

From: [Heather A. Jones](#)
To: [Jack MacDonald](#)
Subject: RE: Trump First Round Comments document
Date: Tuesday, August 15, 2023 9:06:42 AM

Thanks (b)(6) personal to J MacDonald

From: Jack MacDonald
Sent: Tuesday, August 15, 2023 9:03 AM
To: Heather A. Jones <hajones@oge.gov>; Lorna A. Syme <lasyme@oge.gov>
Subject: RE: Trump First Round Comments document

Heather,

I agree with you on Part 8. The only change I saw from the last report was the removal of the mortgage owed to (b)(3) (line 12) that was (b)(3). I will start Part 6 this morning, but I am waiting for Teresa to combine the files into one document so that it will be easier to review and compare to the last report. (b)(6) personal to J MacDonald

Jack

From: Heather A. Jones
Sent: Monday, August 14, 2023 6:37 PM
To: Jack MacDonald <jjmacdon@oge.gov>; Lorna A. Syme <lasyme@oge.gov>
Subject: Trump First Round Comments document

I didn't have any questions on Parts 1, 3, and 8. Jack would you take a look at 8 and see if you agree.

I did have questions on Part 5, if one of you has a chance to take a look (it's pretty short)

Here is the document. I did confirm for all of the sections. Please add anything you think we should:

(b)(5) – internal agency network address

I will start with Part 2 in the morning. I will make a separate document with my questions.

Thanks for your help with this one,
Heather

Heather Jones
Senior Counsel
(202) 482-9316
U.S. Office of Government Ethics

Visit OGE's website: www.oge.gov

From: [Jack MacDonald](#)
To: [Heather A. Jones](#)
Subject: Candidate Report
Date: Tuesday, August 29, 2023 3:33:43 PM

Heather,

My draft of the second round questions on Part 6 of the Trump report are ready for your review. Please let me know if you have any questions or would like to discuss: (b)(5) - internal agency network address

[Redacted]

Thanks,

Jack

From: [Heather A. Jones](#)
To: [Jack MacDonald](#)
Subject: RE: Candidate Report
Date: Tuesday, August 29, 2023 2:22:21 PM

yes

From: Jack MacDonald
Sent: Tuesday, August 29, 2023 2:22 PM
To: Heather A. Jones <hajones@oge.gov>
Subject: RE: Candidate Report

Thanks. Can I call you at 2:30?

From: Heather A. Jones
Sent: Tuesday, August 29, 2023 2:21 PM
To: Jack MacDonald <jjmacdon@oge.gov>
Subject: RE: Candidate Report

Yes, just let me know when you want to do it.

From: Jack MacDonald
Sent: Tuesday, August 29, 2023 2:21 PM
To: Heather A. Jones <hajones@oge.gov>
Subject: Candidate Report

Hi Heather,

Do you have time this afternoon for a few questions on Part 6 of the Trump report?

Jack

From: [Heather A. Jones](#)
To: [Lorna A. Syme](#); [Deborah J. Bortot](#)
Cc: [Jack MacDonald](#)
Subject: RE: Questions for Candidate report
Date: Wednesday, August 30, 2023 4:25:55 PM

I've reviewed and my changes are redlined.

Thanks,
Heather

From: Lorna A. Syme
Sent: Tuesday, August 29, 2023 4:58 PM
To: Deborah J. Bortot <djbortot@oge.gov>; Heather A. Jones <hajones@oge.gov>
Cc: Jack MacDonald <jjmacdon@oge.gov>
Subject: Questions for Candidate report

The combined Second Round questions can be found here: (b)(5) – internal agency network address
[REDACTED]

From: [Scott Gast](#)
To: [Lorna A. Syme](#)
Cc: [Derek Ross](#); [Jack MacDonald](#)
Subject: Re: Trump Responses to 8/18/23 Questions - [Message and attachment(s) contain CUI]
Date: Thursday, August 31, 2023 1:02:23 PM

Thanks, Lorna. We've revived your email and will get back to you as soon as possible.

On Thu, Aug 31, 2023 at 12:26 PM Lorna A. Syme <lasyme@oge.gov> wrote:

CONTROLLED
Email and attachment(s) contain CUI.

1st att contains questions for responses produced below. 2nd att is a nonresponsive record (standard coversheet).

Scott:

Thank you for your responses to our initial questions. We have reviewed the responses and we have some follow-up questions (see attached document). We also note that there were a few of our initial questions that you indicated that you were looking into and are still pending.

Please let me and Jack know if you have any questions.

