Dave-

As we just discussed, we have been informed that Mr. Cohn does not anticipate capital gains on the sale of his interests which are under the heading [redacted]. He will divest those assets without seeking a CD.

He continues to seek a CD for the stock and partnership interests in the CD request we sent to your office late last month.

Please do not hesitate to call me if there are any additional questions in this regard.

Christopher J. Swartz
Ethics Counsel
Office of the White House Counsel
From: Swartz, Christopher J. EOP/WHO
To: Vincent Salamone
Date: Thursday, March 02, 2017 5:09:20 PM

Description of Christopher J. Swartz
Ethics Counsel
Office of the White House Counsel
(b)(6)
Vince,

On February 6, 2017, OGE received a CD request for Gary Cohn. I assigned the CD request to Jack. When Jack reached out to the White House, he was told that the White House was updating the 278 so they asked that OGE delay reviewing the CD request. On Friday, February 24, OGE received a revised CD request for Mr. Cohn. The revised request, which is attached, does not include an updated 278. Using the initial draft 278, please review the attached CD request to determine (b)(6).

Please let me know if you would like to see the initial draft CD request that OGE received on February 6, 2017.

Thanks, Elaine

-----Original Message-----
From: David J. Apol
Sent: Friday, February 24, 2017 3:36 PM
To: Elaine Newton
Subject: FW: COHN COD REQUEST

-----Original Message-----
From: Schultz, James D. EOP/WHO [mailto:james.schultz@whitehouse.gov]
Sent: Friday, February 24, 2017 2:21 PM
To: David J. Apol
Cc: Mullis, Dianna
Subject: COHN COD REQUEST

Dave - attached you will find the Cohn COD Package. Thank you for your assistance. J

JAMES D. SCHULTZ
Senior Associate Counsel and Special Assistant to the President Office of the White House Counsel
Perfect. Talk with you tomorrow.

10:30 would be fine. I am reviewing the other report now, and will be prepared to discuss that one as well at that time.

Chris,

Are you available tomorrow morning to discuss? Would 10:30 work?

Best,

Dianna

Dianna M. Mullis

Associate
Dianna-

I am reviewing the documents for Cohn right now. Can you send us the (b)(6) letters? Also, I am trying to think through what Cohn will retain after his divestitures under the CD so I have a fairly good view into what other steps we need to take for him. In particular, I am interested in the (b)(6) material. I wasn’t sure if he was (b)(5) a {snip}, so it would be helpful to know that.

Chris
My apologies. Attached are the exhibits referenced in the responses, as well as an entity chart.

Dianna

Vince,

Attached please find responses to your first review comments. I have copied Chris Swartz, who is working on the report at WHCO.

Once we are able to edit the report, we will do so. Please let me know if you have any questions.

Best,

Dianna

Dianna M. Mullis

Associate

Steptoe
Dianna – As we discussed today, I have attached comments on the first review of Gary Cohn’s report. Should you have any questions about any comment, please feel free to contact me at the telephone number provided below or by email.

Best,

Vincent Salamone

U.S. Office of Government Ethics

(202) 482-9274

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This looks good. I will forward it to Stefan for his action.

Dave

From: Mullis, Dianna [mailto:djapol@oge.gov]
Sent: Thursday, January 19, 2017 7:13 PM
To: David J. Apol
Cc: Rizzi, Robert
Subject: RE: Cohn

Dave,

Attached please find our proposed edits to the letter.
Let us know if you have any questions.

Dianna

From: David J. Apol [mailto:djapol@oge.gov]
Sent: Thursday, January 19, 2017 5:27 PM
To: Mullis, Dianna
Subject: RE: Cohn

Will this memorandum meet your needs?

Dave

From: Mullis, Dianna [mailto: djapol@oge.gov]
Sent: Thursday, January 19, 2017 1:03 PM
To: Vincent Salamone; David J. Apol
Subject: RE: Cohn

Following up on our phone conversation, please see the attached letter from [b] with the 208 language. I have redacted out the client’s name and former employer for privacy.

