. Krishnamoorthi (v12) (003).docx
Date: Monday, July 27, 2020 5:21:42 PM
Attachments: [Draft response letter to Rep. Krishnamoorthi \(v12\) \(003\).docx](#)

(b)(5) 3 page draft letter withheld in full.
Final version available on OGE website
under Congressional Correspondence.

Here are my comments.

From: [David J. Apol](#)
To: [Diana Veilleux](#)
Cc: [Seth Jaffe](#); [Shelley K. Finlayson](#)
Subject: GC comments on draft
Date: Monday, July 27, 2020 5:55:19 PM
Attachments: [Draft response letter to Rep. Krishnamoorthi \(v12\) \(003\).docx](#)

(b)(5) 3 page draft letter withheld in full. Final version available on OGE website under Congressional Correspondence.

Diana,

Per our discussion, here are our comments on the draft letter.

Dave

From: David J. Apol
Sent: Monday, July 27, 2020 5:53 PM
To: David J. Apol <djapol@oge.gov>
Subject: Draft response letter to Rep. Krishnamoorthi (v12) (003).docx

From: [Seth Jaffe](#)
To: [Shelley K. Finlayson](#); [David J. Apol](#)
Subject: RE: congressional letter
Date: Thursday, July 30, 2020 5:46:49 PM

Shelley,

Thank you.

Seth

From: Shelley K. Finlayson
Sent: Thursday, July 30, 2020 5:27 PM
To: David J. Apol <djapol@oge.gov>; Seth Jaffe <sjaffe@oge.gov>
Subject: congressional letter

Good afternoon –

The congressional letter regarding OVP has been sent to the requestor. Please advise who/how you would like to share the letter and the request letter, as we promised, with OVP.

Thanks,
Shelley

From: LNAPPS1.USOGE@oge.gov
To: [Mark R.B. Stewart](#)
Subject: IMPORTANT - Form 278 [Annual] ACTION NEEDED - Review by assignee
Date: Wednesday, August 12, 2020 7:37:32 AM

Form 278 [Annual] for Marc T Short is pending ACTION: Review by assignee.
Please click the link below.

(b)(5) - internal agency network

Please initiate your review within 5 days. You should contact the appropriate agency with any follow up questions and resolve outstanding issues within 30 days.

Remember to enter all required review and routing dates into FDTS prior to forwarding the report for certification.

From: [Integrity.gov](https://integrity.gov)
To: [Mark R.B. Stewart](#)
Subject: Integrity.gov: Report Pending Action
Date: Wednesday, August 12, 2020 7:45:14 AM

A 2020 Annual report for Short, Marc T is pending your action as OGE Reviewer. You may access the report by logging into integrity at <https://integrity.gov>.

From: [Shelley K. Finlayson](#)
To: [David J. Apol](#); [Dale A. Christopher](#); [Seth Jaffe](#)
Subject: FW: New Letter to OGE From Congressman Krishnamoorthi
Date: Monday, August 31, 2020 8:16:13 AM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[2020.08.28 Rep Krishnamoorthi to OGE re Short Response.pdf](#)

Attachment follows

From: Baldwin, Wilson [[mailto:\(b\) \(6\)](#)]
Sent: Friday, August 28, 2020 4:37 PM
To: Grant Anderson <ganderso@oge.gov>
Subject: New Letter to OGE From Congressman Krishnamoorthi

Grant, please find attached the Congressman's new letter to the Director. While he requests a response within 2 weeks, we're conscious of the time crunch and potential volume you're receiving, including from us, and approach that with flexibility and understanding.
Have a good weekend,

Will Baldwin
Communications Director & Senior Advisor
Office of Congressman Raja Krishnamoorthi (IL-08)
(C) (b) (6)
115 Cannon House Office Building



Congress of the United States
Washington, DC 20515

August 28, 2020

The Honorable Emory A. Rounds
Director
U.S. Office of Government Ethics
1201 New York Avenue NW, Suite 500
Washington, DC 20005

Dear Director Rounds:

I am writing in response to your July 30, 2020 letter regarding my concerns about the conflicts of interest possessed by Marc Short. During his tenure as Vice President Pence's Chief of Staff and the chief aide in determining the Coronavirus Task Force's agenda, Mr. Short has owned between \$506,043 and \$1.64 million of individual stocks in companies that have been directly involved in or affected by the Task Force's work.^{[1][2]}

In response to my questions concerning Mr. Short's acknowledged conflicts of interest, his refusal to divest from those conflicts, and his apparent failure to recuse himself from related matters, you directed me to the Office of the Vice President (OVP)^[3]. As you suggested, I have redirected those specific inquiries to the OVP's Designated Agency Ethics Official (DAEO). However, while your letter cites the responsibility of agency ethics officials, 5 CFR 2638.108(a)(14) also states:

“The Office of Government Ethics orders such corrective action on the part of an agency as the Director deems necessary, pursuant to subpart D of this part, and such corrective action on the part of individual executive branch employees as the Director deems necessary, pursuant to subpart E of this part.”^[4]

While direct oversight and authority over the ethical questions surrounding Mr. Short and any of his colleagues in the OVP fall under that agency's jurisdiction, OGE still retains the responsibility of overseeing the OVP's proper administration of its ethics program and you retain the power to order corrective action as you deem necessary.

In response to the questions around Mr. Short's conflicts of interest and the OVP's addressing them, please provide the following information:

1. What oversight measures does OGE use to ensure that agencies are properly administering their ethics programs?

^[1] NPR, *For Pence, Coronavirus Task Force Is A High-Profile Assignment With Political Risk*, Tamara Keith, 4/29/20, <https://www.npr.org/2020/04/29/847580759/for-pence-coronavirus-task-force-is-a-high-profile-assignment-with-political-ris>

^[2] Ashley Parker, Yasmeen Abutaleb and Josh Dawsey, Trump administration has many task forces — but still no plan for beating covid-19, Washington Post, Apr. 11, 2020, <https://wapo.st/3gv7YgV>

^[3] NPR, *Pence Chief of Staff Owns Stocks that Could Conflict with Coronavirus Response*, Tim Mak, 5/28/20, <https://www.npr.org/2020/05/28/860927054/pence-chief-of-staff-owns-stocks-that-could-conflict-with-coronavirus-response>

^[4] [5 CFR 2638.108\(a\)\(14\)](#)

2. Has OGE opened any inquiries or investigations into whether any agencies are failing to fully and properly administer their ethics programs in accordance with OGE rules?
3. Did reports and inquiries surrounding Mr. Short's conflicts of interest precipitate any review of OVP's ethics program?
4. Have ethical questions around any other executive branch officials led to inquiries by OGE into the administration of agency ethics programs?

Finally, please provide us with copies of the following records:

1. Any records of OGE inquiries into the failure of OVP or any other agency to properly administer its ethics program.
2. Any records of OGE recommendations or guidance for addressing the failure of agencies to properly enforce or administer their ethics programs.
3. All guidance provided to OGE by the White House, the Office of the Vice President and/or Mr. Short regarding OGE's oversight of agency ethics programs.
4. All documents demonstrating that OGE has taken affirmative steps to monitor agency ethics programs.

