

From: [Susman, Thomas](#)
To: [Paul Miller](#); [Walker, Robert](#); [Paul Miller](#); [Kelner, Robert](#); (b)(6) M Elias'; (b)(6) N'; [David J. Apol](#)
Cc: [Amanda Kadilak](#)
Subject: [GRAYMAIL] RE: RE: Panel program details
Date: Tuesday, January 31, 2017 5:06:28 PM

I think Rob Walker has done so already:

http://www.wileyrein.com/newsroom-newsletters-item-Jan_2017_ELN-President-Trump-Extends-Obama-Ethics-Executive-Order-for-Appointees-Some-Differences-in-Details.html

Thomas M. Susman

(b)(6)

(b)(6)

From: Paul Miller [mailto:(b)(6)]
Sent: Tuesday, January 31, 2017 4:57 PM
To: Susman, Thomas <(b)(6)>; Walker, Robert <(b)(6)>;
Paul Miller <(b)(6)>; Kelner, Robert <(b)(6)>; (b)(6) M Elias's email <(b)(6) N Eisen's >; David J. Apol <djapol@oge.gov>
Cc: Amanda Kadilak <(b)(6)>
Subject: RE: RE: Panel program details

If any of you write articles on these topics or anything related to the lobbying profession and would like us to post it and send it to our e-mail list, please send them along.

Paul A. Miller, PPC

Miller/Wenhold Capitol Strategies

3930 Walnut Street

Suite 210

Fairfax, VA 22030

(b)(6)

(b)(6)

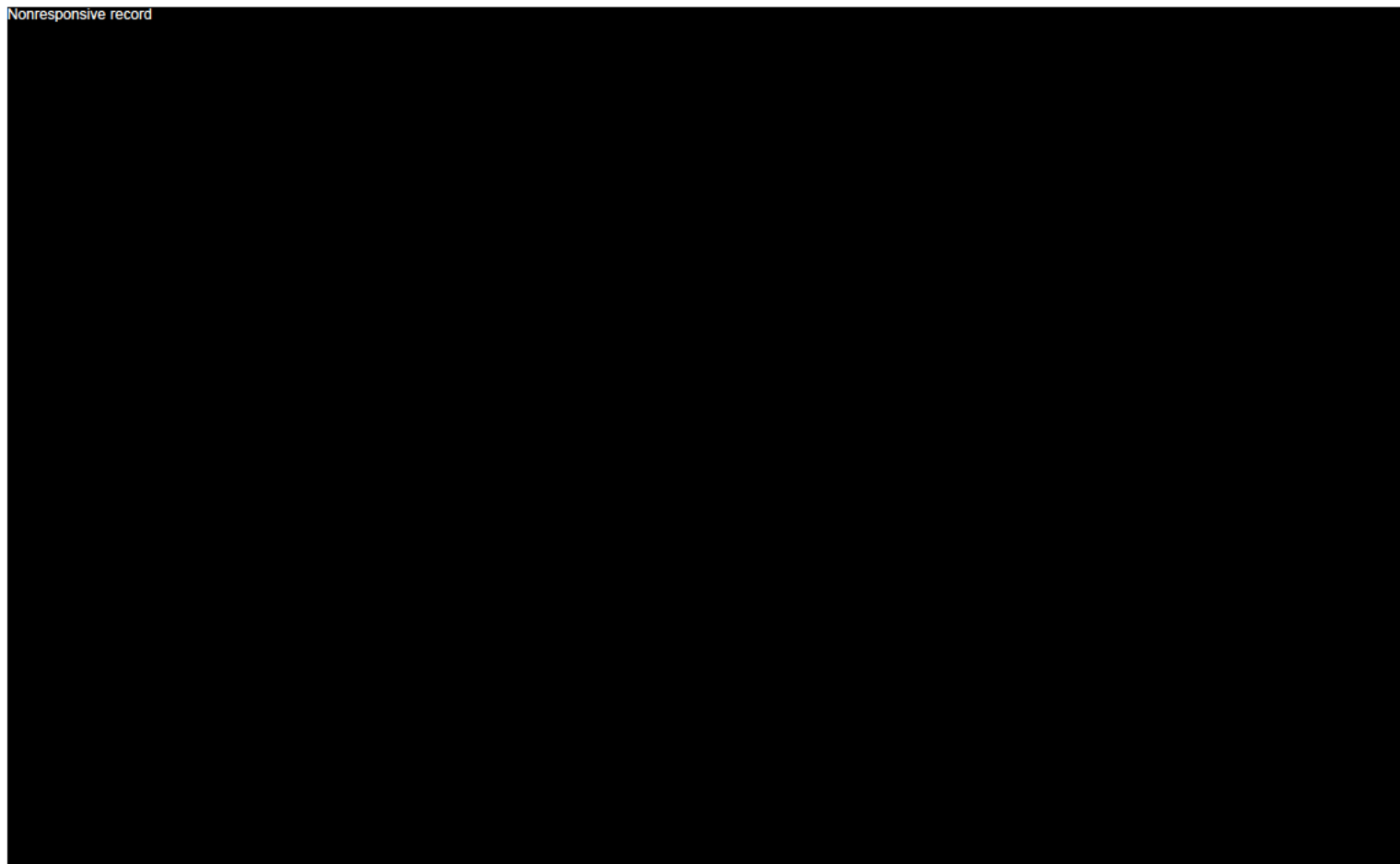
(b)(6)

W: www.mwcapitol.com

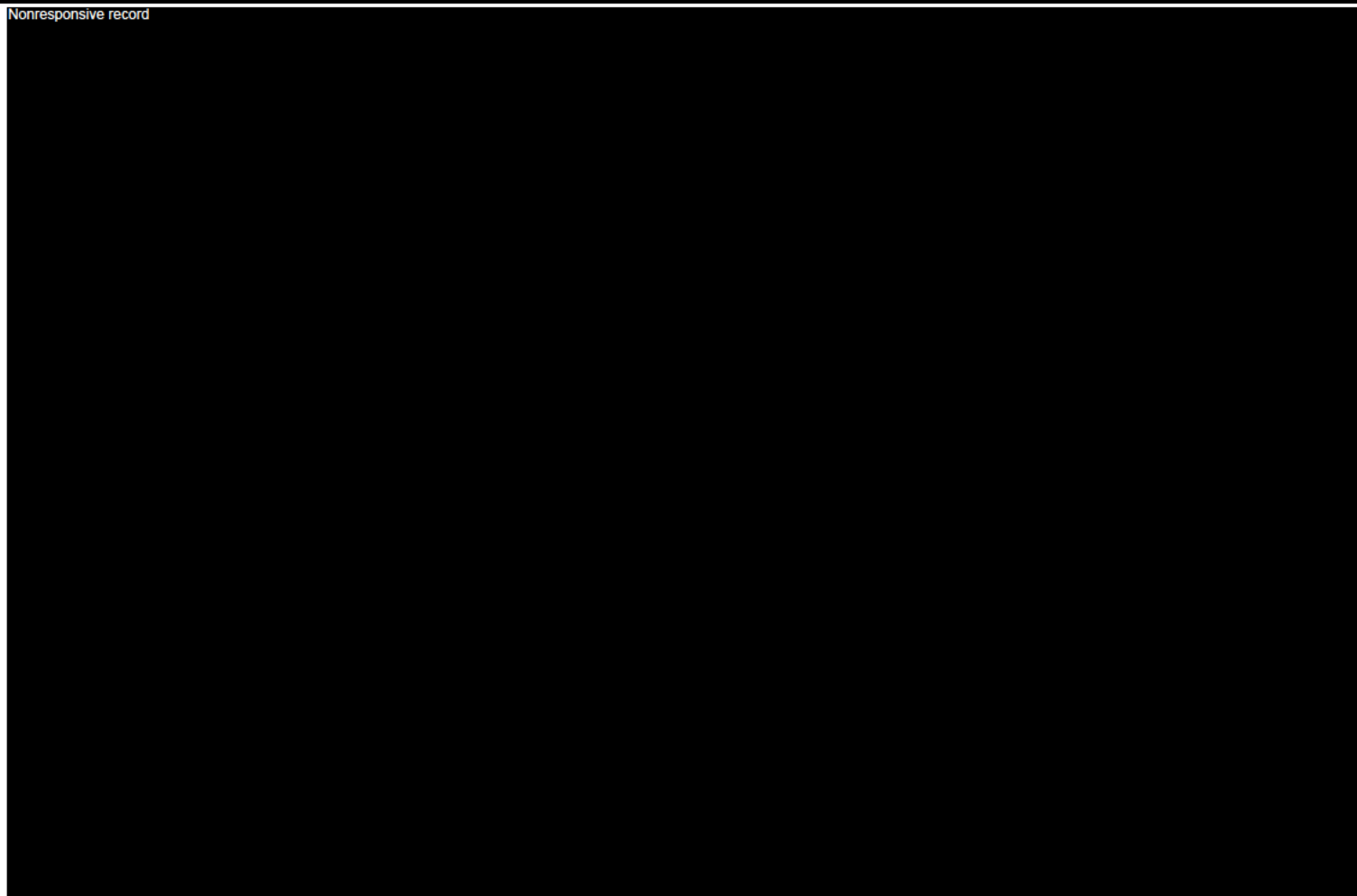
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Nonresponsive record



Nonresponsive record



From: Susman, Thomas [mailto:(b)(6)]
Sent: Thursday, January 26, 2017 6:16 PM
To: Kelner, Robert (b)(6); (b)(6) M Elias's email; Walker, Robert
(b)(6); (b)(6) N Eddins; David J. Apol <djapol@oge.gov>
Cc: Amanda Kadilak <(b)(6)>; 'Paul Miller' (b)(6);
(b)(6); Paul Miller <(b)(6)>; Susman, Thomas
<(b)(6)>
Subject: RE: RE: Panel program details

Colleagues, sorry to be delayed in getting this out. You might guess that this is a busy season for a governmental affairs office.

