

From: [David J. Apol](#)
To: [Heather A. Jones](#); [Deborah J. Bortot](#)
Cc: [Elaine Newton](#)
Subject: FW: Draft SF-278 for Jared Kushner
Date: Wednesday, January 18, 2017 10:25:59 AM
Attachments: [OGE Form 278e Excel ver.xls](#)

(b)(3) 278e
reports are not
available through
FOIA



Anything you want me to add to this before I send?

(b)(5) draft language of a proposed email re CD request



Nonresponsive email from outside OGE



Nonresponsive email from outside OGE



Brandon A. Steele

From: Deborah J. Bortot
Sent: Wednesday, January 18, 2017 10:41 AM
To: David J. Apol; Heather A. Jones
Cc: Elaine Newton
Subject: RE: Draft SF-278 for Jared Kushner

Dave,

(b) (5) [Redacted]

(b) (5) [Redacted]

Once we get the request, there will be additional questions.

Thanks,
Deb

From: David J. Apol
Sent: Wednesday, January 18, 2017 10:26 AM
To: Heather A. Jones; Deborah J. Bortot
Cc: Elaine Newton
Subject: FW: Draft SF-278 for Jared Kushner

Anything you want me to add to this before I send?

(b) (5) [Redacted]

[Redacted]

[Redacted]

UNITED STATES OFFICE OF
GOVERNMENT ETHICS



JAN 26 2017

Stefan C. Passantino
Deputy Counsel to the President
The White House Office
Washington, DC 20500

Dear Mr. Passantino:

In response to your request of January 25, 2017, enclosed are Certificates of Divestiture OGE-2017-002 for Jared C. Kushner, Senior Advisor to the President, White House Office; OGE-2017-003 for Ivanka Trump as trustee for the Ivanka Trump Revocable Trust; OGE-2017-004 for (b)(6) minor child dependent minor child of Jared C. Kushner; OGE-2017-005 for (b)(6) minor child dependent minor child of Jared C. Kushner; and OGE-2017-006 for (b)(6) minor child dependent minor child of Jared C. Kushner. We would appreciate your forwarding the original certificates to Mr. Kushner. Also enclosed is a copy of the certificates for your files.

If there are any questions, you may contact Monica Ashar, Assistant Counsel, at (202) 482-9282.

Sincerely,

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

David J. Apol
General Counsel

Enclosures





CERTIFICATE OF DIVESTITURE

Certificate No. OGE-2017-002

ELIGIBLE PERSON: Jared C. Kushner
White House Office

DATE OF ISSUANCE: JAN 26 2017

DIVESTITURE PROPERTY:

[The divestiture property is identified in the attachment to this Certificate.]

This Certificate of Divestiture is issued in accordance with section 1043 of the Internal Revenue Code of 1986 and 5 C.F.R. § 2634.1002 with respect to the specific property described above. I hereby determine that the divestiture of the described property is reasonably necessary to comply with 18 U.S.C. § 208, or other applicable Federal conflict of interest statutes, regulations, rules, or executive orders.

Note that section 1043 of the Internal Revenue Code and the rules of subpart J of 5 C.F.R. Part 2634 provide for nonrecognition of gain in the case of sales to comply with conflict of interest requirements. The rules of Subpart J relate to the issuance of Certificates of Divestiture and the permitted property into which a reinvestment must be made during the 60-day period beginning on the date of such a sale in order for nonrecognition to be permitted. Such reinvestments are called rollovers, and are limited to obligations of the United States and diversified investment funds as defined in 5 C.F.R. § 2634.1003. The substantive and procedural rules relating to the tax aspects of such sales and rollovers pursuant to the statutory scheme are subject to the jurisdiction of the Internal Revenue Service.

Eligible persons should seek the advice of their personal tax advisors for guidance as to the tax aspects of divestiture transactions and whether proposed acquisitions meet the requirements for permitted property. Internal Revenue Service regulations and other guidance should be consulted as to these matters. Internal Revenue Service requirements for reporting dispositions of property and making an election not to recognize gain under section 1043 (IRS Form 8824) must be followed by eligible persons wishing to make such an election.