Please provide answers to my office no later than September 11th.

Sincerely,

A handwritten signature in black ink, appearing to read "Raja Krishnamoorthi", with a stylized, flowing script.

Raja Krishnamoorthi
Member of Congress

From: [Megan V. Granahan](#)
To: [Mark R.B. Stewart](#)
Subject: RE: IMPORTANT - Form 278 [Annual] ACTION NEEDED - Review by assignee Short, Mark
Date: Thursday, September 3, 2020 7:20:15 PM

(b)(5) discussion of review of Short report

(b)(5) discussion of
general review
procedure

Megan Granahan
Chief, Financial Disclosure Branch
General Counsel and Legal Policy Division
202.482.9204

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

From: Mark R.B. Stewart
Sent: Thursday, September 3, 2020 6:46 PM
To: Megan V. Granahan <mvgranah@oge.gov>
Subject: RE: IMPORTANT - Form 278 [Annual] ACTION NEEDED - Review by assignee Short, Mark - [Message contains CUI]

Okay,

(b)(5) discussion of general review procedure

(b)(5) discussion of review of Short report

(b)(5) discussion of general review procedure

(b)(5) discussion of review of Short report

(b)(5) discussion of general review procedure

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

From: Megan V. Granahan
Sent: Thursday, September 3, 2020 5:01 PM
To: Mark R.B. Stewart <mstewart@oge.gov>
Subject: FW: IMPORTANT - Form 278 [Annual] ACTION NEEDED - Review by assignee Short, Mark - [Message contains CUI]

(b)(5) discussion of review of Short report

(b)(5) discussion of general review procedure

(b)(5) discussion of review of Short report

(b)(5) discussion of general review procedure

Megan Granahan
Chief, Financial Disclosure Branch
General Counsel and Legal Policy Division
202.482.9204

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

From: Mark R.B. Stewart
Sent: Thursday, September 3, 2020 4:46 PM
To: Megan V. Granahan <mvgranah@oge.gov>
Subject: FW: IMPORTANT - Form 278 [Annual] ACTION NEEDED - Review by assignee Short, Mark

Hey,

I was going to bring this up before, but was waiting for a meeting. Could you do me a favor?

(b)(5)
discussion of
general review
procedure

(b)(5) discussion of general review procedure

(b)(5) discussion of review of Short report

(b)(5) discussion of general review procedure

(b)(5) discussion of review of Short report

Mark

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

From: LNAPPS1.USOGE@oge.gov [<mailto:LNAPPS1.USOGE@oge.gov>]

Sent: Wednesday, August 12, 2020 7:38 AM

To: Mark R.B. Stewart <mstewart@oge.gov>

Subject: IMPORTANT - Form 278 [Annual] ACTION NEEDED - Review by assignee

Form 278 [Annual] for Marc T Short is pending ACTION: Review by assignee.
Please click the link below.

(b)(5) - internal agency network

Please initiate your review within 5 days. You should contact the appropriate agency with any follow up questions and resolve outstanding issues within 30 days.

Remember to enter all required review and routing dates into FDTS prior to forwarding the report for certification.

From: [Megan V. Granahan](#)
To: [Lori Kelly](#)
Subject: RE: Short, Marc
Date: Friday, September 4, 2020 8:19:27 AM

Thanks!

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

From: Lori Kelly <lkelly@oge.gov>
Date: 9/4/20 6:41 AM (GMT-05:00)
To: "Megan V. Granahan" <mvgranah@oge.gov>
Cc: "Mark R.B. Stewart" <mstewart@oge.gov>
Subject: RE: Short, Marc

[Done](#)

From: Megan V. Granahan
Sent: Thursday, September 3, 2020 5:03 PM
To: Lori Kelly <lkelly@oge.gov>
Cc: Mark R.B. Stewart <mstewart@oge.gov>
Subject: Short, Marc

Hi Lori can you make sure that this report is reassigned from Mark to me in FDTS and any other tracking system/metrics you use?

Thanks,

m

Megan Granahan
Chief, Financial Disclosure Branch
General Counsel and Legal Policy Division
202.482.9204

Visit OGE's website: www.oge.gov <<http://www.oge.gov>>
Follow OGE on Twitter: @OfficeGovEthics

From: [Megan V. Granahan](#)
To: (b)(6) M Asher's email at WH
Subject: Report Question - [Message contains CUI]
Date: Thursday, September 17, 2020 1:22:18 PM

CONTROLLED

Hi Monica,

Hope all is going well! I'm reviewing Marc Short's 2020 annual and have a couple of confirmations before I can certify.

(b)(5) and some information also (b)(6) and/or (b)(3)

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

(b) (5)

[REDACTED]

Thanks (and if I should be contacting someone else with these types of questions please let me know),

mg

Megan Granahan
Chief, Financial Disclosure Branch
General Counsel and Legal Policy Division
202.482.9204

Visit OGE's website: www.oge.gov <<http://www.oge.gov>>
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From: [Megan V. Granahan](#)
To: ["Kozmycz, Marina M. EOP/OA"](#)
Cc: ["Spence, David J. EOP/OVP"](#)
Subject: RE: Marc Short - [Message contains CUI] - [Message contains CUI] - [Message contains CUI]
Date: Thursday, September 24, 2020 10:05:07 AM

CONTROLLED

Thanks!

Megan Granahan
Chief, Financial Disclosure Branch
General Counsel and Legal Policy Division
202.482.9204

Visit OGE's website: www.oge.gov <<http://www.oge.gov>>
Follow OGE on Twitter: @OfficeGovEthics

From: Kozmycz, Marina M. EOP/OA [[mailto:\(b\) \(6\)](#)]]
Sent: Thursday, September 24, 2020 9:51 AM
To: Megan V. Granahan <mvgranah@oge.gov>
Cc: Spence, David J. EOP/OVP [\(b\) \(6\)](#) >
Subject: RE: Marc Short - [Message contains CUI] - [Message contains CUI]

Megan,

Sounds good. I can conference everyone in.

V/r,
Marina

From: Megan V. Granahan <mvgranah@oge.gov <<mailto:mvgranah@oge.gov>> >
Sent: Thursday, September 24, 2020 9:27 AM
To: Kozmycz, Marina M. EOP/OA [\(b\) \(6\)](#)
<[mailto:\(b\) \(6\)](#)> >
Cc: Spence, David J. EOP/OVP [\(b\) \(6\)](#)
<[mailto:\(b\) \(6\)](#)> >
Subject: RE: Marc Short - [Message contains CUI] - [Message contains CUI]

CONTROLLED

Great, let's do 2:30pm. I'm at 202-482-9204.

