

**From:** [Schultz, James D. EOP/WHO](#)  
**To:** [Rodrick T. Johnson](#)  
**Cc:** [Elaine Newton](#); [Sandra S. Mabry](#); [Teresa L. Williamson](#); [Kimberly L. Sikora Panza](#)  
**Subject:** RE: Certificate of Divestiture for Stephen K. Bannon  
**Date:** Wednesday, April 12, 2017 11:02:38 AM

---

We are in receipt of Mr. Bannon's COD.

JAMES D. SCHULTZ

Senior Associate Counsel and Special Assistant to the President  
Office of the White House Counsel

(b)(6)

---

**From:** Rodrick T. Johnson [mailto:rjohnson@oge.gov]  
**Sent:** Wednesday, April 12, 2017 9:33 AM  
**To:** Schultz, James D. EOP/WHO  
**Cc:** Elaine Newton ; Sandra S. Mabry ; Teresa L. Williamson ; Kimberly L. Sikora Panza  
**Subject:** Certificate of Divestiture for Stephen K. Bannon  
**Importance:** High

Good Morning, Mr. Schultz:

Attached is the Certificate of Divestiture OGE-2017-031 for Stephen K.

Bannon, Assistant to the President and Chief Strategist to the President. We would appreciate your forwarding the original certificate to Mr. Bannon. Also enclosed is a copy of the certificate for your files.

The original certificate and one copy for your records will be mailed to you. We would appreciate your forwarding the original certificate to Mr. Bannon, upon receipt.

**Please confirm receipt of this email by replying to all.**

Thanks, Again

Rodrick Johnson

OGE regulations provide for a special access provision for copies of final Certificates of Divestiture (CDs). You may obtain copies of CDs on OGE's website at: [https://extapps2.oge.gov/201/Presiden nsf/All +Certificates+of+Divestiture](https://extapps2.oge.gov/201/Presiden%20nsf/All%20Certificates%20of%20Divestiture)

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**From:** [Kimberly L. Sikora Panza](#)  
**To:** [David J. Apol](#)  
**Subject:** FW: Bannon CD request  
**Date:** Tuesday, April 11, 2017 7:09:02 AM

---

Hi Dave,

Below please find Jim's responses to your questions.

I am available to discuss at your convenience.

Kim

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**From:** Schultz, James D. EOP/WHO [mailto:(b)(6)]  
**Sent:** Monday, April 10, 2017 3:04 PM  
**To:** Kimberly L. Sikora Panza  
**Subject:** RE: Bannon CD request

Hi Jim,

The CD package is with Dave right now, and he wanted me to ask you these follow up questions:

(1) (b)(5), (b)(6) [Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

JAMES D. SCHULTZ  
Senior Associate Counsel and Special Assistant to the President

Office of the White House Counsel

(b)(6)

(b)(6)

---

**From:** Kimberly L. Sikora Panza [<mailto:klspanza@oge.gov>]

**Sent:** Friday, April 7, 2017 1:25 PM

**To:** Schultz, James D. EOP/WHO (b)(6) >

**Subject:** RE: Bannon CD request

Hi Jim,

The CD package is with Dave right now, and he wanted me to ask you these follow up questions:

(1) (b)(5), (b)(6)

Thank you in advance for your input on these additional questions related to the CD. (As you know, I also am the reviewer for Mr. Bannon's New Entrant report; we will be sending questions on his report (not related to the CD) separately.)

Kim

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**From:** Schultz, James D. EOP/WHO [[\(b\)\(6\)](mailto:(b)(6))]

**Sent:** Thursday, April 06, 2017 11:46 AM

**To:** Kimberly L. Sikora Panza

**Subject:** Re: Bannon CD request

Jim. I believe I responded. (b)(5), (b)(6). Any update on the COD?

James D. Schultz

Senior Associate Counsel and Special Assistant to the President

Office of White House Counsel

(b)(6)

On Apr 4, 2017, at 3:39 PM, Kimberly L. Sikora Panza <[klspanza@oge.gov](mailto:klspanza@oge.gov)> wrote:

Hi Jim,

I have one additional question.

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

Thanks,

Kim

---

**From:** Schultz, James D. EOP/WHO [mailto:(b)(6)]  
**Sent:** Tuesday, April 04, 2017 9:48 AM  
**To:** Kimberly L. Sikora Panza  
**Subject:** RE: Bannon CD request

Yes.

JAMES D. SCHULTZ

Senior Associate Counsel and Special Assistant to the President  
Office of the White House Counsel

(b)(6)

---

**From:** Kimberly L. Sikora Panza [mailto:klspanza@oge.gov]  
**Sent:** Tuesday, April 4, 2017 9:47 AM  
**To:** Schultz, James D. EOP/WHO (b)(6)  
**Subject:** RE: Bannon CD request

Good morning, Jim,

Thanks for your email. I am available to speak now, if you are free – is the (b)(6) number the best number to reach you?

Thanks,

Kim

---

**From:** Schultz, James D. EOP/WHO [mailto:(b)(6)]  
**Sent:** Tuesday, April 04, 2017 9:22 AM  
**To:** Kimberly L. Sikora Panza  
**Subject:** RE: Bannon CD request

Kim – as you know, Steve’s 278 has been finalized. Can we talk this morning regarding the COD?

JAMES D. SCHULTZ

Senior Associate Counsel and Special Assistant to the President  
Office of the White House Counsel

(b)(6)

---

**From:** Kimberly L. Sikora Panza [mailto:klspanza@oge.gov]  
**Sent:** Friday, March 24, 2017 4:39 PM  
**To:** Schultz, James D. EOP/WHO (b)(6)

**Subject:** RE: Bannon CD request

Good afternoon, Jim,

I hope you are well.

I am writing to touch base regarding the Bannon CD, and follow up re: a signed version of the report and my clarification questions below. At your convenience, could you please let me know the status of things?

