

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

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]

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

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> 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:klsanza@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:klsanza@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

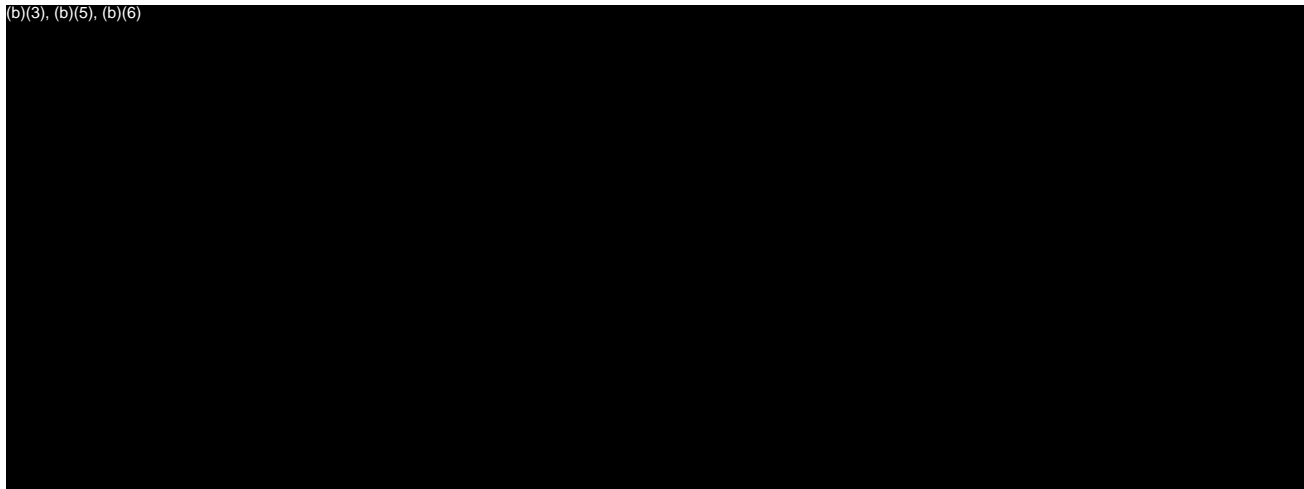
To: 'Schultz, James D. EOP/WHO'

