thanks, Keith.

From: Keith Labedz [mailto:klabedz@oge.gov]
Sent: Thursday, January 12, 2017 9:45 PM
To: Kassinger, Theodore W.; Maggi, David (Federal)
Cc: Schlom, Evan N.; Dorey, David R.; Sheehan, Matthew J.; Jacob, Dana (Federal); Warren, Arthur (Federal); Williams, Gaye (Federal); Jacobi, Will (Federal); Culvahouse Jr., Arthur B.; Deborah J. Bortot; Jacobi, Will (Federal)
Subject: RE: ethics agreement and call

The Part 3 items that Commerce identified might also require an update to Part 1 of the report.

Thank you.

Keith

From: Kassinger, Theodore W. [mailto:tkassinger@omm.com]
Sent: Thursday, January 12, 2017 8:10 PM
To: Maggi, David (Federal)
Cc: Schlom, Evan N.; Dorey, David R.; Keith Labedz; Sheehan, Matthew J.; Jacob, Dana (Federal); Warren, Arthur (Federal); Williams, Gaye (Federal); Jacobi, Will (Federal); Culvahouse Jr., Arthur B.; Deborah J. Bortot; Jacobi, Will (Federal)
Subject: [GRAYMAIL] RE: ethics agreement and call

Thanks, very helpful David. We’ll review and revert asap.

Ted
From: Kassinger, Theodore W. [mailto:tkassinger@omm.com]
Sent: Thursday, January 12, 2017 7:23 PM
To: Walter M. Shaub <wmshaub@oge.gov>; Director of OGE <director@oge.gov>; Heather A. Jones <hajones@oge.gov>; Keith Labedz <klabedz@oge.gov>; Maggi, David (Federal) <dMaggi@doc.gov>; Deborah J. Bortot <djbortot@oge.gov>; Jacobi, Will (Federal) <wjacobi@doc.gov>; Jacob, Dana (Federal) <DJacob@doc.gov>; Williams, Gaye (Federal) <gWilliams@doc.gov>; Warren, Arthur (Federal) <AWarren@doc.gov>; David J. Apol <djapol@oge.gov>
Cc: Culvahouse Jr., Arthur B. <aculvahouse@omm.com>; Schlom, Evan N. <eschlom@omm.com>; Dorey, David R. <ddorey@omm.com>; Sheehan, Matthew J. <msheehan@omm.com>
Subject: RE: ethics agreement and call

All-
Attached is a redline of the draft. It incorporates the exchanges below.

Two main edits:

· We learned that three of the entities [blackened]. We distinguished those three from the and added language that I trust will appropriately address the difference.

· The right place for the three [blackened], we believe, is section 9, with the other retained assets. We added a paragraph and moved the entities there instead of to section 6.

We learned this afternoon of some additional entities in the [blackened] that relate to the [blackened]. These entities do not change the asset ownership picture, but require updating the 278. We regret this discovery so late in the process, and hope that the changes do not cause Keith much difficulty in his additional review. We are adding his comments and making a few more minor edits as well to the 278 (e.g., adding the to the positions list [blackened]).

I am available to discuss any questions. Thanks again for your work.

Ted

From: Walter M. Shaub [mailto:wmshaub@oge.gov]
Sent: Thursday, January 12, 2017 3:39 PM
To: Kassinger, Theodore W.; Director of OGE; Heather A. Jones; Keith Labedz; David Maggi; Deborah J. Bortot; 'wjacobi@doc.gov'; 'DJacob@doc.gov'; 'gWilliams@doc.gov'; 'AWarren@doc.gov'; David J. Apol
Cc: Culvahouse Jr., Arthur B.; Schlom, Evan N.; Dorey, David R.; Sheehan, Matthew J.
Subject: RE: ethics agreement and call

The answer to all of these questions is “Yes”

From: Kassinger, Theodore W. [mailto:tkassinger@omm.com]
Sent: Thursday, January 12, 2017 3:35 PM
To: Walter M. Shaub; Director of OGE; Heather A. Jones; Keith Labedz; David Maggi; Deborah J. Bortot; 'wjacobi@doc.gov'; 'DJacob@doc.gov'; 'gWilliams@doc.gov'; 'AWarren@doc.gov'; David J. Apol
Cc: Culvahouse Jr., Arthur B.; Schlom, Evan N.; Dorey, David R.; Sheehan, Matthew J.
Subject: RE: ethics agreement and call

thanks.

A few quick questions:

· p.3 section 5 list:

  o 6,7 - move to section 6, b/c these are the entities related to (potentially) [blackened]. Ok?

  o 15,16. These are entities, he has financial interests in [blackened].
We propose to move to Section 7. Ok?

- p.3: “do not hold any financial interest in

Each of these entities

but that is a “financial interest.” We propose to move to Section 6. Similar to the
situation. Ok?

- p. 4, section 7:

Ted

From: Walter M. Shaub [mailto:wmshaub@oge.gov]
Sent: Thursday, January 12, 2017 3:04 PM
To: Kassinger, Theodore W.; Director of OGE; Heather A. Jones; Keith Labedz; David Maggi; Deborah J. Bortot; 'wjacobi@doc.gov'; 'DJacob@doc.gov'; 'gWilliams@doc.gov'; 'AWaren@doc.gov'; David J. Apol
Cc: Wilbur Ross; Earl Comstock; Culvahouse Jr., Arthur B.; Schlom, Evan N.; Dorey, David R.; Sheehan, Matthew J.
Subject: RE: ethics agreement and call

Thanks. Use this version instead, then. This version provides for the complete divestiture of

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: Kassinger, Theodore W. [mailto:tkassinger@omm.com]
Sent: Thursday, January 12, 2017 2:56 PM
To: Walter M. Shaub; Director of OGE; Heather A. Jones; Keith Labedz; David Maggi; Deborah J. Bortot; 'wjacobi@doc.gov'; 'DJacob@doc.gov'; 'gWilliams@doc.gov'; 'AWaren@doc.gov'; David J. Apol
Cc: Wilbur Ross; Earl Comstock; Culvahouse Jr., Arthur B.; Schlom, Evan N.; Dorey, David R.; Sheehan, Matthew J.
Subject: RE: ethics agreement and call

He is planning to divest

From: Walter M. Shaub [mailto:wmshaub@oge.gov]
Sent: Thursday, January 12, 2017 2:49 PM
To: Kassinger, Theodore W.; Director of OGE; Heather A. Jones; Keith Labedz; David Maggi; Deborah J. Bortot; 'wjacobi@doc.gov'; 'DJacob@doc.gov'; 'gWilliams@doc.gov'; 'AWarren@doc.gov'; David J. Apol
Cc: Wilbur Ross; Earl Comstock; Culvahouse Jr., Arthur B.; Schlom, Evan N.; Dorey, David R.; Sheehan, Matthew J.
Subject: RE: ethics agreement and call

Here’s a new version. A few highlights:

- We’ve taken your lists and dropped them into this version.

- We moved Attachment B into the body of the agreement.

- We weren’t clear on whether he’s divesting all of (D)(3)(A). If he is, we’ll need to change the language in that section.

We need to go over this draft more closely on this end, so we may have some changes to make. But I thought it would be helpful to send this over for discussion purposes, with the understanding that we may follow up with some revisions if we catch anything we missed.

Also, if further items are added to the report, they’ll need to be added to the ethics agreement.

Thanks

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.schaub@oge.gov

From: Kassinger, Theodore W. [mailto:tkassinger@omn.com]
Sent: Wednesday, January 11, 2017 1:04 PM
To: Director of OGE; Heather A. Jones; Keith Labedz; David Maggi; Walter M. Shaub; Deborah J. Bortot; 'wjacobi@doc.gov'; 'DJacob@doc.gov'; 'gWilliams@doc.gov'; 'AWarren@doc.gov'; David J. Apol
Cc: Wilbur Ross; Earl Comstock; Culvahouse Jr., Arthur B.; Schlom, Evan N.; Dorey, David
R.; Sheehan, Matthew J.

Subject: RE: ethics agreement and call

Walt and OGE/Commerce teams-

As discussed last night, attached is a revised draft of the proposed Ethics Agreement for Mr. Ross, including a revised exhibit listing divestitures. The document may be reviewed either in redline format or "clean" through the "review" feature of Word.

The draft

We appreciate your consideration and work. Please let us know when you would like to discuss the draft.

Thanks,

Ted

From: Director of OGE [mailto:director@oge.gov]
Sent: Tuesday, January 10, 2017 5:40 PM
To: Kassinger, Theodore W.; Director of OGE; Heather A. Jones; Keith Labeled; David Maggi; Culvahouse Jr., Arthur B.; Sheehan, Matthew J.; Schlam, Evan N.; Dorey, David R.; Walter M. Shaub; Deborah E. Baugh; 'wjacob@doc.gov'; 'DJacob@doc.gov'; 'gWilliams@doc.gov'; 'AWarren@doc.gov'; David J. Apol

Subject: ethics agreement and call

Ted,

We’ve been hard at work today drafting two versions of an ethics agreement. I have attached them both.

One version

The other version
I'm happy to schedule a time to talk tonight. If you would prefer to have some more time to study these drafts, however, we can schedule to talk in the morning instead. This call will be my top priority.

As a final note, we’ll all need to scrub this draft carefully to make sure we haven’t left any items out or, perhaps, placed items in the wrong sections. But it’s complete enough for a discussion draft.

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

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From: Kassinger, Theodore W. [mailto:tkassinger@omm.com]
Sent: Thursday, January 12, 2017 7:23 PM
To: Walter M. Shaub ; Director of OGE ; Heather A. Jones ; Keith Labedz ; Maggi, David (Federal)
Attached is a redline of the draft. It incorporates the exchanges below.

Two main edits:

- We learned that three of the [b](3), (4), (6) entities had been overlooked. We distinguished those three from the [b](3), (6) and added language that I trust will appropriately address the difference.

- The right place for the three [b](3), (4), (6) entities, we believe, is section 9, with the other retained assets. We added a paragraph and moved the entities there instead of to section 6.

We learned this afternoon of some additional entities in the [b](3), (4), (6) that relate to the [b](3), (4), (6). These entities do not change the asset ownership picture, but require updating the 278. We regret this discovery so late in the process, and hope that the changes do not cause Keith much difficulty in his additional review. We are addressing his comments and making a few more minor edits as well to the 278 (e.g., adding the [b](3), (6) to the positions list [b](3), (6)).

I am available to discuss any questions. Thanks again for your work.

Ted
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

From: Kassinger, Theodore W. [mailto:tkassinger@omm.com]
Sent: Tuesday, January 12, 2017 7:23 PM
To: Walter M. Shaub; Director of OGE; Heather A. Jones; Keith Labedz; David Maggi; Deborah J. Bortot; wjacobi@doc.gov; DJacobi@doc.gov; gWilliams@doc.gov; AWarren@doc.gov; David J. Apol
Cc: Culvahouse Jr., Arthur B.; Schloen, Evan N.; Dorey, David R.; Sheehan, Matthew J.
Subject: RE: ethics agreement and call

All-
Attached is a redline of the draft. It incorporates the exchanges below.

Two main edits:

- We learned that three of the [redacted]. We distinguished those three from the [redacted] and added language that I trust will appropriately address the difference.

- The right place for the three [redacted], we believe, is section 9, with the other retained assets. We added a paragraph and moved the entities there instead of to section 6.

We learned this afternoon of some additional entities in the [redacted] that relate to the [redacted]. These entities do not change the asset ownership picture, but require updating the 278. We regret this discovery so late in the process, and hope that the changes do not cause Keith much difficulty in his additional review. We are addressing his comments and making a few more minor edits as well to the 278 (e.g., adding the [redacted] to the positions list [redacted]).

I am available to discuss any questions. Thanks again for your work.

Ted
thanks, great eye, as always. we will check.

From: Keith Labedz [mailto:klabedz@oge.gov]
Sent: Thursday, January 12, 2017 4:30 PM
To: Kassinger, Theodore W.
Cc: Culvahouse Jr., Arthur B.; Schlom, Evan N.; Dorey, David R.; Sheehan, Matthew J.; Walter M. Shaub; Director of OGE; Heather A. Jones; David Maggi; Deborah J. Bortot; 'wjakobi@doc.gov'; 'DJacob@doc.gov'; 'gWilliams@doc.gov'; 'AWarren@doc.gov'; David J. Apol
Subject: RE: ethics agreement and call

Hello,

Having reviewed the divestiture list at the end of the ethics agreement, I noticed a few items that might not be held or conflicting. I was asked to forward for your review. The items are listed in the attachment to this email.

Category 1: Certain items are listed on the most recent version of the report with a value of [redacted]. It is possible the [redacted] are still held, but we wished to confirm. Note that three of the [redacted] seemed to have [redacted] (highlighted in red).

Category 2: One [redacted] is listed. This [redacted] may have also [redacted].

Category 3: There is one item that I cannot locate on the most recent version of the report.

Thank you.

Keith

From: Kassinger, Theodore W. [mailto:tkassinger@omm.com]
Sent: Thursday, January 12, 2017 3:40 PM
To: Walter M. Shaub; Director of OGE; Heather A. Jones; Keith Labedz; David Maggi; Deborah J. Bortot; 'wjakobi@doc.gov'; 'DJacob@doc.gov'; 'gWilliams@doc.gov'; 'AWarren@doc.gov'; David J. Apol
Cc: Culvahouse Jr., Arthur B.; Schlom, Evan N.; Dorey, David R.; Sheehan, Matthew J.
Subject: RE: ethics agreement and call

thx.

continuing to review.

From: Walter M. Shaub [mailto:wmshaub@oge.gov]
Sent: Thursday, January 12, 2017 3:39 PM
To: Kassinger, Theodore W.; Director of OGE; Heather A. Jones; Keith Labedz; David
The answer to all of these questions is “Yes”
great, thanks

From: Walter M. Shaub [mailto:wmshaub@oge.gov]
Sent: Thursday, January 12, 2017 2:50 PM
To: Kassinger, Theodore W.; Director of OGE; Heather A. Jones; Keith Labedz; 'David Maggi'; Deborah J. Bortot; 'wjacobi@doc.gov'; 'DJacob@doc.gov'; 'gWilliams@doc.gov'; 'AWarren@doc.gov'; David J. Apol
Cc: 'Wilbur Ross'; 'Earl Comstock'; Culvahouse Jr., Arthur B.; Schlom, Evan N.; Dorey, David R.; Sheehan, Matthew J.
Subject: RE: ethics agreement and call

Sorry, I forgot to add the attachment. Re-sending with the attachment:

From: Walter M. Shaub
Sent: Thursday, January 12, 2017 2:49 PM
To: 'Kassinger, Theodore W.'; Director of OGE; Heather A. Jones; Keith Labedz; David Maggi; Deborah J. Bortot; 'wjacobi@doc.gov'; 'DJacob@doc.gov'; 'gWilliams@doc.gov'; 'AWarren@doc.gov'; David J. Apol
Cc: Wilbur Ross; Earl Comstock; Culvahouse Jr., Arthur B.; Schlom, Evan N.; Dorey, David R.; Sheehan, Matthew J.
Subject: RE: ethics agreement and call

Here’s a new version. A few highlights:

- We’ve taken your lists and dropped them into this version.

- We moved Attachment B into the body of the agreement.

Rest of chain partially released above
Thanks, Keith.

From: Keith Labedz [mailto:klabedz@oge.gov]
Sent: Thursday, January 12, 2017 9:26 AM
To: Schlom, Evan N.; Kassinger, Theodore W.; 'Maggi, David (Federal)'
Cc: Dorey, David R.; 'Jacobi, Will (Federal)'; 'Williams, Gaye (Federal)'; 'Warren, Arthur (Federal)'; 'Jacob, Dana (Federal)'; Deborah J. Bortot; Heather A. Jones
Subject: [GRAYMAIL] RE: Revised WLR 278

Hello,

Attached are my notes on the most recent version of the draft.

Thank you.

Keith

From: Schlom, Evan N. [mailto:eschlom@omm.com]
Sent: Wednesday, January 11, 2017 6:04 PM
To: Keith Labedz; Kassinger, Theodore W.; 'Maggi, David (Federal)'
Cc: Dorey, David R.; 'Jacobi, Will (Federal)'; 'Williams, Gaye (Federal)'; 'Warren, Arthur (Federal)'; 'Jacob, Dana (Federal)'; Deborah J. Bortot; Heather A. Jones
Subject: [GRAYMAIL] RE: Revised WLR 278

Keith,

I have just edited the following items on the form to reflect a slight change in structure. There is no change to any of the underlying holdings of the

Part 2: 10.15, 10.16, 11.1, 14.5, 19.1

Part 3: 23, 24

I apologize for any confusion.

Thanks,

Evan

From: Keith Labedz [mailto:klabedz@oge.gov]
Sent: Wednesday, January 11, 2017 2:10 PM
To: Schlom, Evan N.; Kassinger, Theodore W.; 'Maggi, David (Federal)'
Cc: Dorey, David R.; 'Jacobi, Will (Federal)'; 'Williams, Gaye (Federal)'; 'Warren, Arthur (Federal)'; 'Jacob, Dana (Federal)'; Deborah J. Bortot; Heather A. Jones
Subject: RE: Revised WLR 278
Thank you.

From: Schlom, Evan N. [mailto:eschlom@omm.com]
Sent: Wednesday, January 11, 2017 2:00 PM
To: Keith Labedz; Kassinger, Theodore W.; 'Maggi, David (Federal)'
Cc: Dorey, David R.; 'Jacobi, Will (Federal)'; 'Williams, Gaye (Federal)'; 'Warren, Arthur (Federal)'; 'Jacob, Dana (Federal)'; Deborah J. Bortot; Heather A. Jones
Subject: [GRAYMAIL] RE: Revised WLR 278

K
Keith, All of our changes have been completed, so please go ahead and review. Most are immaterial (like fixing typos and descriptions). We also determined that four of the listed in Part 6 were in fact so.

Evan

From: Keith Labedz [mailto:klabedz@oge.gov]
Sent: Wednesday, January 11, 2017 1:54 PM
To: Schlom, Evan N.; Kassinger, Theodore W.; 'Maggi, David (Federal)'
Cc: Dorey, David R.; 'Jacobi, Will (Federal)'; 'Williams, Gaye (Federal)'; 'Warren, Arthur (Federal)'; 'Jacob, Dana (Federal)'; Deborah J. Bortot; Heather A. Jones
Subject: RE: Revised WLR 278

Can itemize those four.