Thank you in advance for your input.

Best regards,

Kim

---

**From:** Kimberly L. Sikora Panza

**Sent:** Wednesday, March 15, 2017 12:44 PM

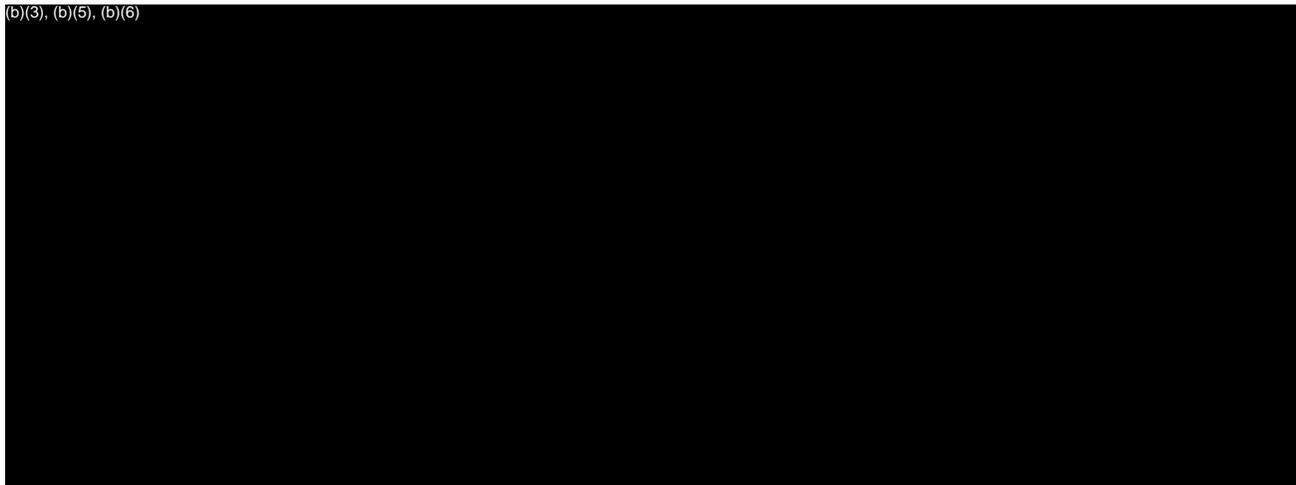
**To:** 'Schultz, James D. EOP/WHO'

**Subject:** RE: Bannon CD request

Thank you for the additional information. Could you please let me know when the signed version of the report is available?

I also would appreciate your help clarifying a few items on the report. Could you please provide a brief description of the following companies:

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



Thank you in advance for your input.