First, I want to welcome David Apol to the panel. Many of you may already know him; he is GC at OGC and has been a government ethics officer/advisor for a distinguished career that included a stint with the Senate Ethics Committee.

Since we have allotted 2½ hours for the program – which we don't need to take if presentations and questions don't fill the time – having 5 participants is likely to be more fun and spread the responsibilities around. (As a side note, I unfortunately will have to leave shortly after 10 for a senior managers' budget meeting back at the ABA was called at the last minute by our Exec. Director; I don't have the option of missing it. Paul will take over when I depart.)

Here's a proposed line-up with a few suggestions of what you might talk about. These are merely suggestions, and as my earlier email stated, I want to keep things informal and with give-and-take, so the opening comments should be under 10 minutes.

1. Susman will do introductions of the participants and do a brief stage-setting. Two points I want to make are: (a) There is nothing inherently evil about revolving door appointments/employment; in fact they can be of substantial value to both government and the private sector. The dangers lie in the potential for conflicts of interest and undermining public perception/confidence in government. (b) There are special, perhaps enhanced, dangers with lobbyists moving in and out of government.

There are plenty of laws and regulations governing revolving in and out of government. Perhaps the best place to start is with the GC to the agency central to this issue in Washington, OGE.

2. Apol will give the overview of laws and regulations, role of agencies, and problem areas.

3. Since the first order of business these days is filling jobs in the new administration, Kelner will address what he's telling clients and friends about navigating the waters – both legally and practically – in applying for, getting vetted for, and ensuring compliance with applicable laws and regulations in entering the new administration.

4. Of course, for every action there's a reaction, and for every person entering government there's someone departing these days. Marc can fill us in on what kinds of cooling off periods, restrictions and prohibitions, screens, etc. need to be considered and discussed by departing officials and the law and lobbying firms they might be going to.

5. Walker has been atop both the Senate and House ethics committees, so he can best provide a rundown on the requirements and limitations affecting those going to and from Capitol Hill.

6. Finally, Eisen – sometimes considered the scourge of Washington lobbyists – will sharpen the focus on lobbyists who go in and out of government. As author of President Obama's Executive Order affecting lobbyists and outspoken critic of some of the current administration's actions on the ethics front, he'll give us an appraisal of the effects of the Obama order and opine on the wisdom and efficacy of the 5-year cooling-off period proposed to be imposed on lobbyists entering the Trump administration.

We'll have plenty of time for questions at the end, but will also take a few questions after (and even during) each presentation.

My plan is to allow everyone to question, interrupt, comment on, and rebut or second whatever is said by others. We'll try to keep it light-hearted and fast-moving. BUT feel free to reply to all with amendments, complaints, or agreement (but no resignations, please).

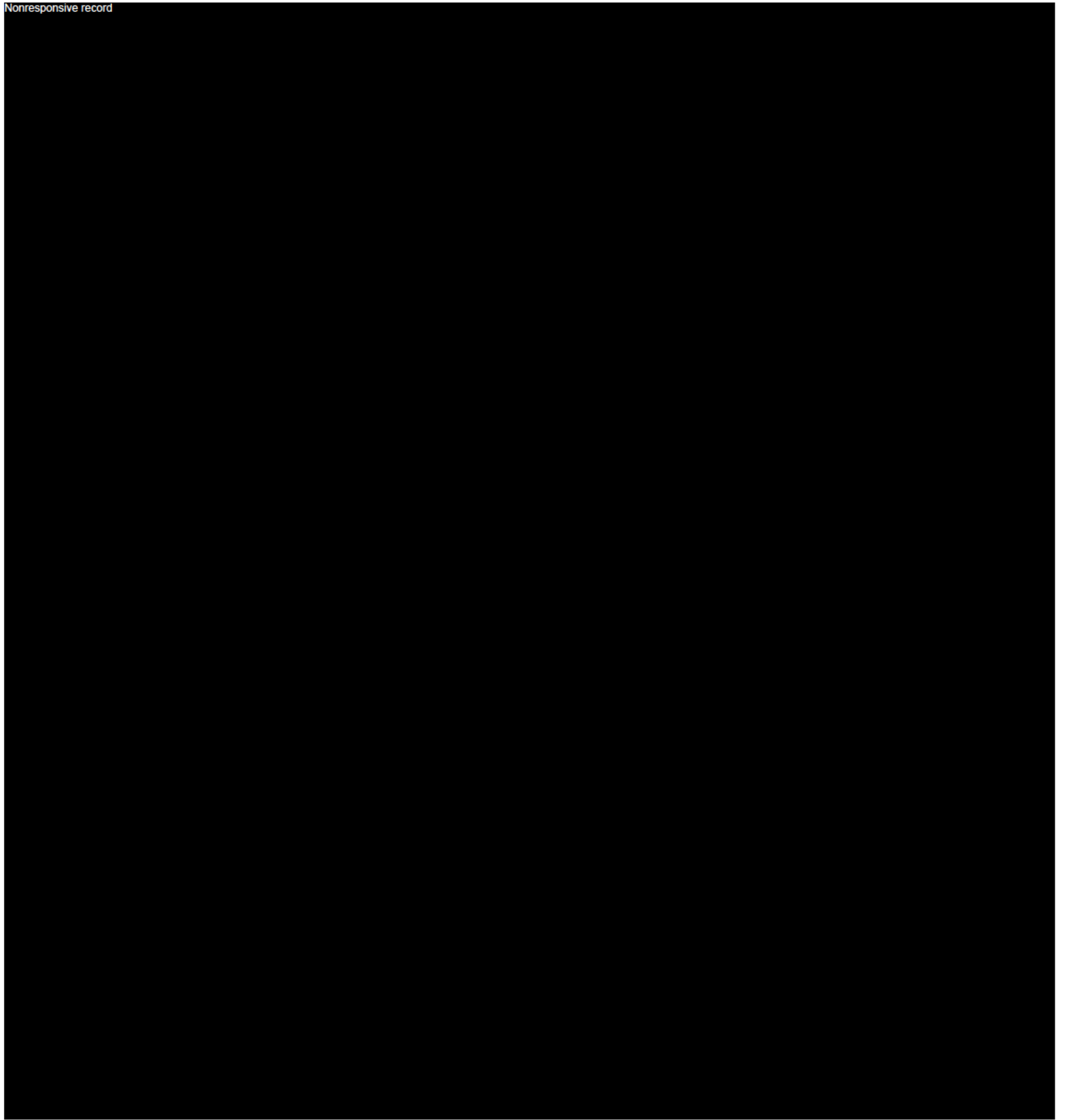
Tom

Thomas M. Susman

(b)(6)

(b)(6)

Nonresponsive record



From: Paul Miller [[mailto:\(b\)\(6\)](#)]
Sent: Tuesday, January 17, 2017 7:21 AM
To: Susman, Thomas <(b)(6)>; Kelner, Robert (b)(6) >;
(b)(6) M Elias's email <(b)(6)>; Walker, Robert (b)(6) >; (b)(6) N Eisen's
<(b)(6)>; Amanda Kadilak (b)(6) >; 'Paul Miller (b)(6)' <(b)(6)>
<(b)(6)>
Subject: RE: RE: Panel program details

I wanted to touch base with everyone regarding our ethics program planned for January 30th. President-Elect Trump has been in the news recently regarding questions arising from potential conflicts. This panel discussion is not focused on Trump. We want to host a panel discussion that focuses on the revolving door from the lobbyist side of the ball. Mr. Trump may come up, but we don't see this panel as solely focused on Mr. Trump's potential issues. We want to make this a learning and value add for our side and what they need to be aware of today when it comes to ethics, the revolving door and potential financial conflicts.

Does this make sense and something that fits your thoughts?

Paul A. Miller, PPC

Miller/Wenhold Capitol Strategies

3930 Walnut Street

Suite 210

Fairfax, VA 22030

(b)(6)

(b)(6)

(b)(6)

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From: Paul Miller

Sent: Monday, January 16, 2017 1:05 PM

To: Tom Susman (b)(6) >; 'Kelner, Robert' (b)(6) >;
(b)(6) M Elias's email (b)(6) M Elias's email >; 'Walker, Robert' (b)(6) >;
(b)(6) N Eisen s <(b)(6) N Eisen s >
Cc: 'Anda Kadilak' (b)(6) >; 'Paul Miller' (b)(6) >
(b)(6) >

Subject: RE: Panel program details

Importance: High

I wanted to thank you again for agreeing to speak on our panel focused on the revolving door. With a new administration, we felt it was time for a refresher of the potential conflicts that arise and what you need to be aware of. I wanted to see if you all could prepare a 3-5 minute opening statement on the topic. Once opening statements are complete, Tom Susman will begin the questioning.