Thank you,

Lorna

From: Scott Gast [(b)(6)]
Sent: Friday, August 25, 2023 4:42 PM
To: Heather A. Jones <hajones@oge.gov>
Cc: Jack MacDonald <jjmacdon@oge.gov>; Lorna A. Syme <lasyme@oge.gov>; Deborah J. Bortot <djbortot@oge.gov>; Derek Ross [(b)(6)]

Subject: Fwd: Trump Responses to 8/18/23 Questions

Attached please find the following materials:

1. OGE Form Part 2 Schedule 1;
2. OGE Form Part 2 Exhibit A;
3. OGE Form Part 6; and
4. Responses to OGE's questions.

Please let us know if you have any questions.


Scott Gast
Compass Legal Group
[300 Independence Avenue, SE](#)
[Washington, DC 20003](#)
202.937.2309

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From: [Lorna A. Syme](#)
To: [Deborah J. Bortot](#); [Heather A. Jones](#)
Cc: [Jack MacDonald](#)
Subject: Questions for Candidate report
Date: Tuesday, August 29, 2023 4:58:00 PM

The combined Second Round questions can be found here: (b)(5) – internal agency network address

A solid black rectangular redaction box covers the text that would follow the URL in the previous block.

From: [Teresa L. Williamson](#)
To: [Jack MacDonald](#)
Subject: RE: Final Nominee Packages for Today through Friday
Date: Wednesday, September 6, 2023 11:52:14 AM

Yep – no worries – I gotcha covered 😊

From: Jack MacDonald <jjmacdon@oge.gov>
Sent: Wednesday, September 6, 2023 11:41 AM
To: Teresa L. Williamson <tlwillia@oge.gov>
Subject: Final Nominee Packages for Today through Friday

Hi Teresa,

I am writing to ask a favor. Would it be possible to not send me any finals for review today? (b)(6) personal
(b)(6) personal to J MacDonald, and Lorna and I just received the second round responses on the Trump report and I am trying to resolve things today with Heather before (b)(6) personal to J MacDonald

Jack

From: [Scott Gast](#)
To: [Lorna A. Syme](#); [Jack MacDonald](#)
Cc: [Derek Ross](#)
Subject: Fwd: Candidate Report 8/9/2023- Round 2Response
Date: Tuesday, September 5, 2023 4:46:59 PM
Attachments: [Second Round Questions_w_Trump.Resp._\(Rcvd.8.31.23\).docx](#)
[Part 6 OGE Form 278e \(08.31.23\).pdf](#)
[Part 2 OGE Form 278e Schedule 1 \(08.31.23\).pdf](#)

1st att follows, 2nd att WIF (b)(3) - 107 pages, 3rd att WIF (b)(3) - 29 pages

Lorna and Jack, attached please find the following:

1. OGE Form Part 2 Schedule 1 with the requested updates highlighted in yellow;
2. OGE Form Part 6 with the requested updates; and
3. Responses to OGE's questions, Round 2.

Thanks,
Scott

Scott Gast
Compass Legal Group
300 Independence Avenue, SE
Washington, DC 20003
202.937.2309



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Donald J. Trump: Round 2, OGE Comments

9/5/2023 Donald J. Trump's Responses to OGE comments dated 8/31/2023 to the 278(e) submittal dated 8/9/2023 (see responses below):

Part 3

*Filer /representative are looking into whether the filer retains health insurance with a former employer.

RESPONSE: Filer (b) (6)

Part 5

* Line 4: Filer/representative are looking into whether the filer's spouse created any of her own NFT's for sale.

RESPONSE: Filer's spouse has not created her own NFT's for sale.

Part 6

* Please confirm the following:

- The filer, spouse, and dependent children do not have any beneficial interests in any other trusts, including discretionary trusts.
- The filer, spouse, and dependent children are not the grantors of any intentionally defective grantor trusts (i.e., there is no irrevocable trust for which the filer or spouse is responsible for the income taxes on the trust assets).
- The filer, spouse, and dependent children do not have any of the following:
 - 529 plan accounts
 - life insurance policies with reportable cash value
 - rental or investment property (including farmland)

RESPONSE: Confirmed.

General Comment: Please remove the yellow highlights that appear for some entries on the report.

RESPONSE: We have made the requested adjustments to the 278(e).

* Page 1 of 81, line 2: Please correct the value to read as "1,000,001-\$5,000,000."

RESPONSE: We have made the requested adjustments to the 278(e).

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* Page 34 of 81, line 1621: Please change the EIF category to “N/A” for this stock.

RESPONSE: We have made the requested adjustments to the 278(e).

* Page 36 of 81, line 21: (b)(3) – OGE asked if this entry represents stock in (b)(3) and to please revise the name of the asset to report its complete name if that is correct. In response, the filer’s representative stated the following: (b)(4).” Please explain what this entry represents.

RESPONSE: (b)(4) We have made the requested adjustments to the 278(e).

* Page 39 of 81, Lines 187-191: The report indicates the (b)(3). Please confirm the income type is correct because capital gains are unusual for (b)(3).