Best regards,

Kim

---

**From:** Schultz, James D. EOP/WHO [mailto:(b)(6)]

**Sent:** Monday, March 13, 2017 9:26 AM

**To:** Kimberly L. Sikora Panza

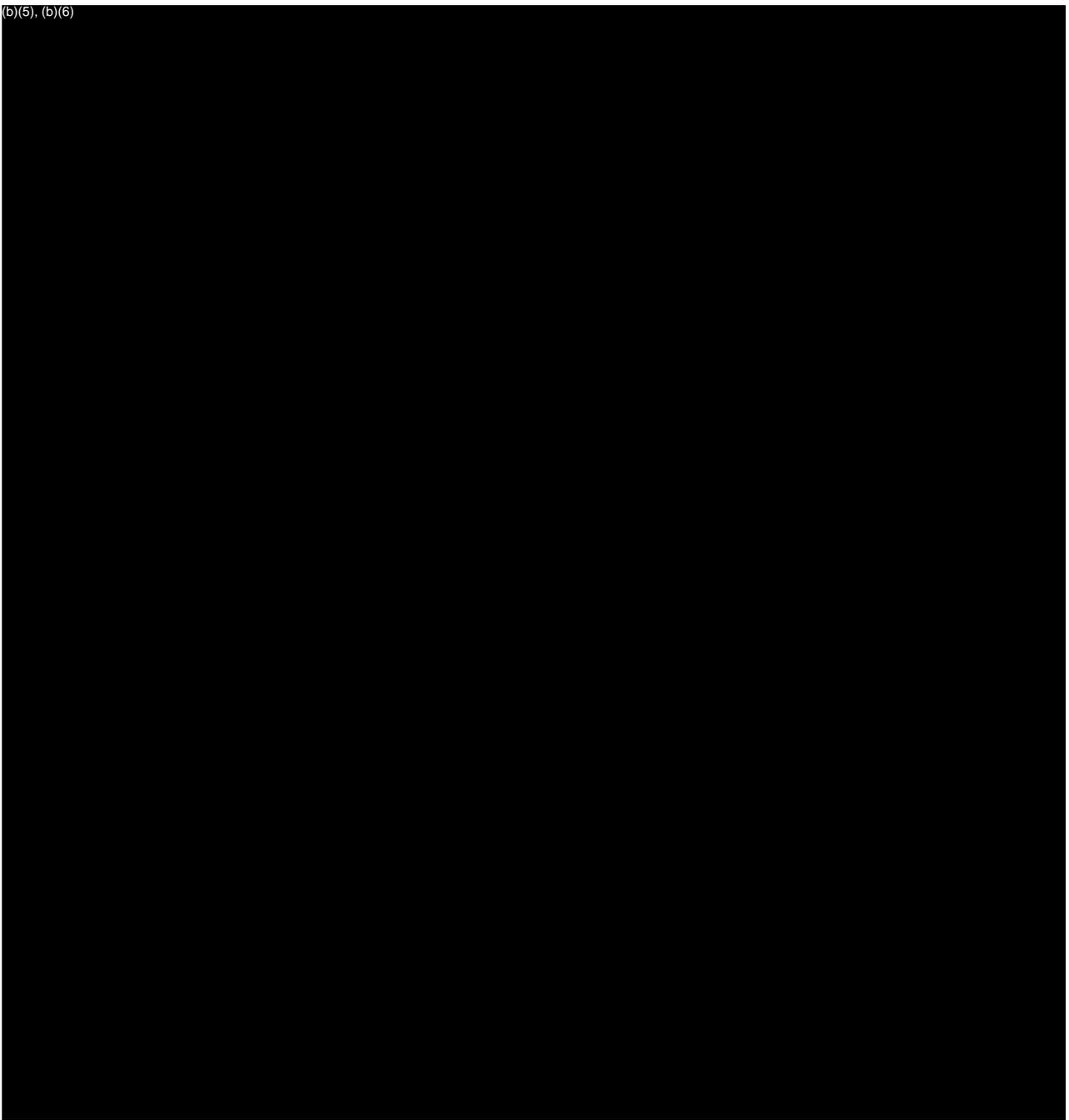
**Subject:** Re: Bannon CD request

The report will be available shortly.

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



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



James D. Schultz

Senior Associate Counsel and Special Assistant to the President

Office of White House Counsel

(b)(6)

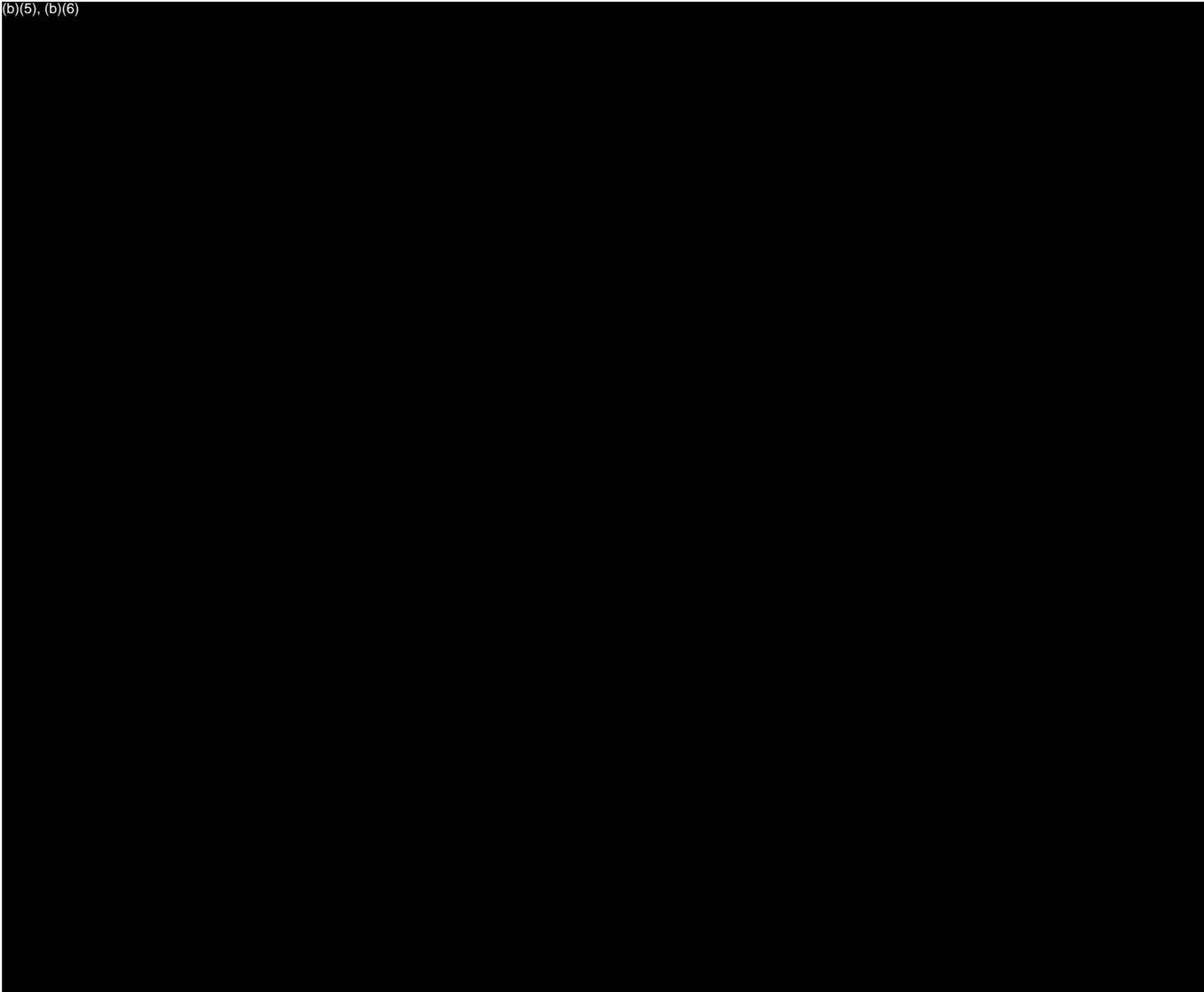
On Mar 8, 2017, at 2:48 PM, Kimberly L. Sikora Panza <[klspanza@oge.gov](mailto:klspanza@oge.gov)> wrote:

Good afternoon,

I am the OGE reviewer assigned to review the CD request for Mr. Bannon.  
I have the following questions regarding the CD request – thank you in

advance for your input!

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



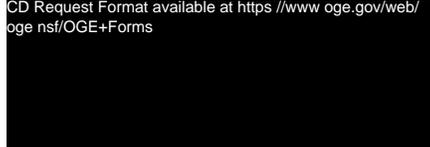
Finally, for your future reference, attached please find the sample CD request format, which asks questions regarding the various pieces of information we need to process a CD request. Most agencies submit CD requests using this form, and using the form can help streamline the CD review process on our end.