Could you also please send along a bio and headshot?

Program Title: The Revolving Door and Financial Conflicts: The Challenges and Risks You Face

Moderator: Thomas Susman, American Bar Association

Speakers: Robert Kelner, Covington & Burling

Marc Elias, Perkins Coie, LLP

Norm Eisen, Brookings

Robert Walker, Wiley Rein LLP

Invited: Walter Shaub, Office of Government Ethics

Date: January 30, 2017

Time: 9:00 am – 11:30 am

Location: Ropes & Gray LLP, 2099 Pennsylvania
Avenue, NW, Washington, DC 20006

Paul A. Miller, PPC

Miller/Wenhold Capitol Strategies

3930 Walnut Street

Suite 210

Fairfax, VA 22030

(b)(6)

(b)(6)

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From: [Michael Hanson](#)
To: [David J. Apol](#)
Cc: [Timothy Mallon](#); [Zohair Baig](#); [Ty Cooper](#); [Nelson Cabrera Jr.](#)
Subject: current link to Whitehouse 201 page no longer exists
Date: Monday, January 23, 2017 10:56:32 AM

Hello David,

The default link we've been using for White House reports is no longer valid as they've pulled and replaced all their content.

Please let me know if I (b) (5)

In the meantime, if I get contacted by anyone on the WH web team (normally likely) I'll ask them (b) (5)

Again, our current link is broken (text below), we need to either (b) (5)

(2) Select Document(s), then click "Add to Cart"

Please visit the White House for these reports.

Here is a link <https://www.whitehouse.gov/the-press-office/financial-disclosure-reports-now-available>

Thanks,

Mike

Michael Hanson
(202) 482-9221
Office of Government Ethics

Visit us at www.oge.gov

From: [Christopher J. Swartz](#)
To: [David J. Apol](#)
Subject: DAEO Designation
Date: Monday, January 23, 2017 12:36:23 PM
Attachments: [The%20White%20House.pdf](#) Attachment - Nonresponsive record

Here is the DAEO designation letter for the last DAEO at the White House, W. Neil Eggleston. A similar letter would have been prepared for Dana Remus. The Deputy Ethics Official designation should be in their briefing book.

BTW, as they should know, both a DAEO and an ADAEO are necessary by law.

Chris

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

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

From: [News and Info for Ethics Officials](#) on behalf of [Ethics Mailinglist](#)
To: OGE-ETHICSINFO@LISTSERV.GSA.GOV
Subject: Detail Opportunity at the White House Counsel's Office
Date: Friday, February 03, 2017 11:28:43 AM

Detail Opportunity at the White House Counsel's Office

The White House Counsel's Office is seeking one or more short-term employees for detail (up to 6 months) to assist the Ethics and Compliance section of the office. Selected candidates will be involved in the tracking and review of OGE Form 278e and OGE Form 450 reports for White House staff, initial and annual ethics training, post-employment out-processing, and general ethics advice and guidance. In particular, we are seeking candidates with a background in financial disclosure review, Integrity.gov, and with experience providing one-on-one ethics advice.

Interested parties should contact James D. Schultz, Associate Counsel to the President and Designated Alternate White House Ethics Official at (b) (6)

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From: [David J. Apol](#)
To: (b)(6)
Subject: FW: Speaking Invite
Date: Wednesday, January 25, 2017 8:05:47 PM
Importance: High

Paul,

I apologize for the late response. I am available to give an OGE perspective at this event in lieu of Walter Shaub if you are still interested. Below is my bio for your info.

Sorry for the delay. I certainly understand if it is too late to join the fun.

David J. Apol
General Counsel, U.S. Office of Government Ethics

As General Counsel at the Office of Government Ethics, Mr. Apol is responsible for interpreting ethics laws and regulations, providing guidance on ethics laws and regulation, and recommending changes to ethics policy for the Executive Branch of the United States Government.

Prior to his position as General Counsel at the U.S. Office of Government Ethics (OGE), Mr. Apol served as the Chief Counsel for Administrative Law at the Office of the U.S. Trade Representative, leading the administrative law program of a cabinet-level agency. Before that, he served as an Associate General Counsel at OGE, where his accomplishments included both working on ethics law reform in the United States and advising a foreign government on establishing its own ethics laws at a critical time of political change. Prior to coming to OGE, Mr. Apol served as Associate Counsel to the President, advising the President, the First Lady, and senior White House officials on ethics issues and the Presidential nominee financial disclosure program. In that capacity, he had the opportunity to work personally with ethics officials from almost every executive branch agency. Mr. Apol was the Counsel for the Department of Labor's Ethics Program from 1992 to 2000, where he was charged with establishing and then managing a new Department-wide ethics program. He served as a Counsel for the Senate Ethics Committee from 1987 to 1992 where he advised Senators and Senate Staff and was involved in several high profile investigations. Prior to coming to Washington, Mr. Apol served as a Judge Advocate General Officer in the U.S. Army where he was responsible for ethics, administrative law, international law, and contract law for the Army's Strategic Missile Defense Command.

He is a graduate of Wheaton College and the University of Michigan Law School

From: Walter M. Shaub
Sent: Monday, January 16, 2017 1:12 PM
To: David J. Apol
Subject: FW: Speaking Invite
Importance: High

Did you ever call to let him know that you're able to speak?

From: Paul Miller [mailto:(b)(6)]
Sent: Monday, January 16, 2017 1:12 PM
To: Walter M. Shaub
Subject: RE: Speaking Invite
Importance: High

Walter,

I am the President of the National Institute For Lobbying & Ethics, which is the professional association for lobbying professionals. I wanted to reachout to you today because we are hosting a panel discussion on January 30 on the topic of the revolving door and financial conflicts. With Donald Trump set to take office and so many unanswered questions, we wanted to continue to shed light on these issues. I've seen you quoted recently on the Trump situation and was hoping you might be willing to bring your expertise to our panel?

Program Title: The Revolving Door and Financial Conflicts: The Challenges and Risks You Face

Moderator: Thomas Susman, American Bar Association

Speakers: Robert Kelner, Covington & Burling

Marc Elias, Perkins Coie, LLP

Norm Eisen, Brookings

Robert Walker, Wiley Rein LLP

Invited: Walter Shaub, Office of Government Ethics

Date: January 30, 2017

Time: 9:00 am – 11:30 am

Location: Ropes & Gray LLP, 2099

Pennsylvania Avenue, NW, Washington, DC

20006

Paul A. Miller, PPC

Miller/Wenhold Capitol Strategies

3930 Walnut Street

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Fairfax, VA 22030

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From: [Michael Hanson](#)
To: [David J. Apol](#)
Subject: Hey Dave. I'm in, Send me the language...RE: Current and former President/VP page
Date: Thursday, February 02, 2017 9:09:30 AM
Attachments: [image001.png](#)

...and add the links to our other pages

From: David J. Apol
Sent: Wednesday, February 01, 2017 11:58 AM
To: Rachel K. Dowell
Cc: Michael Hanson
Subject: RE: Current and former President/VP page

I've got language when either of you are in.

From: Rachel K. Dowell
Sent: Wednesday, February 01, 2017 9:27 AM
To: Christopher J. Swartz; Michael Hanson
Cc: David J. Apol; Vincent Salamone; Seth Jaffe
Subject: RE: Current and former President/VP page

Hi all – Just checking in on this. Please let me know once these go live.

From: Christopher J. Swartz
Sent: Friday, January 27, 2017 11:01 AM
To: Michael Hanson
Cc: Rachel K. Dowell; David J. Apol; Vincent Salamone; Seth Jaffe
Subject: RE: Current and former President/VP page

Excellent- I am good to go, so long as Dave is.

Please let me, Dave, Rachel, Seth, and Vince know when you've pulled the trigger, if you could. Rachel is going to take over my position on this. Vince needs for Comms.

Chris

From: Michael Hanson
Sent: Friday, January 27, 2017 10:58 AM
To: Christopher J. Swartz; David J. Apol
Subject: RE: Current and former President/VP page

Yea, the ordering would ordinarily be a problem but alphabetical – descending gives us

Trump,
Pence,
Obama,
Biden

Couldn't be better though we'll need a president and vp next time whose names start after "T"

☺

From: Christopher J. Swartz
Sent: Friday, January 27, 2017 10:49 AM
To: Michael Hanson; David J. Apol
Subject: RE: Current and former President/VP page

Ok. I misunderstood your email. Also, can you ensure that the former President's report sits above the former Vice Presidents? Once you are good across the board, let me know and I will send OFP a heads-up.