Megan Granahan
Chief, Financial Disclosure Branch
General Counsel and Legal Policy Division
202.482.9204

Visit OGE's website: >www.oge.gov< <<http://www.oge.gov%3c>> <><http://www.oge.gov/><>
Follow OGE on Twitter: @OfficeGovEthics

From: Kozmycz, Marina M. EOP/OA [[<mailto:\(b\) \(6\)>](mailto:(b) (6))] <[<mailto:\(b\) \(6\)>](mailto:(b) (6))>]
Sent: Thursday, September 24, 2020 7:15 AM
To: Megan V. Granahan <mvgranah@oge.gov <<mailto:mvgranah@oge.gov>> >
Cc: Spence, David J. EOP/OVP <(b) (6)> <[<mailto:\(b\) \(6\)>](mailto:(b) (6))> >
Subject: RE: Marc Short - [Message contains CUI]

Good morning,

I am available after 2pm today.

V/r,
Marina

From: Megan V. Granahan <mvgranah@oge.gov <<mailto:mvgranah@oge.gov>> >
Sent: Wednesday, September 23, 2020 6:06 PM
To: Kozmycz, Marina M. EOP/OA <(b) (6)> <[<mailto:\(b\) \(6\)>](mailto:(b) (6))> <[<mailto:\(b\) \(6\)>](mailto:(b) (6))> >
Cc: Spence, David J. EOP/OVP <(b) (6)> <[<mailto:\(b\) \(6\)>](mailto:(b) (6))> <[<mailto:\(b\) \(6\)>](mailto:(b) (6))> >
Subject: Marc Short - [Message contains CUI]

CONTROLLED

Please excuse my delay in responding. Do you have availability tomorrow afternoon? As of now my schedule is open after 1pm.

Megan Granahan
Chief, Financial Disclosure Branch
General Counsel and Legal Policy Division
202.482.9204

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<><http://www.oge.gov%3c><> <>><http://www.oge.gov/><<>

Follow OGE on Twitter: @OfficeGovEthics

From: Kozmycz, Marina M. EOP/OA [[\(b\) \(6\)](mailto:(b) (6))]
<[\(b\) \(6\)](mailto:(b) (6))> <[\(b\) \(6\)](mailto:(b) (6))>
<[\(b\) \(6\)](mailto:(b) (6))>]

Sent: Friday, September 18, 2020 3:03 PM

To: Megan V. Granahan <mvgranah@oge.gov> <<mailto:mvgranah@oge.gov>> > >

Cc: Spence, David J. EOP/OVP (b) (6)
<[\(b\) \(6\)](mailto:(b) (6))> <[\(b\) \(6\)](mailto:(b) (6))> > >

Subject: Marc Short

Hi Megan,

Your question about Mark Short's Annual report came my way. I am also copying David, who is OVP Ethics Counsel. Could you please let us know when is a good time for the three of us to talk, so we can better understand the question and provide you with the correct information?

Thank you in advance.

V/r,
Marina

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From: [Seth Jaffe](#)
To: [David J. Apol](#); [Megan V. Granahan](#)
Subject: FW: Draft Response Second Letter from Rep. Krishnamoorthi
Date: Wednesday, September 30, 2020 10:11:30 AM
Attachments: [Draft response letter to Rep. Krishnamoorthi \(v2\).docx](#)

(b)(5) 3 page draft letter withheld in full.
Final version available on OGE's website
under Congressional Correspondence.

FYI:

From: Diana Veilleux
Sent: Tuesday, September 29, 2020 12:36 PM
To: Dale A. Christopher <dachrist@oge.gov>; Seth Jaffe <sjaaffe@oge.gov>
Cc: Grant Anderson <ganderso@oge.gov>
Subject: Draft Response Second Letter from Rep. Krishnamoorthi

Same attachment as email
immediately above.

Good Afternoon Chip and Seth

Attached is a draft response to the second (and final outstanding) letter from Rep. Krishnamoorthi. Please review the draft and let me know (with a cc to Grant, who is apparently having login problems today) whether you have any questions or concerns. If possible, we would like to get this to Emory for his review late today or early tomorrow.

Thanks!

Diana

From: [Megan V. Granahan](#)
To: [David J. Apol](#)
Subject: Monday
Date: Monday, November 9, 2020 11:41:37 AM

Hi couple of questions for you:

1. Nonresponsive per requester--unrelated filer/s [REDACTED]
2. I saw your email about Nonresponsive per requester--unrelated filer/s.
Where are we with that?
3. Any updates on Short?
4. Nonresponsive per requester--unrelated filer/s Any
updates?

From: [Megan V. Granahan](#)
To: [Lori Kelly](#)
Subject: RE: Reports
Date: Tuesday, December 1, 2020 11:35:45 AM

You can leave them in the next report. I'm just relieved to know what they are 😊

Megan Granahan
Chief, Financial Disclosure Branch
General Counsel and Legal Policy Division
202.482.9204

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Follow OGE on Twitter: @OfficeGovEthics

From: Lori Kelly
Sent: Tuesday, December 1, 2020 11:29 AM
To: Megan V. Granahan <mvgranah@oge.gov>
Subject: RE: Reports

I will remove them for the next report. Sorry.

From: Megan V. Granahan
Sent: Tuesday, December 1, 2020 11:25 AM
To: Lori Kelly <lkelly@oge.gov>
Subject: RE: Reports

Nonresponsive per requester--unrelated filer/s

Megan Granahan
Chief, Financial Disclosure Branch
General Counsel and Legal Policy Division
202.482.9204

Visit OGE's website: www.oge.gov <<http://www.oge.gov>>
Follow OGE on Twitter: @OfficeGovEthics

From: Lori Kelly
Sent: Tuesday, December 1, 2020 11:14 AM
To: Megan V. Granahan <mvgranah@oge.gov>
Subject: RE: Reports

Remember this part includes every annual, new entrant report:

