

From: [Director of OGE](#)
To: Sheri Dillon email - (b)(6)
Subject: Letter attached, original to follow
Date: Wednesday, May 10, 2017 6:40:48 PM
Attachments: [10 May 2017 Letter to S Dillon.pdf](#)

Please find attached a letter dated May 10, 2017. The original will follow by regular United States Mail.

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

UNITED STATES OFFICE OF
GOVERNMENT ETHICS



May 10, 2017

Sheri A. Dillon
Morgan, Lewis & Bockius, LLP
1111 Pennsylvania Avenue, NW
Washington, DC 20004

Dear Ms. Dillon:

Thank you for your letter dated May 9, 2017, regarding the President's decision to adhere to the longstanding tradition of voluntarily filing a public financial disclosure report in the first year after taking office. The U.S. Office of Government Ethics (OGE) is happy to work with you to ensure that the President's report is compliant with the Ethics in Government Act of 1978, as amended, and OGE's implementing regulations before he files it.

As we discussed, OGE will provide this assistance on the condition that the President is committed to certifying that the contents of his report are true, complete and correct. When we met on April 27, 2017, you requested that he be excused from providing this certification. In connection with the request, you emphasized that he is not required to file a report with OGE this year. I agreed with your analysis that he is not legally required to file, but I indicated that OGE would be unwilling to certify a report that failed to meet the requirements generally applicable to public financial disclosure in the executive branch. I also indicated that OGE would be amenable to providing assistance prior to the President's filing the report only if all parties are in agreement that he will, in fact, certify his report.

Based on your subsequent conversations with members of my staff and your May 9, 2017, letter, my understanding is that the President will sign the following standard certification without qualification: "I certify that the statements I have made in this report are true, complete and correct to the best of my knowledge." Based on this understanding, OGE has begun providing the requested assistance. If I am incorrect in this understanding, please notify me as soon as possible so that I can reassign the involved staff members to other duties.

As OGE previously advised you and, early this year, the White House, I anticipate that the work will take approximately 30 days if we receive prompt responses to requests for needed information. Please do not hesitate to contact me if you find that you have any questions or concerns about the assistance my staff is providing.

Sincerely,

A handwritten signature in blue ink that reads "Walter M. Shaub, Jr." with a stylized flourish at the end.

Walter M. Shaub, Jr.
Director



Morgan Lewis

Sheri A. Dillon

Partner

(b)(6)

May 9, 2017

Walter M. Shaub, Jr., Director
U.S. Office of Government Ethics
1201 New York Avenue, N.W.
Suite 500
Washington, D.C. 20005

Re: Voluntary Public Financial Disclosure

Dear Mr. Shaub:

As we have discussed, President Trump is preparing to make a voluntary disclosure of his financial interests on OGE Form 278. This filing will be voluntary, because, having filed a report during the campaign, the President is not required to file a new report until next May. Nonetheless, President Trump welcomes the opportunity to provide this optional disclosure to the public, and hopes to file it shortly.

As we have also discussed, the President hopes we will have the opportunity to confer with the Office of Government Ethics before filing, so as to address any questions prior to submission of the report, as is standard with this process. Here, consultation seems to be especially advisable because the President's disclosure will include an atypically large number of investments and entities, and because the President's affairs have been totally restructured since his prior filing. Consequently, this filing will be a template for future required filings.

The President has instructed us to work with you and your office so he can sign and file the completed Form 278 as close as practicable to May 15 (which will be the required filing date in the future), notwithstanding the unique complexity of this voluntary disclosure. To that end, we are nearing the end of our effort to compile the report and are now ready to further the consultative process. Our goal is that by working together, the President can make this voluntary filing mid-June.

Morgan, Lewis & Bockius LLP

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Walter M. Shaub, Jr., Director
May 9, 2017
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We appreciate your consideration in this matter and look forward to working with you.

Sincerely,

A handwritten signature in cursive script, appearing to read "Sheri A. Dillon".

Sheri A. Dillon