From: Schlom, Evan N. [mailto:eschlom@omm.com]
Sent: Wednesday, January 11, 2017 1:51 PM
To: Keith Labedz; Kassinger, Theodore W.; 'Maggi, David (Federal)'
Cc: Dorey, David R.; 'Jacobi, Will (Federal)'; 'Williams, Gaye (Federal)'; 'Warren, Arthur (Federal)'; 'Jacob, Dana (Federal)'; Deborah J. Bortot; Heather A. Jones
Subject: [GRAYMAIL] RE: Revised WLR 278

Keith,

All of our changes have been completed, so please go ahead and review. Most are immaterial (like fixing typos and descriptions). We also determined that four of the listed in Part 6 were in fact so.

Evan

From: Keith Labedz [mailto:klabedz@oge.gov]
Sent: Wednesday, January 11, 2017 11:26 AM
To: Schlom, Evan N.; Kassinger, Theodore W.; 'Maggi, David (Federal)'
Cc: Dorey, David R.; 'Jacobi, Will (Federal)'; 'Williams, Gaye (Federal)'; 'Warren, Arthur (Federal)'; 'Jacob, Dana (Federal)'; Deborah J. Bortot; Heather A. Jones
Subject: RE: Revised WLR 278

Hello,

Thank you for your response. It appears that other changes have been made to the draft as
well. Can you let us know once all the changes have been completed? We will then look again and follow-up with any questions on the changes/revised draft.

Keith

From: Schlom, Evan N. [mailto:eschlom@omm.com]  
Sent: Wednesday, January 11, 2017 10:59 AM  
To: Keith Labedz; Kassinger, Theodore W.; 'Maggi, David (Federal)'  
Cc: Dorey, David R.; 'Jacobi, Will (Federal)'; 'Williams, Gaye (Federal)'; 'Warren, Arthur (Federal)'; 'Jacob, Dana (Federal)'; Deborah J. Bortot; Heather A. Jones  
Subject: [GRAYMAIL] RE: Revised WLR 278

Keith,

We’ve determined that Mr. Ross is a [REDACTED] so we have removed that position from Part 1 and will keep [REDACTED] in Part 6.

Thanks,

Evan

From: Keith Labedz [mailto:klabeledz@oge.gov]  
Sent: Tuesday, January 10, 2017 6:04 PM  
To: Schlom, Evan N.; Kassinger, Theodore W.; 'Maggi, David (Federal)'  
Cc: Dorey, David R.; 'Jacobi, Will (Federal)'; 'Williams, Gaye (Federal)'; 'Warren, Arthur (Federal)'; 'Jacob, Dana (Federal)'; Deborah J. Bortot; Heather A. Jones  
Subject: [WARNING : MESSAGE ENCRYPTED] RE: Revised WLR 278

Hello,

I have attached a follow-up question to the responses.

Thank you.

Keith

From: Scholm, Evan N. [mailto:eschlom@omm.com]  
Sent: Tuesday, January 10, 2017 3:23 PM  
To: Keith Labedz; Kassinger, Theodore W.; 'Maggi, David (Federal)'  
Cc: Dorey, David R.; 'Jacobi, Will (Federal)'; 'Williams, Gaye (Federal)'; 'Warren, Arthur (Federal)'; 'Jacob, Dana (Federal)'; Deborah J. Bortot; Heather A. Jones  
Subject: [GRAYMAIL] [WARNING : MESSAGE ENCRYPTED] RE: Revised WLR 278

Keith,

Our responses to your comments are in the attached document, highlighted in yellow.

Thanks,

Evan

From: Keith Labedz [mailto:klabeledz@oge.gov]
Hello,

Attached are my comments on draft 4 (as it appeared at 5:35 pm on 1/9).

Thank you.

Keith

From: Schlom, Evan N. [mailto:eschlom@omm.com]  
Sent: Monday, January 09, 2017 2:47 PM  
To: Keith Labedz; Kassinger, Theodore W.; 'Maggi, David (Federal)'  
Cc: Dorey, David R.; 'Jacobi, Will (Federal)'; 'Williams, Gaye (Federal)'; 'Warren, Arthur (Federal)'; 'Jacob, Dana (Federal)'; Deborah J. Bortot; Heather A. Jones  
Subject: [GRAYMAIL] [WARNING : MESSAGE ENCRYPTED]RE: Revised WLR 278  

Keith,

We have revised our SF 278 online in response to your notes and email comments. Attached is Word document containing the written responses and confirmations you asked for, highlighted in yellow.

Thanks,

Evan

From: Keith Labedz [mailto:klabedz@oge.gov]  
Sent: Saturday, January 07, 2017 10:25 PM  
To: Schlom, Evan N.; Kassinger, Theodore W.; 'Maggi, David (Federal)'  
Cc: Dorey, David R.; 'Jacobi, Will (Federal)'; 'Williams, Gaye (Federal)'; 'Warren, Arthur (Federal)'; 'Jacob, Dana (Federal)'; Deborah J. Bortot; Heather A. Jones  
Subject: [GRAYMAIL] RE: Revised WLR 278  

Please see my responses in red below.

Thank you.

Keith

From: Schlom, Evan N. [mailto:eschlom@omm.com]  
Sent: Saturday, January 07, 2017 9:36 PM  
To: Keith Labedz; Kassinger, Theodore W.; 'Maggi, David (Federal)'  
Cc: Dorey, David R.; 'Jacobi, Will (Federal)'; 'Williams, Gaye (Federal)'; 'Warren, Arthur (Federal)'; 'Jacob, Dana (Federal)'; Deborah J. Bortot; Heather A. Jones  
Subject: [GRAYMAIL] RE: Revised WLR 278  

Keith,
Your notes on Draft 3 in Part 2 contains a comment regarding the number of entities that are included. You identify a number of entities that are not included. I have added for two of them. The rest are marked. Given this information, please let us know. Please leave the . However, could you add a note in the Description field (or an endnote) indicating that?

Furthermore, here are two responses to your notes to Part 6 (our responses in red):

1. [related to comment pending from draft 1, repeated in draft 2] lines 21-22
   - Based on the name, it would appear that the
   - I am assuming that the placement is correct given that the interests have not moved in draft 3 (i.e., ). If that is not correct, please clarify. Ok.

2. line 63 and underlying. Does this mean that 63 This is also the case for . Please let us know if you want us to report this in a different manner.

Evan

From: Keith Labedz [mailto:klabedz@oge.gov]
Sent: Saturday, January 07, 2017 4:08 PM
To: Kassinger, Theodore W.; 'Maggi, David (Federal)'; Schlom, Evan N.; Dorey, David R.; 'Jacobi, Will (Federal)'; 'Williams, Gaye (Federal)'; 'Warren, Arthur (Federal)'; 'Jacob, Dana (Federal)'; Deborah J. Bortot; Heather A. Jones
Subject: [WARNING : MESSAGE ENCRYPTED] RE: Revised WLR 278

Hello,

Attached are my technical notes on draft 3, including a few follow-up questions based on the
responses to my please-confirm questions. These notes reflect the report as saved at approximately 10:00 am this morning.

Thank you.

Keith

From: Keith Labeled
Sent: Saturday, January 07, 2017 10:16 AM
To: 'Kassinger, Theodore W. '; Maggi, David (Federal)
Cc: Schom, Evan N.; Dorey, David R.; Jacobi, Will (Federal); Williams, Gaye (Federal); Warren, Arthur (Federal); Jacob, Dana (Federal); Deborah J. Bortot; Heather A. Jones
Subject: RE: Revised WLR 278

Hello,

I am continuing my review (including of the changes made yesterday evening). It does appear that I will still have a number of questions for round 3 (including a number of clean-up items on the positions that have been pending since round 1). I do not think all items will be resolved Monday from a technical perspective.

In terms of a discussion of the ethics agreement, I agree with David's analysis that the [b](5), (6)

[redacted] In addition, ethics agreements typically track the filer's agreements/arrangements, particularly exit arrangements from firms, and the details on many arrangements have just been added in round 3. I am copying Deborah Bortot, Chief of the Presidential Nominations Branch, and Heather Jones, Senior Counsel for Financial Disclosure, as they will be involved in the ultimate review and preclearance of the report and ethics agreement. I think they would need to participate in any discussion from OGE's perspective on the next draft ethics agreement.

Thank you.

Keith

From: Kassinger, Theodore W. [mailto:t.kassinger@onm.com]
Sent: Friday, January 06, 2017 10:18 PM
To: Maggi, David (Federal)
Cc: Keith Labeled; Schom, Evan N.; Dorey, David R.; Jacobi, Will (Federal); Williams, Gaye (Federal); Warren, Arthur (Federal); Jacob, Dana (Federal)
Subject: [GRAYMAIL] Re: Revised WLR 278

Thanks, David.

I don't think any such assets have been newly identified, but I'll review. In any case, [b](5), (6)
We cannot wait until Monday to discuss these issues. Unless otherwise directed, we are instructed to do whatever we can to complete the paperwork on Monday. I will be speaking with Mr. Ross tomorrow afternoon at 2pm, and if there are specific issues that I need to address with him, then I would appreciate knowing them ahead of that discussion.

David, I will call you tomorrow morning. If it would be better to have a joint call, then I am available anytime.

Ted

From: Keith Labeled [mailto:klabeled@oge.gov]
Thank you. I will review and incorporate any clarifying questions that I might have into the round 3 comments.

Keith

From: Schlom, Evan N. [mailto:eschlom@omm.com]
Sent: Friday, January 06, 2017 7:17 PM
To: Keith Labedz; Kassinger, Theodore W.; David Maggi; wjacobi@doc.gov; gwilliams@doc.gov
Cc: Dorey, David R.
Subject: [WARNING : MESSAGE ENCRYPTED] RE: Revised WLR 278

Keith,

Line 17.4 is the [3b)(3), (4), (6). It is currently [redacted]. I have updated the “description” on the form in accordance with the guidance for [3b)(3), (6) on the disclosure guide online, and put [3b)(3), (6)] in the EIF column. The [3b)(3), (6) in Part 6 is a [3b)(3), (4), (6).

Per your request, please see our responses to the “please confirm” questions in the attached documents. Our responses are in red type next to the items containing “please confirm” questions.

Also, you will see that the cross-references in the endnotes on the updated form are blank. This is in case we have to move things around before the form is finalized, since any cross-references would not automatically update. Once we have the final form set, we will populate the endnotes with the appropriate cross-references.

Thanks,

Evan

From: Keith Labedz [mailto:klabeledz@oge.gov]
Sent: Friday, January 06, 2017 6:43 PM
To: Kassinger, Theodore W.; Schlom, Evan N.; David Maggi; wjacobi@doc.gov; gwilliams@doc.gov
Cc: Dorey, David R.; Schlom, Evan N.
Subject: RE: Revised WLR 278

Passing along another item ahead of round 3 notes in the interests of time: Please break out the holdings of the [redacted] at line 17.4. Or is this item in
Part 2 an error? There is a different in Part 6.

Thank you.

Keith

From: Kassinger, Theodore W. [mailto:tkassinger@omm.com]
Sent: Friday, January 06, 2017 6:15 PM
To: Keith Labeledz; Schloem, Evan N.; David Maggi; wjacobi@doc.gov; gwilliams@doc.gov
Cc: Dorey, David R.; Schloem, Evan N.
Subject: RE: Revised WLR 278

thanks, we'll address these.

From: Keith Labeledz [mailto:klabeledz@oge.gov]
Sent: Friday, January 06, 2017 5:58 PM
To: Kassinger, Theodore W.; Schloem, Evan N.; David Maggi; wjacobi@doc.gov; gwilliams@doc.gov
Cc: Dorey, David R.; Schloem, Evan N.
Subject: RE: Revised WLR 278

Thank you. One area that I have noted in my preliminary review of this round is the remaining blank fields for Part 3 and Part 4. I also see that there is a that are new to Part 2 in this draft which would need to be added to Part 3.

I will document in my round 3 notes, but, in the interests of time, I wanted to note now that a (Part 2, line 1.3) (Part 2, line 1.3)

Keith

From: Kassinger, Theodore W. [mailto:tkassinger@omm.com]
Sent: Friday, January 06, 2017 5:39 PM
To: Keith Labeledz; Schloem, Evan N.; David Maggi; wjacobi@doc.gov; gwilliams@doc.gov
Cc: Dorey, David R.; Schloem, Evan N.
Subject: RE: Revised WLR 278

Hi, Keith,

We will send you a copy of your notes with responses to each item. The team is doing another cross-check, but I believe we'll be able to say that all “please
confirm” questions have been addressed, and that all, or almost all, other comments/questions have been addressed.

Thanks,

Ted

From: Keith Labedz [mailto:klabedz@oge.gov]
Sent: Friday, January 06, 2017 4:28 PM
To: Schlom, Evan N.; David Maggi; 'wjacobi@doc.gov'; gwilliams@doc.gov
Cc: Kassinger, Theodore W.
Subject: RE: Revised WLR 278

Hello,

Does this new draft answer all of the outstanding questions from the two rounds of written comments or are there items outstanding? In addition, the original round of comments included a number of “please-confirm” questions. I will need a response to those items as a precondition for completing my review, so I want to make sure we do not lose sight of them.

Thank you.

Keith

Keith Labedz
Senior Program Analyst
Presidential Nominations Branch
U.S. Office of Government Ethics
Telephone: (202) 482-9218

From: Schlom, Evan N. [mailto:eschlom@omm.com]
Sent: Friday, January 06, 2017 3:30 PM
To: David Maggi; Keith Labedz; 'wjacobi@doc.gov'; gwilliams@doc.gov
Cc: Kassinger, Theodore W.
Subject: Revised WLR 278

Hello all,

We have made a number of changes to the 278 in response to our conversations with you and your comments on the previous draft, so please go ahead and review the current update.

Thanks,

Evan

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This message and any attached documents contain information from the law firm of O'Melveny & Myers LLP that may be confidential and/or privileged. If you are not the intended recipient, you may not read, copy, distribute, or use this information. If you have received this transmission in error, please notify the sender immediately by reply e-mail and then delete this message.
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I have time now. Alternatively, we can schedule a time for 2:15.

202-482-9218

Keith

From: Schlom, Evan N. [mailto:eschlom@omm.com]
Sent: Thursday, January 12, 2017 1:47 PM
To: Keith Labedz
Subject: [GRAYMAIL] RE: Revised WLR 278

Keith,

Please let me know if you have a few minutes to discuss on the phone a few clarification questions I have about your comments. Thanks very much.

Evan

From: Keith Labedz [mailto:klabedz@oge.gov]
Sent: Thursday, January 12, 2017 9:26 AM
To: Schlom, Evan N.; Kassinger, Theodore W.; 'Maggi, David (Federal)'
Cc: Dorey, David R.; 'Jacobi, Will (Federal)'; 'Williams, Gaye (Federal)'; 'Warren, Arthur (Federal)'; 'Jacob, Dana (Federal)'; Deborah J. Bortot; Heather A. Jones
Subject: [WARNING : MESSAGE ENCRYPTED]RE: Revised WLR 278

Hello,

Attached are my notes on the most recent version of the draft.

Thank you.

Keith
Keith,

I’ve added the [b](6) position to Part 1 (line 68).

Regarding the discrepancies, if you could please call me at your convenience, I’d appreciate it. I have a few questions as to what specifically you’re looking at. My direct line is [b](6).

Thanks,

Evan

From: Keith Labedz [mailto:klabedz@oge.gov]
Sent: Friday, January 13, 2017 9:09 AM
To: Schlom, Evan N.; Kassinger, Theodore W.; 'Maggi, David (Federal)'
Cc: Dorey, David R.; 'Jacobi, Will (Federal)'; 'Williams, Gaye (Federal)'; 'Warren, Arthur (Federal)'; 'Jacob, Dana (Federal)'; Deborah J. Bortot; Heather A. Jones
Subject: RE: Revised WLR 278

Also -- An email last night on the ethics agreement indicated that a position with [b](6) was being added. I do not see that position.

Thank you.

From: Keith Labedz
Sent: Friday, January 13, 2017 8:41 AM
To: 'Schlom, Evan N.'; Kassinger, Theodore W.; 'Maggi, David (Federal)'
Cc: Dorey, David R.; 'Jacobi, Will (Federal)'; 'Williams, Gaye (Federal)'; 'Warren, Arthur (Federal)'; 'Jacob, Dana (Federal)'; Deborah J. Bortot; Heather A. Jones
Subject: RE: Revised WLR 278

Hello,

Does this draft address the Part 1 / Part 3 discrepancies identified by Commerce?

Thank you.

Keith

From: Schlom, Evan N. [mailto:eschlom@omm.com]
Sent: Friday, January 13, 2017 1:05 AM
To: Keith Labedz; Kassinger, Theodore W.; 'Maggi, David (Federal)'
Cc: Dorey, David R.; 'Jacobi, Will (Federal)'; 'Williams, Gaye (Federal)'; 'Warren, Arthur (Federal)'; 'Jacob, Dana (Federal)'; Deborah J. Bortot; Heather A. Jones
Subject: [GRAYMAIL] [WARNING : MESSAGE ENCRYPTED]RE: Revised WLR 278
Keith,

Attached are responses to your comments. There are four unanswered comments, all relating to value/income. We are tracking those answers down.

I wanted to note three changes we made to the form since the last draft:

- **10.6.1.2; 10.16.1**: We learned of a [redacted] regarding the endnotes, please feel free to call me to discuss.

- **10.13**: We were able to ascertain the [redacted], so we added that to the form. This is limited to 10.13.

- **10.17**: We discovered a [redacted] which is listed at 10.17.

Evan

**From:** Keith Labedz [mailto:klabedz@oge.gov]
**Sent:** Thursday, January 12, 2017 9:26 AM
**To:** Schlom, Evan N.; Kassinger, Theodore W.; 'Maggi, David (Federal)'
**Cc:** Dorey, David R.; 'Jacobi, Will (Federal)'; 'Williams, Gaye (Federal)'; 'Warren, Arthur (Federal)'; 'Jacob, Dana (Federal)'; Deborah J. Bortot; Heather A. Jones

**Subject:** [WARNING : MESSAGE ENCRYPTED]RE: Revised WLR 278

Hello,

Attached are my notes on the most recent version of the draft.

Thank you.

Keith
Thanks very much, Keith. I was just now reviewing the endnotes on the form, so I will incorporate these comments before sending back to you.