Filer Last Name

Filer First Name

Filer MI

Agency

Date Received

Date Assigned

Reviewer

Nonresponsive per requester--unrelated filer/s



Unrelated filers-nonresponsive per requester

Nonresponsive per requester--unrelated filer/s



Short

Marc

T

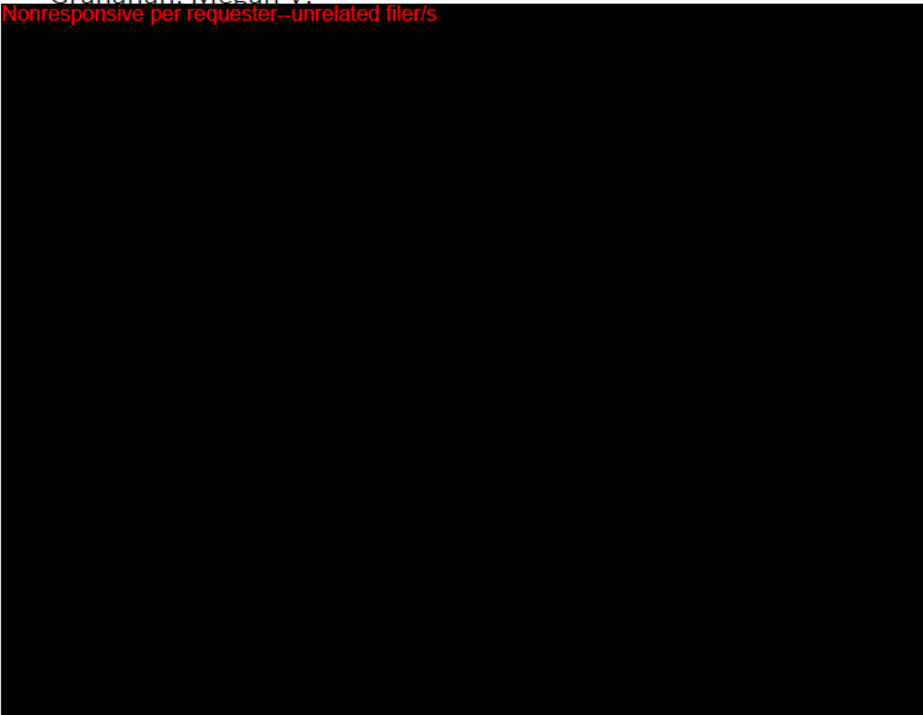
White House Office

8/11/2020

8/12/2020

Granahan, Megan V.

Nonresponsive per requester--unrelated filer/s



From: Megan V. Granahan
Sent: Tuesday, December 1, 2020 10:57 AM
To: Lori Kelly <lKelly@oge.gov <<mailto:lkelly@oge.gov>> >
Subject: RE: Reports

Sorry, also for those 19 that are under our review (per the weekly update).

Megan Granahan
Chief, Financial Disclosure Branch
General Counsel and Legal Policy Division
202.482.9204

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

—

[From: Lori Kelly](#)
[Sent: Tuesday, December 1, 2020 10:56 AM](#)
[To: Megan V. Granahan <mvgranah@oge.gov <<mailto:mvgranah@oge.gov>> >](#)
Subject: RE: Reports

Filer

—
From: Megan V. Granahan

Sent: Tuesday, December 1, 2020 10:53 AM

To: Lori Kelly <lkelly@oge.gov <mailto:lkelly@oge.gov <mailto:lkelly@oge.gov> > >

Subject: Reports

Hi,

Can you send me a list of the filer names for all of the remaining expected 278s?

Megan Granahan

Chief, Financial Disclosure Branch

General Counsel and Legal Policy Division

202.482.9204

Visit OGE's website: www.oge.gov <<http://www.oge.gov>> <<http://www.oge.gov>> >
<<http://www.oge.gov/>> >

Follow OGE on Twitter: @OfficeGovEthics

<<http://www.oge.gov/%20%3chttp://www.oge.gov/>>

From: [Mark R.B. Stewart](#)
To: [Grant Anderson](#)
Subject: RE: FOIA FY 20/052
Date: Tuesday, December 29, 2020 10:29:47 AM

Hey Grant,

The only things I had for him was that his report was assigned to me in FDTs and Integrity, then reassigned to Megan.

I put those emails (and this one) in the H drive.

I searched all my email boxes.

I didn't work his CD or have any comms with the WH on him.

Mark

From: Grant Anderson
Sent: Monday, December 28, 2020 3:14 PM
To: Mark R.B. Stewart <mstewart@oge.gov>; Lori Kelly <lkelly@oge.gov>
Subject: FW: FOIA FY 20/052

Mark & Lori,

Can you please also search for records responsive to this request?

Best,

Grant

From: Grant Anderson
Sent: Tuesday, December 22, 2020 6:29 PM
To: David J. Apol <djapol@oge.gov>; Deborah J. Bortot <djbortot@oge.gov>; Elaine Newton <enewton@oge.gov>; Heather A. Jones <hajones@oge.gov>; Jack MacDonald <jjmacdon@oge.gov>; Seth Jaffe <sjafe@oge.gov>; Teresa L. Williamson <tlwillia@oge.gov>
Subject: FOIA FY 20/052

Below is a FOIA request we have received. Can you please search for any records responsive to this request and provide any responsive records by COB on Wednesday, 12/30?

Please save all responsive records, including emails in their native ".msg" format, in the folder with your name at: (b)(5) - internal agency network

In your response, please provide a brief summary of the locations you searched and the search terms you used. If you do not have any responsive records, please note that in your response.

If you have any responsive records on a non-official email account, please provide them. Please also let me know if you are aware that anyone else not copied on this email may have responsive records or if you have any questions. Thank you!

Best,

Grant

Request:

(1) records pertaining to communication regarding, or consideration of, the possibility of OGE granting a Certificate of Divestiture for Marc Short at any time on or after March 11, 2019

(2) records that mention, discuss or contain information regarding Marc Short on or after April 23, 2020

(3) records of communications between OGE and the Office of the Vice President on or after April 23, 2020

From: [278Tracking](#)
To: [278Tracking](#); [Megan V. Granahan](#)
Subject: RE: Weekly Report
Date: Friday, December 18, 2020 5:07:23 PM
Attachments: [Weekly Report 12 21 2020.pdf](#)

Updated info below

[Reports under Agency/Filer Review.](#)

Filer name		Agency	Response from Agency	Review Status
Unrelated filers-nonresponsive per requester				

[Reports under OGE Review:](#)

Filer Last Name	Filer First Name	Filer MI	Agency	Date Received	Reviewer	Review Start	Fwd for Certification
Unrelated filers-nonresponsive per requester							

[Reports certified over 60 days \(1st quarter\)](#)

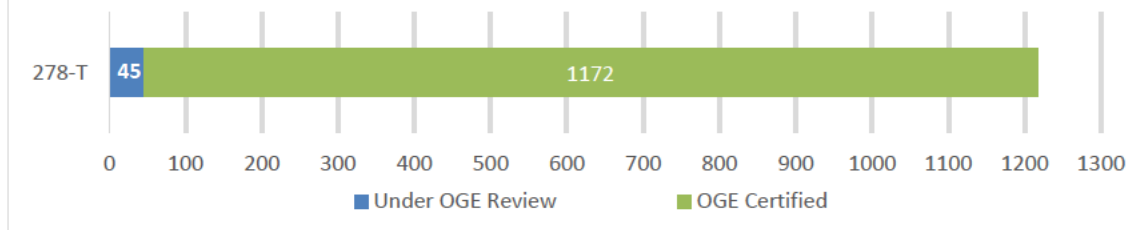
Filer Last Name	Filer First Name	Filer MI	Agency	Date Received	Date Certified	Proc Time - recd-cert/uncert
Unrelated filers-nonresponsive per requester						
Short	Marc	T	White House Office	8/11/2020	12/2/2020	113
Unrelated filers-nonresponsive per requester						

Best,

Lori Kelly, Program Specialist
U.S. Office of Government Ethics
Financial Disclosure Branch
Compliance Division
Tel. 202.482.9306