RESPONSE: We have made the requested adjustments to the 278(e).

* Page 39 of 81, line 197 (formerly page 47, line 198): (b)(3) – The filer’s prior report disclosed a bond named “(b)(3)” (see page 66, line 308). OGE asked if the filer can explain the change in the description of the asset, including the year, and the filer’s representative stated the following: (b)(4).”

- Please explain why the description of the asset changed.
 - **RESPONSE:** It changed because it is a different asset.
- Please confirm that the asset had (b)(3) as of 5/15/2023.
 - **RESPONSE:** Confirmed as of 4/30/2023.

* Page 46 of 81, lines 5-6: Please change the EIF category to “N/A” for each stock.

RESPONSE: We have made the requested adjustments to the 278(e).

* Page 46 of 81, line 8: Please change the EIF category to “Yes”.

RESPONSE: We have made the requested adjustments to the 278(e).

* Page 47 of 81, lines 43-48: Please confirm that the income type of “Dividend” is correct for these (b)(3).

RESPONSE: We have made the requested adjustments to the 278(e).

* Page 47 of 81, (b)(3), line 3: Please change the value category to \$1,001-\$15,000.

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RESPONSE: We have made the requested adjustments to the 278(e).

* Page 47 of 81, (b)(3):

- Line 8: Please confirm the income type and that this is a (b)(3) rather than a money market mutual fund. Cash accounts normally earn interest income.
 - **RESPONSE:** Confirmed: We have made the requested adjustments to the 278(e).
- Missing entry: On the original filing, the filer reported four entries for “(b)(3)” (see page 55, lines 7-10 of original filing). Now the filer reports three accounts. Can you please explain what happened to the missing account with a reported value of (b)(3)?
 - **RESPONSE:** (b)(4).

* Page 49 of 81, line 87, to page 78 of 81, line 1506: Please change the EIF category for all stocks from “Yes” to “N/A.”

RESPONSE: We have made the requested adjustments to the 278(e).

Note: The EIF category of “Yes” is correctly reported for lines 634 and 1386.

* Page 57 of 81. Line 502: The filer is not required to report the exact value. This can be changed to a range (i.e., \$1,001-\$15,000).

RESPONSE: We have made the requested adjustments to the 278(e).

* Page 65 of 81. Line 868: The filer is not required to report the exact value. This can be changed to a range (i.e., None (or less than (1,001)).

RESPONSE: We have made the requested adjustments to the 278(e).

* Page 79 of 81, (b)(3): Please revise the income amount category to read as “100,001-\$1,000,000.”

RESPONSE: We have made the requested adjustments to the 278(e).

* Page 79 of 81, (b)(3), lines 1-3: Each of these state “(b)(3)”. The reporting period for income is through 5/15/2023.

- Please confirm that all of the income for the reporting period is reported.
 - **RESPONSE:** Confirmed through 4/30/2023.
- It might be helpful to delete that text from the description.

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- **RESPONSE:** We have made the requested adjustments to the 278(e).

* Page 80 of 81, (b)(3), line 3: This entry states “(b)(3)”. The reporting period for income is through 5/15/2023.

- Please confirm that all of the income for the reporting period is reported.

- **RESPONSE:** Confirmed through 4/30/2023.

- It might be helpful to delete that text from the description.

- **RESPONSE:** We have made the requested adjustments to the 278(e).

Asset that appeared to be Missing from Prior Report

* Page 23 of prior report, line 412: (b)(3) (value (b)(3)). OGE asked if this asset was sold during the reporting period with no income from the sale. The filer’s representative responded “(b) (4)”. Is this asset now reported on page 1 of 81, line 2?

RESPONSE: (b) (4), so nothing to report.

Attachment – Part 2

* Line 2: We asked about the distribution amount because it was a larger amount than on the previous report, even though the reporting period is shorter. You have indicated that the “the information previously provided was through 9/30/2022, we have now received all the information and have updated the 278(e) appropriately.”

- Please add an endnote to this report stating: “The income amount on my 2022 report should have been \$ (dollar amount through 12/15/2022).”
- If the filer would like to provide an explanation that is fine.
- Alternatively, the filer may amend the 2022 by providing an amended Page 1 of the attachment.

RESPONSE: Note the income on the 2022 278(e) filing should have been \$14,056,200. We have noted this on the 278(e).

*Lines 24.1 and 24.2. If no income was earned, please add “None (or less than \$201)” in the Income Amount column.

RESPONSE: We have made the appropriate adjustments to the 278(e).

*Line 40: Please revise the Income Amount category to “\$15,001-\$50,000.”

RESPONSE: We have made the appropriate adjustments to the 278(e).

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* Line 41: If (b)(3) holds (b)(3), then please add "40" to the list of underlying assets.