David J. Apol
General Counsel

cc: Deputy Counsel to the President, White House Office



Attachment

OGE-2017-002

- 100% of all financial interests in JKM Capital, LLC, that you hold as of the date of this Certificate of Divestiture
- 100% of all financial interests in Thrive Partners II GP, LLC, that you hold as of the date of this Certificate of Divestiture
- 100% of all financial interests in Thrive Partners III GP, LLC, that you hold as of the date of this Certificate of Divestiture
- 100% of all financial interests in JK IV, LLC, that you hold as of the date of this Certificate of Divestiture
- 100% of all financial interests in Thrive Partners V GP, LLC, that you hold as of the date of this Certificate of Divestiture
- 112,376 shares, Regal Bank
- 100% of all financial interests in Broadband Proliferation Partners, LLC, that you hold as of the date of this Certificate of Divestiture
- 100% of all financial interests in BFPS Ventures LLC that you hold as of the date of this Certificate of Divestiture



CERTIFICATE OF DIVESTITURE

Certificate No. OGE-2017-003

ELIGIBLE PERSON: Ivanka Trump
[Trustee of the Ivanka Trump Revocable Trust]
White House Office

DATE OF ISSUANCE: JAN 26 2017

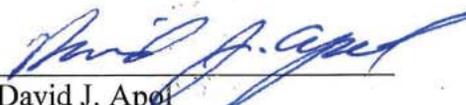
DIVESTITURE PROPERTY:

[The divestiture property is identified in the attachment to this Certificate.]

This Certificate of Divestiture is issued in accordance with section 1043 of the Internal Revenue Code of 1986 and 5 C.F.R. § 2634.1002 with respect to the specific property described above. I hereby determine that the divestiture of the described property is reasonably necessary to comply with 18 U.S.C. § 208, or other applicable Federal conflict of interest statutes, regulations, rules, or executive orders.

Note that section 1043 of the Internal Revenue Code and the rules of subpart J of 5 C.F.R. Part 2634 provide for nonrecognition of gain in the case of sales to comply with conflict of interest requirements. The rules of Subpart J relate to the issuance of Certificates of Divestiture and the permitted property into which a reinvestment must be made during the 60-day period beginning on the date of such a sale in order for nonrecognition to be permitted. Such reinvestments are called rollovers, and are limited to obligations of the United States and diversified investment funds as defined in 5 C.F.R. § 2634.1003. The substantive and procedural rules relating to the tax aspects of such sales and rollovers pursuant to the statutory scheme are subject to the jurisdiction of the Internal Revenue Service.

Eligible persons should seek the advice of their personal tax advisors for guidance as to the tax aspects of divestiture transactions and whether proposed acquisitions meet the requirements for permitted property. Internal Revenue Service regulations and other guidance should be consulted as to these matters. Internal Revenue Service requirements for reporting dispositions of property and making an election not to recognize gain under section 1043 (IRS Form 8824) must be followed by eligible persons wishing to make such an election.


David J. Apol
General Counsel

cc: Deputy Counsel to the President, White House Office



Attachment
OGE-2017-003

- 3,208 shares, Signature Bank
- 100% of all financial interests in Blackstone Strategic Alliance Fund II that you hold as of the date of this Certificate of Divestiture
- 2,076.278 shares, Hennessy Gas Utility Index Fund Investor Class Shares
- 100% of all financial interests in The Obsidian Fund LLC Class C that you hold as of the date of this Certificate of Divestiture



CERTIFICATE OF DIVESTITURE

Certificate No. OGE-2017-004

ELIGIBLE PERSON: (b)(6) minor child
[minor child of Jared C. Kushner]
White House Office

DATE OF ISSUANCE: JAN 26 2017

DIVESTITURE PROPERTY:

221 shares, Signature Bank

This Certificate of Divestiture is issued in accordance with section 1043 of the Internal Revenue Code of 1986 and 5 C.F.R. § 2634.1002 with respect to the specific property described above. I hereby determine that the divestiture of the described property is reasonably necessary to comply with 18 U.S.C. § 208, or other applicable Federal conflict of interest statutes, regulations, rules, or executive orders.