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

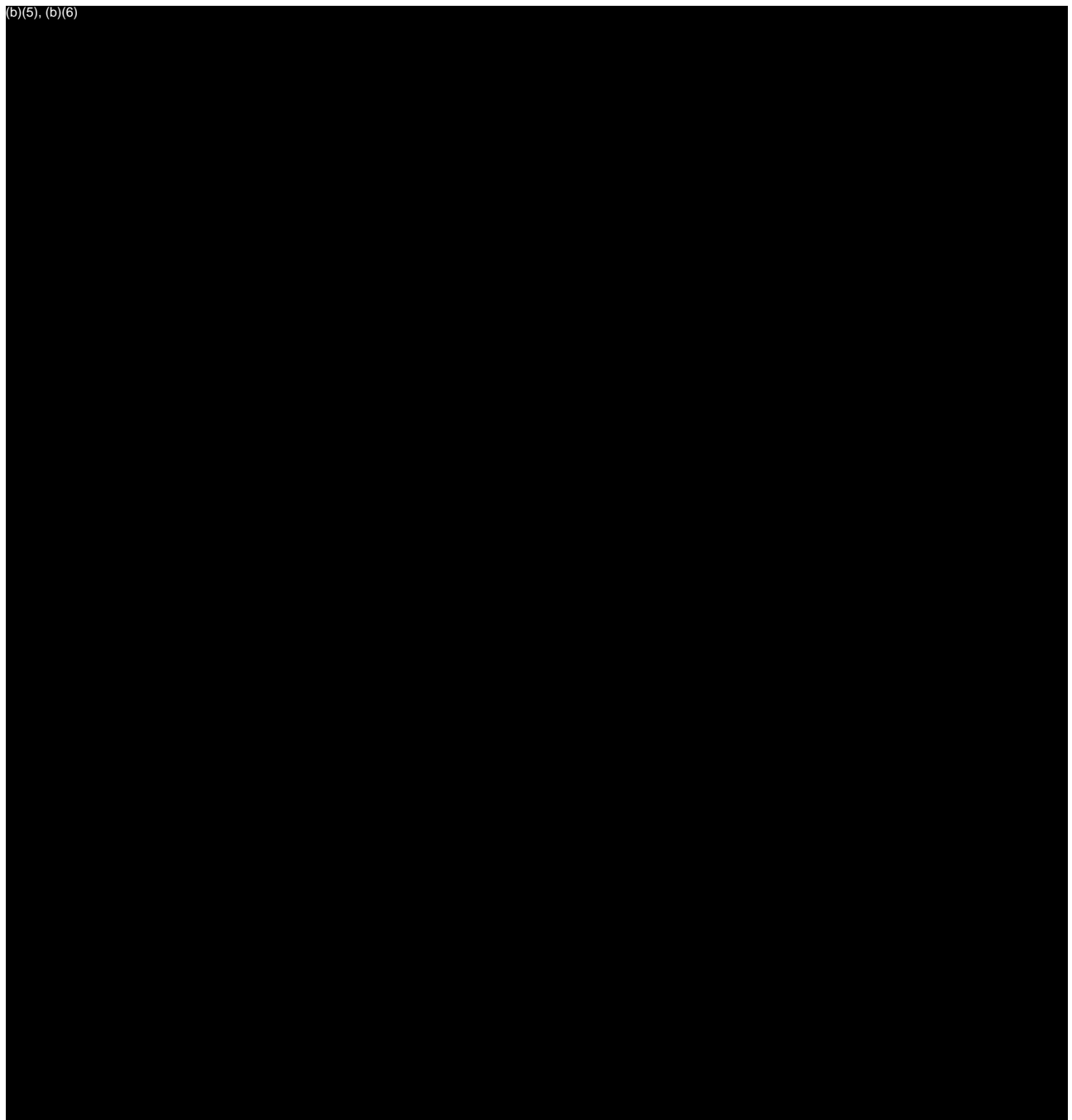
Subject: Re: Bannon CD request

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> 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)



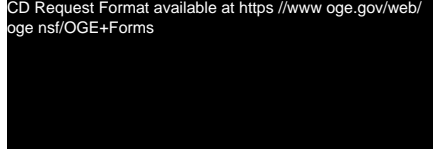
Finally, for your future reference, attached please find the sample CD request format, which asks questions regarding the various pieces of information we need to process a CD request. Most agencies submit CD requests using this form, and using the form can help streamline the CD review process on our 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: [Kimberly L. Sikora Panza](#)
To: [Monica M. G. Ashar](#)
Subject: 000
Date: Friday, April 07, 2017 6:46:46 PM
Attachments: [RE Bannon CD request.msg](#)

Attached emails included in responsive records

Hi Monica,
I have CWS Monday.
Noms:

(b) (5)

Desk Officer – nada
Waivers – got stuff I’m working on, nothing for you to worry about
CD – Dave had me ask Jim some follow up Qs to the Bannon CD request this afternoon (See attached). Jim still hasn’t responded. If anything comes in, I would forward it directly to Dave.
I think that is it!
Kim

From: [Kimberly L. Sikora Panza](#)
To: [Deborah J. Bortot](#); [Heather A. Jones](#)
Subject: RE: New Entrant initial questions
Date: Thursday, April 06, 2017 3:11:51 PM

6 pages of draft reviewer questions withheld in full - (b)(3), (b)(5), (b)(6)

Bannon questions done and in the folder in the N drive (Finally!)

Nonresponsive record

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: [Elaine Newton](#)
To: [Deborah J. Bortot](#); [Heather A. Jones](#)
Subject: WH CDs
Date: Wednesday, April 05, 2017 11:14:23 AM

Here is a list of the CDs issued to White House employees. The Bannon CD is ready for review and signature and we just received the (b)(5) CD, which I assigned to Stephanie because she has the report. I spoke to Scott De La Vega this morning and he said (b)(5)

Jared Kushner (Monica)
Christopher Liddell (Sandy)
Gary Cohn (Vince)
Dina Powell (Lorna)
Stephen Bannon (Kim SP)
Kenneth Juster (Rachel)

(b)(5)

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> 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)