Let me know if you have any questions.

Best,

Dianna

From: Mullis, Dianna
Sent: Wednesday, January 18, 2017 8:15 PM
To: vjsalamo@oge.gov; 'djapol@oge.gov'
Cc: Rizzi, Robert
Subject: Cohn

David and Vince,

Following up on our call this morning, below please find the steps to be taken tomorrow/Friday. I have highlighted some pressing matters where we would like some guidance from you in red. As you know.

Could we plan to discuss at your earliest convenience tomorrow?

Steps to be taken Tomorrow/Friday

1. [b]
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As requested.

Vince
Here it is

From: Vincent Salamone
Sent: Thursday, January 19, 2017 3:36 PM
To: David J. Apol
Subject: Cohn memorandum

As requested.

Vince
Dave,

We want to confirm with you that the 

\[ \text{[redacted]} \]

Thanks again,
Dianna

From: Mullis, Dianna
Sent: Thursday, January 19, 2017 5:39 PM
To: 'David J. Apol'
Cc: 'vjsalamo@oge.gov'; Rizzi, Robert
Subject: RE: Cohn

Dave,

Thanks for turning this around so quickly. We will review with the group and get back to you.

Are you comfortable with the timing issues and other elements outlined in the email last night? For example, [b](6) We want to be sure all elements of the plan are satisfactory.

Dianna

From: David J. Apol [mailto:djapol@oge.gov]
Sent: Thursday, January 19, 2017 5:27 PM
To: Mullis, Dianna
Subject: RE: Cohn

Will this memorandum meet your needs?

Dave

From: Mullis, Dianna [mailto:b](6)
Sent: Thursday, January 19, 2017 1:03 PM
To: Vincent Salamone; David J. Apol
Subject: RE: Cohn
Following up on our phone conversation, please see the attached letter from [redacted] with the 208 language. I have redacted out the client’s name and former employer for privacy.

Let me know if you have any questions.

Best,
Dianna

From: Mullis, Dianna
Sent: Wednesday, January 18, 2017 8:15 PM
To: 'vjsalamo@oge.gov'; 'djapol@oge.gov'
Cc: Rizzi, Robert
Subject: Cohn

David and Vince,

Following up on our call this morning, below please find the steps to be taken tomorrow/Friday. I have highlighted some pressing matters where we would like some guidance from you in red. As you know, timing is a major issue on this as the [redacted]

Could we plan to discuss at your earliest convenience tomorrow?

Steps to be taken Tomorrow/Friday

1. [b](6), (b)(4)
Other Steps

- 3. (b) (4), (b) (6)

- 4. (b) (4), (b) (6)
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The change in “address” helps, but does not change [REDACTED].

We are trying to figure out all the timing issues and should know more by tomorrow morning.

Bob

From: Stefan Passantino [mailto: [REDACTED]]
Sent: Thursday, January 19, 2017 8:12 PM
To: David J. Apol; Mullis, Dianna
Cc: Rizzi, Robert
Subject: Re: Cohn [REDACTED]

Understood. The letter is not as important as the fact that the [REDACTED]. Does that change things?

On Thu, Jan 19, 2017 at 8:08 PM Mullis, Dianna <[REDACTED]> wrote:

Stefan,

If you could actually wait and issue the letter from the WH, rather than PTT, that would be better for our purposes.

We will also confirm the appointment date with you tomorrow, if that's OK.

Thanks very much.
On Jan 19, 2017, at 7:57 PM, David J. Apol <djapol@oge.gov> wrote:

Stefan,

Here is the letter that Gary Cohn’s representatives need to [redacted] done before he joins the administration eliminates any potential issues under 18 USC 209, which is always a good thing. If you could initial and forward this to them, it would be extremely helpful.

Thanks.

I can be reached tomorrow at [b][6] .

Hope you have a chance to enjoy tomorrow.

Dave
We had to go back for more info, re the [redacted]. We understand the request is being amended tomorrow. We should get something out early next week.