Visit OGE's website: www.oge.gov

2020 Filing Season - 278T



Additional Performance Metrics

FD Performance 1st QTR (278 & 278T)	FY2021
Total	341
Total Cert/Closed in 60 days	332
Number Cert/Closed over 60	9
Cert/Closed in 60 days (%)	97.4%

CY 2020 Receipt (Any Filing Year)	278	278-T	ANN	TERM	A/T	NE
JAN	23	109	7	14	0	2
FEB	22	84	8	7	1	4
MAR	37	103	26	6	2	2
APR	88	136	70	11	0	2
MAY	198	118	182	9	0	2
JUN	239	111	226	6	2	2
JUL	167	93	152	9	4	2
AUG	92	105	76	9	3	3
SEP	56	115	41	8	5	0
OCT	34	99	21	5	0	0
NOV	17	89	11	5	0	0
DEC	15	55	4	10	0	1

CY2020 Online 201 Requests	278	278-T	CD	EA	Total
JAN	72	44	14	0	130
FEB	142	141	21	0	304
MAR	308	381	92	0	781
APR	717	795	75	0	1587
MAY	431	594	34	0	1059
JUN	226	217	27	0	470
JUL	211	128	19	0	358
AUG	538	297	25	0	860
SEP	226	85	9	0	320
OCT	234	208	40	0	482
NOV	137	72	5	0	214
DEC	113	52	9	0	174

AIMS Agency Information Management System

[My Dashboard](#)[New Interaction](#)[New Outreach](#)[Search](#)[Trends](#)[Agencies](#)[Administration](#)

Resolved Interaction

Interaction Number: 19686

[copy press contact to new](#)

Initiation Date*: 2020-05-22

Title*: NPR Media Inquiry: Marc Short and OGE

Question*: Hi Elizabeth, Patrick and Seth -- I'm working on a story about Marc Short, the chief of staff to the Vice President.

He owns stock in companies that are related directly to the White House's Coronavirus response, as outlined on his Public Financial Disclosure Report. These may present a conflict of interest for his work on the Coronavirus pandemic response.

Some questions for you:

1. Generically, can an executive branch official own stock related to his/her work?
2. Short has not divested his holdings. Is he in compliance with the law?
3. On May 1st, the OGE took the unusual step of reminding executive branch ethics officials that employees that own various stocks may not participate in particular matters that would have a direct effect on their stock holdings. Was this prompted by Short's ethics situation?
4. Earlier this month OGE met with lawyers from the Office of the Vice President to discuss Short's situation. What was discussed?

My deadline is Friday COB.

Thanks,
Tim
Tim Mak <(b) (6)>

Update:

Categories*: 208

Origin Of Interaction*: Email

Source*: Non-Agency

	Press
First Name:	Tim
Last Name:	Mak
Title:	Reporter - NPR
Position:	
Email:	(b) (6)
Phone:	(b) (6)
Other Contact Notes:	
Assignment:	Patrick Shepherd
Watching:	
Temporary Notes:	
created by:	Patrick Shepherd

Resolution Information	
Resolution Date*:	2020-05-22
Resolution Category*:	Resolved
Response*:	<p>On the record: OGE is committed to transparency and citizen oversight of Government. However, OGE does not discuss situation involving individuals.</p> <p>On background: walked through an elemental analysis of 18 USC 208 with an emphasis on particular matters. Discussed the differing threshold for requesting a CD and being directed to divest under 5 CF 2635.402. And the flexibility granted to agencies to determine if recusal rather than divestiture is a workable remedy. (Assigned to: Patrick Shepherd)</p>
Complexity (level):	4 <div>[Click to view/hide complexity guidelines]</div>
Time Spent (hours):	1-4 hours
Contributor:	David J. Apol
<div>reopen</div>	

Interaction History Log	

Closed	05/22/2020 12:37:46 PM by Patrick Shepherd
Now Assigned: Patrick Shepherd	05/22/2020 12:37:46 PM by Patrick Shepherd

Division(s) assigned: PCD

AIMS Agency Information Management System

My Dashboard

New Interaction

New Outreach

Search

Trends

Agencies

Administration

Resolved Interaction

Interaction Number: 19916

Initiation Date*: 2020-07-01

Title*: Technical Consult w/OVP

Question*: OVP DAEO Gregory Jacob asked for a call with OGE in order for OGE to provide a technical consultation concerning (b) (5)

Update:

Categories*: 208

Origin Of Interaction*: Phone

Source*: Agency
Office Of The Vice President

First Name: Gregory

Last Name: Jacob

Title:

Position:

Email: (b) (6)

Phone: (b) (6)

Other Contact Notes:

Assignment: David J. Apol, Seth Jaffe

Watching:

Temporary Notes:

created by: Seth Jaffe

Resolution Information

Resolution Date*: 2020-07-01

Resolution Category*: Resolved

Response*: On the call we provided technical assistance on (b) (5)

(Assigned to: David J. Apol; Seth Jaffe)

Complexity (level):

3

[\[Click to view/hide complexity guidelines\]](#)

Time Spent (hours): 1-4 hours

Contributor:

[reopen](#)

Interaction History Log

Closed

07/01/2020 04:52:53 PM by Seth Jaffe

Now Assigned:

Seth Jaffe

David J. Apol

07/01/2020 04:52:53 PM by Seth Jaffe

Division(s) assigned: GCLPD

From: [201 Forms](#)
To: "Meredith Lerner"; [201 Forms](#)
Subject: RE: OGE Form 201 Request - Corrected
Date: Tuesday, September 8, 2020 11:02:05 AM

Yes that is correct, the 2020 annual report for Marc T. Short is not available for release from OGE.

From: Meredith Lerner [mailto:(b) (6)]
Sent: Tuesday, September 8, 2020 10:59 AM
To: 201 Forms <201forms@oge.gov>
Subject: Re: OGE Form 201 Request - Corrected

Thank you. And just to clarify, I requested the 2020 annual report of Marc T. Short.

On Tue, Sep 8, 2020 at 10:44 AM 201 Forms <201forms@oge.gov> wrote:

CONTROLLED

My apology, the documents you requested for Marc T. Scott are not available. A copy of your completed (corrected) request is attached for your files.

Status: Complete

Best regards,

Lori Kelly, Program Specialist
US Office of Government Ethics
Financial Disclosure Branch
Compliance Division
202-482-9306

From: Meredith Lerner [mailto:(b) (6)]
Sent: Tuesday, September 8, 2020 10:23 AM
To: 201 Forms <201forms@oge.gov>
Subject: Re: OGE Form 201 Request

Thank you for your prompt response. I see that you indicated that, with regard to Marc Short's 2020 annual report, the available reports were attached but I don't think the document was included in the response. Is his report available to be released?

On Tue, Sep 8, 2020 at 10:21 AM 201 Forms <201forms@oge.gov> wrote:

CONTROLLED

The documents you requested are attached where available. The documents are not certified by OGE as they are still under review. A copy of your completed request is attached for your files.