Chris

From: Michael Hanson
Sent: Friday, January 27, 2017 10:42 AM
To: Christopher J. Swartz
Subject: RE: Current and former President/VP page

A couple little hiccups with the text – we may not have 2017 reports until May, and, the view will show past P/VP as well until their reports fall off. Spoke with Dave about this and he was ok with it.

When we get the ok we can do our text then.

From: Christopher J. Swartz
Sent: Friday, January 27, 2017 10:17 AM
To: Michael Hanson; David J. Apol
Cc: Sandra S. Mabry; Daniel L. Skalla; Seth Jaffe; Rachel K. Dowell; Ty Cooper
Subject: RE: Current and former President/VP page

(b) (5)

From: Michael Hanson

Sent: Friday, January 27, 2017 10:15 AM
To: Christopher J. Swartz; David J. Apol
Cc: Sandra S. Mabry; Daniel L. Skalla; Seth Jaffe; Rachel K. Dowell; Ty Cooper
Subject: RE: Current and former President/VP page

Hello David,

(b) (5)

From: Christopher J. Swartz
Sent: Friday, January 27, 2017 9:23 AM
To: Michael Hanson; David J. Apol
Cc: Sandra S. Mabry; Daniel L. Skalla; Seth Jaffe; Rachel K. Dowell; Ty Cooper
Subject: RE: Current and former President/VP page

Mike-

It may be helpful to Dave if you could share the link/print screen to the pages for him to see.

Chris

From: Michael Hanson
Sent: Friday, January 27, 2017 9:00 AM
To: David J. Apol
Cc: Sandra S. Mabry; Daniel L. Skalla; Seth Jaffe; Rachel K. Dowell; Christopher J. Swartz; Ty Cooper
Subject: Current and former President/VP page

Good morning David,

Not sure if there are still discussions to be had on making the P & VP reports available, but the technical parts are built and waiting to the go-ahead.

These include:

- The publication mechanism from FDTs to 201,
- The page to display the filings,
- The edited entry on the OGE Homepage, and,
- Cross-links between the related pages.

Please let me know when we can go live. It will take about 10-minutes to unhide the design elements and then replicate to the web.

Thanks.

Mike

From: Christopher J. Swartz
Sent: Thursday, January 26, 2017 2:41 PM
To: Michael Hanson
Cc: Sandra S. Mabry; Daniel L. Skalla; David J. Apol; Seth Jaffe; Rachel K. Dowell
Subject: RE: give me text

(b) (5)

I won't track down the 278 reports.

From: Michael Hanson
Sent: Thursday, January 26, 2017 2:39 PM
To: Christopher J. Swartz
Cc: Sandra S. Mabry; Daniel L. Skalla; David J. Apol; Seth Jaffe; Rachel K. Dowell
Subject: RE: give me text

Hey there Chris,

All we have in FDTs are the 278's for the 2 positions. (b) (5)

Teresa has uploaded the full set of 278s so we now have the complete set, no need to track them down.

From: Christopher J. Swartz
Sent: Thursday, January 26, 2017 2:36 PM
To: Michael Hanson
Cc: Sandra S. Mabry; Daniel L. Skalla; David J. Apol; Seth Jaffe; Rachel K. Dowell
Subject: RE: give me text

For the landing page here, I've messed around with the language (b) (5)

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Otherwise it looked good to me. I'm going to try to pull and save the last few years of financial disclosure documents from the Archive site for you.

From: Michael Hanson
Sent: Thursday, January 26, 2017 1:36 PM
To: Christopher J. Swartz
Cc: Sandra S. Mabry; Daniel L. Skalla; David J. Apol; Seth Jaffe; Rachel K. Dowell
Subject: RE: give me text

Hey there Chris,
Based on the discussion I've pulled the view till the details are worked out.
Attached is a screenshot. Please wordsmith it however you'd like and send me the text.

We can put the site back up in moments. The complete mechanism is in place for publication at this point.

Mike

From: Christopher J. Swartz
Sent: Thursday, January 26, 2017 12:47 PM
To: Michael Hanson
Cc: Sandra S. Mabry; Daniel L. Skalla; David J. Apol; Seth Jaffe; Rachel K. Dowell
Subject: RE: give me text

Mike-

I talked to Dave about our plan on posting the P and VP reports. Per STOCK Act, they are to be released without requirement of a 201 form.

(b) (5)

[REDACTED]

Finally, before anything goes live, let me, Rachel, and Dave know so that we can coordinate with the Office of the Former President for their situational awareness.

Chris

From: Michael Hanson
Sent: Thursday, January 26, 2017 12:01 PM
To: Christopher J. Swartz; Sandra S. Mabry; Daniel L. Skalla
Subject: give me text

<https://www.oge.gov/web/oge/nsf/Presidential+Appointee+&+Nominee+Records>

Michael Hanson
(202) 482-9221
Office of Government Ethics

Visit us at www.oge.gov

From: [David J. Apol](#)
To: ["Schultz, James D. EOP/WHO"; Seth Jaffe](#)
Subject: question from White House employee
Date: Tuesday, January 24, 2017 5:26:21 PM

Jim,

Meet Seth Jaffe, my Deputy GC and (b) (5) expert.

As we discussed, we have been getting questions from a WH employee's husband on (b) (5)
(b) (5) I will have Seth refer the person to you. Feel free to talk directly to Seth if you have any questions about how we handle these.

From: [Al Shaw](#)
To: [David J. Apol](#)
Subject: Question re: Kushner Certificates of Divestiture
Date: Thursday, February 16, 2017 3:06:38 PM

Dear Mr. Apol,

I'm a reporter at ProPublica in New York. I recently received five Certificates of Divestiture for Jared Kushner, Ivanka Trump and their dependents from OGE via FOIA. (ID numbers OGE-2017-002 through OGE-2017-006). Would you be able to tell me if Mr. Kushner and/or Ms. Trump have sought and/or received additional CDs beyond the ones mentioned above? If so, would you be able to provide them to me?

Thank you,

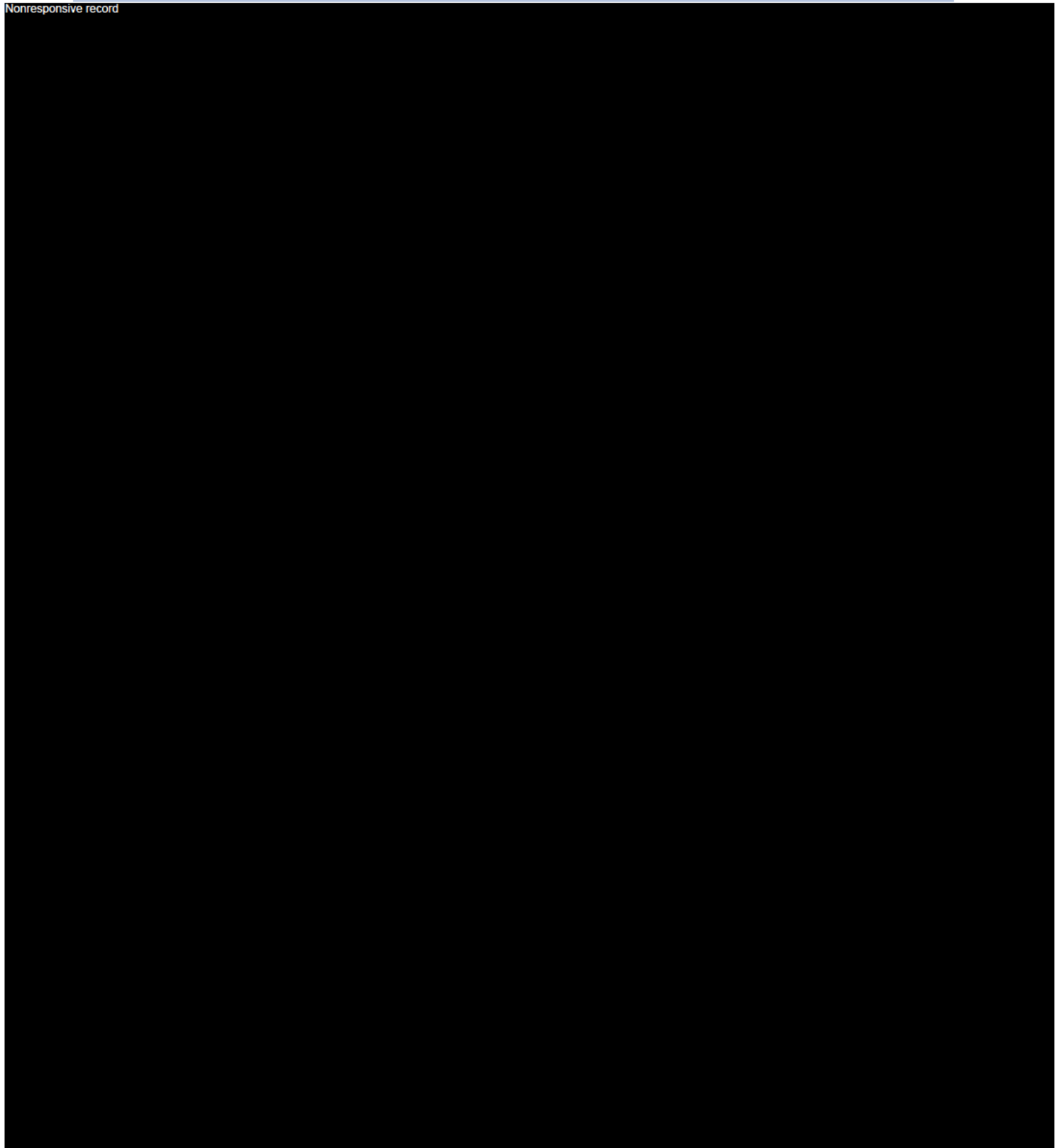
Al Shaw
ProPublica

(b)(6)

From: [David J. Apol](#)
To: [George Hancock](#)
Cc: [Emory A. Rounds III](#); [Diana Veilleux](#)
Subject: RE: (b) (6) Integrity privileges - Changed
Date: Friday, February 03, 2017 1:30:55 PM

Thanks. BTW, our policy is that OGE folk should not be accessing White House reports on integrity until the WHC office certifies.