RESPONSE: We have made the appropriate adjustments to the 278(e).

* Line 58: Please revise the value category to "\$5,000,001-\$25,000,000."

RESPONSE: We have made the appropriate adjustments to the 278(e).

*Line 106: Pending with filer/representative.

RESPONSE: We're currently looking into this and will advise.

*Line 140.3: Pending with filer/representative.

RESPONSE: We're currently looking into this and will advise.

* Line 195: This line indicates there may be multiple trademarks held by this entity but we only see one on the attachment. Please add additional trademarks to the attachment or delete the "s".

RESPONSE: This entity owns one trademark: We have made the appropriate adjustments to the 278(e).

*Line 201: (b)(3). Please confirm the income is correct. We ask because the income value is over (b)(3) on this report, but the income value for the previous report was under (b)(3) and including a longer reporting period.

RESPONSE: Confirmed.

*Line 225: (b)(3) Is the underlying asset of (b)(3) airplane(s) or other aircraft? If so, please add so it reads "US Bank account and aircraft(s)." If not, please provide additional explanation of the nature of the business.

RESPONSE: (b)(4) and some info also (b)(3) (see line 44), as we state in the underlying assets it has a (b)(3) ".
".

*Line 228: Please revise the value to "\$1,000,001 to \$5,000,000."

RESPONSE: We have made the appropriate adjustments to the 278(e).

CONTROLLED

*Line 258: (b)(3) . If income of less than \$200 was earned, please add "None (or less than \$201) to the Income Amount column.

RESPONSE: We have made the appropriate adjustments to the 278(e).

*line 264 and 268: These are asset management companies. You indicate that (b)(4) .” Please see below for possible methods of valuing businesses pursuant to 5 CFR § 2634.301(e). An operating business cannot be valued solely on its cash receipts.

5 CFR 2634.301(e). *Valuation of interests in property.* A good faith estimate of the fair market value of interests in property may be made in any case in which the exact value cannot be obtained without undue hardship or expense to the filer. If a filer is unable to make a good faith estimate of the value of an asset, the filer may indicate on the report that the “value is not readily ascertainable.” Value may also be determined by:

- (1) The purchase price (in which case, the filer should indicate date of purchase);
- (2) Recent appraisal;
- (3) The assessed value for tax purposes (adjusted to reflect the market value of the property used for the assessment if the assessed value is computed at less than 100 percent of that market value);
- (4) The year-end book value of nonpublicly traded stock, the year-end exchange value of corporate stock, or the face value of corporate bonds or comparable securities;
- (5) The net worth of a business partnership;
- (6) The equity value of an individually owned business; or
- (7) Any other recognized indication of value (such as the last sale on a stock exchange).

RESPONSE: The value is not readily ascertainable and we’ve made the appropriate adjustments to the 278(e).

*line 366: Pending with filer/representative.

RESPONSE: According to our records (b)(4) and some info also (b)(3)

*The note is wrong.

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(b)(3)

A large black rectangular redaction box covers the majority of the page content, starting below the 'CONTROLLED' header and extending across most of the width. The text '(b)(3)' is visible in the top-left corner of this redacted area.

You either need to delete the endnote or revise it to include the statutorily required reporting period. For example, you could instead indicate for the endnote “Any asset value provided is as of April 30, 2023.”

RESPONSE: We’ve made the appropriate adjustments to the 278(e).

- Also please confirm that the filer reported income through May 15, 2023. Income is required to be current through the date of filing by the EIGA.

RESPONSE: We’re currently looking into this.

From: [Scott Gast](#)
To: [Lorna A. Syme](#); [Jack MacDonald](#)
Cc: [Derek Ross](#)
Subject: Re: Candidate Report 8/9/2023- Round 2Response
Date: Wednesday, September 6, 2023 11:33:55 AM

Lorna and Jack,

Following up on the responses sent yesterday, a question has come up as to whether the filer may report income as of the same record date (April 30, 2023) used to value assets and liabilities. As accounting records are based on month-end dates, it is less burdensome for the filer to use the month-end record date for reporting income.

Please let us know if you'd like to have a call to discuss.

Thanks,
Scott

Scott Gast
Compass Legal Group
300 Independence Avenue, SE
Washington, DC 20003
202.937.2309



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On Tue, Sep 5, 2023 at 4:47 PM Scott Gast <(b) (6)> wrote:
Lorna and Jack, attached please find the following:

1. OGE Form Part 2 Schedule 1 with the requested updates highlighted in yellow;
2. OGE Form Part 6 with the requested updates; and
3. Responses to OGE's questions, Round 2.

Thanks,
Scott

Scott Gast
Compass Legal Group
300 Independence Avenue, SE
Washington, DC 20003
202.937.2309

The rest of this thread has already
been produced above