Status: Complete

Best regards,

Lori Kelly, Program Specialist
US Office of Government Ethics
Financial Disclosure Branch
Compliance Division
202-482-9306

From: Meredith Lerner [mailto:(b) (6)]
Sent: Tuesday, September 8, 2020 8:56 AM
To: 201 Forms <201forms@oge.gov>
Subject: OGE Form 201 Request

Good morning,

Please see the attached 201 request for public financial disclosure reports. If you have any questions about this request, please do not hesitate to contact me.

Best,
Meredith

--

Meredith Lerner
Research Associate
CREW | Citizens for Responsibility and Ethics in Washington
(b) (6)

CREW | Citizens for Responsibility and Ethics in Washington
Main: (202) 408-5565 | Fax: (202) 588-5020 |
www.citizensforethics.org

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--

Meredith Lerner

Research Associate

CREW | Citizens for Responsibility and Ethics in Washington

(b) (6)

CREW | Citizens for Responsibility and Ethics in Washington

Main: (202) 408-5565 | Fax: (202) 588-5020 |

www.citizensforethics.org

--

Meredith Lerner

Research Associate

CREW | Citizens for Responsibility and Ethics in Washington

(b) (6)

CREW | Citizens for Responsibility and Ethics in Washington

Main: (202) 408-5565 | Fax: (202) 588-5020 | www.citizensforethics.org

From: [201 Forms](#)
To: "Meredith Lerner"; [201 Forms](#)
Subject: RE: OGE Form 201 Request
Date: Tuesday, September 29, 2020 10:55:20 AM
Attachments: [Marc-T-Short-2020-278DRAFT.pdf](#)
[Louis-Dejoy-07.21.2020-278TDRAFT.pdf](#)
[Louis-Dejoy-2020-278NEDRAFT.pdf](#)
[20200929 Lerner.pdf](#)

Requester previously received attachments, can resend upon request.

CONTROLLED

The documents you requested are attached where available. The documents are labeled "Draft" because they are still under review and are not yet certified by OGE. A copy of your completed request is attached for your files.

Status: Complete

Best regards,

Lori Kelly, Program Specialist
US Office of Government Ethics
Financial Disclosure Branch
Compliance Division
202-482-9306

From: Meredith Lerner [mailto:(b) (6)]
Sent: Tuesday, September 29, 2020 10:14 AM
To: 201 Forms <201forms@oge.gov>
Subject: OGE Form 201 Request

Good morning,

Please see the attached 201 request for public financial disclosure reports.

If you have any questions about this request, please do not hesitate to contact me.

Best,
Meredith

--

Meredith Lerner
Research Associate
CREW | Citizens for Responsibility and Ethics in Washington
(b) (6)

Main: (202) 408-5565 | Fax: (202) 588-5020 | www.citizensforethics.org

From: [201 Forms](#)
To: "[Meredith Lerner](#)"; [201 Forms](#)
Subject: RE: OGE Form 201 Request
Date: Monday, October 5, 2020 1:04:17 PM
Attachments: [Marc-T-Short-2020-278DRAFT.pdf](#)
[Louis-Dejoy-07.21.2020-278TDRAFT.pdf](#)
[Louis-Dejoy-2020-278NEDRAFT.pdf](#)
[20201005 Lerner.pdf](#)

Requester previously
received attachments, can
resend upon request.

CONTROLLED

The documents you requested are attached where available. The documents are labeled "Draft" because they are still under review and are not yet certified by OGE. A copy of your completed request is attached for your files.

Status: Complete

Best regards,

Lori Kelly, Program Specialist
US Office of Government Ethics
Financial Disclosure Branch
Compliance Division
202-482-9306

From: Meredith Lerner [mailto:(b) (6)]
Sent: Monday, October 5, 2020 9:11 AM
To: 201 Forms <201forms@oge.gov>
Subject: OGE Form 201 Request

Good morning,

Please see the attached 201 request for public financial disclosure reports.

If you have any questions about this request, please do not hesitate to contact me.

Best,
Meredith

--

Meredith Lerner
Research Associate (*she/her*)
CREW | Citizens for Responsibility and Ethics in Washington
(b) (6)

Main: (202) 408-5565 | Fax: (202) 588-5020 | www.citizensforethics.org

From: [201 Forms](#)
To: "Meredith Lerner"; [201 Forms](#)
Subject: RE: OGE Form 201 Request
Date: Tuesday, October 13, 2020 11:11:49 AM
Attachments: [Marc-T-Short-2020-278DRAFT.pdf](#)
[Louis-DeJoy-07.21.2020-278TDRAFT.pdf](#)
[Louis-DeJoy-2020-278NEDRAFT.pdf](#)
[Marc-T-Short-08.15.2018.278T.pdf](#)
[Marc-T-Short-01.26.2018-278T.pdf](#)
[Marc-T-Short-08.04.2017-278T.pdf](#)
[Marc-T-Short-07.03.2017-278T.pdf](#)
[Louis-DeJoy-09.01.2020-278TDRAFT.pdf](#)
[20201020 Lerner.pdf](#)

Requester previously received attachments, can resend upon request.

CONTROLLED

The documents you requested are attached where available. Some documents are labeled "Draft" because they are still under review and are not yet certified by OGE. A copy of your completed request is attached for your files.

Status: Complete

Best regards,

Lori Kelly, Program Specialist
US Office of Government Ethics
Financial Disclosure Branch
Compliance Division
202-482-9306

From: Meredith Lerner [mailto:(b) (6)]
Sent: Monday, October 12, 2020 9:18 AM
To: 201 Forms <201forms@oge.gov>
Subject: OGE Form 201 Request

Good morning,

Please see the attached request for public financial disclosure and periodic transaction reports. If you have any questions about this request, please do not hesitate to contact me..

Best,
Meredith

--

Meredith Lerner
Research Associate (*she/her*)
CREW | Citizens for Responsibility and Ethics in Washington
(b) (6)

CREW | Citizens for Responsibility and Ethics in Washington
Main: (202) 408-5565 | Fax: (202) 588-5020 | www.citizensforethics.org

From: [Gast, Scott F. EOP/WHO](#)
To: [278Tracking](#); [Jones, David M. EOP/WHO](#)
Cc: [David Taube](#); [Maura Leary](#); [Monica M. G. Ashar](#); [Kozmycz, Marina M. EOP/OA](#)
Subject: RE: CY2020 Public Financial Disclosure Filing Season - [Message contains CUI]
Date: Wednesday, July 15, 2020 4:07:34 PM

Hi Lori,

Thanks for the information. **Unrelated filers-nonresponsive per requester**

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

The remainder of the reports should be coming to you within the next several weeks.

Scott

From: 278Tracking <278Tracking@oge.gov>
Sent: Friday, July 10, 2020 12:11 PM
To: 278Tracking <278Tracking@oge.gov>; Jones, David M. EOP/WHO
<(b) (6)>; Gast, Scott F. EOP/WHO (b) (6)>
Cc: David Taube <dtaube@oge.gov>; Maura Leary <mleary@oge.gov>; Monica M. G. Ashar
<mimgashar@oge.gov>
Subject: RE: CY2020 Public Financial Disclosure Filing Season - [Message contains CUI]
Importance: High

Hello,

We have received from your agency all but the following report(s) required by the Ethics in Government Act to be submitted to the Office of Government Ethics for the 2020 filing cycle. **A response to this email is requested no later than July 30, 2020**, letting us know the status of the remaining reports.