From: Keith Labeledz [mailto:klabedz@oge.gov]  
Sent: Friday, January 13, 2017 3:16 PM  
To: Schlom, Evan N.; Kassinger, Theodore W.; 'Maggi, David (Federal)'  
Cc: Dorey, David R.; 'Jacobi, Will (Federal)'; 'Williams, Gaye (Federal)'; 'Warren, Arthur (Federal)'; 'Jacob, Dana (Federal)'; Deborah J. Bortot; Heather A. Jones  
Subject: [GRAYMAIL] [WARNING : MESSAGE ENCRYPTED] RE: Revised WLR 278

Hello,

I know that some value/income responses are pending as are potentially some updates to Part 1/3 and assets that are no longer held. However, given the interest in moving forward as quickly as possible, I am providing the attached comments on the version of the report exported at approximately 9:00 this morning. Most of the questions are related to the consistency between Part 2 entries and endnotes. If the line numbering of Part 2 entries will change, you may wish to hold on responding/addressing until the structure is finalized. However, we will need to have all the endnotes settled before I move the report forward for preclearance review here at OGE.

Thank you.

Keith

From: Schlom, Evan N. [mailto:eschlom@omm.com]  
Sent: Friday, January 13, 2017 1:05 AM  
To: Keith Labeledz; Kassinger, Theodore W.; 'Maggi, David (Federal)'  
Cc: Dorey, David R.; 'Jacobi, Will (Federal)'; 'Williams, Gaye (Federal)'; 'Warren, Arthur (Federal)'; 'Jacob, Dana (Federal)'; Deborah J. Bortot; Heather A. Jones  
Subject: [GRAYMAIL] [WARNING : MESSAGE ENCRYPTED] RE: Revised WLR 278

Keith,

Attached are responses to your comments. There are four unanswered comments, all relating to value/income. We are tracking those answers down.

I wanted to note three changes we made to the form since the last draft:

- 10.6.1.2; 10.16.1 (b)(3), (6)
- We learned of a
- If you have questions
David,

Do these documents need to go through this portal? It seems odd to have OMM and OGE sending documents back and forth via email and your comments through a separate portal (i.e., it is the same information). Anything you send through this portal, I will need to export and transfer for the Director’s review, which is going to slow things down, especially if my review for the day ends...
Hello,

I will continue reviewing the report today, but I wanted to pass along the following from my check of Part 1 v. Part 3:

- Part 3, line 13 mentions a position with (b)(3), (6) which does not appear in Part 1.

- Part 3, line 17 mentions a position with (b)(3), (6). This position does not appear in Part 1.

Thanks.

- Part 3, line 18 mentions a position with This position does not appear in Part 1.
- Part 3, line 19 mentions a position with This position does not appear in Part 1.
- Part 3, line 21 mentions a position with This position does not appear in Part 1. Note, though, that Part 2 references a If there is a position, would it be
- Part 3, line 22 mentions a position with This position does not appear in Part 1.
- Part 3, line 29 mentions a position with This position does not appear in Part 1.

Thank you.

Keith

From: Schlom, Evan N. [mailto:eschlom@omm.com]
Sent: Friday, January 13, 2017 5:07 PM
To: Keith Labedz; Kassinger, Theodore W.; 'Maggi, David (Federal)'
Cc: Dorey, David R.; 'Jacobi, Will (Federal)'; 'Williams, Gaye (Federal)'; 'Warren, Arthur (Federal)'; 'Jacob, Dana (Federal)'; Deborah J. Bortot; Heather A. Jones
Subject: [GRAYMAIL] RE: Revised WLR 278

Yes, they have.

From: Keith Labedz [mailto:klabedz@oge.gov]
Sent: Friday, January 13, 2017 4:32 PM
To: Schlom, Evan N.; Kassinger, Theodore W.; 'Maggi, David (Federal)'
Cc: Dorey, David R.; 'Jacobi, Will (Federal)'; 'Williams, Gaye (Federal)'; 'Warren, Arthur (Federal)'; 'Jacob, Dana (Federal)'; Deborah J. Bortot; Heather A. Jones
Subject: RE: Revised WLR 278

Have all the Part 1 v. Part 3 issues raised by Commerce (in relation to the ethics agreement) been checked and addressed?

From: Schlom, Evan N. [mailto:eschlom@omm.com]
Sent: Friday, January 13, 2017 4:30 PM
To: Keith Labedz; Kassinger, Theodore W.; 'Maggi, David (Federal)'
Cc: Dorey, David R.; 'Jacobi, Will (Federal)'; 'Williams, Gaye (Federal)'; 'Warren, Arthur (Federal)'; 'Jacob, Dana (Federal)'; Deborah J. Bortot; Heather A. Jones
Subject: [GRAYMAIL] RE: Revised WLR 278

Keith,

I have addressed your comments, including those relating to endnotes. We determined that the “missing” values and incomes from the previous draft.

If you have any questions, please let me know.

Thanks,

Evan

From: Keith Labedz [mailto:klabedz@oge.gov]
Sent: Friday, January 13, 2017 3:16 PM
Thanks, David. We will respond to comments soon.
Hello,

I will continue reviewing the report today, but I wanted to pass along the following from my check of Part 1 v. Part 3:

- Part 3, line 13 mentions a __________ position with __________ This position does not appear in Part 1.

- Part 3, line 17 mentions a __________ position with __________. This position does not appear in Part 1.

- Part 3, line 18 mentions a __________ position with __________ This position does not appear in Part 1.

- Part 3, line 19 mentions a __________ position with __________ This position does not appear in Part 1.

- Part 3, line 21 mentions a __________ position with __________. This position does not appear in Part 1. Note, though, that Part 2 references a __________. If there is a position, would it be __________?

- Part 3, line 22 mentions a __________ position with __________ This position does not appear in Part 1.

Thank you.

Keith
will do

From: Keith Labedz [mailto:klabedz@oge.gov]
Sent: Saturday, January 14, 2017 12:49 PM
To: Kassinger, Theodore W.; Schlom, Evan N.; 'Maggi, David (Federal)'
Cc: Dorey, David R.; 'Jacobi, Will (Federal)'; 'Williams, Gaye (Federal)'; 'Warren, Arthur (Federal)'; 'Jacob, Dana (Federal)'; Deborah J. Bortot; Heather A. Jones
Subject: [GRAYMAIL] RE: Revised WLR 278

I would go ahead and circulate the revised document. I anticipate my draft 7 comments will be resolved shortly so that we will all be on the same versions of the report and ethics agreement.

Thank you.

From: Kassinger, Theodore W. [mailto:tkassinger@omm.com]
Sent: Saturday, January 14, 2017 12:13 PM
To: Keith Labedz; Schlom, Evan N.; 'Maggi, David (Federal)'
Cc: Dorey, David R.; 'Jacobi, Will (Federal)'; 'Williams, Gaye (Federal)'; 'Warren, Arthur (Federal)'; 'Jacob, Dana (Federal)'; Deborah J. Bortot; Heather A. Jones
Subject: [GRAYMAIL] RE: Revised WLR 278

thanks very much.

We are addressing David Maggi’s comments in a new draft EA. Should we await any comments that you will have on the EA before circulating the revised document, or would you prefer to work from it? It should be ready shortly.

From: Keith Labedz [mailto:klabedz@oge.gov]
Sent: Saturday, January 14, 2017 12:08 PM
To: Schlom, Evan N.; Kassinger, Theodore W.; 'Maggi, David (Federal)'
Cc: Dorey, David R.; 'Jacobi, Will (Federal)'; 'Williams, Gaye (Federal)'; 'Warren, Arthur (Federal)'; 'Jacob, Dana (Federal)'; Deborah J. Bortot; Heather A. Jones
Subject: [WARNING : MESSAGE ENCRYPTED] RE: Revised WLR 278

Attached are my notes on the most recent draft. In the interests of time, I made technical corrections myself (as itemized in the document). I still need to compare against the revised ethics agreement; however, I wanted to send along the two pending value questions so we keep moving.

Thank you.

From: Schlom, Evan N. [mailto:eschlom@omm.com]
Sent: Saturday, January 14, 2017 10:34 AM
To: Keith Labedz; Kassinger, Theodore W.; 'Maggi, David (Federal)'

2 page attachment withheld in full - (b)(3), (5), (6)
Cc: Dorey, David R.; 'Jacobi, Will (Federal)'; 'Williams, Gaye (Federal)'; 'Warren, Arthur (Federal)'; 'Jacob, Dana (Federal)'; Deborah J. Bortot; Heather A. Jones
Subject: [GRAYMAIL] RE: Revised WLR 278

It has been added to Part 1. Thanks.

From: Keith Labedz [mailto:klabeled@oge.gov]
Sent: Saturday, January 14, 2017 10:30 AM
To: Schlom, Evan N.; Kassinger, Theodore W.; 'Maggi, David (Federal)'
Cc: Dorey, David R.; 'Jacobi, Will (Federal)'; 'Williams, Gaye (Federal)'; 'Warren, Arthur (Federal)'; 'Jacob, Dana (Federal)'; Deborah J. Bortot; Heather A. Jones
Subject: RE: Revised WLR 278

Ok. Regarding [redacted], should there also be a position added to Part 1?

Thank you.

From: Schlom, Evan N. [mailto:eschol@omm.com]
Sent: Saturday, January 14, 2017 10:08 AM
To: Keith Labedz; Kassinger, Theodore W.; 'Maggi, David (Federal)'
Cc: Dorey, David R.; 'Jacobi, Will (Federal)'; 'Williams, Gaye (Federal)'; 'Warren, Arthur (Federal)'; 'Jacob, Dana (Federal)'; Deborah J. Bortot; Heather A. Jones
Subject: [GRAYMAIL] RE: Revised WLR 278

Keith,

I have made the following changes:

- Part 3, line 13 mentions a [redacted] position with [redacted]. This position does not appear in Part 1. Added the position to Part 1

- Part 3, line 17 mentions a [redacted] position with [redacted]. This position does not appear in Part 1. Edited Part 3 line 17 (now Part 3 line 16)

- Part 3, line 18 mentions a [redacted] position with [redacted]. This position does not appear in Part 1. Edited Part 3 line 18 (now Part 3 line 17)

- Part 3, line 19 mentions a [redacted] position with [redacted]. This position does not appear in Part 1. Edited Part 3 line 19 (now Part 3 line 18)

- Part 3, line 21 mentions a [redacted] position with [redacted]. This position does not appear in Part 1. Note, though, that Part 2 references a [redacted] if there is a position, would it be [redacted]? Edited Part 3 line 21 (now Part 3 line 20)

- Part 3, line 22 mentions a [redacted] position with [redacted]. This position does not appear in Part 1. Edited Part 3 line 22 (now Part 3 line 21)

Hello,

I will continue reviewing the report today, but I wanted to pass along the following from my check of Part 1 v. Part 3:

· Part 3, line 13 mentions a position with. This position does not appear in Part 1.

· Part 3, line 17 mentions a position with. This position does not appear in Part 1.

· Part 3, line 18 mentions a position with. This position does not appear in Part 1.

· Part 3, line 19 mentions a position with. This position does not appear in Part 1.

· Part 3, line 21 mentions a position with. This position does not appear in Part 1. Note, though, that Part 2 references a position. If there is a position, would it be?

· Part 3, line 22 mentions a position with. This position does not appear in Part 1.

· Part 3, line 29 mentions a position with. This position does not appear in Part 1.

Thank you.

Keith
From: Heather A. Jones
Sent: Saturday, January 14, 2017 2:17 PM
To: Keith Labeledz; Director of OGE
Subject: Re: Revised WLR 278

Please see below

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

From: Keith Labeledz
Sent: Saturday, January 14, 2017 2:10 PM
To: Heather A. Jones
Subject: FW: Revised WLR 278
Still looking but...

From: Kassinger, Theodore W. [mailto:tkassinger@omm.com]
Sent: Saturday, January 14, 2017 1:35 PM
To: Keith Labeledz; Schomb, Evan N.; Maggi, David (Federal); Dorey, David R.; Jacobi, Will (Federal); Williams, Gaye (Federal); Warren, Arthur (Federal); Jacob, Dana (Federal); Deborah J. Bortot; Heather A. Jones
Subject: [GRAYMAIL] RE: Revised WLR 278

Attached, along with comparison showing changes from prior draft.

In response to David’s comment on section 2, we --

· added a footnote explanation

· deleted the list of [redacted]. This list was created before was defined in the opening sentence of section 2. That definition is comprehensive. A [redacted]

· on section 6, we moved the solution. Mr. Ross has [redacted], to eliminate confusion. This is similar to the [redacted] which are captured on the 278 under the [redacted]

· Only [redacted] needs to be on Exhibit A. The other [redacted]
The other comments are also addressed.

Ted

From: Keith Labedz [mailto:klabedz@oge.gov]
Sent: Saturday, January 14, 2017 12:49 PM
To: Kassinger, Theodore W.; Schlom, Evan N.; 'Maggi, David (Federal)'
Cc: Dorey, David R.; 'Jacobi, Will (Federal)'; 'Williams, Gaye (Federal)'; 'Warren, Arthur (Federal)'; 'Jacob, Dana (Federal)'; Deborah J. Bortot; Heather A. Jones
Subject: RE: Revised WLR 278

I would go ahead and circulate the revised document. I anticipate my draft 7 comments will be resolved shortly so that we will all be on the same versions of the report and ethics agreement.

Thank you
Keith,

I have made the applicable changes to 10.15/11.1 and 10.16/24.1.

Thanks,

Evan

You need not attribute between the two but the figure should be the combined amount without double-counting.

So, if the combined value of 10.15 and 11.1 is \( X \) and the combined income is \( Y \), then you can report \( X \) and \( Y \) as the value/income at 10.15 or 11.1, leaving the value/income fields for the other entry blank. Let’s say you pick 10.15, so \( X \) is recorded as the value and \( Y \) is recorded as the income. Then, the endnote for 10.15 would say that the value/income reflect the combined income for 10.15 and 11.1. Entry 11.1 would have blank value/income fields and an endnote indicating that its value/income is reflected in 10.15.

I think there’s some confusion about how best to represent the values and incomes. For instance, the values and incomes shown in 10.15 and 11.1 reflect the values and incomes of \( b(3), (4), (6) \). Similarly, for \( b(3), (6) \), the values and incomes shown in 10.16 and 24.1 reflect the values and incomes of \( b(3), (4), (6) \).

Please let me know the best way to show this on the report and I will make the appropriate change.
Thanks,

Evan

From: Keith Labedz [mailto:klabedz@oge.gov]
Sent: Saturday, January 14, 2017 12:08 PM
To: Sehlom, Evan N.; Kassinger, Theodore W.; 'Maggi, David (Federal)'
Cc: Dorey, David R.; 'Jacobi, Will (Federal)'; 'Williams, Gaye (Federal)'; 'Warren, Arthur (Federal)'; 'Jacob, Dana (Federal)'; Deborah J. Bortot; Heather A. Jones
Subject: [WARNING : MESSAGE ENCRYPTED]RE: Revised WLR 278

Attached are my notes on the most recent draft. In the interests of time, I made technical corrections myself (as itemized in the document). I still need to compare against the revised ethics agreement; however, I wanted to send along the two pending value questions so we keep moving.

Thank you.
Correct, thanks Keith. I also have two other conforming changes along the same line. I will circulate an update in a moment.

On Jan 14, 2017, at 2:28 PM, Keith Labedz <klabedz@oge.gov> wrote:

I also have a question about dropping the list in Section 2. I have been mostly focused on the report itself so far (therefore, I may be missing something) but does the section 2 90-day divestiture requirement apply to each previously-listed from which the filer is resigning? It seems some of the [redacted] being retained.

On Jan 14, 2017, at 1:35 PM, Kassinger, Theodore W. <tkassinger@omm.com> wrote:
Attached, along with comparison showing changes from prior draft.

In response to David’s comment on section 2, we --

- added a footnote explanation

- deleted the list of [redacted]. This list was created before [redacted] was defined in the opening sentence of section 2. That definition is comprehensive. A

- on section 6, we moved the [redacted] to eliminate confusion. This is similar to the solution. Mr. Ross has [redacted], which are captured on the

- Only [redacted] needs to be on Exhibit A. The other [redacted].

The other comments are also addressed.

Ted

From: Keith Labedz [mailto:klabeled@oge.gov]
Sent: Saturday, January 14, 2017 12:49 PM
To: Kassinger, Theodore W.; Schlom, Evan N.; 'Maggi, David (Federal)'
Cc: Dorey, David R.; 'Jacobi, Will (Federal)'; 'Williams, Gaye (Federal)'; 'Warren, Arthur (Federal)'; 'Jacob, Dana (Federal)'; Deborah J. Bortot; Heather A. Jones
Subject: RE: Revised WLR 278

I would go ahead and circulate the revised document. I anticipate my draft 7 comments will be resolved shortly so that we will all be on the same versions of the report and ethics agreement.

Thank you.
I have a few edits to the EA I’m working on.

From: Keith Labedz
Sent: Saturday, January 14, 2017 3:20 PM
To: Heather A. Jones
Subject: RE: Revised WLR 278

Take a look at the document labeled “KSL edit…” Not sure if I am on the wrong track or not but this seems clearer (to me).

From: Heather A. Jones
Sent: Saturday, January 14, 2017 3:08 PM
To: Keith Labedz
Subject: RE: Revised WLR 278

I agree. We will have to see what Walt says

From: Kassinger, Theodore W. [mailto:tkassinger@omm.com]
Sent: Saturday, January 14, 2017 1:35 PM
To: Keith Labedz; Schlom, Evan N.; 'Maggi, David (Federal)'
Cc: Dorey, David R.; 'Jacobi, Will (Federal)'; 'Williams, Gaye (Federal)'; 'Warren, Arthur (Federal)'; 'Jacob, Dana (Federal)'; Deborah J. Bortot; Heather A. Jones
Subject: [GRAYMAIL] RE: Revised WLR 278

Attached, along with comparison showing changes from prior draft.
In response to David’s comment on section 2, we --

· added a footnote explanation
On Jan 14, 2017, at 4:47 PM, Kassinger, Theodore W. <tkassinger@omm.com> wrote:

Attached is an updated draft to address comments of David and Keith. Also attached is a comparison showing changes to the last draft.

On questions raised and changes:

- **Section 2**
  - New wording to clarify that the entities on Attachment A, except for the retained interests permitted under Section 9.
  - Delete last sentence. With the comprehensive definition of that starts the section, there is no apparent purpose for listing the specific entities in Parts 1 and 2 of the 278. To the contrary, it seems rife with the potential for being misleading and perhaps, despite multiple pair of eyes reviewing the list, not concordant. Section 2 is unambiguously comprehensive: Mr. Ross added footnote 1, along lines of David’s suggestion.
• Section 7
  o conformed section 7 list to Annex A. Discrepancies generally reflected differences in specific positions in which Mr. Ross has a position, and the list in the divestitures in A. We added all from 7 not specifically listed.

• Sections 8, 11
  o Retitled 11 to be “ADDITIONAL ACTIONS, ETHICS BRIEFING”
  o moved the CD paragraph from 8 to 11, where it fits better as applying to all divestitures (not just those in 8)
  o added a sentence to make clear that

Thanks for your patience.