Nonresponsive record



From: [Heather A. Jones](#)
To: [Deborah J. Bortot](#); [David J. Apol](#); [Director of OGE](#)
Cc: [Seth Jaffe](#); [Leigh J. Francis](#)
Subject: RE: EO on lobbying was signed today
Date: Sunday, January 29, 2017 12:51:14 PM
Attachments: [Trump ethics pledge.pdf](#) Attachment - Nonresponsive; also publicly available

All –

Attached is a copy of the new pledge from the WH website.

Heather

From: Heather A. Jones
Sent: Saturday, January 28, 2017 10:45 PM
To: Deborah J. Bortot; David J. Apol; Director of OGE
Subject: EO on lobbying was signed today

Sent from my BlackBerry 10 smartphone on the Verizon Wireless 4G LTE network.

From: Schultz, James D. EOP/WHO

Sent: Sunday, February 5, 2017 1:26 PM

To: Walker, Evan J. EOP/WHO (b)(6); Michael Hanson
<mhanson@oge.gov>

Cc: David J. Apol <djapol@oge.gov>; Vincent Salamone <visalamo@oge.gov>

Subject: RE: Old info on WH website: where to get Financial Disclosure Reports

While this works for Assistants to the President and Deputy Assistants, the Special Assistants' 278s

are housed in our office. We need to come up with a plan to make them available via electronic request. Please make some suggestions. Thank you. J

JAMES D. SCHULTZ

Associate Counsel to the President, Ethics & Compliance
Office of the White House Counsel

(b)(6)

(b)(6)

Nonresponsive record

Nonresponsive record

From: Michael Hanson [<mailto:mhanson@oge.gov>]

Sent: Wednesday, February 1, 2017 10:12 AM

To: Walker, Evan J. EOP/WHO (b)(6); Schultz, James D. EOP/WHO (b)(6)

Cc: David J. Apol <djapol@oge.gov>; Vincent Salamone <vsalamo@oge.gov>

Subject: Old info on WH website: where to get Financial Disclosure Reports

Good morning Evan/Jim,

Vince, our Press Liaison, got a call this morning about a page on the White House website:

<https://www.whitehouse.gov/public-forms/oge278> This appears to be old information from the last Administration.

The page we updated last week has the new information: <https://www.whitehouse.gov/briefing-room/disclosures/financial-disclosures>

If both pages are needed, humbly suggest you make them consistent pointing both to the collections available on OGE's website.

Current page we worked on : <https://www.whitehouse.gov/briefing-room/disclosures/financial-disclosures> has:

Financial Disclosures

Click here to view [Presidential Appointee & Nominee Records](#).

This page details the process for requesting OGE Form 278 Executive Branch Personnel Public Financial Disclosure reports as they become available.

The old page <https://www.whitehouse.gov/public-forms/oge278> has:

OGE Form 278 (Formerly SF 278)

OGE Form 278 Executive Branch Personnel Public Financial Disclosure reports for White House officials are now available. Interested parties may request online those reports they would like to review. As we did for the first time ever last year, we have streamlined the distribution process, so that each report is available in pdf form for quick transmission via email.

By filling out this electronic form, you can access the reports of the officials you wish to review. Requested reports will be emailed as quickly as possible - please call the press office if you have any questions.

Respectfully,

Mike

Michael Hanson

From: [Seth Jaffe](#)
To: [Christopher J. Swartz](#)
Cc: [David J. Apol](#)
Subject: RE: Regulatory Freeze Application to (b) (5)
Date: Wednesday, January 25, 2017 3:10:35 PM

Chris,

Thank you very much for this analysis. We will take it under advisement.

Seth

From: Christopher J. Swartz
Sent: Wednesday, January 25, 2017 2:40 PM
To: David J. Apol; Seth Jaffe
Cc: Leigh J. Francis
Subject: Regulatory Freeze Application to (b) (5)

(b) (5)



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

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

From: Mike Catanzaro

Sent: Friday, February 3, 2017 6:44 PM

To: David J. Apol

Cc: Steve Clark

Subject: Request for meeting

David, hope you are well. I am considering a position in the White House National Economic Council. I am currently a percentage partner at a lobbying firm, and before I enter the federal government, I want to be absolutely sure that any payment from my firm is reviewed and approved by OGE, and that I and my firm follow every relevant ethical and statutory guideline and requirement. Robert Walker of Wiley Rein is our firm's ethics counsel, and he suggested I contact you. Would you be available for a meeting or conference call early next week? Thanks for considering.

Best,

Mike

MIKE CATANZARO | CGCN GROUP

1101 K STREET, NW, SUITE 650 WASHINGTON, D.C. 20005

(b)(6) / www.cgcnc.com

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From: [Walter M. Shaub](#)
To: ["Passantino, Stefan C. EOP/WHO"](#)
Cc: [Schultz, James D. EOP/WHO](#); [David J. Apol](#)
Subject: RE: update on a nominee
Date: Friday, February 03, 2017 4:53:25 PM
Attachments: [possible detailees.pdf](#)

Attachment - Nonresponsive record

Stefan and Jim,

I had my folks put together a list of agency ethics officials you might consider approaching for possible details to the White House. The list is attached to this email.

Walt

Walter M. Shaub, Jr.
Director
U.S. Office of Government Ethics
1201 New York Avenue, NW, Suite 500
Washington, DC 20005-3917

Telephone: 202.482.9292
Email: walter.shaub@oge.gov

Nonresponsive record

Nonresponsive record

On Jan 26, 2017, at 8:13 AM, Michael Hanson <mhanson@oge.gov> wrote:

Hello Jim,

Made the change and all reports can now be ordered through the OGE site. All that is needed is for the edit to the White House page (<https://www.whitehouse.gov/briefing-room/disclosures/financial-disclosures>) adding the link to our page <https://www.oge.gov/web/oge.nsf/Presidential+Appointee+&+Nominee+Records>

One note – you may want to have 2 additional links on the page. There are actually 2 classes of Filers, see the **Background** below.

Let me know if we can provide language or any other assistance.

Mike

Background

There are 2 classes of Filings – One for Executive Pay Levels I & II and one for all other covered employees.

<!--[if !supportLists]-->• <!--[endif]-->Reports for people in or formerly occupying the 67 Pay Level I & II positions (Cabinet Level, etc.) can simply be downloaded. (<https://extapps2.oge.gov/201/Presiden.nsf/PAS%20Index?OpenView>)

<!--[if !supportLists]-->• <!--[endif]-->Reports for all other covered positions must be requested and, under the Stock Act, the requestor must complete the OGE Form 201*. (<https://extapps2.oge.gov/201/Presiden.nsf/201+Request?OpenForm>)

* Filers in this group have the right to get a list of people who requested their reports from OGE. The 201 form is where we collect the information.

From: Michael Hanson [<mailto:mhanson@oge.gov>]

Sent: Wednesday, January 25, 2017 2:18 PM

To: Schultz, James D. EOP/WHO (b)(6) >; David J. Apol
<djapol@oge.gov>

Subject: RE: White House reports

Hello Jim,

We are getting requests for White House reports which cannot be filled until the White House mechanism is built.

(b) (5)

An option you may want to consider:

-

(b) (5)

We do have 2 legal requirements – provide the reports to requestors, and, provide Filers with a list of people who requested their report. (b) (5)

Please let me know what you think. We can make the change in a few moments.

Thank you,

Mike

Michael Hanson
(202) 482-9221
Office of Government Ethics

Visit us at www.oge.gov

From: Michael Hanson [<mailto:mhanson@oge.gov>]
Sent: Monday, January 23, 2017 2:22 PM
To: David J. Apol <djapol@oge.gov>; Schultz, James D. EOP/WHO
<(b)(6)>
Subject: RE: White House reports

Hello Jim,
I've set our 201 request form to display <https://www.whitehouse.gov/briefing-room/disclosures/financial-disclosures> for all White House staff reports. Currently the **Office of the Vice President** reports are treated as any other Executive Branch organization.

To see the difference:

Use this link to our 201 Request Form
(<https://extapps2.oge.gov/201/Presiden.nsf/201+Request?OpenForm>),
Enter **Obama**, click Find Filer, select him and you'll see the White House link and a Close button.