White House Office	STATUS
Unrelated filers-nonresponsive per requester	
[REDACTED]	

Unrelated filers-nonresponsive per requester



Short, Marc T

Unrelated filers-nonresponsive per requester



Thank you for your continued contributions to the success of the 2020 filing season.
Stay Safe,

Lori Kelly, Program Specialist
U.S. Office of Government Ethics
Financial Disclosure Branch
Compliance Division
Tel. 202.482.9306

Visit OGE's website: www.oge.gov

From: 278Tracking

Sent: Friday, April 17, 2020 5:08 PM

To: 'Jones, David M. EOP/WHO' <(b) (6)>; Gast, Scott F. EOP/WHO

Cc: 278Tracking <278Tracking@oge.gov>; Rachel K. McRae <rkmcrae@oge.gov>

Subject: CY2020 Public Financial Disclosure Filing Season - [Message contains CUI]

Importance: High

CONTROLLED

Hello,

The CY2020 public financial disclosure filing season is fast approaching. Reports are due to be filed on May 15, 2020.

According to our records, below are the filer(s) at your agency whose report(s) are required by the Ethics in Government Act to be submitted to the Office of Government Ethics (OGE) for the 2020 filing cycle. **A response to this email is requested no later than April 30, 2020,** letting us know if the list is accurate. If a filer should be added or removed from the list, please let us know so that we can update our records.

Name	Agency Response
Unrelated filers-nonresponsive per requester	

Unrelated filers-nonresponsive per requester



Short, Marc T

Unrelated filers-nonresponsive per requester



Please take this opportunity to ensure that the above filer(s) are placed in the PAS/DAEO work group in Integrity rather than the General 278 work group, so that they are routed to OGE in a timely manner. I have attached instructions on how to change a report workflow if needed.

Note: Reports submitted to Integrity within the last day may not have registered on our list. Please do not hesitate to contact me if you have any questions.

Best,

Lori Kelly, Program Specialist
U.S. Office of Government Ethics
Financial Disclosure Branch
Compliance Division
Tel. 202.482.9306

Visit OGE's website: www.oge.gov

OGE Confidential Notice: This message may contain Controlled Unclassified Information (CUI) that requires safeguarding or dissemination control under applicable law, regulation, or Government-wide policy. This email, including all attachments, may constitute a Federal record or other Government property that is intended only for the use of the individual or entity to which it is addressed. If you are not the intended recipient or the employee or agent responsible for delivering the transmission to the intended recipient, you are hereby notified that any dissemination, distribution, copying or use of this email or its contents is strictly prohibited. If you have received this email in error, please notify the sender by responding to the email and then immediately delete the email.

From: [201 Forms](#)
To: "Meredith Lerner"; [201 Forms](#)
Subject: RE: OGE Form 201 Request
Date: Wednesday, October 21, 2020 9:56:26 AM
Attachments: [Marc-T-Short-2020-278DRAFT.pdf](#)

Requester previously received
attachment, can resend upon request.

Sorry.

From: Meredith Lerner [mailto:(b) (6)]
Sent: Wednesday, October 21, 2020 9:52 AM
To: 201 Forms <201forms@oge.gov>
Subject: Re: OGE Form 201 Request

Thank you. I don't believe that Marc Short's 2020 annual report was attached in the emails above. Also, can you please confirm that these are the most recent versions of DeJoy's reports and that they have not been further revised?

Best,
Meredith

On Wed, Oct 21, 2020 at 9:47 AM 201 Forms <201forms@oge.gov> wrote:

CONTROLLED

The documents you requested are attached where available. Documents are labeled "Draft" because they are still under review and are not yet certified by OGE. A copy of your completed request is attached for your files.

Status: Complete

Best regards,

Lori Kelly, Program Specialist
US Office of Government Ethics
Financial Disclosure Branch
Compliance Division
202-482-9306

From: Meredith Lerner [mailto:(b) (6)]
Sent: Wednesday, October 21, 2020 9:13 AM
To: 201 Forms <201forms@oge.gov>
Subject: Re: OGE Form 201 Request

Good morning,

Can you please update me on the status of this request?

Best,
Meredith

On Mon, Oct 19, 2020 at 9:15 AM Meredith Lerner (b) (6) wrote:

Good morning,

Please see the attached 201 request for public financial and periodic transaction reports. If you have any questions about this request, please do not hesitate to contact me.

Best,
Meredith

--

Meredith Lerner

Research Associate (*she/her*)

CREW | Citizens for Responsibility and Ethics in Washington

(b) (6)

CREW | Citizens for Responsibility and Ethics in Washington
Main: (202) 408-5565 | Fax: (202) 588-5020 | www.citizensforethics.org

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From: [201 Forms](#)
To: "Meredith Lerner"; [201 Forms](#)
Subject: RE: OGE Form 201 Request
Date: Monday, October 26, 2020 1:34:08 PM
Attachments: [Louis-DeJoy-09.01.2020-278TDRAFT.pdf](#)
[Marc-T-Short-2020-278DRAFT.pdf](#)
[Louis-DeJoy-07.21.2020-278TDRAFT.pdf](#)
[Louis-DeJoy-2020-278NEDRAFT.pdf](#)

Requester previously received attachments, can resend upon request.

CONTROLLED

The documents you requested are attached where available. Documents are labeled "Draft" because they are still under review and are not yet certified by OGE. A copy of your completed request is attached for your files.

Status: Complete

Best regards,

Lori Kelly, Program Specialist
US Office of Government Ethics
Financial Disclosure Branch
Compliance Division
202-482-9306

From: Meredith Lerner [mailto:(b) (6)]
Sent: Monday, October 26, 2020 9:24 AM
To: 201 Forms <201forms@oge.gov>
Subject: OGE Form 201 Request

Good morning,

Please see the attached 201 request for public financial disclosure and periodic transaction reports. If you have any questions about this request, please do not hesitate to contact me.

Best,
Meredith

--

Meredith Lerner
Research Associate (*she/her*)
CREW | Citizens for Responsibility and Ethics in Washington
(b) (6)

CREW | Citizens for Responsibility and Ethics in Washington
Main: (202) 408-5565 | Fax: (202) 588-5020 | www.citizensforethics.org

From: [201 Forms](#)
To: ["Meredith Lerner"; 201 Forms](#)
Subject: RE: OGE Form 201 Request
Date: Monday, November 2, 2020 9:21:49 AM
Attachments: [20201102 Lerner.pdf](#)
[Louis-DeJoy-09.01.2020-278TDRAFT.pdf](#)
[Marc-T-Short-2020-278DRAFT.pdf](#)
[Louis-DeJoy-07.21.2020-278TDRAFT.pdf](#)
[Louis-DeJoy-2020-278NEDRAFT.pdf](#)

Requester previously
received attachments, can
resend upon request.