Ted

On Jan 14, 2017, at 2:28 PM, Keith Labedz <klabedz@oge.gov> wrote:

I also have a question about dropping the list in Section 2. I have been mostly focused on the report itself so far (therefore, I may be missing something) but does the section 2 90-day divestiture requirement apply to each previously-listed from which the filer is resigning? It seems some of the being retained.
We will not make any changes on the 278 until we hear from you.

Ted

From: Keith Labedz [mailto:klabedz@oge.gov]
Sent: Saturday, January 14, 2017 5:27 PM
To: Kassinger, Theodore W.; Maggi, David (Federal)
Cc: Schlom, Evan N.; Dorey, David R.; Jacobi, Will (Federal); Williams, Gaye (Federal); Warren, Arthur (Federal); Jacob, Dana (Federal); Deborah J. Bortot; Heather A. Jones
Subject: RE: Revised WLR 278

Thank you. As we review and discuss, I have one suggestion: Please check with us before making any further changes to the 278 itself. That way, we are all working on the same versions as we proceed through finalizing the ethics agreement.

Keith

From: Kassinger, Theodore W. [mailto:tkassinger@omm.com]
Sent: Saturday, January 14, 2017 4:46 PM
To: Maggi, David (Federal); Keith Labedz
Cc: Schlom, Evan N.; Dorey, David R.; Jacobi, Will (Federal); Williams, Gaye (Federal); Warren, Arthur (Federal); Jacob, Dana (Federal); Deborah J. Bortot; Heather A. Jones
Subject: [GRAYMAIL] RE: Revised WLR 278

Attached is an updated draft to address comments of David and Keith. Also attached is a comparison showing changes to the last draft.

On questions raised and changes:

- Section 2
will get it to you shortly.

From: Heather A. Jones [mailto:hajones@oge.gov]
Sent: Saturday, January 14, 2017 5:57 PM
To: Kassinger, Theodore W.; Keith Labedz; Maggi, David (Federal); Director of OGE
Cc: Schlom, Evan N.; Dorey, David R.; Jacobi, Will (Federal); Williams, Gaye (Federal); Warren, Arthur (Federal); Jacob, Dana (Federal); Deborah J. Bortot
Subject: RE: Revised WLR 278

Ted-

Before OGE can preclear the report, we will need a copy of the written request to remove his name from the businesses.

Thanks,

Heather

From: Kassinger, Theodore W. [mailto:tkassinger@omm.com]
Sent: Saturday, January 14, 2017 5:35 PM
To: Heather A. Jones; Keith Labedz; Maggi, David (Federal); Director of OGE
Cc: Schlom, Evan N.; Dorey, David R.; Jacobi, Will (Federal); Williams, Gaye (Federal); Warren, Arthur (Federal); Jacob, Dana (Federal); Deborah J. Bortot
Subject: [GRAYMAIL] RE: Revised WLR 278

We will not make any changes to the 278 until we hear from you.

We agree with David Maggi’s two suggestions for edits to the EA that he provided in a separate response, but also will withhold further edits until we get other feedback.

Ted

From: Heather A. Jones [mailto:hajones@oge.gov]
Sent: Saturday, January 14, 2017 5:29 PM
To: Keith Labedz; Kassinger, Theodore W.; Maggi, David (Federal); Director of OGE
Cc: Schlom, Evan N.; Dorey, David R.; Jacobi, Will (Federal); Williams, Gaye (Federal); Warren, Arthur (Federal); Jacob, Dana (Federal); Deborah J. Bortot
Subject: RE: Revised WLR 278

I want to loop Walt into the discussion at this point. Please use this e-mail to reply.

From: Keith Labedz
Sent: Saturday, January 14, 2017 5:27 PM
To: 'Kassinger, Theodore W.'; Maggi, David (Federal)
Thank you. As we review and discuss, I have one suggestion: Please check with us before making any further changes to the 278 itself. That way, we are all working on the same versions as we proceed through finalizing the ethics agreement.

Keith
Understood. I will take a look as well.

Keith –
Can you send a list of those before 6? I working on edits to the EA.
Heather
On Jan 14, 2017, at 4:47 PM, Kassinger, Theodore W. <tkassinger@omm.com> wrote:

Attached is an updated draft to address comments of David and Keith. Also attached is a comparison showing changes to the last draft.
On questions raised and changes:

Referral to DOC

2 9-page attachments withheld in full - (b)(3), (4), (5), (6)
On Jan 14, 2017, at 7:00 PM, Kassinger, Theodore W. <tkassinger@omm.com> wrote:

Letter attached.

From: Heather A. Jones [mailto:hajones@oge.gov]
Sent: Saturday, January 14, 2017 5:57 PM
To: Kassinger, Theodore W.; Keith Labedz; Maggi, David (Federal); Director of OGE
Cc: Schlom, Evan N.; Dorey, David R.; Jacobi, Will (Federal); Williams, Gaye (Federal); Warren, Arthur (Federal); Jacob, Dana (Federal); Deborah J. Bortot
Subject: RE: Revised WLR 278
Ted-
Before OGE can preclear the report, we will need a copy of the written request to remove his name from the businesses.
Thanks,
Got it.

From: Heather A. Jones [mailto:hajones@oge.gov]
Sent: Saturday, January 14, 2017 7:35 PM
To: Kassinger, Theodore W.; Keith Labedz; Maggi, David (Federal); Director of OGE
Cc: Schlom, Evan N.; Dorey, David R.; Jacobi, Will (Federal); Williams, Gaye (Federal); Warren, Arthur (Federal); Jacob, Dana (Federal); Deborah J. Bortot
Subject: Couple of notes on Part 1

I think:

Please don’t make the change until Keith gives the go-ahead.

From: Kassinger, Theodore W. [mailto:tkassinger@omm.com]
Sent: Saturday, January 14, 2017 7:00 PM
To: Heather A. Jones; Keith Labedz; Maggi, David (Federal); Director of OGE
Cc: Schlom, Evan N.; Dorey, David R.; Jacobi, Will (Federal); Williams, Gaye (Federal); Warren, Arthur (Federal); Jacob, Dana (Federal); Deborah J. Bortot
Subject: [GRAYMAIL] RE: Revised WLR 278

Letter attached.

1 page attachment withheld in full - (b)(3), (4), (6)
On Jan 14, 2017, at 7:35 PM, Heather A. Jones <hajones@oge.gov> wrote:

I think

[Redacted]

Most of email chain partially disclosed above
Dave-
Are you ok with this as a sufficient request to remove a name? I think it is fine since there is really nothing more he can do.
Heather
We are cross-checking whether there is a position.

From: Keith Labedz [mailto:klabedz@oge.gov]
Sent: Saturday, January 14, 2017 7:51 PM
To: Heather A. Jones; Kassinger, Theodore W.; Maggi, David (Federal); Director of OGE
Cc: Schlom, Evan N.; Dorey, David R.; Jacobi, Will (Federal); Williams, Gaye (Federal); Warren, Arthur (Federal); Jacob, Dana (Federal); Deborah J. Bortot
Subject: RE: Couple of notes on Part 1

There is (b)(3), (6). If 278 is correct, it should appear in the attachment but not section 7.

From: Heather A. Jones
Sent: Saturday, January 14, 2017 7:49 PM
To: 'Kassinger, Theodore W.'; Keith Labedz; Maggi, David (Federal); Director of OGE
Cc: Schlom, Evan N.; Dorey, David R.; Jacobi, Will (Federal); Williams, Gaye (Federal); Warren, Arthur (Federal); Jacob, Dana (Federal); Deborah J. Bortot
Subject: RE: Couple of notes on Part 1

This item is in the EA but not listed in Part 1:

1. (b)(3), (6)

Should it stay in the EA?

From: Kassinger, Theodore W. [mailto:tkassinger@omm.com]
Sent: Saturday, January 14, 2017 7:42 PM
To: Keith Labedz; Heather A. Jones; Maggi, David (Federal); Director of OGE
Cc: Schlom, Evan N.; Dorey, David R.; Jacobi, Will (Federal); Williams, Gaye (Federal); Warren, Arthur (Federal); Jacob, Dana (Federal); Deborah J. Bortot
Subject: [GRAYMAIL] RE: Couple of notes on Part 1

thanks

From: Keith Labedz [mailto:klabedz@oge.gov]
Sent: Saturday, January 14, 2017 7:39 PM
To: Heather A. Jones; Kassinger, Theodore W.; Maggi, David (Federal); Director of OGE
Cc: Schlom, Evan N.; Dorey, David R.; Jacobi, Will (Federal); Williams, Gaye (Federal); Warren, Arthur (Federal); Jacob, Dana (Federal); Deborah J. Bortot
Subject: RE: Couple of notes on Part 1

I think that those two changes make sense and would not require a new round of review. I’ll just make them. Thank you.
I think [redacted].

Please don’t make the change until Keith gives the go-ahead.
Yes, I think so since Walt is MIA. Though I don’t see how we clear without Walt giving the go ahead.

Do you and I need to talk to Dave?

Keith and I are working on reconciling everything. Walt will also need to work through everything. I’m thinking Monday if there aren’t major changes and if Walt is happy with it.

Thanks
Ok, I will remove it from the EA

From: Schalom, Evan N. [mailto:eschalom@omm.com]
Sent: Saturday, January 14, 2017 7:57 PM
To: Keith Labedz
Cc: Heather A. Jones; Kassinger, Theodore W.; Maggi, David (Federal); Director of OGE; Dorey, David R.; Jacobi, Will (Federal); Williams, Gaye (Federal); Warren, Arthur (Federal); Jacob, Dana (Federal); Deborah J. Bortot
Subject: [GRAYMAIL] Re: Couple of notes on Part 1

The 278 is correct. Mr. Ross holds no position with

From: Heather A. Jones
Sent: Saturday, January 14, 2017 7:49 PM
To: 'Kassinger, Theodore W.'; Keith Labedz; Maggi, David (Federal); Director of OGE
Cc: Schlom, Evan N.; Dorey, David R.; Jacobi, Will (Federal); Williams, Gaye (Federal); Warren, Arthur (Federal); Jacob, Dana (Federal); Deborah J. Bortot
Subject: RE: Couple of notes on Part 1

This item is in the EA but not listed in Part 1:

1. Should it stay in the EA?

From: Kassinger, Theodore W. [mailto:tkassinger@omm.com]
Sent: Saturday, January 14, 2017 7:42 PM
To: Keith Labedz; Heather A. Jones; Maggi, David (Federal); Director of OGE
Cc: Schlom, Evan N.; Dorey, David R.; Jacobi, Will (Federal); Williams, Gaye (Federal); Warren, Arthur (Federal); Jacob, Dana (Federal); Deborah J. Bortot
Subject: [GRAYMAIL] RE: Couple of notes on Part 1

This item is in the EA but not listed in Part 1:

1. Should it stay in the EA?

From: Keith Labedz [mailto:klabedz@oge.gov]
Sent: Saturday, January 14, 2017 7:39 PM
To: Heather A. Jones; Kassinger, Theodore W.; Maggi, David (Federal); Director of OGE
Cc: Schlom, Evan N.; Dorey, David R.; Jacobi, Will (Federal); Williams, Gaye (Federal); Warren, Arthur (Federal); Jacob, Dana (Federal); Deborah J. Bortot
Subject: RE: Couple of notes on Part 1

I think that those two changes make sense and would not require a new round of
review. I'll just make them. Thank you.
I agree with Keith.

From: Keith Labedz
Sent: Saturday, January 14, 2017 7:53 PM
To: Heather A. Jones; Director of OGE
Subject: RE: Revised WLR 278

In theory that could occur but...[b][b]

From: Heather A. Jones
Sent: Saturday, January 14, 2017 7:44 PM
To: Director of OGE; Keith Labedz
Subject: FW: Revised WLR 278
FYI

From: Kassinger, Theodore W. [mailto:tkassinger@omm.com]
Sent: Saturday, January 14, 2017 7:43 PM
To: Heather A. Jones
Subject: [GRAYMAIL] RE: Revised WLR 278
David Maggi must deliver the cleared and signed documents to the Committee tomorrow, because of the hearing date on Wednesday morning. Whatever we can do to make that happen, let me know.

thanks for all the work, especially on a Saturday night.

From: Heather A. Jones [mailto:hajones@oge.gov]
Sent: Saturday, January 14, 2017 7:38 PM
To: Kassinger, Theodore W.
Subject: RE: Revised WLR 278
Keith and I are working on reconciling everything. Walt will also need to work through everything. I’m thinking Monday if there aren’t major changes and if Walt is happy with it.

From: Kassinger, Theodore W. [mailto:tkassinger@omm.com]
Sent: Saturday, January 14, 2017 7:32 PM
To: Heather A. Jones
Subject: [GRAYMAIL] RE: Revised WLR 278
any sense of timing on pre-clearance?
I removed the duplicate from the EA.

From: Keith Labeledz
Sent: Saturday, January 14, 2017 8:32 PM
To: Heather A. Jones
Subject: FW: Revised WLR 278

Further notes on David’s questions regarding Attachment A as you review the documents: The following appear on Attachment A but are not listed as [redacted] on the 278:

[Redacted text]

The first four are not listed as [redacted] on the 278 because the [redacted]. We propose to keep them on Attachment A, however. Mr. Ross needs to resign his position in [redacted], so that resignation will need to stay in section 7. Mr. Ross [redacted] in [redacted] and thus it is not included in either part 2 or part 6 of the 278. It is listed in Section 7 of the EA because he is [redacted], as reported on the 278. It could be moved to Part 5 [redacted]. It seems out of place there because all other entities listed in section 5 are [redacted]. It does no harm to have it in section 7 and on Attachment A.

We hope this helps.
On Jan 14, 2017, at 4:47 PM, Kassinger, Theodore W. <tkassinger@omm.com> wrote:

Attached is an updated draft to address comments of David and Keith. Also attached is a comparison showing changes to the last draft.

On questions raised and changes:

Referral to DOC

Referral to DOC

2 9-page attachments withheld in full - (b)
(3), (4), (5), (6)

Rest of email chain partially disclosed above
Sounds good. Thanks to you all.
We'll review promptly after receiving the draft, and will be ready to go from there.

Very much appreciate all of your hard, late-night work.

On Jan 15, 2017, at 12:48 AM, Walter M. Shaub <wmshaub@oge.gov> wrote:

Ted & David (and all),

Keith, Heather, and I have now gone through the report, the ethics agreement, and the letter regarding the use of his name.

The letter regarding his name looks good.

The 278 looks good to me and, I think, Heather and Keith. I don’t think Heather and Keith have any further comments on it, but I’ll double check in the morning with them to confirm that there’s not any last outstanding item. (I am, however, sure that there are no significant items that would take more than a few minutes to fix.)

We have made some edits to the ethics agreement. I don’t believe there’s any changes that would trouble you, as they are drafting changes and not substantive changes. I just want to be sure all three of us have made all of our changes correctly, so we’ll go through it once more in the morning. The biggest change is that we’ve added back in the names because the OGE branch that does the compliance tracking will really need that level of detail to do their work and because we’ll likely get calls from the committee staff asking for clarifications if we don’t spell things out clearly enough.

We will have a revised draft to you before noon, probably earlier.

All of this is to say, that I now have a high level of confidence that we should be able to meet the deadline of getting the paperwork up to the Senate tomorrow, provided that you’re available to review the edits to the ethics agreement.

Once we have come to final agreement, OGE will preclear. At that time, we’ll give you detailed instructions for getting the final paperwork up to us in the right sequence. (David, you can start working on your cover letter to OGE if you have not done that already.) Ted, at that time, we’ll need your client available to certify his report one final time in Integrity and to sign the final ethics agreement –but don’t have him do that until we give the green light.

Thanks for all the hard work on this nomination everyone. The end is in sight. Let’s just stay focused through tomorrow morning and into the early afternoon if
need be.

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

On Jan 14, 2017, at 7:15 PM, Kassinger, Theodore W. <tkassinger@omm.com> wrote:

Further notes on David’s questions regarding Attachment A as you review the documents:

The following appear on Attachment A but are not listed as...
Sent from my BlackBerry 10 smartphone on the Verizon Wireless 4G LTE network.

From: Keith Labedz
Sent: Sunday, January 15, 2017 11:15 AM
To: Director of OGE; Heather A. Jones
Subject: FW: Revised WLR 278

From: Kassinger, Theodore W. [mailto:t.kassinger@omm.com]
Sent: Sunday, January 15, 2017 11:11 AM
To: Walter M. Shaub
Cc: Maggi, David (Federal); Keith Labedz; Schlom, Evan N.; Dorey, David R.; Jacobi, Will (Federal); Williams, Gaye (Federal); Warren, Arthur (Federal); Jacob, Dana (Federal); Deborah J. Bortot; Heather A. Jones
Subject: [GRAYMAIL] Re: Revised WLR 278

Thanks very much, Walt. We will revert adapt.

On Jan 15, 2017, at 11:08 AM, Walter M. Shaub <wmshaub@oge.gov> wrote:

Ted,
Attached is the revised ethics agreement. I’ve spoken with Heather and Keith this morning. We would be willing to preclear him with this ethics agreement as now drafted.
If your client can live with these changes, we can issue the preclearance as soon as we hear back from you and move to the stage where we all start working on getting the paperwork up to the Senate. We’ll reach out to the transition team immediately for clearance to send the package up to the Senate.
If you have any concerns about this language, we can schedule a conference call instead to discuss them and try to come to resolution as fast as possible.
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
On Jan 15, 2017, at 12:48 AM, Walter M. Shaub <wmshaub@oge.gov> wrote:

Ted & David (and all),
Keith, Heather, and I have now gone through the report, the ethics agreement, and the letter regarding the use of his name.
The letter regarding his name looks good.
The 278 looks good to me and, I think, Heather and Keith. I don’t think Heather and Keith have any further comments on it, but I’ll double check in the morning with them to confirm that there’s not any last outstanding item. (I am, however, sure that there are no significant items that would take more than a few minutes to fix.)
We have made some edits to the ethics agreement. I don’t believe there’s any changes that would trouble you, as they are drafting changes and not substantive changes. I just want to be sure all three of us have made all of our changes correctly, so we’ll go through it once more in the morning. The biggest change is that we’ve added back in the names because the OGE branch that does the compliance tracking will really need that level of detail to do their work and because we’ll likely get calls from the committee staff asking for clarifications if we don’t spell things out clearly enough.
We will have a revised draft to you before noon, probably earlier.
All of this is to say, that I now have a high level of confidence that we should be able to meet the deadline of getting the paperwork up to the Senate tomorrow, provided that you’re available to review the edits to the ethics agreement.
Once we have come to final agreement, OGE will preclear. At that time, we’ll give you detailed instructions for getting the final paperwork up to us in the right sequence. (David, you can start working on your cover letter to OGE if you have not done that already.) Ted, at that time, we’ll need your client available to certify his report one final time in Integrity and to sign the final ethics agreement—but don’t have him do that until we give the green light.
Thanks for all the hard work on this nomination everyone. The end is in sight. Let’s just stay focused through tomorrow morning and into the early afternoon if need be.
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
“asap” instead of “adapt”…. auto-correct strikes again

From: Kassinger, Theodore W.
Sent: Sunday, January 15, 2017 11:11 AM
To: Walter M. Shaub
Cc: Maggi, David (Federal); Keith Labedz; Schlom, Evan N.; Dorey, David R.; Jacobi, Will (Federal); Williams, Gaye (Federal); Warren, Arthur (Federal); Jacob, Dana (Federal); Deborah J. Bortot; Heather A. Jones
Subject: Re: Revised WLR 278

Thanks very much, Walt. We will revert adapt.
He and I traded emails. He clarified that he just meant they will move fast.