Note that section 1043 of the Internal Revenue Code and the rules of subpart J of 5 C.F.R. Part 2634 provide for nonrecognition of gain in the case of sales to comply with conflict of interest requirements. The rules of Subpart J relate to the issuance of Certificates of Divestiture and the permitted property into which a reinvestment must be made during the 60-day period beginning on the date of such a sale in order for nonrecognition to be permitted. Such reinvestments are called rollovers, and are limited to obligations of the United States and diversified investment funds as defined in 5 C.F.R. § 2634.1003. The substantive and procedural rules relating to the tax aspects of such sales and rollovers pursuant to the statutory scheme are subject to the jurisdiction of the Internal Revenue Service.

Eligible persons should seek the advice of their personal tax advisors for guidance as to the tax aspects of divestiture transactions and whether proposed acquisitions meet the requirements for permitted property. Internal Revenue Service regulations and other guidance should be consulted as to these matters. Internal Revenue Service requirements for reporting dispositions of property and making an election not to recognize gain under section 1043 (IRS Form 8824) must be followed by eligible persons wishing to make such an election.


David J. Apol
General Counsel

cc: Deputy Counsel to the President, White House Office





CERTIFICATE OF DIVESTITURE

Certificate No. OGE-2017-005

ELIGIBLE PERSON: (b)(6) minor child
[minor child of Jared C. Kushner]
White House Office

DATE OF ISSUANCE: JAN 26 2017

DIVESTITURE PROPERTY:

221 shares, Signature Bank

This Certificate of Divestiture is issued in accordance with section 1043 of the Internal Revenue Code of 1986 and 5 C.F.R. § 2634.1002 with respect to the specific property described above. I hereby determine that the divestiture of the described property is reasonably necessary to comply with 18 U.S.C. § 208, or other applicable Federal conflict of interest statutes, regulations, rules, or executive orders.

Note that section 1043 of the Internal Revenue Code and the rules of subpart J of 5 C.F.R. Part 2634 provide for nonrecognition of gain in the case of sales to comply with conflict of interest requirements. The rules of Subpart J relate to the issuance of Certificates of Divestiture and the permitted property into which a reinvestment must be made during the 60-day period beginning on the date of such a sale in order for nonrecognition to be permitted. Such reinvestments are called rollovers, and are limited to obligations of the United States and diversified investment funds as defined in 5 C.F.R. § 2634.1003. The substantive and procedural rules relating to the tax aspects of such sales and rollovers pursuant to the statutory scheme are subject to the jurisdiction of the Internal Revenue Service.

Eligible persons should seek the advice of their personal tax advisors for guidance as to the tax aspects of divestiture transactions and whether proposed acquisitions meet the requirements for permitted property. Internal Revenue Service regulations and other guidance should be consulted as to these matters. Internal Revenue Service requirements for reporting dispositions of property and making an election not to recognize gain under section 1043 (IRS Form 8824) must be followed by eligible persons wishing to make such an election.


David J. Apol
General Counsel

cc: Deputy Counsel to the President, White House Office





CERTIFICATE OF DIVESTITURE

Certificate No. OGE-2017-006

ELIGIBLE PERSON: (b)(6) minor child
[minor child of Jared C. Kushner]
White House Office

DATE OF ISSUANCE: JAN 26 2017

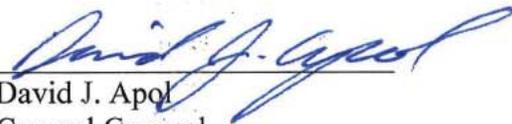
DIVESTITURE PROPERTY:

104 shares, Signature Bank

This Certificate of Divestiture is issued in accordance with section 1043 of the Internal Revenue Code of 1986 and 5 C.F.R. § 2634.1002 with respect to the specific property described above. I hereby determine that the divestiture of the described property is reasonably necessary to comply with 18 U.S.C. § 208, or other applicable Federal conflict of interest statutes, regulations, rules, or executive orders.