(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

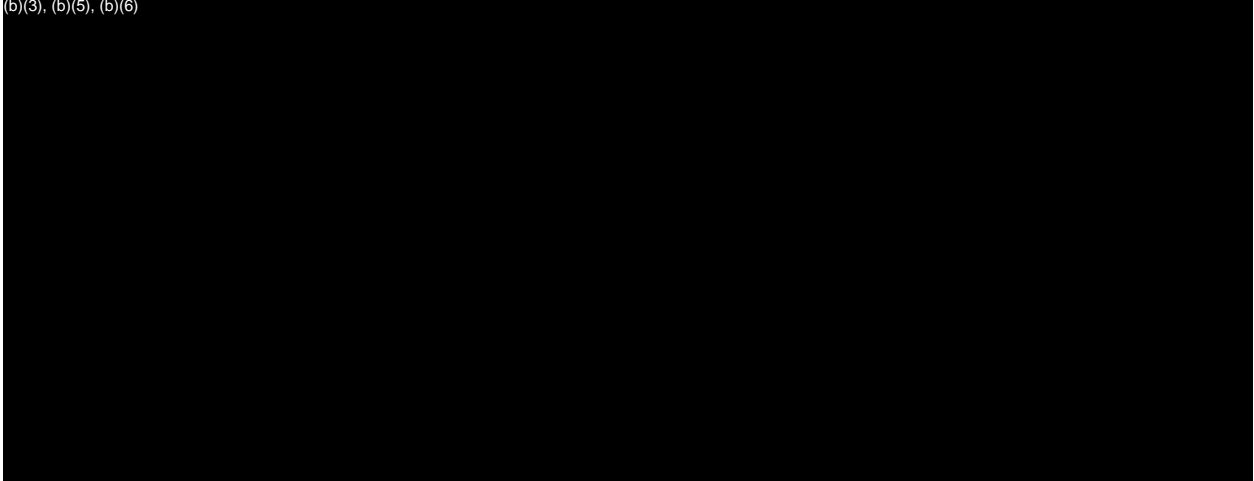
To: 'Schultz, James D. EOP/WHO'

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> 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:kspanza@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:[\(b\)\(6\)@oge.gov](mailto:(b)(6)@oge.gov)]
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: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,

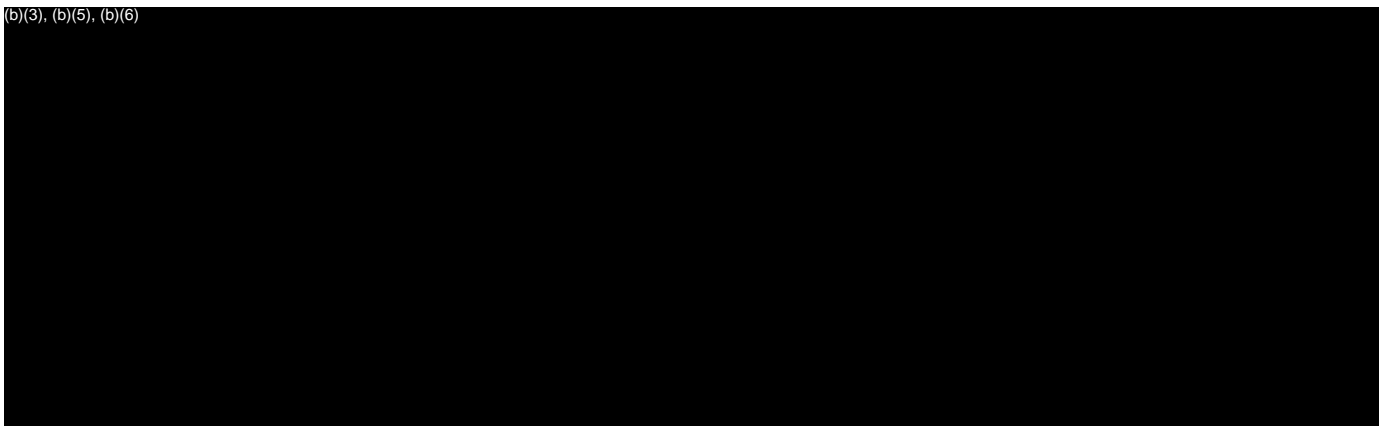
Kim

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.