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: Keith Labedz
Sent: Sunday, January 15, 2017 11:15 AM
To: Director of OGE; Heather A. Jones
Subject: FW: Revised WLR 278

Thanks very much, Walt. We will revert adapt.
Two questions on initial read:

1) Section 5:

[Redacted text]

2) Section 12:

[Redacted text]

Ted

From: Walter M. Shaub [mailto:wmschaub@oge.gov]
Sent: Sunday, January 15, 2017 11:07 AM
To: 'Maggi, David (Federal)'; Kassinger, Theodore W.
Cc: Keith Labeled; Schlom, Evan N.; Dorey, David R.; Jacoby, Will (Federal); Williams, Gaye (Federal); Warren, Arthur (Federal); Jacob, Dana (Federal); Deborah J. Bortot; Heather A. Jones
Subject: RE: Revised WLR 278

Ted,

Attached is the revised ethics agreement. I’ve spoken with Heather and Keith this morning. We would be willing to preclear him with this ethics agreement as now drafted.
If your client can live with these changes, we can issue the preclearance as soon as we hear back from you and move to the stage where we all start working on getting the paperwork up to the Senate. We’ll reach out to the transition team immediately for clearance to send the package up to the Senate.

If you have any concerns about this language, we can schedule a conference call instead to discuss them and try to come to resolution as fast as possible.

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
No. I think there're still reviewing

From: Heather A. Jones
Sent: Sunday, January 15, 2017 12:31 PM
To: 'Kassinger, Theodore W.'; Director of OGE; 'Maggi, David (Federal)'
Cc: Keith Labeled; Schlom, Evan N.; Dorey, David R.; Jacobi, Will (Federal); Williams, Gaye (Federal); Warren, Arthur (Federal); Jacob, Dana (Federal); Deborah J. Bortot
Subject: RE: Revised WLR 278

I just want to confirm with everyone that all sides are ready for me to preclear with these changes.

From: Kassinger, Theodore W. [mailto:tkassinger@omm.com]
Sent: Sunday, January 15, 2017 12:26 PM
To: Walter M. Shaub; 'Maggi, David (Federal)'
Cc: Keith Labeled; Schlom, Evan N.; Dorey, David R.; Jacobi, Will (Federal); Williams, Gaye (Federal); Warren, Arthur (Federal); Jacob, Dana (Federal); Deborah J. Bortot; Heather A. Jones
Subject: [GRAYMAIL] RE: Revised WLR 278

Both good. thanks

From: Walter M. Shaub [mailto:wmshaub@oge.gov]
Sent: Sunday, January 15, 2017 12:25 PM
To: Kassinger, Theodore W.; 'Maggi, David (Federal)'
Cc: Keith Labeled; Schlom, Evan N.; Dorey, David R.; Jacobi, Will (Federal); Williams, Gaye (Federal); Warren, Arthur (Federal); Jacob, Dana (Federal); Deborah J. Bortot; Heather A. Jones
Subject: RE: Revised WLR 278

Ted, my response below are in red text:

From: Kassinger, Theodore W. [mailto:tkassinger@omm.com]
Sent: Sunday, January 15, 2017 12:00 PM
To: Walter M. Shaub; 'Maggi, David (Federal)'
Cc: Keith Labeled; Schlom, Evan N.; Dorey, David R.; Jacobi, Will (Federal); Williams, Gaye (Federal); Warren, Arthur (Federal); Jacob, Dana (Federal); Deborah J. Bortot; Heather A. Jones
Subject: [GRAYMAIL] RE: Revised WLR 278

Two questions on initial read:

1) Section 5:

2) Section X:

...
2) Section 12: [b](3), (4), (5), (6)

Ted

Rest of email chain partially disclosed above.
On Jan 15, 2017, at 12:31 PM, Heather A. Jones <hajones@oge.gov> wrote:

I just want to confirm with everyone that all sides are ready for me to preclear with these changes.
Yes

From: Director of OGE
Sent: Sunday, January 15, 2017 1:36 PM
To: Heather A. Jones; Keith Labedz
Subject: RE: Revised WLR 278

Heather & Keith,

Can you make all necessary changes to the EA and then recirculate. Be sure to include this email address (Director@oge.gov) so that it goes through.

Then, go ahead and ask whether all parties are in agreement.

From: Heather A. Jones
Sent: Sunday, January 15, 2017 1:30 PM
To: 'Schlom, Evan N.'; Maggi, David (Federal); Walter M. Shaub
Cc: Kassinger, Theodore W.; Keith Labedz; Dorey, David R.; Jacobi, Will (Federal); Williams, Gaye (Federal); Warren, Arthur (Federal); Jacob, Dana (Federal); Deborah J. Bortot; Director of OGE
Subject: RE: Revised WLR 278

I just spoke with Keith. I will make the change to the 278 and I fixed the typo in the EA.
I do not believe that he has a position with any of these entities.
I just spoke with Keith. I will make the change to the 278 and I fixed the typo in the EA.
I just want to confirm. He has positions with the [REDACTED] But is divesting the [REDACTED]

From: Schom, Evan N. [mailto:eschom@omm.com]
Sent: Sunday, January 15, 2017 1:42 PM
To: Jacobi, Will (Federal); Heather A. Jones; Maggi, David (Federal); Walter M. Shaub
Cc: Kassinger, Theodore W.; Keith LabeDz; Dorey, David R.; Williams, Gaye (Federal); Warren, Arthur (Federal); Jacob, Dana (Federal); Deborah J. Bortot; Director of OGE
Subject: [GRAYMAIL] RE: Revised WLR 278
From: Heather A. Jones <hajones@oge.gov>
Sent: Sunday, January 15, 2017 1:29 PM
To: 'Schlom, Evan N.'; Maggi, David (Federal); Walter M. Shaub
Cc: Kassing, Theodore W.; Keith Labedz; Dorey, David R.; Jacobi, Will (Federal);
Williams, Gaye (Federal); Warren, Arthur (Federal); Jacob, Dana (Federal); Deborah J.
Bortot; Director of OGE
Subject: RE: Revised WLR 278
I just spoke with Keith. I will make the change to the 278 and I fixed the typo in the EA.

From: Schlom, Evan N. [mailto:eschlom@omm.com]
Sent: Sunday, January 15, 2017 1:26 PM
To: Maggi, David (Federal); Walter M. Shaub
Cc: Kassing, Theodore W.; Keith Labedz; Dorey, David R.; Jacobi, Will (Federal);
Williams, Gaye (Federal); Warren, Arthur (Federal); Jacob, Dana (Federal); Deborah J.
Bortot; Heather A. Jones; Director of OGE
Subject: [GRAYMAIL] RE: Revised WLR 278
10.1.10 on the report shows as That should read.
10.1.11 on the report shows as That should
I have not edited the report to make those changes, per last night’s instructions. Please let me know if you will make the changes, or if you would like me to do so.

On Jan 15, 2017, at 12:35 PM, Walter M. Shaub <wmschaub@oge.gov> wrote:

Keith, can you look at that?
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.schaub@oge.gov

On Jan 15, 2017, at 12:00 PM, Kassinger, Theodore W. <tkassinger@omm.com> wrote:

Two questions on initial read:
1) Section 5.1...
2) Section 12: [Redacted]
On Jan 15, 2017, at 1:43 PM, Schlom, Evan N. <eschlom@omm.com> wrote:

EA Section 2

EA Section 4

EA Section 8
From: Heather A. Jones <hajones@oge.gov>
Sent: Sunday, January 15, 2017 1:29 PM
To: 'Schlom, Evan N.'; Maggi, David (Federal); Walter M. Shaub
Cc: Kassinger, Theodore W.; Keith Labedz; Dorey, David R.; Jacobi, Will (Federal); Williams, Gaye (Federal); Warren, Arthur (Federal); Jacob, Dana (Federal); Deborah J. Bortot; Director of OGE
Subject: RE: Revised WLR 278

I just spoke with Keith. I will make the change to the 278 and I fixed the typo in the EA

Rest of chain released in part above
Regarding the item below, I changed the

EA Section 4

[Redacted]

From: Schlam, Evan N. [mailto:eschlam@omm.com]
Sent: Sunday, January 15, 2017 1:42 PM
To: Jacobi, Will (Federal); Heather A. Jones; Maggi, David (Federal); Walter M. Shaub
Cc: Kassing, Theodore W.; Keith Labez; Dorey, David R.; Williams, Gaye (Federal); Warren, Arthur (Federal); Jacob, Dana (Federal); Deborah J. Bortot; Director of OGE
Subject: [GRAYMAIL] RE: Revised WLR 278

EA Section 2

[Redacted]

EA Section 4

[Redacted]

EA Section 8

[Redacted]
All-
Here is the revised agreement. If you are ok, with it I will preclear and send a clean version around.
Heather

From: Schlam, Evan N. [mailto:eschlam@omm.com]
Sent: Sunday, January 15, 2017 2:05 PM
To: Heather A. Jones; "Jacobi, Will (Federal)"; Maggi, David (Federal); Director of OGE
Cc: Kassinger, Theodore W.; Keith Labedz; Dorey, David R.; Williams, Gaye (Federal); Warren, Arthur (Federal); Jacob, Dana (Federal); Deborah J. Bortot; Director of OGE
Subject: [GRAYMAIL] RE: Revised WLR 278

If you are asking for confirmation on EA Section 8 (the ***), I can confirm: he has positions with the ***, but is divesting the ***.

From: Heather A. Jones [mailto:hajones@oge.gov]
Sent: Sunday, January 15, 2017 2:00 PM
To: "Jacobi, Will (Federal)"; Schlam, Evan N.; Maggi, David (Federal); Director of OGE
Cc: Kassinger, Theodore W.; Keith Labedz; Dorey, David R.; Williams, Gaye (Federal); Warren, Arthur (Federal); Jacob, Dana (Federal); Deborah J. Bortot; Director of OGE
Subject: RE: Revised WLR 278

Regarding this item, I think it is important they be listed twice since one paragraph focuses on the position and on focuses on managing the conflicts.

EA Section 10 (assets to be retained)

The above assets are already stated as being retained in EA, Section 7. Once I have confirmation on this item I can send the revised EA around. I have made all the changes to the report.
I just want to confirm. He has positions with the ***. But is divesting the ***.

EA Section 8

There is no typo. The *** entities and the *** entities are separate. The *** entities were
On Jan 15, 2017, at 2:43 PM, Director of OGE <director@oge.gov> wrote:

As soon as Ted responds with a thumbs up, we'll do that.
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

All-
Here is the revised agreement. If you are ok, with it I will preclear and send a clean version around.
Heather

From: Schlom, Evan N. [mailto:eschlom@omm.com]
Sent: Sunday, January 15, 2017 2:05 PM
To: Heather A. Jones; 'Jacobi, Will (Federal)'; Maggi, David (Federal); Director of OGE
Cc: Kassinger, Theodore W.; Keith Labedz; Dorey, David R.; Williams, Gaye (Federal); Warren, Arthur (Federal); Jacob, Dana (Federal); Deborah J. Bortot;  Director of OGE
Subject: [GRAYMAIL] RE: Revised WLR 278

If you are asking for confirmation on EA Section 8 the [b][3], [5]...I can confirm: he has positions with the [b][3], [6] but is divesting the [b][3], [6]...
Ok, we will wait to hear from you that he approves.

From: Kassinger, Theodore W. [mailto:tkassinger@omm.com]
Sent: Sunday, January 15, 2017 2:46 PM
To: 'Maggi, David (Federal)'; Heather A. Jones
Cc: Schlom, Evan N.; Jacobi, Will (Federal); Keith Labedz; Dorey, David R.; Williams, Gaye (Federal); Warren, Arthur (Federal); Jacob, Dana (Federal); Deborah J. Bortot
Subject: [GRAYMAIL] RE: Revised WLR 278

thanks. looks good. need to clear with Mr. Ross, but I expect he will approve.
Great. Here’s a clean copy, in case you haven’t already cleaned it up. The deletions created some problems with numbering and page breaks. You can disregard this email if you’ve already done the clean-up yourself, but it’s attached for your convenience. As soon as we hear he’s ok, we’ll preclear and then ask the transition team to authorize us sending it up to the Senate.

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: Kassinger, Theodore W. [mailto:tkassinger@omm.com]
Sent: Sunday, January 15, 2017 2:46 PM
To: Director of OGE; 'Maggi, David (Federal)'; Heather A. Jones
Cc: Schlom, Evan N.; Jacobi, Will (Federal); Keith Labedz; Dorey, David R.; Williams, Gaye (Federal); Warren, Arthur (Federal); Jacob, Dana (Federal); Deborah J. Bortot
Subject: [GRAYMAIL] RE: Revised WLR 278

thanks. looks good. need to clear with Mr. Ross, but I expect he will approve.
Looking again, I noticed one other item: Is it \[\text{(as in EA)}\] or \[\text{(as in the 278 at line 63)}\]?

---

**From:** Director of OGE  
**Sent:** Sunday, January 15, 2017 2:51 PM  
**To:** 'Kassinger, Theodore W.'; Director of OGE; 'Maggi, David (Federal)'; Heather A. Jones  
**Cc:** Schlom, Evan N.; Jacobi, Will (Federal); Keith Labedz; Dorey, David R.; Williams, Gaye (Federal); Warren, Arthur (Federal); Jacob, Dana (Federal); Deborah J. Bortot  
**Subject:** RE: Revised WLR 278

Great. Here’s a clean copy, in case you haven’t already cleaned it up. The deletions created some problems with numbering and page breaks. You can disregard this email if you’ve already done the clean-up yourself, but it’s attached for you convenience. As soon as we hear he’s ok, we’ll preclear and then ask the transition team to authorize us sending it up to the Senate.

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
Here is the draft with the typo that Keith found changed.

From: Kassinger, Theodore W. [mailto:tkassinger@omm.com]
Sent: Sunday, January 15, 2017 2:54 PM
To: Director of OGE; 'Maggi, David (Federal)'; Heather A. Jones
Cc: Schlom, Evan N.; Jacobi, Will (Federal); Keith Labedz; Dorey, David R.; Williams, Gaye (Federal); Warren, Arthur (Federal); Jacob, Dana (Federal); Deborah J. Bortot
Subject: [GRAYMAIL] RE: Revised WLR 278

thanks

From: Director of OGE [mailto:director@oge.gov]
Sent: Sunday, January 15, 2017 2:51 PM
To: Kassinger, Theodore W.; Director of OGE; 'Maggi, David (Federal)'; Heather A. Jones
Cc: Schlom, Evan N.; Jacobi, Will (Federal); Keith Labedz; Dorey, David R.; Williams, Gaye (Federal); Warren, Arthur (Federal); Jacob, Dana (Federal); Deborah J. Bortot
Subject: RE: Revised WLR 278

Great. Here’s a clean copy, in case you haven’t already cleaned it up. The deletions created some problems with numbering and page breaks. You can disregard this email if you’ve already done the clean-up yourself, but it’s attached for you convenience. As soon as we hear he’s ok, we’ll preclear and then ask the transition team to authorize us sending it up to the Senate.

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
Attached is the revised EA. I will be preclearing momentarily.

Here is the draft with the typo that Keith found changed.
All,

Attached is the signed EA. The 278 has been signed electronically in Integrity.gov.

Thanks,

Evan

From: Kassinger, Theodore W.
Sent: Sunday, January 15, 2017 5:28 PM
To: 'Heather A. Jones'; Director of OGE; 'Maggi, David (Federal)'
Cc: Schom, Evan N.; 'Jacobi, Will (Federal)'; Keith Labedz; Dorey, David R.; 'Williams, Gaye (Federal)'; 'Warren, Arthur (Federal)'; 'Jacob, Dana (Federal)'; Deborah J. Bortot
Subject: RE: Revised WLR 278

thanks

From: Heather A. Jones [mailto:hajones@oge.gov]
Sent: Sunday, January 15, 2017 5:20 PM
To: Kassinger, Theodore W.; Director of OGE; 'Maggi, David (Federal)'
Cc: Schom, Evan N.; 'Jacobi, Will (Federal)'; Keith Labedz; Dorey, David R.; 'Williams, Gaye (Federal)'; 'Warren, Arthur (Federal)'; 'Jacob, Dana (Federal)'; Deborah J. Bortot
Subject: RE: Revised WLR 278

Attached is the revised EA. I will be preclearing momentarily.
From: Kassinger, Theodore W.
Sent: Sunday, January 15, 2017 7:00 PM
To: Jacobi, Will (Federal); Maggi, David (Federal); Schlom, Evan N.
Subject: RE: Revised WLR 278

please hold the agreement if it has not been sent on. I just spotted a question and raised with Walt.
can you reprint the signature page without the fax numbers etc at top? I’ve asked Evan to resend a clean one just in case

All,
Attached is the signed EA. The 278 has been signed electronically in Integrity.gov.
Thanks,
Evan

Attached is the revised EA. I will be preclearing momentarily.
Referral to DOC
Yes. For those of you using Word, the easiest way to read the document is to choose the "review" button from the menu, and either save all changes to review a clean document or toggle between "final" and "final showing changes."

On Jan 13, 2017, at 7:42 PM, Kassinger, Theodore W. <tkassinger@omm.com> wrote:

Just in case our firewall removed the redlines:

From: Kassinger, Theodore W.
Sent: Friday, January 13, 2017 7:41 PM
To: Walter M. Shaub; Maggi, David (Federal); Keith Labedz
Cc: Deborah J. Bortot; Heather A. Jones; David J. Apol; Dorey, David R.; Williams, Gaye (Federal); Warren, Arthur (Federal); Jacob, Will (Federal); Jacob, Dana (Federal); Evan Schlom
Subject: RE: Ross-Completion of Comparison of 278 and EA-All Issues Resolved

All-

We realized that we inadvertently omitted two edits to the revised draft EA circulated earlier. These edits are captured in the attached version. They are:

1) [redacted] is deleted from section 7, consistent with our proposed treatment of [redacted] in Section 9.