Close that window, enter **Biden** and click Find Filer.
Select him and you'll be able to order reports specific reports.

Be glad to answer any questions you might have about our current process, give me a shout.

Thanks,

Mike

Michael Hanson
(202) 482-9221
Office of Government Ethics

Visit us at www.oge.gov

From: David J. Apol
Sent: Monday, January 23, 2017 2:07 PM
To: 'Schultz, James D. EOP/WHO'
Cc: Michael Hanson
Subject: White House reports

Jim,

Per your request, we will link to the White House site for request for White House reports. Please let Mike know as soon as that link is available to us. Currently request are going to your "coming soon" page.

Thanks

Dave

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From: [Seth Jaffe](#)
To: [Vincent Salamone](#)
Subject: FW: give me text
Date: Thursday, January 26, 2017 12:58:42 PM

FYI:

From: Christopher J. Swartz
Sent: Thursday, January 26, 2017 12:47 PM
To: Michael Hanson
Cc: Sandra S. Mabry; Daniel L. Skalla; David J. Apol; Seth Jaffe; Rachel K. Dowell
Subject: RE: give me text

Mike-

I talked to Dave about our plan on posting the P and VP reports. Per STOCK Act, they are to be released without requirement of a 201 form.

Dave agrees that we should add a box on the front page that links to a landing page (whether separate or on another page) that has the P and VP reports. (b)(5)

Finally, before anything goes live, let me, Rachel, and Dave know so that we can coordinate with the Office of the Former President for their situational awareness.


Chris

From: Michael Hanson
Sent: Thursday, January 26, 2017 12:01 PM
To: Christopher J. Swartz; Sandra S. Mabry; Daniel L. Skalla
Subject: give me text
<https://www.oge.gov/web/oge.nsf/Presidential+Appointee+&+Nominee+Records>
Michael Hanson
(202) 482-9221
Office of Government Ethics
Visit us at www.oge.gov

From: [Veda E. Marshall](#)
To: [Seth Jaffe](#)
Subject: RE: Time and Attendance REMINDER
Date: Wednesday, February 01, 2017 5:27:43 PM

Chris has been validated, thanks for letting me know because I did not know that he was back at the White House.

Nonresponsive record



From: [Brandon A. Steele](#)
To: [Matthew A. Marinec](#); [Shelley K. Finlayson](#); [Seth Jaffe](#); [Diana Veilleux](#); [Douglas L. Chapman](#); [David J. Apol](#); [Dale A. Christopher](#); [Daniel L. Skalla](#); [Deborah J. Bortot](#); [Nicole Stein](#); [Ty Cooper](#); [Nelson Cabrera Jr.](#)
Subject: Records Search OGE FOIA FY 17/172
Date: Tuesday, February 07, 2017 4:37:10 PM
Attachments: [image001.jpg](#)

OGE received a FOIA request for a copy of all emails, memos, letters, and other correspondence from White House Counsel Don McGahn to senior managers at OGE. The search period covered by this request is 1/7/17 – 2/7/17.

Please search your email account, desktop, and “HOME” drives, for any records responsive to this request during this time period and provide any responsive records by **COB Friday, February 17, 2017.**

If you have emails that are responsive to this request that are saved digitally you can simply forward those to me (for example by attaching them all to a single email).

If you do not have any responsive records, please reply with a “no records” response.

Please let me know if you have any questions. Thank you.

Best regards,

Brandon A. Steele

Attorney Advisor

U.S. Office of Government Ethics

1201 New York Ave NW

Suite #500

Washington, D.C. 20005

Ph: 202-482-9209

bastele@oge.gov

Visit OGE's website: www.oge.gov

Follow OGE on Twitter: @OfficeGovEthics

OGE_rgb



From: [Dale A. Christopher](#)
To: [Kelsey D. Phipps](#)
Subject: FW: White House reports
Date: Monday, March 06, 2017 10:43:31 AM

FOIA

From: Ty Cooper
Sent: Thursday, January 26, 2017 1:57 PM
To: Teresa L. Williamson; Daniel L. Skalla; Sandra S. Mabry
Cc: Vincent Salamone; Dale A. Christopher
Subject: RE: White House reports

Just curious... (b) (5)

[REDACTED]

[REDACTED] ?

From: Teresa L. Williamson
Sent: Thursday, January 26, 2017 12:28 PM
To: Michael Hanson; Daniel L. Skalla; Lori Kelly; Sandra S. Mabry
Cc: David J. Apol; Ty Cooper; Vincent Salamone; Dale A. Christopher
Subject: RE: White House reports

President Obama and Vice President Biden reports have been uploaded to FDTS.

Thanks
Teresa

From: Michael Hanson
Sent: Thursday, January 26, 2017 8:47 AM
To: Daniel L. Skalla; Lori Kelly; Sandra S. Mabry; Teresa L. Williamson
Cc: David J. Apol; Ty Cooper; Vincent Salamone; Dale A. Christopher
Subject: RE: White House reports

Hey Dan,
Just spoke with Teresa and she "volunteered" to help out.

From: Daniel L. Skalla
Sent: Thursday, January 26, 2017 8:44 AM
To: Michael Hanson; Lori Kelly; Sandra S. Mabry
Cc: David J. Apol; Ty Cooper; Vincent Salamone; Dale A. Christopher
Subject: RE: White House reports

When we last spoke, Sandy had the electronic version of the former President's report and PNB would handle the FDTS upload.

Sandy, if PNB is too busy over there Lori or I could upload it as well – just forward it to 278tracking@oge.gov and we'll do the rest.

I don't know the status of the former VP's report. Once we get it, we'll upload it right away.

Dan

From: Michael Hanson
Sent: Thursday, January 26, 2017 8:26 AM
To: Daniel L. Skalla; Lori Kelly
Cc: David J. Apol; Ty Cooper; Vincent Salamone; Dale A. Christopher
Subject: RE: White House reports

Hey Dan,

Just a thought –former President and VP reports aren't in FDTS at the moment. It will be hard to fill requests for these until they are.

From: Daniel L. Skalla
Sent: Thursday, January 26, 2017 8:17 AM
To: Michael Hanson; Lori Kelly
Cc: David J. Apol; Ty Cooper; Vincent Salamone; Dale A. Christopher
Subject: RE: White House reports

Thanks Mike!

From: Michael Hanson
Sent: Thursday, January 26, 2017 8:17 AM
To: Daniel L. Skalla; Lori Kelly
Cc: David J. Apol; Ty Cooper; Vincent Salamone; Dale A. Christopher
Subject: FW: White House reports

Hello Dan/Lori,

Worked with the White House and as of this morning we (OGE) will now be releasing their reports.
Give me a call if you have questions,

Mike

From: [Dale A. Christopher](#)
To: [Kelsey D. Phipps](#)
Subject: FW: Machine-readable OGE Form 278s
Date: Monday, March 06, 2017 10:42:33 AM

FOIA

From: Daniel L. Skalla
Sent: Friday, January 27, 2017 10:38 AM
To: Dale A. Christopher
Subject: RE: Machine-readable OGE Form 278s

Ty found the following, from a prior conversation with Paul, that was published on our website in our FY16 Annual Performance Plan

In support of the President's Management Agenda, OGE is committed to making information resources accessible, discoverable, and usable by the public. However, OGE does not create or collect data sets from which the public could derive the benefits of an Open Data format for manipulation to "fuel entrepreneurship, innovation, and scientific discovery." Rather, OGE performs its mission on a much lower data level (e.g., document level of PDF and basic tracking spread sheets). OGE has a policy of proactively and aggressively providing transparency and accessibility of data collected or created. Currently, releasable data from which the public could derive benefit is provided at the document level, available on the OGE website.

This appears to be our formal answer. Ty agrees. If you have no objections, I'll get back with Mr. Lathrop today with this statement.

From: Dale A. Christopher
Sent: Friday, January 27, 2017 10:17 AM
To: Daniel L. Skalla
Subject: Re: Machine-readable OGE Form 278s

Thank you, Dan.

Sent from my BlackBerry 10 smartphone on the Verizon Wireless 4G LTE network.

From: Daniel L. Skalla
Sent: Friday, January 27, 2017 9:44 AM
To: Dale A. Christopher
Subject: FW: Machine-readable OGE Form 278s

For when you're back in the office. In the meantime, I'll get with Ty for more details.

From: Daniel L. Skalla
Sent: Friday, January 27, 2017 9:43 AM
To: 'Daniel Lathrop'
Subject: RE: Machine-readable OGE Form 278s

Mr. Lathrop,

Thanks for the additional clarification. Let me do a little more research on your question and I'll get back in touch with you.

Sincerely,
Dan

From: Daniel Lathrop (b)(6)]
Sent: Friday, January 27, 2017 9:28 AM
To: Daniel L. Skalla
Subject: Re: Machine-readable OGE Form 278s

Thanks for your reply Dan, but those aren't considered "machine readable" under the EO.

What The EO calls for is, in essence, usable data. That would include a CSV, Excel file, data dump, XML file, Quickbooks file, SQLite file, MS Access file, etc.