Thank you in advance for your input.

Best regards,

Kim

CD Request Format available at <https://www.oge.gov/web/oge/nsf/OGES+Forms>



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**From:** [Elaine Newton](#)  
**To:** [Kimberly L. Sikora Panza](#)  
**Subject:** RE: COD PACKAGE  
**Date:** Thursday, April 06, 2017 10:14:25 AM

---

Thank you.

CD request package withheld in full (4 pages) - (b)(5), (b)(6)

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

From: Kimberly L. Sikora Panza  
Sent: Thursday, April 06, 2017 9:58 AM  
To: Elaine Newton  
Subject: RE: COD PACKAGE

Notes now saved in J drive folder. Thanks.

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

From: Kimberly L. Sikora Panza  
Sent: Thursday, April 06, 2017 9:55 AM  
To: Elaine Newton  
Subject: FW: COD PACKAGE

Hi Elaine-

Here's the electronic copy, per your VM (I just got in; had a (b)(6) this a m.)

I'll save my notes on the J drive now.

Thanks  
Kim

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

From: Elaine Newton  
Sent: Monday, March 06, 2017 12:08 PM  
To: Kimberly L. Sikora Panza  
Subject: FW: COD PACKAGE

Kim,

Please review this new CD request for a White House staff member.

Thanks, Elaine

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

From: David J. Apol  
Sent: Monday, March 06, 2017 11:57 AM  
To: Elaine Newton  
Subject: FW: COD PACKAGE

Elaine,

Please assign this and let me know the lucky recipient. Thanks.

Dave

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

From: Schultz, James D. EOP/WHO [[mailto:\(b\)\(6\)](#)]

Sent: Monday, March 06, 2017 11:01 AM

To: David J. Apol

Subject: COD PACKAGE

Dave - Attached please find the COD package for Mr. Bannon. His draft 278 is available for review on integrity.  
Jim

JAMES D. SCHULTZ

Senior Associate Counsel and Special Assistant to the President Office of the White House Counsel

(b)(6)

**From:** [Kimberly L. Sikora Panza](#)  
**To:** [Elaine Newton](#)  
**Subject:** FW: Bannon CD request  
**Date:** Wednesday, April 05, 2017 7:01:54 AM

---

Elaine – response to your Q.

Thanks,

Kim

---

**From:** Schultz, James D. EOP/WHO [mailto:(b)(6)]  
**Sent:** Tuesday, April 04, 2017 10:43 PM  
**To:** Kimberly L. Sikora Panza  
**Subject:** Re: Bannon CD request

Confirmed.

James D. Schultz

Senior Associate Counsel and Special Assistant to the President

Office of White House Counsel

(b)(6)

On Apr 4, 2017, at 3:39 PM, Kimberly L. Sikora Panza <[klspanza@oge.gov](mailto:klspanza@oge.gov)> wrote:

Hi Jim,

I have one additional question.

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

Thanks,

Kim

---

**From:** Schultz, James D. EOP/WHO [mailto:(b)(6)]  
**Sent:** Tuesday, April 04, 2017 9:48 AM  
**To:** Kimberly L. Sikora Panza  
**Subject:** RE: Bannon CD request

Yes.

JAMES D. SCHULTZ

Senior Associate Counsel and Special Assistant to the President

Office of the White House Counsel

(b)(6)

---

**From:** Kimberly L. Sikora Panza [mailto:[klspanza@oge.gov](mailto:klspanza@oge.gov)]  
**Sent:** Tuesday, April 4, 2017 9:47 AM

**To:** Schultz, James D. EOP/WHO (b)(6)

**Subject:** RE: Bannon CD request

Good morning, Jim,

Thanks for your email. I am available to speak now, if you are free – is the (b)(6) number the best number to reach you?

Thanks,

Kim

---

**From:** Schultz, James D. EOP/WHO [mailto:(b)(6)]

**Sent:** Tuesday, April 04, 2017 9:22 AM

**To:** Kimberly L. Sikora Panza

**Subject:** RE: Bannon CD request

Kim – as you know, Steve’s 278 has been finalized. Can we talk this morning regarding the COD?

JAMES D. SCHULTZ

Senior Associate Counsel and Special Assistant to the President

Office of the White House Counsel

(b)(6)

(b)(6)

---

**From:** Kimberly L. Sikora Panza [mailto:kspanza@oge.gov]

**Sent:** Friday, March 24, 2017 4:39 PM

**To:** Schultz, James D. EOP/WHO <(b)(6)>

**Subject:** RE: Bannon CD request

Good afternoon, Jim,

I hope you are well.

I am writing to touch base regarding the Bannon CD, and follow up re: a signed version of the report and my clarification questions below. At your convenience, could you please let me know the status of things?

Thank you in advance for your input.

Best regards,

Kim

---

**From:** Kimberly L. Sikora Panza

**Sent:** Wednesday, March 15, 2017 12:44 PM

**To:** 'Schultz, James D. EOP/WHO'

**Subject:** RE: Bannon CD request

Thank you for the additional information. Could you please let me know when the signed version of the report is available?

I also would appreciate your help clarifying a few items on the report. Could you please provide a brief description of the following companies:

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



Thank you in advance for your input.