-----Original Message-----
From: Schultz, James D. EOP/WHO [mailto]
Sent: Wednesday, March 01, 2017 7:19 PM
To: David J. Apol
Subject: Cohn

What is timing on COD?

James D. Schultz
Senior Associate Counsel and Special Assistant to the President Office of White House Counsel
I have signed the CDs.

Dave

-----Original Message-----
From: Passantino, Stefan C. EOP/WHO
Sent: Wednesday, March 08, 2017 12:36 PM
To: David J. Apol
Subject: Re: Gary Cohn

I received your message. Thank you.

Stefan C. Passantino
Deputy Counsel to the President
Office of the White House Counsel

On Mar 8, 2017, at 12:21 PM, Passantino, Stefan C. EOP/WHO wrote:
> Sorry I missed you. Try me back when you can. Thank you.
> STEFAN C. PASSANTINO
> Deputy Counsel to the President, Compliance & Ethics Office of the
> White House Counsel

---Original Message-----
From: David J. Apol
Sent: Wednesday, March 8, 2017 11:53 AM
To: Passantino, Stefan C. EOP/WHO
Subject: RE: Gary Cohn

Yes. Is now good? I can tell you that it has moved on for final review before it comes to me.

-----Original Message-----
From: Passantino, Stefan C. EOP/WHO
Sent: Wednesday, March 08, 2017 10:44 AM
To: David J. Apol
Subject: Gary Cohn

Are you available to discuss the status of Gary's CD?
My apologies. Attached are the exhibits referenced in the responses, as well as an entity chart.

Dianna

From: Mullis, Dianna
Sent: Monday, February 06, 2017 10:19 AM
To: 'Vincent Salamone'
Cc: Swartz, Christopher J. EOP/WHO; Rizzi, Robert
Subject: RE: First Review Comments - Gary Cohn 278e report

Vince,

Attached please find responses to your first review comments. I have copied Chris Swartz, who is working on the report at WHCO.

Once we are able to edit the report, we will do so. Please let me know if you have any questions.

Best,

Dianna

Dianna M. Mullis
Associate
Steptoe
Steptoe & Johnson LLP
1330 Connecticut Avenue, NW
Washington, DC 20036
www.steptoe.com

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From: Vincent Salamone [mailto:vjsalamo@oge.gov]
Sent: Tuesday, January 31, 2017 4:30 PM
To: Mullis, Dianna
Subject: First Review Comments - Gary Cohn 278e report

Dianna – As we discussed today, I have attached comments on the first review of Gary Cohn’s report. Should you have any questions about any comment, please feel free to contact me at the telephone number provided below or by email.

Best,

Vincent Salamone

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Good Afternoon,

I believe the attached material is the revised CD request for Mr. Cohn. Let's talk Monday morning about the status of the 278.

Thanks, Elaine

-----Original Message-----
From: David J. Apol
Sent: Friday, February 24, 2017 3:36 PM
To: Elaine Newton
Subject: FW: COHN COD REQUEST

-----Original Message-----
From: Schultz, James D. EOP/WHO [mailto](b) (6)
Sent: Friday, February 24, 2017 2:21 PM
To: David J. Apol
Cc: Mullis, Dianna
Subject: COHN COD REQUEST

Dave - attached you will find the Cohn COD Package. Thank you for your assistance. J

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

Attachment 1: 6 pages withheld in full - (b)(5), (b)(6). Attachment 2 not responsive.
-----Original Message-----
From: David J. Apol
Sent: Monday, February 06, 2017 3:30 PM
To: Elaine Newton
Subject: FW: COHN COD

This is another big one. Deb says Jack it available to work on it if you want.

-----Original Message-----
From: Schultz, James D. EOP/WHO
Sent: Monday, February 06, 2017 1:33 PM
To: David J. Apol
Subject: COHN COD

Dave

Please find the COD request for Mr. Cohn. Expedited review on this one is appreciated. J

JAMES D. SCHULTZ
Associate Counsel to the President, Ethics & Compliance Office of the White House Counsel