Note that section 1043 of the Internal Revenue Code and the rules of subpart J of 5 C.F.R. Part 2634 provide for nonrecognition of gain in the case of sales to comply with conflict of interest requirements. The rules of Subpart J relate to the issuance of Certificates of Divestiture and the permitted property into which a reinvestment must be made during the 60-day period beginning on the date of such a sale in order for nonrecognition to be permitted. Such reinvestments are called rollovers, and are limited to obligations of the United States and diversified investment funds as defined in 5 C.F.R. § 2634.1003. The substantive and procedural rules relating to the tax aspects of such sales and rollovers pursuant to the statutory scheme are subject to the jurisdiction of the Internal Revenue Service.

Eligible persons should seek the advice of their personal tax advisors for guidance as to the tax aspects of divestiture transactions and whether proposed acquisitions meet the requirements for permitted property. Internal Revenue Service regulations and other guidance should be consulted as to these matters. Internal Revenue Service requirements for reporting dispositions of property and making an election not to recognize gain under section 1043 (IRS Form 8824) must be followed by eligible persons wishing to make such an election.


David J. Apol
General Counsel

cc: Deputy Counsel to the President, White House Office



UNITED STATES OFFICE OF
GOVERNMENT ETHICS



FEB 01 2017

Stefan C. Passantino
Deputy Counsel to the President,
Ethics and Compliance
The White House Office
Washington, DC 20500

Dear Mr. Passantino:

In response to your request dated February 1, 2017, enclosed is Certificate of Divestiture OGE-2017-007 for Jared C. Kushner, Senior Advisor to the President, White House Office. This certificate replaces Certificate of Divestiture OGE-2017-002. We would appreciate your forwarding the original certificate to Mr. Kushner. Also enclosed is a copy of the certificate for your files.

If there are any questions, you may contact Monica Ashar, Assistant Counsel, at (202) 482-9282.

Sincerely,

A handwritten signature in blue ink, appearing to read "David J. Apol", written over a light blue circular stamp.

David J. Apol
General Counsel

Enclosures





CERTIFICATE OF DIVESTITURE

Certificate No. OGE-2017-007
(To replace Certificate No. OGE-2017-002)

ELIGIBLE PERSON: Jared C. Kushner
White House Office

DATE OF ISSUANCE: FEB 01 2017

DIVESTITURE PROPERTY:

[The divestiture property is identified in the attachment to this Certificate.]

This Certificate of Divestiture is issued in accordance with section 1043 of the Internal Revenue Code of 1986 and 5 C.F.R. § 2634.1002 with respect to the specific property described above. I hereby determine that the divestiture of the described property is reasonably necessary to comply with 18 U.S.C. § 208, or other applicable Federal conflict of interest statutes, regulations, rules, or executive orders.

Note that section 1043 of the Internal Revenue Code and the rules of subpart J of 5 C.F.R. Part 2634 provide for nonrecognition of gain in the case of sales to comply with conflict of interest requirements. The rules of Subpart J relate to the issuance of Certificates of Divestiture and the permitted property into which a reinvestment must be made during the 60-day period beginning on the date of such a sale in order for nonrecognition to be permitted. Such reinvestments are called rollovers, and are limited to obligations of the United States and diversified investment funds as defined in 5 C.F.R. § 2634.1003. The substantive and procedural rules relating to the tax aspects of such sales and rollovers pursuant to the statutory scheme are subject to the jurisdiction of the Internal Revenue Service.

Eligible persons should seek the advice of their personal tax advisors for guidance as to the tax aspects of divestiture transactions and whether proposed acquisitions meet the requirements for permitted property. Internal Revenue Service regulations and other guidance should be consulted as to these matters. Internal Revenue Service requirements for reporting dispositions of property and making an election not to recognize gain under section 1043 (IRS Form 8824) must be followed by eligible persons wishing to make such an election.