Best regards,

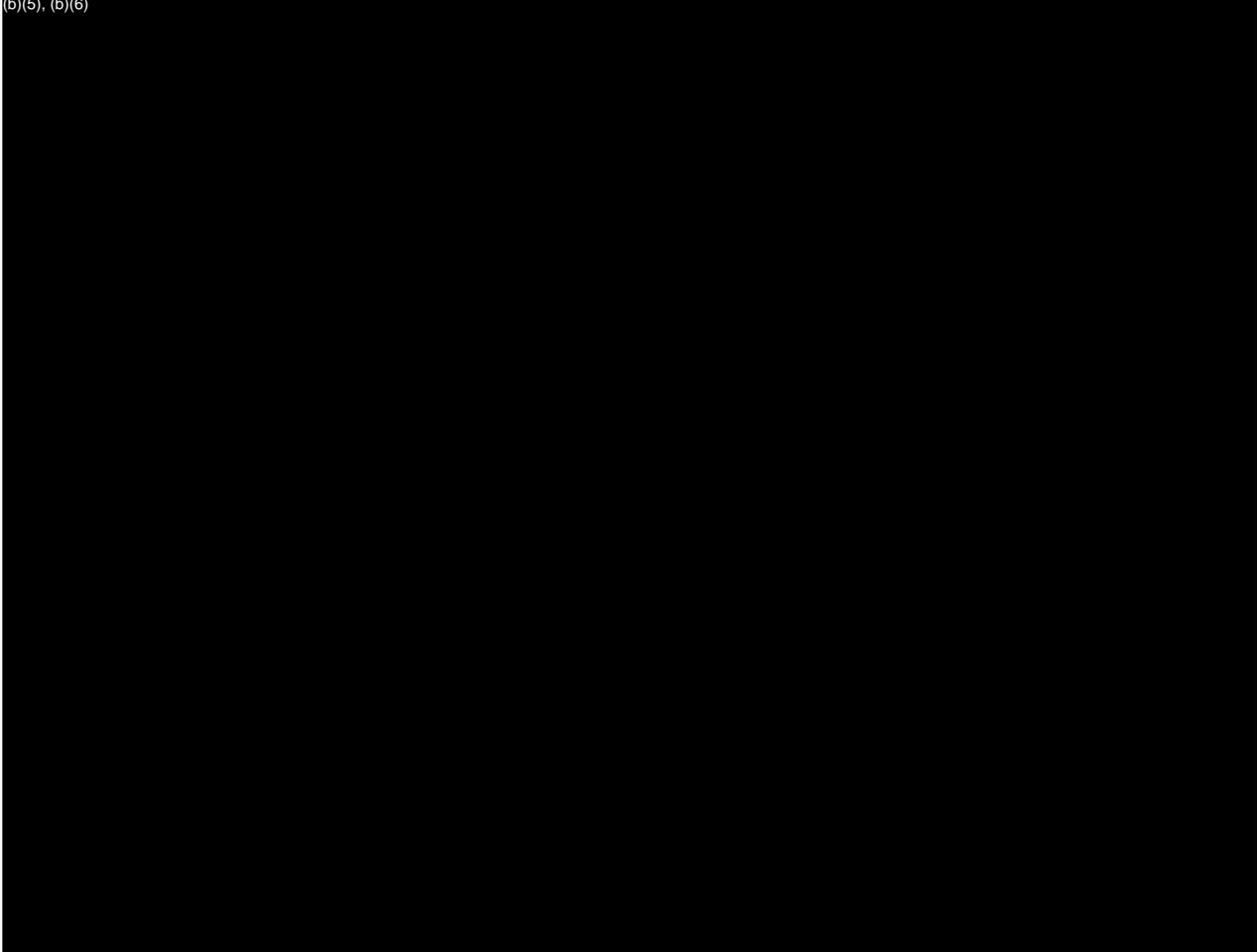
Kim

---

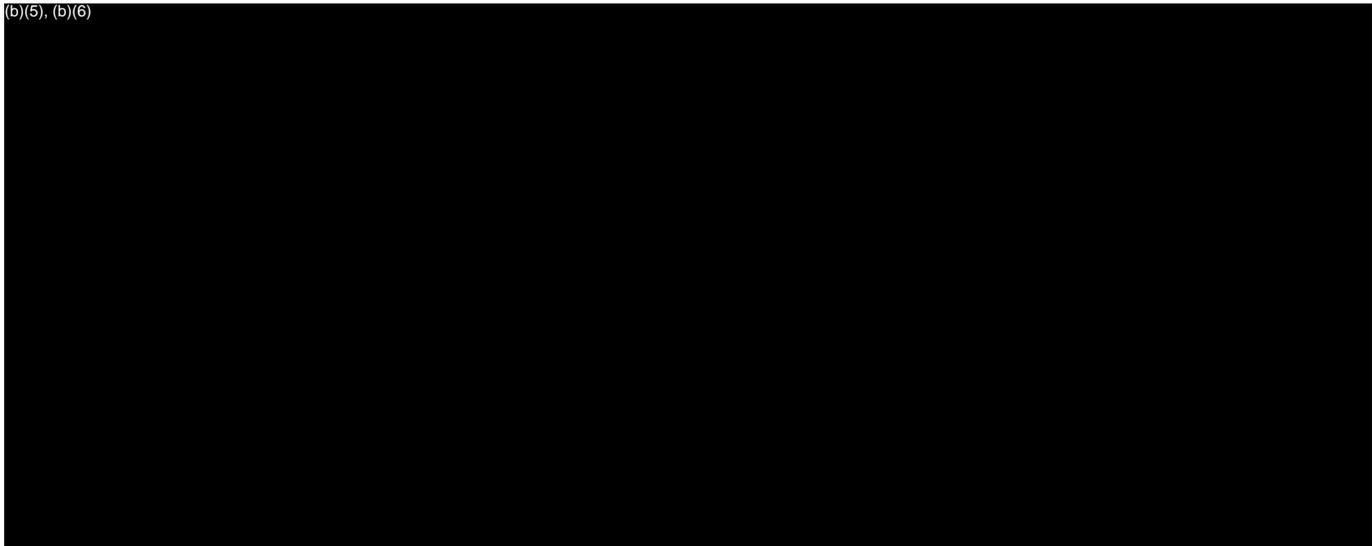
**From:** Schultz, James D. EOP/WHO [mailto:(b)(6)]  
**Sent:** Monday, March 13, 2017 9:26 AM  
**To:** Kimberly L. Sikora Panza  
**Subject:** Re: Bannon CD request

The report will be available shortly.