2) We consolidated references to [redacted], [redacted], and [redacted] to eliminate confusion. At David Maggi's suggestion, we list these as one item where referenced:

Thanks,
Ted

From: Walter M. Shaub [mailto:wmshaub@oge.gov]
Sent: Friday, January 13, 2017 6:35 PM
To: 'Maggi, David (Federal)'; Keith Labedz
Cc: Deborah J. Bortot; Heather A. Jones; David J. Apol; Kassinger, Theodore W.; Dorey, David R.; Williams, Gaye (Federal); Warren, Arthur (Federal); Jacobi, Will (Federal); Jacob, Dana (Federal)
Subject: RE: Ross-Completion of Comparison of 278 and EA-All Issues Resolved

Folks, looks like we’re closing in on this one. Keith is reviewing it now, then Heather and I will take over. We’ll look at it as soon as Keith is done tonight or tomorrow. (David, thanks for your phone number.) We’re going to make this one a high priority to wrap up as soon as we can.

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: Keith Labedz [mailto:klabedz@oge.gov]
Sent: Friday, January 13, 2017 12:47 PM
To: Maggi, David (Federal) <dMaggi@doc.gov>
Cc: Deborah J. Bortot <djborot@oge.gov>; Heather A. Jones <hajones@oge.gov>; Walter M. Shaub <wmshaub@oge.gov>; David J. Apol <djapol@oge.gov>; Kassinger, Theodore W. <tkassinger@omm.com>; Dorey, David R. <ddorey@omm.com>; Williams, Gaye (Federal) <gWilliams@doc.gov>; Warren, Arthur (Federal) <AWarren@doc.gov>; Jacob, Will (Federal) <wjacobi@doc.gov>; Jacob, Dana (Federal) <DJacob@doc.gov>
Subject: RE: Ross-Completion of Comparison of 278 and EA-All Issues Resolved

David,

I have several questions outstanding from my round 5 questions. My review this morning has also noted some issues, and I believe the representatives are double-checking the Part 1 and Part 3 references to ensure that no positions are disclosed in Part 3 that do not appear in Part 1. Whether I get my new questions out before a new draft or not, there will still need to be at least one more round of review at my level before Heather can examine the report. Given all the rounds of edits, I certainly may have missed something.

Once I have a handle on the report and am sure it is stable, I can conduct my own review of the ethics agreement to be sure if matches the finalized report. These steps will take some time (each structural change can add hours to my review as I re-check the endnotes and Parts for consistency). Only then can I send for preclearance review.

Thank you.

Keith
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Thank you.

Folks, looks like we’re closing in on this one. Keith is reviewing it now, then Heather and I will take over. We’ll look at it as soon as Keith is done tonight or tomorrow. (David, thanks for your phone number.) We’re going to make this one a high priority to wrap up as soon as we can.

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
On Jan 13, 2017, at 6:35 PM, Walter M. Shaub <wmshaub@oge.gov> wrote:

Folks, looks like we’re closing in on this one. Keith is reviewing it now, then Heather and I will take over. We’ll look at it as soon as Keith is done tonight or tomorrow. (David, thanks for your phone number.) We’re going to make this one a high priority to wrap up as soon as we can.

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
David,

I cannot access documents via the secure links.

More generally, we are not going to resolve all issues today. The report is unfortunately still in a state of flux, and I cannot turn my attention to the ethics agreement again until the report is stable. Each round of structure changes adds several hours of review as I need to check for inter-Part consistency and track down the endnote references (which sometimes get out of order).

Thank you.
Keith
From: Kassinger, Theodore W. [mailto:tkassinger@omm.com]
Sent: Friday, January 13, 2017 10:45 AM
To: Maggi, David (Federal) <dMaggi@doc.gov>
Cc: Keith Labedz <klabedz@oge.gov>
Subject: RE: Ross-Completion of Comparison of 278 and EA-All Issues Resolved

Thanks. will check (b)(3), (b)(6), I fairly certain. the report would not have (b)(3), (b)(6), I will check on (b)(3), (b)(6) as well. This information just goes to you, David, for your use with the Committee? Or do I send it elsewhere?
Ted
Thanks. I’ll confirm with WLR on sales.

Yes, our goal was to have only [redacted].

From: Walter M. Shaub [mailto:wmshaub@oge.gov]
Sent: Thursday, January 12, 2017 2:30 PM
To: Kassinger, Theodore W.; Deborah J. Bortot; Heather A. Jones; David Maggi; Keith Labedz
Cc: Schlom, Evan N.; Dorey, David R.
Subject: RE: Ross enclosures

Well, there are some readily marketable securities in there. If you can flag those, we should go with 90 days on those.

On a separate but related question, what do you think are remaining now? We’ll take a look at it, but I want to get your take first. Here’s what you wrote in the last draft, but we seem to have whittled things down since then:

[redacted]

Walter M. Shaub, Jr.
Director
U.S. Office of Government Ethics
1201 New York Avenue, NW, Suite 500
Washington, DC 20005-3917
While Mr. Ross expects, as he noted last night, to be able to move quickly on many things, he would like a simple 180 day rule covering all divestitures. He sees the effort as an integrated whole, a massive restructuring and disposition of his business and personal financial life. He came away from the discussion last night with that in mind. Can we make that work?

Thanks

Ted

Can you highlight the items in the divestiture for which you’re seeking 180 days, for example, is one he can divest in 90 days.

Walter M. Shaub, Jr.

Director

U.S. Office of Government Ethics

1201 New York Avenue, NW, Suite 500

Washington, DC 20005-3917
From: Kassinger, Theodore W. [mailto:tkassinger@omm.com]
Sent: Thursday, January 12, 2017 1:41 PM
To: Walter M. Shaub; Deborah J. Bortot; Heather A. Jones; David Maggi; Keith Labedz
Cc: Schloam, Evan N.; Dorey, David R.
Subject: Ross enclosures

All-

As discussed last night, attached are the proposed lists for Enclosures A and B. On B, we note in brackets for discussion purposes the [b](3), (6) associated with each holding. In each case, [b](3), (4), (6).

These lists remain under review, as we continue to scrub the [b](3), (6) to ensure accuracy and completeness. We are checking [b](3), (6) in particular, and may have a correction to the 278 regarding that entry when we update the form to respond to Keith’s most recent round of comments.

Thanks,

Ted

[redacted]

O’Melveny
Theodore W. Kassinger
Partner

fkassinger@omm.com

O: +1-202-383-5170
M: [b](6) [redacted]

O’Melveny & Myers LLP
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Please see below

From: Kassinger, Theodore W. [mailto:tkassinger@omm.com]
Sent: Sunday, January 15, 2017 5:00 PM
To: Heather A. Jones
Cc: Director of OGE
Subject: RE: When do expect to hear from Mr. Ross

appears favorably inclined to the language solution. They want to talk to you at 5pm, however. What they want to hear is

From: Heather A. Jones [mailto:hajones@oge.gov]
Sent: Sunday, January 15, 2017 3:57 PM
To: Kassinger, Theodore W.
Cc: Director of OGE
Subject: RE: When do expect to hear from Mr. Ross

Yes, as long as Mr. Ross is ok with the EA and 278. Just so you know,

From: Kassinger, Theodore W. [mailto:tkassinger@omm.com]
Sent: Sunday, January 15, 2017 3:55 PM
To: Heather A. Jones
Cc: Director of OGE
Subject: RE: When do expect to hear from Mr. Ross

If the call satisfies concerns, could you clear today?

From: Heather A. Jones [mailto:hajones@oge.gov]
Sent: Sunday, January 15, 2017 3:54 PM
To: Kassinger, Theodore W.
Cc: Director of OGE
Subject: RE: When do expect to hear from Mr. Ross

Ted-
Walt is not available until 5. This development makes it unlikely that we will be able to clear today.

Thanks,
Heather

From: Kassinger, Theodore W. [mailto:tkassinger@omm.com]
Sent: Sunday, January 15, 2017 3:46 PM
To: Heather A. Jones
Cc: Walter M. Shaub  
Subject: RE: When do expect to hear from Mr. Ross

Heather,  
I've alerted Walt. We've run into an issue with Reg Brown and WilmerHale would like a call at 4:45pm to discuss. They circulated an invite to Walt that I will forward to you. Apologies for the surprise.

Ted

From: Heather A. Jones [mailto:hajones@oge.gov]  
Sent: Sunday, January 15, 2017 3:40 PM  
To: Kassinger, Theodore W.  
Subject: When do expect to hear from Mr. Ross

Ted-  
I need to run a quick errand but I will wait if you think it will be in the next 30 minutes.

Heather

Heather Jones  
(202) 482-9316  
Office of Government Ethics

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

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what are recent examples of a two year recusal?

From: Heather A. Jones [mailto:hajones@oge.gov]
Sent: Sunday, January 15, 2017 3:47 PM
To: Kassinger, Theodore W.
Cc: Walter M. Shaub
Subject: RE: When do expect to hear from Mr. Ross

Ok, we will talk with you at 4:45

From: Kassinger, Theodore W. [mailto:tkassinger@omm.com]
Sent: Sunday, January 15, 2017 3:46 PM
To: Heather A. Jones
Cc: Walter M. Shaub
Subject: RE: When do expect to hear from Mr. Ross

Heather,

I’ve alerted Walt. We’ve run into an issue with Reg Brown and WilmerHale would like a call at 4:45pm to discuss. They circulated an invite to Walt that I will forward to you.

Apologies for the surprise.

Ted

From: Heather A. Jones [mailto:hajones@oge.gov]
Sent: Sunday, January 15, 2017 3:40 PM
To: Kassinger, Theodore W.
Subject: When do expect to hear from Mr. Ross
Ted-

I need to run a quick errand but I will wait if you think it will be in the next 30 minutes.

Heather

Heather Jones
(202) 482-9316
Office of Government Ethics

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On Jan 15, 2017, at 8:53 PM, Kassinger, Theodore W. <tkassinger@omm.com> wrote:

I will send you clean in a minute

On Jan 15, 2017, at 8:49 PM, Kassinger, Theodore W. <tkassinger@omm.com> wrote:

All-
I approved the change and the agreement as revised to incorporate the change.
We appreciate your quick attention and willingness to resolve this issue.
Your advice is well taken, and Mr. Ross will strive to invest quickly.,
Ted

From: Director of OGE [mailto:director@oge.gov]
Sent: Sunday, January 15, 2017 8:38 PM
To: Kassinger, Theodore W.; 'Maggi, David (Federal)'
Cc: Director of OGE; Heather A. Jones; Keith Labedz
Subject: RE: Ted & David,

Based on Ted’s response below, I’ve gone ahead and amended the ethics agreement. We can live with this on our end, and David says Commerce can too. Based on a telephone call that Ted and I just had, I have merged the two revised pages (pages 2 and 3) with the version he signed and deleted the two corresponding pages in the original. (Note that the Page 3 is revised only in that some of the material previously on Page 2 now appears on Page 3.) I have also attached a one-paragraph document that shows the tracked changes.
Because we’re using his old signature and a new first page, I’ll need an email back from Ted ratifying this change before we can send the package to the Senate.
I just want to reiterate a note of caution that I’ve raised a couple of times in this process. I know I sound like a broken record, but I’ll feel better if I
know I’ve given Wilbur Ross the best guidance I know how to give. It’s this:

The timeframes in this agreement are unusually long. This is fully compliant with 18 USC 208, and he and his representatives have assured OGE and Commerce that he will recuse from as much, and for as long, as he needs to recuse. That’s all we can ask. What I have no ability to do, and insufficient experience in legislative matters to do, is predict what effect the unusual nature of the agreement will have on the Senate with regard to the question of confirmation. From our conversation with him, that sounds like a risk he’s comfortable with taking, and he knows the players far better than we do. I just wanted to have been diligent about flagging the risks, so that he can make an informed decision. Please just give us the green light if you’re good with this agreement. We’ll wait to send it to the Senate until after we hear back from you.

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: Kassinger, Theodore W. [mailto:tkassinger@omm.com]
Sent: Sunday, January 15, 2017 7:40 PM
To: 'Maggi, David (Federal)'
Cc: Director of OGE; Heather A. Jones; Keith Labedz
Subject: RE: we can make that work. if we get any hook at all, I also think he will persuade to come to its senses about this. he wants to sell this stuff asap.

On Jan 15, 2017, at 7:30 PM, Kassinger, Theodore W. <tkassinger@omm.com> wrote:
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: Kassinger, Theodore W. [mailto:tkassinger@omm.com]
Sent: Sunday, January 15, 2017 7:20 PM
To: Walter M. Shaub
Cc: Director of OGE; Heather A. Jones

Subject: RE: [b][3], [6]...b] understood, but he will be working to sell [b][6]...b]...b]...b], and he has up to 180 days for those. he will recuse for two years, voluntarily, from [b][6]...b] matters overall.

From: Walter M. Shaub [mailto:wmshaub@oge.gov]
Sent: Sunday, January 15, 2017 7:22 PM
To: Kassinger, Theodore W.
Cc: Director of OGE; Heather A. Jones

Subject: RE: [b][3], [6]...b] It’s not a drafting issue. We’re concerned about the length of the recusal.

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: Kassinger, Theodore W. [mailto:tkassinger@omm.com]
Sent: Sunday, January 15, 2017 7:23 PM
To: Walter M. Shaub
Cc: Director of OGE; Heather A. Jones; David Maggi (dMaggi@doc.gov); Keith Labedz

Subject: RE: [b][3], [6]...b] The 2-year recusal is much narrower in scope than this recusal. I need a few minutes to research the difference between recusing from [b][6]...b] and recusing from [b][3], [6]...b]

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: Kassinger, Theodore W. [mailto:tkassinger@omm.com]
Sent: Sunday, January 15, 2017 7:27 PM
To: Kassinger, Theodore W.
Cc: Director of OGE; Heather A. Jones; David Maggi (dMaggi@doc.gov); Keith Labedz

Subject: RE: [b][3], [6]...b] is being incredibly difficult about this. got to find a path out of their thicket
Subject: RE: 

Wilmer is checking but says they can't confirm tonight even if company is willing. Unless agrees, then this would be no more than 180 days.

From: Walter M. Shaub [mailto:wmshaub@oge.gov]
Sent: Sunday, January 15, 2017 7:02 PM
To: Kassinger, Theodore W.
Cc: Director of OGE; Heather A. Jones
Subject: RE: 

Well, I think it is clear. It provides for 90-day divestiture. We can consider agreeing to these different terms, but I'll have to talk to David, Heather, and Keith. Also, the divestiture period would have to be more than 180 days, which would really jump off the page and cause a stir on the Hill. He's better off if.

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: Kassinger, Theodore W. [mailto:tkassinger@omm.com]
Sent: Sunday, January 15, 2017 6:59 PM
To: Walter M. Shaub
Cc: Director of OGE; Heather A. Jones
Subject: Re: 

Not clear they can't, but they raised it this afternoon. If we can make the sentence clear tonight please let's do so.

On Jan 15, 2017, at 6:55 PM, Walter M. Shaub <wmshaub@oge.gov> wrote:

Ted,

That provision provides for ... I'm not sure if Heather has already sent the package to the Senate. Can you call ... and find out ...
Walt

From: Kassinger, Theodore W.  
<kassinger@omm.com>

Sent: Sunday, January 15, 2017 6:24 PM

To: Heather A. Jones; David Maggi

Subject: [redacted] question under section 2:

[redacted]

[redacted]

[redacted]

[redacted]

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Here is the EA. Everything else is in the folder

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

Ted & David,

Based on Ted’s response below, I’ve gone ahead and amended the ethics agreement. We can live with this on our end, and David says Commerce can too. Based on a telephone call that Ted and I just had, I have merged the two revised pages (pages 2 and 3) with the version he signed and deleted the two corresponding pages in the original. (Note that the Page 3 is revised only in that some of the material previously on Page 2 now appears on Page 3.) I have also attached a one-paragraph document that shows the tracked changes.

Because we’re using his old signature and a new first page, I’ll need an email back from Ted ratifying this change before we can send the package to the Senate.

I just want to reiterate a note of caution that I’ve raised a couple of times in this process. I know I sound like a broken record, but I’ll feel better if I know I’ve given Wilbur Ross the best guidance I know how to give. It’s this:

The timeframes in this agreement are unusually long. This is fully compliant with 18 USC 208, and he and his representatives have assured OGE and Commerce that he will recuse from as much, and for as long, as he needs to recuse. That’s all we can ask. What I have no ability to do, and insufficient experience in legislative matters to do, is predict what effect the unusual nature of the agreement will have on the Senate with regard to the question of confirmation. From our conversation with him, that sounds like a risk he’s comfortable with taking, and he knows the players far better than we do. I just wanted to have been diligent about flagging the risks, so that he can make an informed decision.

Please just give us the green light if you’re good with this agreement. We’ll wait to send it to the Senate until after we hear back from you.

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
Thanks, I just sent the green light.

On Jan 15, 2017, at 8:38 PM, Director of OGE wrote:

Ted & David,

Based on Ted’s response below, I’ve gone ahead and amended the ethics agreement. We can live with this on our end, and David says Commerce can too. Based on a telephone call that Ted and I just had, I have merged the two revised pages (pages 2 and 3) with the version he signed and deleted the two corresponding pages in the original. (Note that the Page 3 is revised only in that some of the material previously on Page 2 now appears on Page 3.) I have also attached a one-paragraph document that shows the tracked changes.

Because we’re using his old signature and a new first page, I’ll need an email back from Ted ratifying this change before we can send the package to the Senate.

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Please just give us the green light if you’re good with this agreement. We’ll wait to send it to the Senate until after we hear back from you.

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
my expectation is that they will not respond yes or no.

If we add a sentence along the line I suggested earlier...

Would you mind if I emailed Reg? I'm happy to copy you. I won't do it, though, if you think it will make things more difficult for you.

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: Kassinger, Theodore W. [mailto:tkassinger@omm.com]
thanks. is being incredibly difficult about this. got to find a path out of their thicket
Reg,

Heather was literally seconds away from hitting “send” on Mr. Ross’s report to the Senate. We’ve certified his report and cleared the ethics agreement. I think the transition team may have told the Senate that we will be meeting their deadline, which is today, for his report. It’s particularly sensitive because Mr. Ross’s hearing is one of the three hearings they delayed, partly as a result of my letter to the Senate. So, there’s a lot at stake here for Mr. Ross if we miss the deadline and the hearing is postponed again.