Since the information is already being collected that way, it seems like the system must have a way to export it other than PDF.

Thanks a bunch,
Daniel Lathrop

Sent from my iPhone

Daniel Lathrop (@lathropd)
Assistant Professor @ University of Iowa // Independent Journalist
Mobile: (b)(6) // University office: (b)(6)
PGP key: (b)(5)

On Jan 27, 2017, at 8:16 AM, Daniel L. Skalla <dlskalla@oge.gov> wrote:

Good morning,

I'm emailing regarding your question about the machine-readability of OGE Form 278s available online.

Reports posted online by OGE are already in machine-readable format. For example, the recently posted report for James N. Mattis, Secretary of Defense, can be read using Adobe Acrobat's "Read Out Loud" feature found in the "View" tab (or CTRL-SHIFT-Y to activate, arrow keys to move through the document). Additionally, the reports posted online are also word-searchable for added convenience ("Edit" -> "Find" or CTRL-F). If you have encountered any reports that are not machine readable, please let me know right away and I'll see what the issue is and correct it.

Please let me know if you have any questions.

Sincerely,

Dan Skalla
Chief, Financial Disclosure Branch
Compliance Division
U.S. Office of Government Ethics
1201 New York Ave., NW, Suite 500
Washington, DC 20005-3917
Tel. 202.482.9222
Fax 202.482.9238

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From: [Dale A. Christopher](#)
To: [Kelsey D. Phipps](#)
Subject: FW: White House Detail Opportunity
Date: Monday, March 06, 2017 10:41:33 AM
Attachments: [Detail Opportunity at the White House Counsel's Office.msg](#)

FOIA

From: (b) (6) [mailto:(b)(6)]
Sent: Monday, February 27, 2017 2:05 PM
To: Dale A. Christopher
Subject: White House Detail Opportunity

Good afternoon Dale,

(b) (6) I am emailing you in regards to the detail opportunity at the White House, see attached. I emailed Mr. Schultz shortly after the email broadcast went out but have not heard anything back. I was hoping that you might have additional information about applying for the detail, or the name of Mr. Schultz' administrative assistant so that I could follow up with him.

Thank you much and have a great day!

(b) (6)
[Redacted]
[Redacted]
[Redacted]

Telephone: (b)(6)
BlackBerry: (b)(6)

From: [Craig Holman](#)
To: [Walter M. Shaub](#)
Subject: RE: Trump ethics executive order: "Ethics commitments by executive branch appointees"
Date: Tuesday, February 21, 2017 12:40:57 PM
Attachments: [image001.jpg](#)

Got it! That is great news, and once again your prompt response is most appreciated

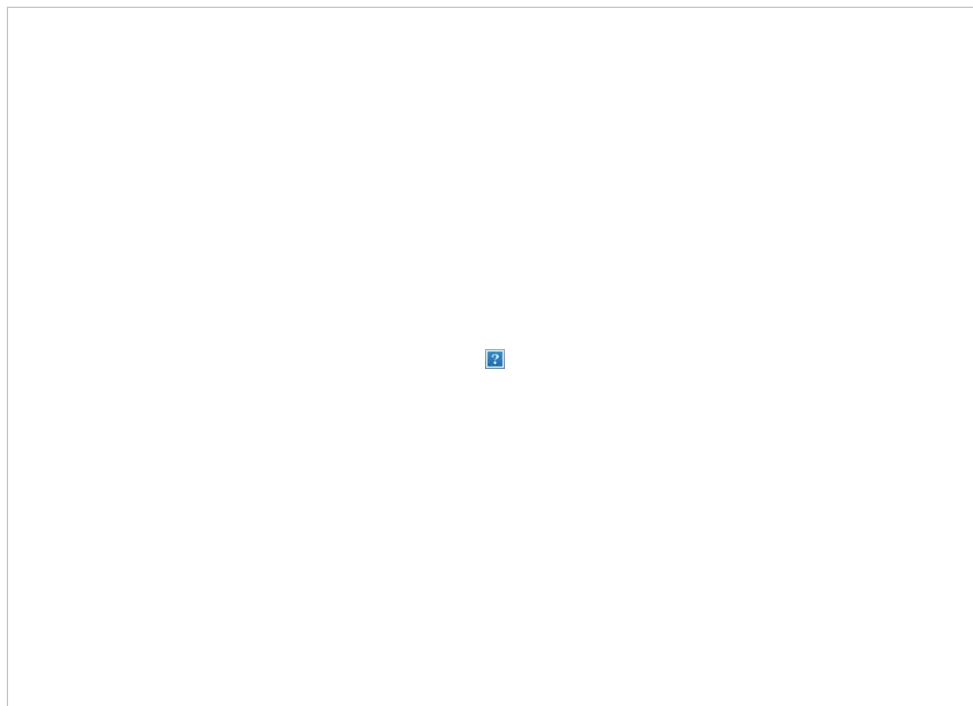
Craig Holman, Ph D

(b)(6)

From: Walter M. Shaub [mailto:wmshaub@oge.gov]
Sent: Tuesday, February 21, 2017 12:38 PM
To: Craig Holman
Subject: RE: Trump ethics executive order: "Ethics commitments by executive branch appointees"

Hi Craig,

Yes, we've been going back and getting them to sign supplemental ethics agreements that include basically the same language as we used in ethics agreements under President Obama. If you go to our website, you can pull up an ethics agreement, then scroll down to see the supplemental ethics agreement at the bottom. Here's a screenshot of the supplement for Tillerson, for example. I've also provided a hyperlink below.



[https://extapps2.oge.gov/201/Presiden.nsf/PAS+Index/02AB20DA8210059D852580CB002C7C35/\\$FILE/Tillerson,%20Rex%20W.%20%20finalAmendedEA.pdf](https://extapps2.oge.gov/201/Presiden.nsf/PAS+Index/02AB20DA8210059D852580CB002C7C35/$FILE/Tillerson,%20Rex%20W.%20%20finalAmendedEA.pdf)

I hope this is helpful.

Walt

Walter M. Shaub, Jr.

Director

U.S. Office of Government Ethics

1201 New York Avenue, NW, Suite 500

Washington, DC 20005-3917

Telephone: 202 482 9292

Email: walter.shaub@oge.gov

From: Craig Holman (b)(6)
Sent: Tuesday, February 21, 2017 12:34 PM
To: Walter M. Shaub
Subject: Trump ethics executive order: "Ethics commitments by executive branch appointees"

Hello Walter:

I have noticed that the ethics agreements signed so far by presidential nominees and appointees do not include the elements of Trump's ethics executive order, "Ethics Commitments by Executive Branch Appointees," issued on January 28. I understand this executive order was issued after many of the nominees have

already signed ethics agreements, but are all nominees and appointees going to sign new ethics agreements that include these provisions?

As you may know, I am most concerned about preserving Obama's "reverse revolving door" agreement, in which all presidential appointees agree to recuse themselves from taking official actions that directly and substantially affect their former employers and clients of the last two years. Much to my surprise this provision is preserved in Trump's ethics executive order. However, if no one is signing onto this latest ethics agreement, I am worried that it may not be implemented or enforceable.

Craig Holman, Ph.D.

Government affairs lobbyist

Public Citizen

215 Pennsylvania Avenue SE

Washington, D.C. 20003

(b)(6)

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From: (b)(6)
To: [Walter M. Shaub](#)
Subject: Thank you for insisting that Donald Trump address his conflicts of interest
Date: Tuesday, January 17, 2017 2:40:41 PM

Dear Mr. Shaub:

I am writing to commend you for standing up to Donald Trump in insisting that he resolve the many potential conflicts of interest he will have the minute he is sworn in as President. It is terribly unfortunate that so many Republicans have criticized you for insisting that Mr. Trump meet the standards that recent presidents and well as their cabinet nominees have met to resolve their potential conflicts of interest.

Keep up your great work and please do not be intimidated by Rep. Chaffetz's threats of investigating your actions.

(b)(6)

Alexandria, Virginia

From: (b)(6)
To: [Walter M. Shaub](#)
Subject: Urge POTUS to delay transition of power for six months to complete ethics investigation of Trump
Date: Tuesday, January 17, 2017 9:39:23 AM

walter.shaub@oge.gov Telephone: 202.482.9292

To: Walter M. Shaub, Jr., Director of the U.S. Office of Government Ethics

Dear Director Shaub,

Please courier a letter to President Obama urging him to delay the transition of power until investigations related to Donald Trump can be finalized. Your letter could explain:

Our Office of Government Ethics was created to achieve a high level of public confidence in the integrity of executive branch programs and operations.

It is our mission to provide overall leadership and oversight of the executive branch ethics program designed to prevent and resolve conflicts of interest.