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



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



James D. Schultz

Senior Associate Counsel and Special Assistant to the President

Office of White House Counsel

(b)(6)

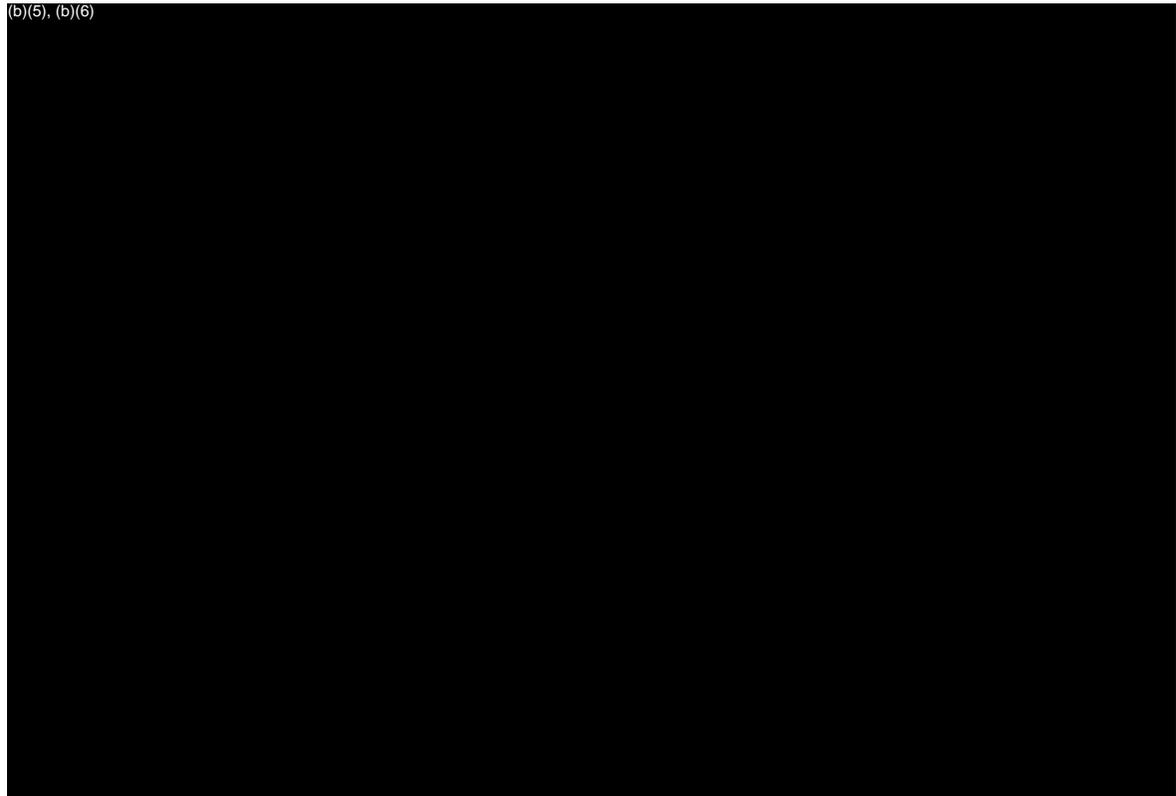


On Mar 8, 2017, at 2:48 PM, Kimberly L. Sikora Panza <[klspanza@oge.gov](mailto:klspanza@oge.gov)> wrote:

Good afternoon,

I am the OGE reviewer assigned to review the CD request for Mr. Bannon.  
I have the following questions regarding the CD request – thank you in  
advance for your input!

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



Finally, for your future reference, attached please find the sample CD request format, which asks questions regarding the various pieces of information we need to process a CD request. Most agencies submit CD requests using this form, and using the form can help streamline the CD review process on our end.

Thank you in advance for your input.

Best regards,

Kim

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**From:** [Schultz, James D. EOP/WHO](#)  
**To:** [Kimberly L. Sikora Panza](#)  
**Subject:** RE: Bannon CD request  
**Date:** Tuesday, April 04, 2017 9:53:17 AM

---

I am at my desk until noonish. J

JAMES D. SCHULTZ  
Senior Associate Counsel and Special Assistant to the President  
Office of the White House Counsel

(b)(6)

---

**From:** Kimberly L. Sikora Panza [mailto:[klspanza@oge.gov](mailto:klspanza@oge.gov)]  
**Sent:** Tuesday, April 4, 2017 9:47 AM  
**To:** Schultz, James D. EOP/WHO  
**Subject:** RE: Bannon CD request

Good morning, Jim,

Thanks for your email. I am available to speak now, if you are free – is the (b)(6) number the best number to reach you?

Thanks,

Kim

---

**From:** Schultz, James D. EOP/WHO [mailto:(b)(6)]  
**Sent:** Tuesday, April 04, 2017 9:22 AM  
**To:** Kimberly L. Sikora Panza  
**Subject:** RE: Bannon CD request

Kim – as you know, Steve’s 278 has been finalized. Can we talk this morning regarding the COD?

JAMES D. SCHULTZ  
Senior Associate Counsel and Special Assistant to the President  
Office of the White House Counsel

(b)(6)

---

**From:** Kimberly L. Sikora Panza [mailto:[klspanza@oge.gov](mailto:klspanza@oge.gov)]  
**Sent:** Friday, March 24, 2017 4:39 PM  
**To:** Schultz, James D. EOP/WHO (b)(6)  
**Subject:** RE: Bannon CD request

Good afternoon, Jim,

I hope you are well.

I am writing to touch base regarding the Bannon CD, and follow up re: a signed version of the report and my clarification questions below. At your convenience, could you please let me know the status of things?

Thank you in advance for your input.