From our perspective, at OGE and Commerce, if there is any way you could move heaven and earth to get the guys back in action to make a decision, you will solve what has become a significant problem.

Thanks

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
please do.

From: Director of OGE [mailto:director@oge.gov]  
Sent: Sunday, January 15, 2017 7:38 PM  
To: Kassinger, Theodore W.; Director of OGE  
Cc: Heather A. Jones; David Maggi (dMaggi@doc.gov); Keith Labedz  
Subject: RE: (b)(3), (6)  

Would you mind if I emailed Reg? I’m happy to copy you. I won’t do it, though, if you think it will make things more difficult for you.

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
Thank you. On it.

----- Message from "Heather A. Jones" <hajones@oge.gov> on Sun, 15 Jan 2017 22:21:32 GMT -----

From: "Heather A. Jones" <hajones@oge.gov>
To: "Ann M Donaldson"
Subject: FW: is there a number where I can call you?

This is the changed language at the end of Section 2

From: Heather A. Jones
Sent: Sunday, January 15, 2017 4:38 PM
To: 'Kassinger, Theodore W.'
Subject: RE: is there a number where I can call you?

Current language is:
Is this correct for the change?

From: Heather A. Jones [mailto:hajones@oge.gov]
Sent: Sunday, January 15, 2017 4:01 PM
To: Kassinger, Theodore W.
Subject: is there a number where I can call you?

Heather Jones
(202) 482-9316
Office of Government Ethics

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

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Ok. Thx

On Jan 15, 2017, at 4:38 PM, Heather A. Jones <hajones@oge.gov> wrote:

[Email content]

Rest of email chain partially disclosed above
Yes, I sent Mr. Shaub an invite for that time. Same dial-in and passcode.

--- Original Appointment ---
From: Heather A. Jones [mailto:hajones@oge.gov]  
Sent: Sunday, January 15, 2017 4:23 PM  
To: Raviv, Adam  
Subject: Declined: FW: Call with Counsel re Wilbur Ross  

We can do a call at 5.

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From: Heather A. Jones [mailto:hajones@oge.gov]
Sent: Sunday, January 15, 2017 4:01 PM
To: Kassinger, Theodore W.
Subject: is there a number where I can call you?

Heather Jones
(202) 482-9316
Office of Government Ethics

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On Jan 15, 2017, at 3:18 PM, Heather A Jones <hajones@oge.gov> wrote:

I will change it in Part 3
confidential, or otherwise protected from disclosure under applicable law. If you are not the intended recipient or the employee or agent responsible for delivering the transmission to the intended recipient, you are hereby notified that any dissemination, distribution, copying or use of this email or its contents is strictly prohibited. If you have received this email in error, please notify the sender by responding to the email and then immediately delete the email.
Tim, I see Mike is out of the office. I just checked our website and found that the Ethics Agreements for Mulvaney and Ross are not on the website. Who is handling this? Can you help us or tell me who can? Thanks, Sandy 202-482-9258

FYI. Mulvaney, Ross, McMahon have been added to the website.
The notes have been updated. Thanks.

From: Heather A. Jones  
Sent: Sunday, January 15, 2017 5:49 PM  
To: Keith Labedz  
Subject: Ross notes

There is one thing we need to add, but it does not need to happen until Tuesday. Enjoy a few days of peace.

Heather

Heather Jones  
(202) 482-9316  
Office of Government Ethics

Visit OGE's website: www.oge.gov  
Follow OGE on Twitter: @OfficeGovEthics
Could one of you print this and bring it to Walt?

Thanks

Here’s the update for Walt’s 10am meeting – if that’s still on.
<table>
<thead>
<tr>
<th>Filer</th>
<th>Date Recd</th>
<th>Agency [Position]</th>
<th>Reviewer</th>
<th>Report Progress</th>
<th>Days Pending</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ross, Wilbur</td>
<td>12/21/2016</td>
<td>Department Of Commerce [Secretary]</td>
<td>Keith Labedz</td>
<td>(b) (5)</td>
<td>27</td>
</tr>
</tbody>
</table>
The report is very large now with an extensive change history. If others are in the report at the same time, there may have been a drag updating everything on the certification step.

---

From: Heather A. Jones  
Sent: Sunday, January 15, 2017 6:12 PM  
To: Director of OGE; Keith Labedz  
Subject: RE: something's wrong

It is showing up as signed on my end. I have a certified PDF

---

From: Director of OGE  
Sent: Sunday, January 15, 2017 6:10 PM  
To: Heather A. Jones; Director of OGE; Keith Labedz  
Subject: RE: something's wrong

Any idea why the system is stuck? The wheel keeps spinning and spinning

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: Heather A. Jones  
Sent: Sunday, January 15, 2017 6:09 PM  
To: Walter M. Shaub; Director of OGE  
Subject: RE: something's wrong

I have no idea. Keith is the best bet on that one.

---

From: Walter M. Shaub  
Sent: Sunday, January 15, 2017 6:08 PM  
To: Heather A. Jones; Director of OGE  
Subject: something's wrong

I clicked certify, but the wheel keeps spinning and spinning

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
Can you close and try again?

Any idea why the system is stuck? The wheel keeps spinning and spinning

I have no idea. Keith is the best bet on that one.

I clicked certify, but the wheel keeps spinning and spinnning

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
I have an idea for fixing it. Can you send me the MS Word version?

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

I just realized this is not on letter head.

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
Yes. We’ll have this call, and then you can go. We’ve been working around the clock, and this last minute wrinkle will get sorted out.

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

I’m supposed to [802]. Depending on how the call goes, I’m hoping to go and I can come home to move things when needed. I will have my blackberry with me and you can call me at that number or e-mail me if you need me.

Heather

Heather Jones
(202) 482-9316
Office of Government Ethics

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

Am I correct that the purchase of a Treasury would not be reportable in a periodic transaction report?
Everything we have is on the website. They can help themselves to anything they want. We’re going to stay focused on our work.

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

---

Ok. I called Maggi and we went through the logistics. Commerce is doing a double-check on everything but he said not to wait. As soon as the filer signs, he will certify. The transmittal letter is ready.

Also -- I did not get the full background on this but the committee apparently asked Commerce for copies of ethics agreements going back to the 1990s. He asked whether we had a database of old ethics agreements. I explained our records disposition schedule and noted that ethics agreements should generally be destroyed after the final 278 reaches the end of the retention cycle.

---

Keith, you did OUTSTANDING work on this.

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

---

Keith Labedz
To: Keith Labedz; Director of OGE  
Subject: Re: revised EA

Keith
I can pull it forward and send to Walt so you don't need to sit around and wait. You did great work on this.

Heather

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

From: Keith Labedz  
Sent: Sunday, January 15, 2017 11:05 AM  
To: Heather A. Jones; Director of OGE  
Subject: FW: revised EA

One issue with the next steps is that I will need them to give us some timeline for actions. In the absence of a Blackberry, I would more or less have to sit and watch outlook all day until they decide to approve/submit. That seems inefficient. Alternatively, if not wrapped up by 1:00, I will check in at set times.

From: Director of OGE  
Sent: Sunday, January 15, 2017 10:42 AM  
To: Heather A. Jones; Director of OGE; Deborah J. Bortot; Keith Labedz; Director of OGE  
Subject: RE: revised EA

Sorry, I just got disconnected, so none of you were probably able to dial in. Let’s try this again:

(b) (6)

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: Heather A. Jones  
Sent: Sunday, January 15, 2017 10:40 AM  
To: Director of OGE; Deborah J. Bortot; Keith Labedz; Director of OGE  
Subject: Re: revised EA

What number are we using?
Ive opened the line now

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

I just got off my 10:00 call. Do we have a call schedule for this or is the next call at 11:45 on Megan’s report?
Thanks, Keith. I’ll send you an update. We’ll also get you a blackberry next time you’re in DC.

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: Keith Labedz
Sent: Sunday, January 15, 2017 11:06 AM
To: Heather A. Jones; Director of OGE
Subject: FW: revised EA

One issue with the next steps is that I will need them to give us some timeline for actions. In the absence of a Blackberry, I would more or less have to sit and watch outlook all day until they decide to approve/submit. That seems inefficient. Alternatively, if not wrapped up by 1:00, I will check in at set times.
no

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

Do you need me on this call or should I keep working on Megan’s report?

Ive opened the line now

At 11

Sent from my BlackBerry 10 smartphone on the Verizon Wireless 4G LTE network.
Subject: RE: revised EA

I just got off my 10:00 call. Do we have a call schedule for this or is the next call at 11:45 on Megan’s report?
What’s the call in number for the 11:00 call?

At 11

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

I just got off my 10:00 call. Do we have a call schedule for this or is the next call at 11:45 on Megan’s report?
Can the date be centered with the "Sincerely"?

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

-----Original Message-----
From: Heather A. Jones
Sent: Sunday, January 15, 2017 12:44 AM
To: Director of OGE
Subject: Emailing: Ross, Wilbur L. finalsenateltr (unsigned).pdf

Your message is ready to be sent with the following file or link attachments:

Ross, Wilbur L. finalsenateltr (unsigned).pdf

Note: To protect against computer viruses, e-mail programs may prevent sending or receiving certain types of file attachments. Check your e-mail security settings to determine how attachments are handled.
Hi Sandy, if you don’t mind, do you think you could post Mr. Ross’s OGE package on OGE’s website today? We find it helpful to refer the media and interested staff to your website for this information.

Best,
Jason Van Beek
General Counsel
Chairman John Thune (R-SD)
U.S. Senate Commerce Committee
512 Dirksen Senate Office Building
Washington, DC 20510
thanks

From: Walter M. Shaub [mailto:wmshaub@oge.gov]
Sent: Monday, January 16, 2017 9:38 AM
To: Kassinger, Theodore W.; Heather A. Jones; David Maggi (dMaggi@doc.gov)
Subject: Senate Docs

Ted,

Here are the 278 and EA we sent to the Senate.

Walt

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From: Deborah J. Bortot
To: Teresa L. Williamson
Cc: Heather A. Jones; Sandra S. Mabry
Subject: RE: Hard copy of paperwork for Senate
Date: Monday, January 16, 2017 9:32:03 AM

That’s great. Thanks!

---

From: Teresa L. Williamson
Sent: Monday, January 16, 2017 9:26 AM
To: Deborah J. Bortot
Subject: Re: Hard copy of paperwork for Senate

I will talk to Rod tomorrow to get him to make the packages. If he's not there I'll reach out to Kaneisha to have her have one if her staff do it and include instructions.

I can print the packages from here and send it to the nominee room printer.

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

---

From: Deborah J. Bortot
Sent: Monday, January 16, 2017 8:39 AM
To: Teresa L. Williamson
Cc: Heather A. Jones; Sandra S. Mabry
Subject: Hard copy of paperwork for Senate

Teresa,

Who is preparing the hard copy packages for Mulvaney and Ross?

Thanks,

Deb
On Jan 16, 2017, at 8:43 AM, Deborah J. Bortot <djbortot@oge.gov> wrote:

From: Teresa L. Williamson
Sent: Sunday, January 15, 2017 9:41 PM
To: 'Jason vanbeek@commerce.senate.gov'
Cc: Deborah J. Bortot; Sandra S. Mabry; Rodrick T. Johnson; Heather A. Jones; 'adonaldson@jonesday.com'
Subject: Public Financial Disclosure Report of Wilbur L. Ross

Good Evening,

I’ve attached the financial disclosure package for Wilbur L. Ross. President-Elect Trump has announced his intention to nominate Mr. Ross for the position of Secretary, Department of Commerce.

The hard copy of the attached documents will be placed at OGE reception for pick up by a Senate rider page per our agreement. If you have any questions, please contact Teresa Williamson @ 202-482-9283.

Please respond to this message to confirm receipt of the attached package, and please let me know in your response whether you will send a Senate rider page.

Thanks!

Teresa Williamson
Presidential Nominations Branch
U.S. Office of Government Ethics
1201 New York Avenue, NW - Suite 500
Washington, DC 20005
202-482-9283

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the individual or entity to which it is addressed. This email also may contain information that is privileged, confidential, or otherwise protected from disclosure under applicable law. If you are not the intended recipient or the employee or agent responsible for delivering the transmission to the intended recipient, you are hereby notified that any dissemination, distribution, copying or use of this email or its contents is strictly prohibited. If you have received this email in error, please notify the sender by responding to the email and then immediately delete the email.

<ROSS, Wilber L. finalsenateltr.pdf>

<Ross Wilbur L. Final 278.pdf>

<Ross, Wilbur L finalEA.PDF>
From: Teresa L. Williamson
Sent: Sunday, January 15, 2017 9:41 PM
To: [b (6)] - Ann Donaldson email
Cc: Deborah J. Bortot; Heather A. Jones; Heather A. Jones
Subject: Public Financial Disclosure Report of Wilbur L. Ross

Good Evening,

I’ve attached the financial disclosure package for Wilbur L. Ross. President-Elect Trump has announced his intention to nominate Mr. Ross for the position of Secretary, Department of Commerce.

The hard copy of the attached documents will be placed at OGE reception for pick up by a Senate rider page per our agreement. If you have any questions, please contact Teresa Williamson @ 202-482-9283.

Please respond to this message to confirm receipt of the attached package, and please let me know in your response whether you will send a Senate rider page.

Thanks!

Teresa Williamson
Presidential Nominations Branch
U.S. Office of Government Ethics
1201 New York Avenue, NW - Suite 500
Washington, DC 20005
202-482-9283
January 15, 2017

The Honorable John Thune
Chairman
Committee on Commerce, Science, and Transportation
United States Senate
Washington, DC  20510

Dear Mr. Chairman:

In accordance with the Ethics in Government Act of 1978, I enclose a copy of the financial disclosure report filed by Wilbur L. Ross. President-Elect Trump has announced his intention to nominate Mr. Ross for the position of Secretary, Department of Commerce.

We have reviewed the report and have obtained advice from the agency concerning any possible conflict in light of its functions and the nominee’s proposed duties. Also enclosed is an ethics agreement outlining the actions that the nominee will undertake to avoid conflicts of interest. Unless a date for compliance is indicated in the ethics agreement, the nominee must fully comply within three months of confirmation with any action specified in the ethics agreement.

Based thereon, we believe that this nominee is in compliance with applicable laws and regulations governing conflicts of interest.

Sincerely,

Walter M. Shaub, Jr.
Director

Enclosures
David,

With OGE’s letter, the report and the EA to the Commerce Committee last night at 9:41 pm.

I’ll forward you the email we sent.

Thanks,
Deb
Subject: Re: Mr. Wilbur Ross confirmation documents

Jim:

Thanks for sending. Do you know whether the 278 and OGE letter are also complete?

Chris

Sent from my iPhone
thank you, Heather, Keith, David.
It's a very strong agreement, and we appreciate the long hours you've put into it.
Can someone send us a copy of what actually went to the Senate - the 278 and agreement? I know we can pull both, but just in case....

On Jan 15, 2017, at 10:18 PM, "Walter M. Shaub" <wmshaub@oge.gov> wrote:

The package is now with the Senate. Thanks for your work on this everyone!

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

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notify the sender by responding to the email and then immediately delete the email.
Thank you

From: Teresa L. Williamson
Sent: Sunday, January 15, 2017 9:42 PM
To: Heather A. Jones; Deborah J. Bortot
Subject: RE: Wilbur Ross - Senate and OGE documents

I bcc’d walt at director’s email address. Have a good night!

From: Heather A. Jones
Sent: Sunday, January 15, 2017 9:41 PM
To: Deborah J. Bortot; Teresa L. Williamson
Subject: Re: Wilbur Ross - Senate and OGE documents

Yes. Teresa is sending now

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

From: Deborah J. Bortot
Sent: Sunday, January 15, 2017 9:40 PM
To: Heather A. Jones; Teresa L. Williamson
Subject: Fw: Wilbur Ross - Senate and OGE documents

Heather, Is this the new EA?
Sent from my BlackBerry 10 smartphone on the Verizon Wireless 4G LTE network.
Good Evening,

I’ve attached the financial disclosure package for Wilbur L. Ross. President-Elect Trump has announced his intention to nominate Mr. Ross for the position of Secretary, Department of Commerce.

The hard copy of the attached documents will be placed at OGE reception for pick up by a Senate rider page per our agreement. If you have any questions, please contact Teresa Williamson @ 202-482-9283.

Please respond to this message to confirm receipt of the attached package, and please let me know in your response whether you will send a Senate rider page.

Thanks!

Teresa Williamson
Presidential Nominations Branch
U.S. Office of Government Ethics
1201 New York Avenue, NW - Suite 500
Washington, DC 20005
202-482-9283
Heather, Is this the new EA?

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

Referral to DOC
Thanks

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

From: Walter M. Shaub [mailto:wmshaub@oge.gov]
Sent: Sunday, January 15, 2017 9:18 PM
To: Kassinger, Theodore W.; David Maggi; Jacobi, Will (Federal) (wjacobi@doc.gov); Heather A. Jones; Keith Labedz
Cc: Schlom, Evan N.; Dorey, David R.
Subject: Re:

Thanks. This works. Can you confirm that you're ok with us sending this one to the Senate? I need an express authorization.

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

From: Kassinger, Theodore W.
Sent: Sunday, January 15, 2017 9:12 PM
To: Walter M. Shaub; David Maggi; Jacobi, Will (Federal) (wjacobi@doc.gov); Heather A. Jones; Keith Labedz
Cc: Schlom, Evan N.; Dorey, David R.
Subject: RE:

Yes, we agree.

Will was just trying to get a copy of what you sent with a signature page without the fax headers showing. I sent the attached, which is your document with a clean signature page.
spliced in, but if you can create and send, all the better.

From: Walter M. Shaub [mailto:wmshaub@oge.gov]
Sent: Sunday, January 15, 2017 9:10 PM
To: Kassinger, Theodore W.; David Maggi; Jacobi, Will (Federal) (wjacobi@doc.gov); Heather A. Jones; Keith Labedz
Cc: Schlom, Evan N.; Dorey, David R.
Subject: RE:

I’m not sure what this document is. I just need a green light on the document I sent, unless there’s a concern.

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: Kassinger, Theodore W. [mailto:tkassinger@omm.com]
Sent: Sunday, January 15, 2017 8:54 PM
To: David Maggi; Jacobi, Will (Federal) (wjacobi@doc.gov); Walter M. Shaub; Heather A. Jones; Keith Labedz
Cc: Schlom, Evan N.; Dorey, David R.
Subject: OGE Confidential Notice: This email, including all attachments, may constitute a Federal
record or other Government property that is intended only for the use of the individual or entity to which it is addressed. This email also may contain information that is privileged, confidential, or otherwise protected from disclosure under applicable law. If you are not the intended recipient or the employee or agent responsible for delivering the transmission to the intended recipient, you are hereby notified that any dissemination, distribution, copying or use of this email or its contents is strictly prohibited. If you have received this email in error, please notify the sender by responding to the email and then immediately delete the email.