David J. Apel
General Counsel

cc: Deputy Counsel to the President, White House Office



Attachment
OGE-2017-007

- 100% of all financial interests in JKM Capital, LLC, that you hold as of the date of this Certificate of Divestiture
- 100% of all financial interests in Thrive Partners II GP, LLC, that you hold as of the date of this Certificate of Divestiture
- 100% of all financial interests in Thrive Partners III GP, LLC, that you hold as of the date of this Certificate of Divestiture
- 100% of all financial interests in JK Thrive IV LLC that you hold as of the date of this Certificate of Divestiture
- 100% of all financial interests in JK Thrive V LLC that you hold as of the date of this Certificate of Divestiture
- 112,376 shares, Regal Bank
- 100% of all financial interests in Broadband Proliferation Partners, LLC, that you hold as of the date of this Certificate of Divestiture
- 100% of all financial interests in BFPS Ventures LLC that you hold as of the date of this Certificate of Divestiture

UNITED STATES OFFICE OF
GOVERNMENT ETHICS



FEB 01 2017

Stefan C. Passantino
Deputy Counsel to the President,
Ethics and Compliance
The White House Office
Washington, DC 20500

Dear Mr. Passantino:

In response to your request dated February 1, 2017, enclosed is Certificate of Divestiture OGE-2017-007 for Jared C. Kushner, Senior Advisor to the President, White House Office. This certificate replaces Certificate of Divestiture OGE-2017-002. We would appreciate your forwarding the original certificate to Mr. Kushner. Also enclosed is a copy of the certificate for your files.

If there are any questions, you may contact Monica Ashar, Assistant Counsel, at (202) 482-9282.

Sincerely,

A handwritten signature in blue ink, appearing to read "David J. Apol", written over a horizontal line.

David J. Apol
General Counsel

Enclosures





CERTIFICATE OF DIVESTITURE

Certificate No. OGE-2017-007
(To replace Certificate No. OGE-2017-002)

ELIGIBLE PERSON: Jared C. Kushner
White House Office

DATE OF ISSUANCE: FEB 01 2017

DIVESTITURE PROPERTY:

[The divestiture property is identified in the attachment to this Certificate.]

This Certificate of Divestiture is issued in accordance with section 1043 of the Internal Revenue Code of 1986 and 5 C.F.R. § 2634.1002 with respect to the specific property described above. I hereby determine that the divestiture of the described property is reasonably necessary to comply with 18 U.S.C. § 208, or other applicable Federal conflict of interest statutes, regulations, rules, or executive orders.

Note that section 1043 of the Internal Revenue Code and the rules of subpart J of 5 C.F.R. Part 2634 provide for nonrecognition of gain in the case of sales to comply with conflict of interest requirements. The rules of Subpart J relate to the issuance of Certificates of Divestiture and the permitted property into which a reinvestment must be made during the 60-day period beginning on the date of such a sale in order for nonrecognition to be permitted. Such reinvestments are called rollovers, and are limited to obligations of the United States and diversified investment funds as defined in 5 C.F.R. § 2634.1003. The substantive and procedural rules relating to the tax aspects of such sales and rollovers pursuant to the statutory scheme are subject to the jurisdiction of the Internal Revenue Service.

Eligible persons should seek the advice of their personal tax advisors for guidance as to the tax aspects of divestiture transactions and whether proposed acquisitions meet the requirements for permitted property. Internal Revenue Service regulations and other guidance should be consulted as to these matters. Internal Revenue Service requirements for reporting dispositions of property and making an election not to recognize gain under section 1043 (IRS Form 8824) must be followed by eligible persons wishing to make such an election.

David J. Apfel
General Counsel

cc: Deputy Counsel to the President, White House Office



Attachment
OGE-2017-007

- 100% of all financial interests in JKM Capital, LLC, that you hold as of the date of this Certificate of Divestiture
- 100% of all financial interests in Thrive Partners II GP, LLC, that you hold as of the date of this Certificate of Divestiture
- 100% of all financial interests in Thrive Partners III GP, LLC, that you hold as of the date of this Certificate of Divestiture
- 100% of all financial interests in JK Thrive IV LLC that you hold as of the date of this Certificate of Divestiture
- 100% of all financial interests in JK Thrive V LLC that you hold as of the date of this Certificate of Divestiture
- 112,376 shares, Regal Bank
- 100% of all financial interests in Broadband Proliferation Partners, LLC, that you hold as of the date of this Certificate of Divestiture
- 100% of all financial interests in BFPS Ventures LLC that you hold as of the date of this Certificate of Divestiture