Best regards,

Kim

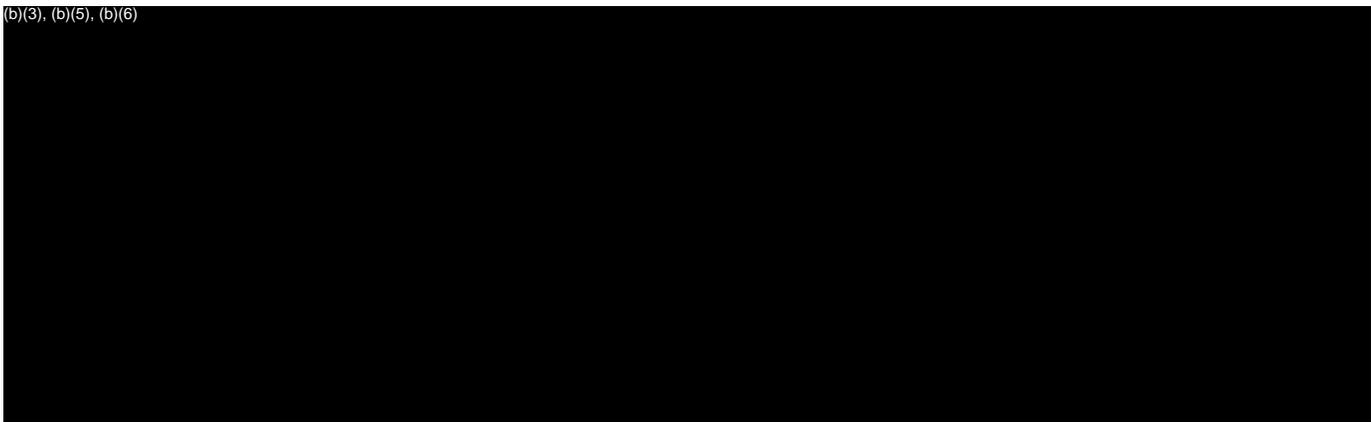
---

**From:** Kimberly L. Sikora Panza  
**Sent:** Wednesday, March 15, 2017 12:44 PM  
**To:** 'Schultz, James D. EOP/WHO'  
**Subject:** RE: Bannon CD request

Thank you for the additional information. Could you please let me know when the signed version of the report is available?

I also would appreciate your help clarifying a few items on the report. Could you please provide a brief description of the following companies:

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



Thank you in advance for your input.

Best regards,

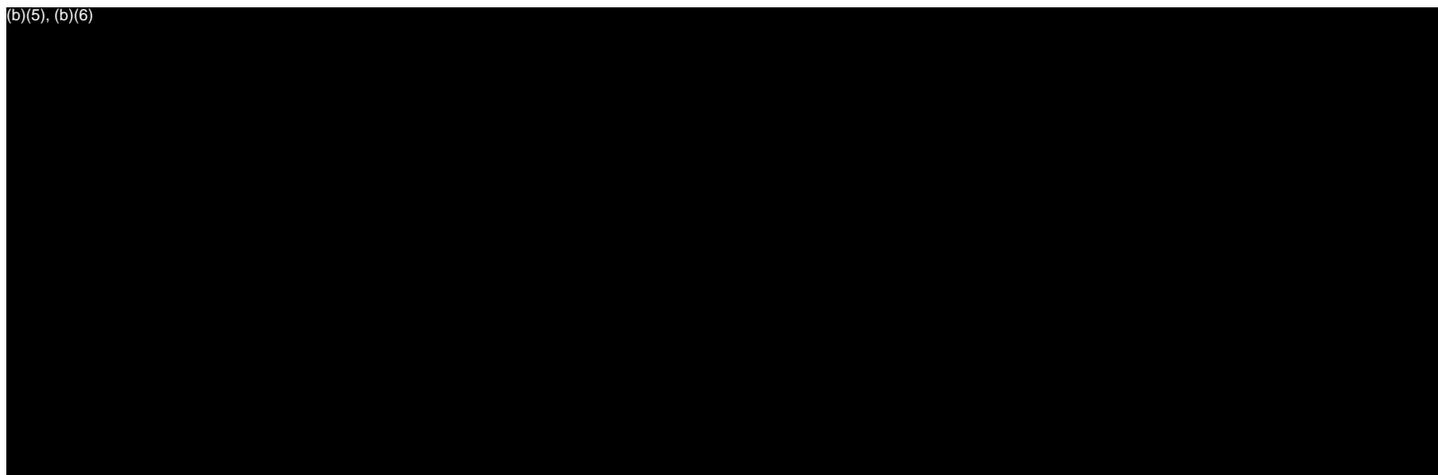
Kim

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**From:** Schultz, James D. EOP/WHO [mailto:(b)(6)]  
**Sent:** Monday, March 13, 2017 9:26 AM  
**To:** Kimberly L. Sikora Panza  
**Subject:** Re: Bannon CD request

The report will be available shortly.

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



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



James D. Schultz

Senior Associate Counsel and Special Assistant to the President

Office of White House Counsel

(b)(6)