Your letter can go further:

1. It is our task to investigate Mr. Trump's finances and external activities to determine potential conflicts of interest.
 2. As a public servant, Mr. Trump would be subject to regulations including:
 - a. An employee may be required to seek approval before engaging in an outside activity.
 2. An employee may be disqualified from working on a particular Government matter while engaged in an outside activity.
 3. An employee may be prohibited from accepting compensation for an activity.
 4. An employee may be prohibited from engaging in an outside activity.
 3. Mr. Trump has indicated that he has no intention to provide us his tax returns.
 4. Mr. Trump has avoided providing our office with statements of his outside activities both within and outside the U. S.
 5. Mr. Trump has indicated that he has no intention to divest of his business assets to qualify for public service.
- Mr. Trump is currently under investigation by the Federal Trade Commission, the Federal Election Commission, and intelligence agencies for anti-American, and/or internal illegal business. Mr. *Trump's* companies face open *cases* of fraud, unpaid bills, contract disputes and sexual discrimination suits. He will have to address charges of libel, fees, and sexual harassment.
6. Please delay transfer of government to Mr. Trump until our ethics investigation is complete.

Nonresponsive record

Nonresponsive record

From: Michael Hanson [<mailto:mhanson@oge.gov>]

Sent: Wednesday, January 25, 2017 2:18 PM

To: Schultz, James D. EOP/WHO (b)(6) >; David J. Apol <djapol@oge.gov>

Subject: RE: White House reports

Hello Jim,

We are getting requests for White House reports which cannot be filled until the White House mechanism is built.

(b)(5)

An option you may want to consider:

- (b)(5)

We do have 2 legal requirements – provide the reports to requestors, and, provide Filers with a list of people who requested their report. (b)(5)

Please let me know what you think. We can make the change in a few moments.


Thank you,

Mike

Michael Hanson
(202) 482-9221
Office of Government Ethics

Visit us at www.oge.gov

Nonresponsive record



From: Michael Hanson [<mailto:mhanson@oge.gov>]

Sent: Monday, January 23, 2017 2:22 PM

To: David J. Apol <djapol@oge.gov>; Schultz, James D. EOP/WHO <(b)(6)>

Subject: RE: White House reports

Hello Jim,

I've set our 201 request form to display <https://www.whitehouse.gov/briefing-room/disclosures/financial-disclosures> for all White House staff reports.

Currently the **Office of the Vice President** reports are treated as any other Executive Branch organization.

To see the difference:

Use this link to our 201 Request Form

(<https://extapps2.oge.gov/201/Presiden.nsf/201+Request?OpenForm>),

Enter **Obama**, click Find Filer, select him and you'll see the White House link and a Close button.

Close that window, enter **Biden** and click Find Filer.

Select him and you'll be able to order reports specific reports.

Be glad to answer any questions you might have about our current process, give me a shout.

Thanks,

Mike

Michael Hanson
(202) 482-9221
Office of Government Ethics

Visit us at www.oge.gov

From: David J. Apol
Sent: Monday, January 23, 2017 2:07 PM
To: 'Schultz, James D. EOP/WHO'
Cc: Michael Hanson
Subject: White House reports

Jim,

Per your request, we will link to the White House site for request for White House reports. Please let Mike know as soon as that link is available to us. Currently request are going to your "coming soon" page.

Thanks

Dave

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From: [Walter M. Shaub](#)
To: "[Kassinger, Theodore W.](#)"; [Director of OGE](#); [Heather A. Jones](#); [Keith Labedz](#); [David Maggi](#); [Deborah J. Bortot](#); Commerce ethics officials - W. Jacobi, O. Williams, A. Warren, D. Jacob [David J. Apol](#); [Donald F McGahn](#); [A. Donaldson](#); [Shelley K. Finlayson](#)
Cc: [Culvahouse Jr., Arthur B.](#); [Schlom, Evan N.](#); [Dorey, David R.](#); [Sheehan, Matthew J.](#)
Subject: RE: ethics agreement and call
Date: Thursday, January 12, 2017 7:35:41 PM

Thanks, these changes look pretty good to me. Unfortunately, I just received a summons from Chairman Chaffetz and am going to have to turn my attention to addressing that summons. I will see if someone else here is available to work on this report and ethics agreement until I am able to turn my attention back to this nomination. A number of members of my staff will have to assist me in preparing to respond to Mr. Chaffetz, so we may have a lean team available for the next few weeks.

Walter M. Shaub, Jr.

Director

U.S. Office of Government Ethics

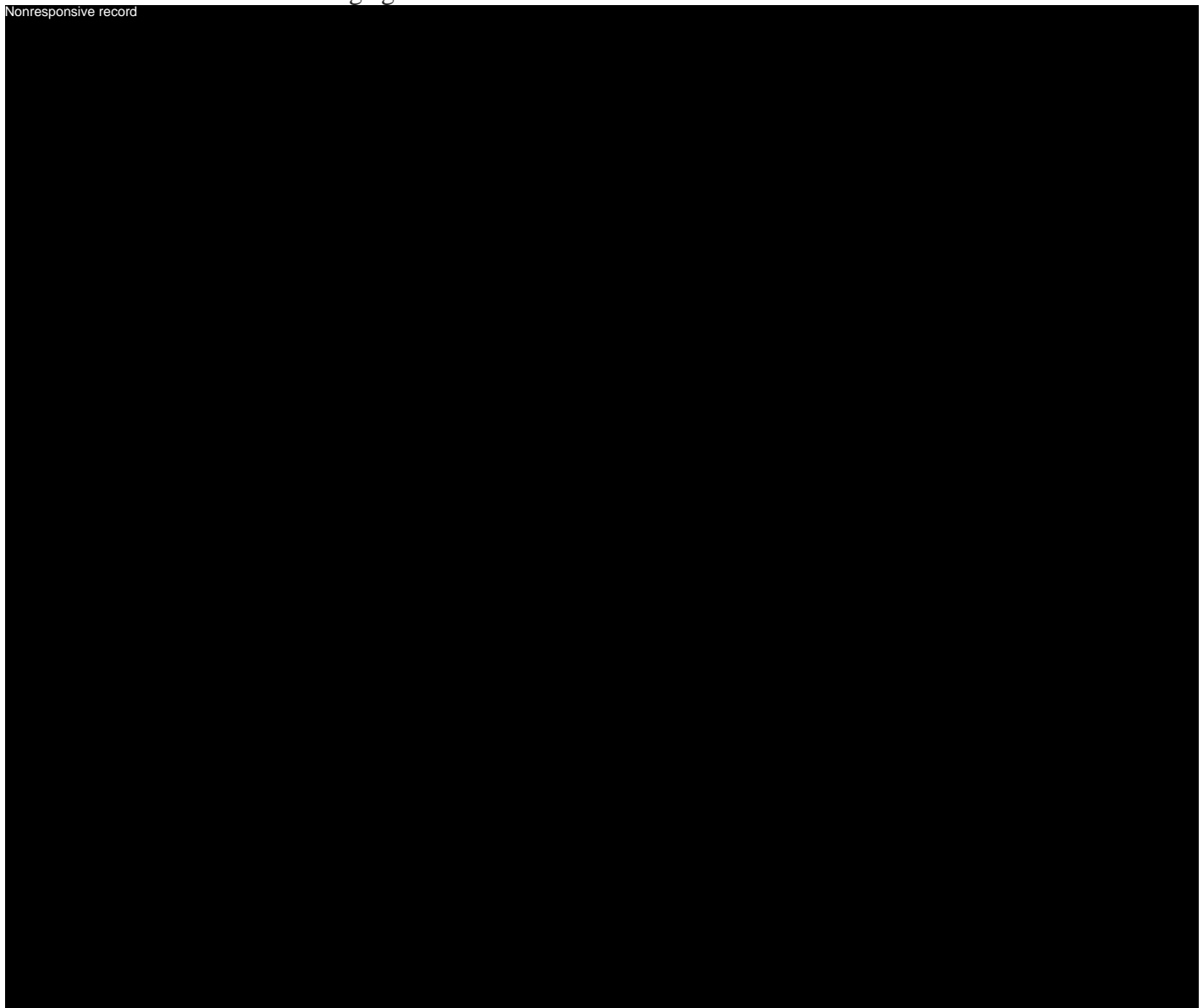
1201 New York Avenue, NW, Suite 500

Washington, DC 20005-3917

Telephone: 202.482.9292

Email: walter.shaub@oge.gov

Nonresponsive record



From: [Walter M. Shaub](#)
To: ["Minton, Shira"](#); [Schultz, James D. EOP/WHO](#); [Leigh J. Francis](#); [David J. Apol](#)
Cc: ["Passantino, Stefan C. EOP/WHO"](#)
Subject: revised language for (b) (5)
Date: Tuesday, February 14, 2017 5:52:58 PM
Attachments: Attachments: Not responsive. Attachment text: (b)(5)

Jim and Shira,

I have revised the draft (b) (5). I have attached both MS Word and PDF versions (but note that Leigh will proofread the document tomorrow and may circulate a corrected version if he finds errors).

(b) (5). Most notably are the facts that (b) (6), (b) (5)

(b) (5). Also, Shira has explained that (b) (5)

(b) (5). Finally, (b) (5), (b) (6)

Walt

Walter M. Shaub, Jr.
Director
U.S. Office of Government Ethics
1201 New York Avenue, NW, Suite 500
Washington, DC 20005-3917
Telephone: 202.482.9292
Email: walter.shaub@oge.gov