CONTROLLED

The documents you requested are attached where available. Documents are labeled "Draft" because they are still under review and are not yet certified by OGE. A copy of your completed request is attached for your files.

Status: Complete

Best regards,

Lori Kelly, Program Specialist
US Office of Government Ethics
Financial Disclosure Branch
Compliance Division
202-482-9306

From: Meredith Lerner [mailto:(b) (6)]
Sent: Monday, November 2, 2020 9:15 AM
To: 201 Forms <201forms@oge.gov>
Subject: OGE Form 201 Request

Good morning,

Please see the attached 201 request for public financial disclosure and periodic transaction reports. If you have any questions about this request, please do not hesitate to contact me.

Best,
Meredith Lerner

--

Meredith Lerner
Research Associate (*she/her*)
CREW | Citizens for Responsibility and Ethics in Washington
(b) (6)

Main: (202) 408-5565 | Fax: (202) 588-5020 | www.citizensforethics.org

From: [201 Forms](#)
To: ["Meredith Lerner"; 201 Forms](#)
Subject: RE: OGE Form 201 Request
Date: Monday, November 9, 2020 10:28:29 AM
Attachments: [Marc-T-Short-2020-278DRAFT.pdf](#)
[Louis-DeJoy-07.21.2020-278TDRAFT.pdf](#)
[Louis-DeJoy-2020-278NEDRAFT.pdf](#)
[Louis-DeJoy-09.01.2020-278TDRAFT.pdf](#)
[20201109 Lerner.pdf](#)

Requester previously received attachments, can resend upon request.

CONTROLLED

The documents you requested are attached where available. Documents are labeled "Draft" because they are still under review and are not yet certified by OGE. A copy of your completed request is attached for your files.

Status: Complete

Best regards,

Lori Kelly, Program Specialist
US Office of Government Ethics
Financial Disclosure Branch
Compliance Division
202-482-9306

From: Meredith Lerner [mailto:(b) (6)]
Sent: Monday, November 9, 2020 9:11 AM
To: 201 Forms <201forms@oge.gov>
Subject: OGE Form 201 Request

Good morning,

Please see the attached 201 request for financial disclosure and periodic transaction reports. If you have any questions about this request, please do not hesitate to contact me.

Best,
Meredith

--

Meredith Lerner
Research Associate (*she/her*)
CREW | Citizens for Responsibility and Ethics in Washington

(b) (6)

CREW | Citizens for Responsibility and Ethics in Washington
Main: (202) 408-5565 | Fax: (202) 588-5020 | www.citizensforethics.org

From: [201 Forms](#)
To: ["Meredith Lerner"; 201 Forms](#)
Subject: RE: OGE Form 201 Request
Date: Monday, November 16, 2020 4:03:39 PM
Attachments: [Marc-T-Short-2020-278DRAFT.pdf](#)
[Louis-DeJoy-07.21.2020-278TDRAFT.pdf](#)
[Louis-DeJoy-2020-278NEDRAFT.pdf](#)
[Louis-DeJoy-09.01.2020-278TDRAFT.pdf](#)
[20201116 Lerner.pdf](#)

Requester previously
received attachments, can
resend upon request.

CONTROLLED

The documents you requested are attached where available. Documents are labeled "Draft" because they are still under review and are not yet certified by OGE. A copy of your completed request is attached for your files.

Status: Complete

Best regards,

Lori Kelly, Program Specialist
US Office of Government Ethics
Financial Disclosure Branch
Compliance Division
202-482-9306

From: Meredith Lerner [mailto:[\(b\) \(6\)](#)]
Sent: Monday, November 16, 2020 9:35 AM
To: 201 Forms <201forms@oge.gov>
Subject: OGE Form 201 Request

Good morning,

Please see the attached 201 request for public financial disclosure and periodic transaction reports. If you have any questions about this request, please do not hesitate to contact me.

Best,
Meredith

--

Meredith Lerner
Research Associate (*she/her*)
CREW | Citizens for Responsibility and Ethics in Washington
[\(b\) \(6\)](#)

Main: (202) 408-5565 | Fax: (202) 588-5020 | www.citizensforethics.org

From: [Lori Kelly](#)
To: [Megan V. Granahan](#)
Subject: RE: Reports
Date: Tuesday, December 1, 2020 11:13:54 AM

Remember this part includes every annual, new entrant report:

Filer Last Name	Filer First Name	Filer MI	Agency	Date Received	Date Assigned	Reviewer
ated filers-nonresponsive per requester						
Short	Marc	T	White House Office	8/11/2020	8/12/2020	Granahan, Megan V.

Category	Count	Percentage
Unrelated filers-nonresponsive per requester	1	100%

From: Megan V. Granahan
Sent: Tuesday, December 1, 2020 10:57 AM
To: Lori Kelly
Subject: RE: Reports

Sorry, also for those 19 that are under our review (per the weekly update).

Megan Granahan
Chief, Financial Disclosure Branch
General Counsel and Legal Policy Division
202.482.9204

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From: Lori Kelly
Sent: Tuesday, December 1, 2020 10:56 AM
To: Megan V. Granahan <mvgranah@oge.gov>
Subject: RE: Reports

Filer

Unrelated filers-nonresponsive per requester

From: Megan V. Granahan
Sent: Tuesday, December 1, 2020 10:53 AM
To: Lori Kelly mailto:lkelly@oge.gov> >
Subject: Reports

Hi,
Can you send me a list of the filer names for all of the remaining expected 278s?

Megan Granahan
Chief, Financial Disclosure Branch
General Counsel and Legal Policy Division
202.482.9204

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-

AIMS Agency Information Management System

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Agencies

Administration

Resolved Interaction

Interaction Number: 19673

Initiation Date*: 2020-05-19

Title*: (b)(5) deliberative desk officer question

Question*: Question about (b)(5) deliberative desk officer question

Update:

Categories*: 278s

Origin Of Interaction*: Phone

Source*: Agency
Office Of The Vice President

First Name: david

Last Name: spence

Title: Ethics Counsel

Position:

Email: (b) (6)

Phone:

Other Contact Notes:

Assignment: Rachel K. McRae

Watching:

Temporary Notes:

created by: Rachel K. McRae

Resolution Information	
Resolution Date*:	2020-05-19
Resolution Category*:	Resolved
Response*:	Discussed the (b)(5) deliberative desk officer question (Assigned to: Rachel K. McRae)
Complexity (level):	1 [Click to view/hide complexity guidelines]
Time Spent (hours):	0-1 hour
Contributor:	
reopen	

Interaction History Log	
Closed	05/19/2020 02:30:10 PM by Rachel K. McRae
Now Assigned: Rachel K. McRae	05/19/2020 02:30:10 PM by Rachel K. McRae

Division(s) assigned: GCLPD