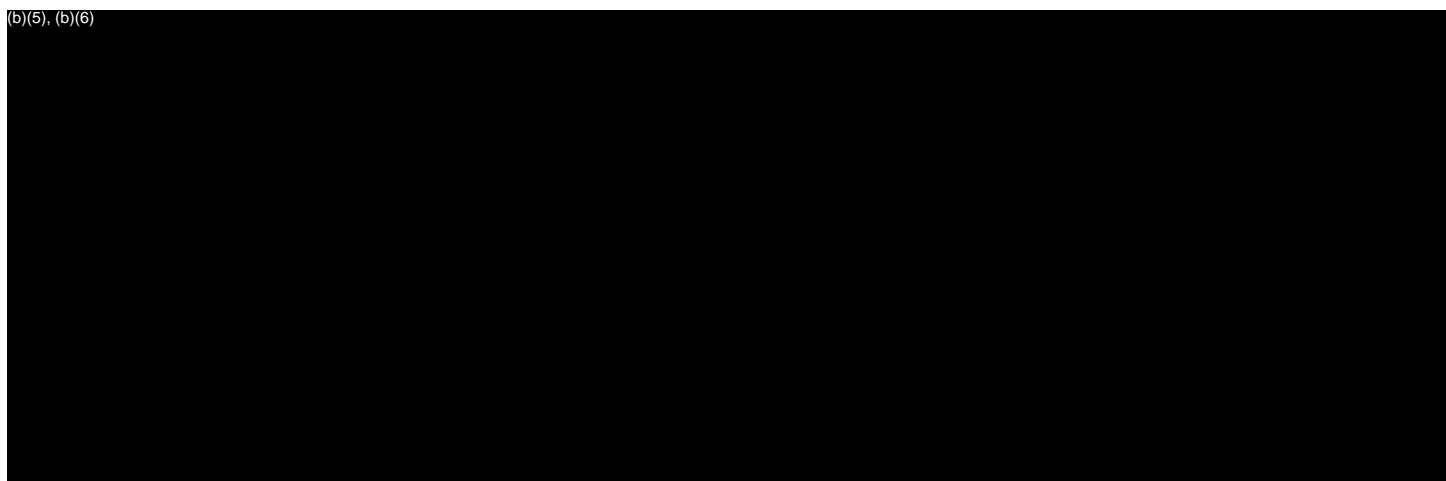
Best regards,

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> 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: [Monica M. G. Ashar](#)
Date: Friday, March 24, 2017 8:17:51 PM

Hi Monica

I hope you enjoyed your day off! The weather was definitely crummy this morning, but it looks lovely now!

Wanted to share just a quick update re what I've got going on, though I don't anticipate anything should bother you on Monday.

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



I don't anticipate anything emergent happening with those reports Monday, and can review updates/changes etc on my return.

Bannon CD- still waiting for the filer to sign the report and WH to get my answers to a couple of questions, I pinged Jim today for a status update. I can review anything that comes in on my return.

Kim

From: [Kimberly L. Sikora Panza](#)
To: [Monica M. G. Ashar](#)
Subject: CD docs
Date: Thursday, March 09, 2017 4:24:29 PM
Attachments: [notes.docx](#)
[Bannon CD request.msg](#)

Attachment 1 - 3 pages of reviewer notes withheld in full;
Attachment 2: Email chain included above

CD (have printed a copy already but never know if details will change!) –

Nonresponsive
network info

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/2011/Presiden.nsf/All+Certificates+of+Divestiture>

CD letter (ditto) –

Nonresponsive network info

Draft CD letter withheld in full (b)(5); final signed letter included in responsive records

Working notes – attached

Questions sent to WH – in the folder printed, electronic version attached.

FD report – in integrity, also printed in folder

CD folder – on my desk

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:\(b\)\(6\)](mailto:(b)(6)@whitehouse.gov)]
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: [Matthew A. Marinec](#)
Subject: RE: Mtg re: CD request
Date: Tuesday, March 07, 2017 9:48:56 AM

Could we do 11?

Thanks!

From: Matthew A. Marinec
Sent: Tuesday, March 07, 2017 9:43 AM
To: Kimberly L. Sikora Panza
Subject: RE: Mtg re: CD request

Sure! The best times for Dave tho are between 11 and 12 or 4 or later, do either of those windows work for you?

From: Kimberly L. Sikora Panza
Sent: Tuesday, March 07, 2017 7:33 AM
To: Matthew A. Marinec; David J. Apol
Subject: Mtg re: CD request

Good morning,

Can I get a meeting with Dave today to discuss the WH CD request I was assigned yesterday? Elaine suggested I should circle up with him regarding my questions, etc.

Thanks,
Kim

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.
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(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