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From: Teresa L. Williamson  
To: Heather A. Jones  
Subject: Re: I'm on my way home  
Date: Sunday, January 15, 2017 9:28:44 PM

completely up to you. I was able to get the fax stuff off the top of page 7. It's saved to the N drive. There are two transmittal letters. One ending in pdf and one ending in doxt.pdf. I'm assuming since they both look the same the. Pdf is the right one

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

From: Heather A. Jones  
Sent: Sunday, January 15, 2017 9:21 PM  
To: Teresa L. Williamson  
Subject: I'm on my way home

Want me to take over?  
Sent from my BlackBerry 10 smartphone on the Verizon Wireless 4G LTE network.
From: Teresa L. Williamson
To: Heather A. Jones
Subject: Re:
Date: Sunday, January 15, 2017 9:21:43 PM

OK. Can we go with the corrected page 7 inserted?

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

From: Heather A. Jones
Sent: Sunday, January 15, 2017 9:20 PM
To: Teresa L. Williamson
Subject: Re:

We are waiting for authorization now

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

From: Teresa L. Williamson
Sent: Sunday, January 15, 2017 9:19 PM
To: Heather A. Jones
Subject: Re:

I'm trying but I'm not sure I can do it.

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

From: Heather A. Jones
Sent: Sunday, January 15, 2017 9:14 PM
To: Teresa L. Williamson
Subject: Fw:

Walt is worried about changes. Can you just remove the fax line from what he sent

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

From: Walter M. Shaub <wmshaub@oge.gov>
Sent: Sunday, January 15, 2017 9:10 PM
To: 'Kassinger, Theodore W.'; David Maggi; Jacobi, Will (Federal) (wjacobi@doc.gov); Heather A. Jones; Keith Labedz
Cc: Schlom, Evan N.; Dorey, David R.
Subject: RE:

I’m not sure what this document is. I just need a green light on the document I sent, unless there’s a concern.

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
From: Kassinger, Theodore W. [mailto:tkassinger@omm.com]
Sent: Sunday, January 15, 2017 8:54 PM
To: David Maggi; Jacobi, Will (Federal) (wjacobi@doc.gov); Walter M. Shaub; Heather A. Jones; Keith Labedz
Cc: Schlom, Evan N.; Dorey, David R.
Subject: Signature page to EA, available online
I’m not sure what this document is. I just need a green light on the document I sent, unless there’s a concern.
under applicable law. If you are not the intended recipient or the employee or agent responsible for delivering the transmission to the intended recipient, you are hereby notified that any dissemination, distribution, copying or use of this email or its contents is strictly prohibited. If you have received this email in error, please notify the sender by responding to the email and then immediately delete the email.
Will was just trying to get a copy of what you sent with a signature page without the fax headers showing. I sent the attached, which is your document with a clean signature page spliced in, but if you can create and send, all the better.

I’m not sure what this document is. I just need a green light on the document I sent, unless there’s a concern.

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
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From: Kassinger, Theodore W. <tkassinger@omm.com>
Sent: Sunday, January 15, 2017 8:54 PM
To: Maggi, David (Federal); Jacobi, Will (Federal); Walter M. Shaub (wmshaub@oge.gov); Heather A. Jones (hajones@oge.gov); Keith Labedz
Cc: Schlom, Evan N.; Dorey, David R.
Subject: Signature page to EA; EA available at https://extapps2.oge.gov/201/Presiden.nsf/PAS%20Index?OpenView
we are waiting for Mr. Ross’s signature page.

Please send the EA and your letter saying all conflicts have been resolved to me and I will get everything up to the Senate.
Okay. so I don't have to notify David then?

-----Original Message-----
From: Heather A. Jones
Sent: Sunday, January 15, 2017 5:55 PM
To: Deborah J. Bortot; Teresa L. Williamson
Cc: Keith Labedz
Subject: RE: Mr. Wilbur Ross

Yes, he has signed and it is with David Maggi.

-----Original Message-----
From: Deborah J. Bortot
Sent: Sunday, January 15, 2017 5:55 PM
To: Teresa L. Williamson
Cc: Heather A. Jones; Keith Labedz
Subject: FW: Mr. Wilbur Ross

-----Original Message-----
From: Ann M Donaldson [mailto:]
Sent: Sunday, January 15, 2017 5:44 PM
To: Deborah J. Bortot; Heather A. Jones
Subject: Mr. Wilbur Ross

On behalf of the President-Elect, this email serves as confirmation that the President-Elect intends to nominate Mr. Wilbur Ross to be Commerce Secretary. Please transmit his pre-cleared 278 report to the appropriate Senate committee.

Ann M. Donaldson
Associate
JONES DAY® - One Firm Worldwide
51 Louisiana Avenue, NW
Washington, DC 20001
Office +151520001
On Jan 15, 2017, at 5:48 PM, Heather A. Jones <hajones@oge.gov> wrote:

All-
We have received authorization from the President-Elect to send the paperwork to the Senate. Please ask Mr. Ross to certify and sign the EA.

Thanks,
Heather

Heather Jones
(202) 482-9316
Office of Government Ethics

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

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Thanks, let me know when I should go in and sign.

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

Heather A. Jones
Sent: Sunday, January 15, 2017 5:48 PM
To: 'Kassinger, Theodore W.'; Maggi, David (Federal)
Cc: 'Jacobi, Will (Federal)'; 'Schlom, Evan N.'; Keith Labedz; Director of OGE
Subject: Please ask Mr. Ross to certify to 278 and sign the EA

All-
We have received authorization from the President-Elect to send the paperwork to the Senate. Please ask Mr. Ross to certify and sign the EA.

Thanks,
Heather

Heather Jones
(202) 482-9316
Office of Government Ethics

Visit OGE's website: www.oge.gov
Follow OGE on Twitter: @OfficeGovEthics
Dave, we’ll need you to certify and then send the cover letter to us ASAP. We’re going to try to get this to the hill tonight.

Walter M. Shaub, Jr.
Director
U.S. Office of Government Ethics
1201 New York Avenue, NW, Suite 500
Washington, DC 20005-3917
If you need me, you can call me anytime at [redacted]. I’ll send you the signed letter in a minute. Then, just send me an email when you want me to certify.

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

Annie, Wilbur Ross is precleared. I have attached the ethics agreement.

Thanks!
Heather

Heather Jones
(202) 482-9316
Office of Government Ethics

Visit OGE’s website: www.ogle.gov
Follow OGE on Twitter: @OfficeGovEthics
Annie, Wilbur Ross is precleared. I have attached the ethics agreement.

Thanks!
Heather

Heather Jones
(202) 482-9316
Office of Government Ethics

Visit OGE’s website: www.oge.gov
Follow OGE on Twitter: @OfficeGovEthics
I made the changes
Sorry about the confusion. Apparently [b](a), [b](6) did not get involved until this afternoon.

Sent from my BlackBerry 10 smartphone on the Verizon Wireless 4G LTE network.
We’re in a holding pattern. David and I are going back and forth with Ted. Question: How does “Reg” sign his emails --- Reg?

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

It is down the chain

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

Yes. I can't put the date in until we hear from the PTT. Thanks for everything

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

----- Message from "Heather A. Jones" <hajones@oge.gov> on Sun, 15 Jan 2017 20:49:16 GMT -----

From: "Heather A. Jones" <hajones@oge.gov>
To: "Ann M Donaldson"
Subject: RE: We are just waiting for Mr. Ross' Approval

Apparently [b](3), [6] has an issue.

---

From: Heather A. Jones
Sent: Sunday, January 15, 2017 3:15 PM
To: 'Ann M Donaldson'
Subject: RE: We are just waiting for Mr. Ross' Approval

Here is the draft that is with Mr. Ross

---

From: Ann M Donaldson [mailto] (b) (6)
Sent: Sunday, January 15, 2017 3:06 PM
To: Heather A. Jones
Subject: RE: We are just waiting for Mr. Ross' Approval

Great. We should be able to move quickly. Is there a currebt draft EA we can go ahead and review understanding that if he has any changes from the current version, we will re-review?

Thanks,
Annie
Annie-

Just wanted you to know we are waiting for Mr. Ross’ approval before we preclear. We hope it will come in the next couple of minutes. How much time do you think you will need before you can authorize?

Thanks,
Heather

Heather Jones
(202) 482-9316
Office of Government Ethics

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

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Keith, I’m confused by your comment. Let’s have a quick call. I’ll open the line now, and everyone can call:

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

The EA looks ok to me except that [REDACTED] from Section 8 does not appear in the Attachment. My guess is that it should be Attachment B. Once they agreed to the revisions, I will build the EA tracking sheet in FDTS.

I’m good with all of the changes and believe we have resolved the outstanding questions.

Yes. Go to sleep
From: Heather A. Jones  
Sent: Sunday, January 15, 2017 12:40 AM  
To: Keith Labedz; Director of OGE  
Cc: Deborah J. Bortot  
Subject: RE: revised EA

Ok, I’m going to look at it with fresh eyes in the morning

From: Walter M. Shaub  
Sent: Sunday, January 15, 2017 12:37 AM  
To: Heather A. Jones; Keith Labedz  
Cc: Deborah J. Bortot  
Subject: revised EA

Heather & Keith,

I have finished my review of the Ross agreement submitted for preclearance. I made some edits to the ethics agreement, including some of my own and some of Keith’s suggested language.

The 278 looks good too. I did not cross-reference each item with the EA or between sections to ensure consistency, as I assume you’ve done that. However, the report looks good from a substantive standpoint. (Let me know if there were any items you wanted me to take an especially hard look at, or any outstanding questions.)

I reviewed the letter the filer sent regarding his name, and it looks fine. Be sure to save that to FDTS.

I also reviewed Keith’s notes, which look very good. I made a few edits for clarity, nothing substantive. Keith, I used tracked changes, so you can reject any of the suggestions you don’t like.

Here’s what I think needs to be done:

1. I’ll send an email to Kassinger and Commerce tonight letting them know where things stand.
2. Heather and Keith, please go through the revised ethics agreement to see whether you think I’ve captured everything and whether you have any concerns or comments.
3. Heather please confirm for me that I’ve addressed all of the outstanding questions from you and Keith.
4. If we could have one final call among us, just to make sure we’re all on the same page, that would be helpful. 11:00 EST might be late enough for Keith to join in. (Keith, if you’re up and
ready sooner than that out there in Chicago, just shoot us an email, and we can set up the call for an earlier time.)

5. After we talk, I’ll send the revised EA to Kassinger and Commerce.

6. Go ahead and work up the cover letter right away, so we’ll be ready to transmit. Type the date (January 15, 2017) into the text of the letter. Then, save the cover letter as a PDF. I’ll sign using my electronic signature. (I just tested the signature on a test document, and it worked fine.)

7. As soon as we come to final agreement, Heather can preclear.

8. Then, we’ll need the filer and Commerce to move quickly to sign the EA and certify the report.

9. Next, I’ll certify it.

10. Then, we’ll send to Senate. (Heather, you should try to get Teresa to do that for you, so we can turn to DeVos and try to help with that report.)

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
I think Walt wants us to talk first

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

I can speak now if we still need the call. Should we tell OMM that we’re now just waiting on them?

The EA looks ok to me except that [redacted] from Section 8 does not appear in the Attachment. My guess is that it should be Attachment B. Once they agreed to the revisions, I will build the EA tracking sheet in FDTS.

I’m good with all of the changes and believe we have resolved the outstanding questions.

Yes. Go to sleep

Walter M. Shaub, Jr.
Director
U.S. Office of Government Ethics
1201 New York Avenue, NW, Suite 500
Washington, DC 20005-3917
Ok, I’m going to look at it with fresh eyes in the morning
Rest of email chain partially disclosed above
I’m working on Megan’s report right now. Do you need anything from me on this one, if not I’ll keep working on the other report?

From: Heather A. Jones  
Sent: Sunday, January 15, 2017 9:48 AM  
To: Director of OGE; Keith Labedz  
Cc: Deborah J. Bortot  
Subject: RE: revised EA

I’m good with all of the changes and believe we have resolved the outstanding questions.

From: Director of OGE  
Sent: Sunday, January 15, 2017 12:50 AM  
To: Heather A. Jones; Keith Labedz; Director of OGE  
Cc: Deborah J. Bortot  
Subject: RE: revised EA

Yes. Go to sleep

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
One more thing, we have to wait for PTT to give the ok before we have him certify. I asked Ted to reach out to the PTT and I e-mailed Annie separately so she will be on the look-out.

---

I have finished my review of the Ross agreement submitted for preclearance. I made some edits to the ethics agreement, including some of my own and some of Keith’s suggested language.

The 278 looks good too. I did not cross-reference each item with the EA or between sections to ensure consistency, as I assume you’ve done that. However, the report looks good from a substantive standpoint. (Let me know if there were any items you wanted me to take an especially hard look at, or any outstanding questions.)

I reviewed the letter the filer sent regarding his name, and it looks fine. Be sure to save that to FDTS.

I also reviewed Keith’s notes, which look very good. I made a few edits for clarity, nothing substantive. Keith, I used tracked changes, so you can reject any of the suggestions you don’t like.

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3. Heather please confirm for me that I’ve addressed all of the outstanding questions from you and Keith.
4. If we could have one final call among us, just to make sure we’re all on the same page, that would be helpful. 11:00 EST might be late enough for Keith to join in. (Keith, if you’re up and ready sooner than that out there in Chicago, just shoot us an email, and we can set up the call for an earlier time.)
5. After we talk, I’ll send the revised EA to Kassinger and Commerce.
6. Go ahead and work up the cover letter right away, so we’ll be ready to transmit. Type the date (January 15, 2017) into the text of the letter. Then, save the cover letter as a PDF. I’ll sign using my electronic signature. (I just tested the signature on a test document, and it worked fine.)
7. As soon as we come to final agreement, Heather can preclear.
8. Then, we’ll need the filer and Commerce to move quickly to sign the EA and certify the
9. Next, I’ll certify it.
10. Then, we’ll send to Senate. (Heather, you should try to get Teresa to do that for you, so we can turn to DeVos and try to help with that report.)

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
I think we may have Ross for you later today. We have been told that the Committee wants it by the end of the day

Thanks
Heather
Sent from my BlackBerry 10 smartphone on the Verizon Wireless 4G LTE network.
Ok. Thank

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

If we resolve the questions below and your ok with the name letter

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

So, Heather, just to confirm. You recommend preclearance at this point, unless I find something?

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Yes. I can't put the date in until we hear from the PTT. Thanks for everything

Sent from my BlackBerry 10 smartphone on the Verizon Wireless 4G LTE network.
Ok. Submitted. I also added the committee. Once precleared, a placeholder date would be needed in the “Nominated” field on the General Information page. Preclearance + completing that field allows the filer to file officially.

(I am logging off. If needed, I’ll have my cell nearby: [covering phone number])

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I think yes since issues are really with the EA

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

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I saved a “for preclearance” version of the 278 to your folder within the filer’s folder. The only difference from the earlier version are two end date corrections based on the EA review. I verified, via Change History, that no further updates have been made. Should I forward the report up to the program manager step so that, if appropriate, the report can be precleared without a pull-forward action?

---

Yes, unless they have confirmed that the value is zero.

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From: Heather A. Jones
Sent: Saturday, January 14, 2017 8:50 PM
To: Keith Labedz; Director of OGE
Subject: RE: question
And I did part 1.

One more specific question:
There are 4 items on the divesture list in the EA that are not on the 278 because the value is below the reporting threshold. Should we keep them in the EA?

From: Keith Labedz  
Sent: Saturday, January 14, 2017 8:48 PM  
To: Heather A. Jones; Director of OGE  
Subject: RE: question

Although moving too fast for comfort, I think I’ve reconciled Parts 2, 5, 6 v. the ethics agreement. I know the report is internally consistent at this point.

From: Heather A. Jones  
Sent: Saturday, January 14, 2017 8:44 PM  
To: Director of OGE; Keith Labedz  
Subject: RE: question

Walt-
Here is where I think we are:

- I made some edits to the 4:45 OMM version of the EA. They are saved on the N Drive in this doc: Ross Ethics Agreement 1-14 6pm (OGE edits). My changes are redlined.
- OMM made the following changes:
  - Section 2
    - §(b)(3), (4), (5), (6)
Keith made the following point:

1. Are we ok with the EA saying:

Keith’s thoughts:

---

From: Walter M. Shaub  
Sent: Saturday, January 14, 2017 8:37 PM  
To: Keith Labedz; Heather A. Jones  
Subject: question

Am I looking at this for preclearance at this point, or are there outstanding questions still pending?

Walt

Walter M. Shaub, Jr.  
Director
Yes. I have a 10:00 call and will be on the 11:45 call that Heather mentioned, but should be available at 11:00.

Yes, we have a conference call on DeVos at 11:45.

Thanks. I’ll look things over. Would any of you be available for a conference call tomorrow morning? We could do 11:00 since Keith is an hour behind.

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Made the changes re the second paragraph and will wait to hear from Walt on the first.
From: Heather A. Jones  
Sent: Saturday, January 14, 2017 7:54 PM  
To: Keith Labeledz; Director of OGE  
Cc: Deborah J. Bortot; David J. Apol  
Subject: Re Ross Positions

Are we ok with the EA saying:

- Positions on the report but not in the EA (Are these all positions Keith?):

Heather Jones  
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Office of Government Ethics

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I think the report is ok at this point assuming the final piece of EA v. 278 reconciliation does not uncover a 278 issue. So far, the problems seem to be with the EA. I’ve also more or less accounted for Part 2.

Am I looking at this for preclearance at this point, or are there outstanding questions still pending?

Walt

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They haven’t signaled any changes since the last pass-back and this version answers my two open questions.

Do you think we have reached a stable 278 draft?

I have updated my technical notes and added a brief COI discussion. In terms of next steps, the email last night suggested I would pass the EA off once we had a stable 278 draft. I will keep working a bit; however, I’ll stop at 6:00. If I’m needed, please call. I will be at home but I do not always hear the office line. I’ll keep the cell phone close.

Thanks.

We have two versions with different language in the section. They are in the N drive folder ready for review.

Heather Jones
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Office of Government Ethics

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Ok. I tried a different approach to the entities (#2 on shared drive) but I do not know if that quite works. I guess we are also waiting on a revision from the representatives. Maybe we then forward both up the chain to see which approach (if either) looks promising.

You can see my edits in a KL-HAJ document in the folder.

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