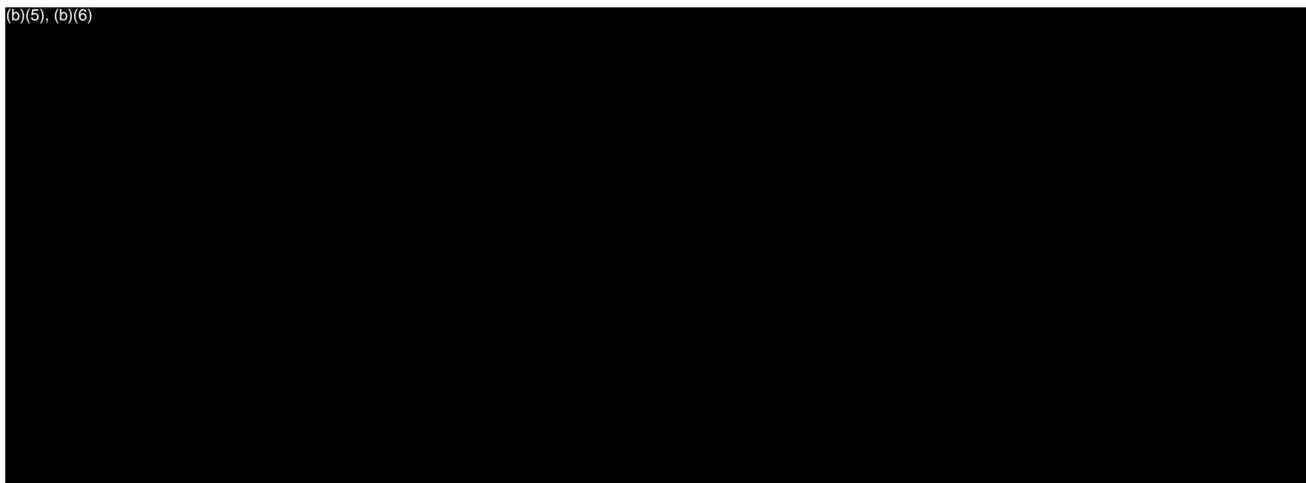


On Mar 8, 2017, at 2:48 PM, Kimberly L. Sikora Panza <[klspanza@oge.gov](mailto:klspanza@oge.gov)> wrote:

Good afternoon,

I am the OGE reviewer assigned to review the CD request for Mr. Bannon. I have the following questions regarding the CD request – thank you in advance for your input!

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



Finally, for your future reference, attached please find the sample CD request format, which asks questions regarding the various pieces of information we need to process a CD request. Most agencies submit CD requests using this form, and using the form can help streamline the CD review process on our end.

Thank you in advance for your input.

Best regards,

Kim

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**From:** [Kimberly L. Sikora Panza](#)  
**To:** [Elaine Newton](#)  
**Subject:** RE: COD PACKAGE  
**Date:** Wednesday, March 08, 2017 2:40:53 PM

---

Hi Elaine,

Do we still route CDs using the brown folders? Will Rod be making one for this request?

(I'm not at that point yet, obviously, just wanted to check!!)

Thanks,  
Kim

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

From: Elaine Newton  
Sent: Monday, March 06, 2017 12:08 PM  
To: Kimberly L. Sikora Panza  
Subject: FW: COD PACKAGE

Kim,

Please review this new CD request for a White House staff member.

Thanks, Elaine

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

From: David J. Apol  
Sent: Monday, March 06, 2017 11:57 AM  
To: Elaine Newton  
Subject: FW: COD PACKAGE

Elaine,

Please assign this and let me know the lucky recipient. Thanks.

Dave

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

From: Schultz, James D. EOP/WHO [[mailto:\(b\)\(6\)](#)]  
Sent: Monday, March 06, 2017 11:01 AM  
To: David J. Apol  
Subject: COD PACKAGE

Dave - Attached please find the COD package for Mr. Bannon. His draft 278 is available for review on integrity.  
Jim

JAMES D. SCHULTZ

Senior Associate Counsel and Special Assistant to the President Office of the White House Counsel

(b)(6)

**From:** [Kimberly L. Sikora Panza](#)  
**To:** [Elaine Newton](#)  
**Subject:** RE: COD PACKAGE  
**Date:** Monday, March 06, 2017 12:15:10 PM

---

Thanks - just wanted to make sure that I wasn't dropping the ball on that! :-)

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

From: Elaine Newton  
Sent: Monday, March 06, 2017 12:15 PM  
To: Kimberly L. Sikora Panza  
Subject: RE: COD PACKAGE

I told Dave.

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

From: Kimberly L. Sikora Panza  
Sent: Monday, March 06, 2017 12:14 PM  
To: Elaine Newton  
Subject: RE: COD PACKAGE

Ok. Did you let Dave know I was assigned, or should I? (per his email below)

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

From: Elaine Newton  
Sent: Monday, March 06, 2017 12:08 PM  
To: Kimberly L. Sikora Panza  
Subject: FW: COD PACKAGE

Kim,

Please review this new CD request for a White House staff member.

Thanks, Elaine

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

From: David J. Apol  
Sent: Monday, March 06, 2017 11:57 AM  
To: Elaine Newton  
Subject: FW: COD PACKAGE

Elaine,

Please assign this and let me know the lucky recipient. Thanks.

Dave

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

From: Schultz, James D. EOP/WHO [[mailto:\(b\)\(6\)](#)]  
Sent: Monday, March 06, 2017 11:01 AM  
To: David J. Apol  
Subject: COD PACKAGE

Dave - Attached please find the COD package for Mr. Bannon. His draft 278 is available for review on integrity.  
Jim

JAMES D. SCHULTZ

Senior Associate Counsel and Special Assistant to the President Office of the White House Counsel

(b)(6)

UNITED STATES OFFICE OF  
GOVERNMENT ETHICS



APR 12 2017

James D. Schultz  
Alternate Designated Agency Ethics Official  
The White House Office  
Washington, D.C. 20500

Dear Mr. Schultz:

In response to your request of March 6, 2017, enclosed is Certificate of Divestiture OGE-2017-031 for Stephen K. Bannon, Assistant to the President and Chief Strategist to the President. We would appreciate your forwarding the original certificate to Mr. Bannon. Also enclosed is a copy of the certificate for your files.

If there are any questions, you may contact Kimberly L. Sikora Panza, Associate Counsel, at (202) 482-9214.

Sincerely,

A handwritten signature in blue ink, appearing to read "David J. Apol".

David J. Apol  
General Counsel

Enclosures

