

From: [Sandra S. Mabry](#)
To: [Teresa L. Williamson](#)
Subject: RE: OGE Reports for Trump Nominees
Date: Monday, December 19, 2016 6:31:10 PM

I spoke to him this afternoon. Sandy

From: Teresa L. Williamson
Sent: Monday, December 19, 2016 3:14 PM
To: Sandra S. Mabry
Subject: FW: OGE Reports for Trump Nominees

HEALTH

Committee

(b) (6)

Chung Shek (chief clerk)

(b) (6)

(b) (6)

Liz Hackett (deputy clerk)

(b) (6)

From: Shek, Chung (HELP Committee) (b) (6)
Sent: Monday, December 19, 2016 1:42 PM
To: Teresa L. Williamson
Subject: OGE Reports for Trump Nominees

Hey Teresa,

Wanted to check in to see if there was a status on the OGE reports for any of the upcoming Trump nominees. We're looking for Price, DeVos, and Puzder.

Thanks!
Chung

From: Teresa L. Williamson [mailto:tlwillia@oge.gov]

Sent: Tuesday, December 20, 2016 1:55 PM

To: Shapiro, Robert - SOL; Sadler, Rob - SOL

Subject: Points of Contact for Nominee Packages

Importance: High

Good Afternoon,

I hope you are both doing well. We want to make sure we have a point of contact during the holidays on any new nominees that come in. Would you please provide contact information for staff from your office that will be working on the nominee packages over the next few weeks.

Thanks!

Teresa

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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From: LNAPPS1.USOGE@oge.gov
To: [Elaine Newton](#)
Subject: IMPORTANT - ACTION NEEDED - New Nominee Assigned - Begin Review & Send 1st Set of Comments - Andrew F Puzder
Date: Monday, January 09, 2017 10:28:13 AM

Nominee, Andrew F Puzder, has been assigned to you.

ACTION: Within 2 days, please begin your review of the report and send the first set of comments/questions to the agency (by email or phone). If you need additional time, please contact Teresa or Deb.

Please log completion of this step into FDTS by entering a date and then clicking the forward routing button to save and mark this step complete.

Remember to add a new Progress Report for this nominee and update the progress at the end of each week until the report and EA have been precleared.

The link below will take you to the FDTS record.

Nonresponsive network information

From: [Teresa L. Williamson](#)
To: [Sandra S. Mabry](#)
Subject: FW: OGE Reports
Date: Thursday, January 12, 2017 11:05:31 AM

Hi Sandy, See Chung's email below. I figure we have one voice from OGE to the committee on questions on the status of reports and I'm assuming that's your voice☺ Let me know if I should be calling, I'd be happy to do so.

Thanks
Teresa

From: Shek, Chung (HELP Committee) (b) (6)]
Sent: Thursday, January 12, 2017 11:03 AM
To: Teresa L. Williamson
Subject: OGE Reports

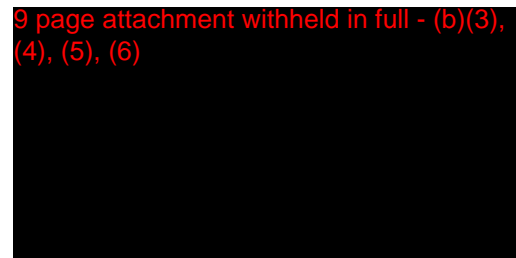
Hey Teresa,

Are there any updates as to when we might be getting OGE reports for Price, DeVos, and Puzder?

Thanks!
Chung

From: [Elaine Newton](#)
To: [Seth Jaffe](#)
Subject: Nominee Notes
Date: Thursday, January 12, 2017 2:28:13 PM
Attachments: [Puzder Notes \(1-11-17\).docx](#)

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



From: [Deborah J. Bortot](#)
To: [Seth Jaffe](#)
Cc: [Elaine Newton](#)
Subject: RE: Puzder
Date: Monday, January 16, 2017 6:23:07 PM

Thank you

From: Seth Jaffe
Sent: Monday, January 16, 2017 6:12 PM
To: Deborah J. Bortot
Cc: Elaine Newton
Subject: Re: Puzder

Deborah,

I don't have an update after the last update Elaine put in AIMS.

We provided an extensive list of questions last week and the agency is actively involved with the report and COI analysis. Exactly where we are will depend on the answers to the questions. (b) (5)

[REDACTED]

[REDACTED]

[REDACTED]

I hope this helps
Seth

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

From: Deborah J. Bortot
Sent: Monday, January 16, 2017 10:32 AM
To: Elaine Newton; Seth Jaffe
Cc: Heather A. Jones
Subject: Puzder

How is the report coming along?

From: [Deborah J. Bortot](#)
To: [Jack MacDonald](#); [Sandra S. Mabry](#)
Subject: FW: Nominee progress Jan 17
Date: Tuesday, January 17, 2017 10:13:56 AM
Attachments: [Financial Disclosure Tracking System \(FDTS\)-Progress Reports Consolidated \(12\).xlsb](#)
Importance: High

Could one of you print this and bring it to Walt?

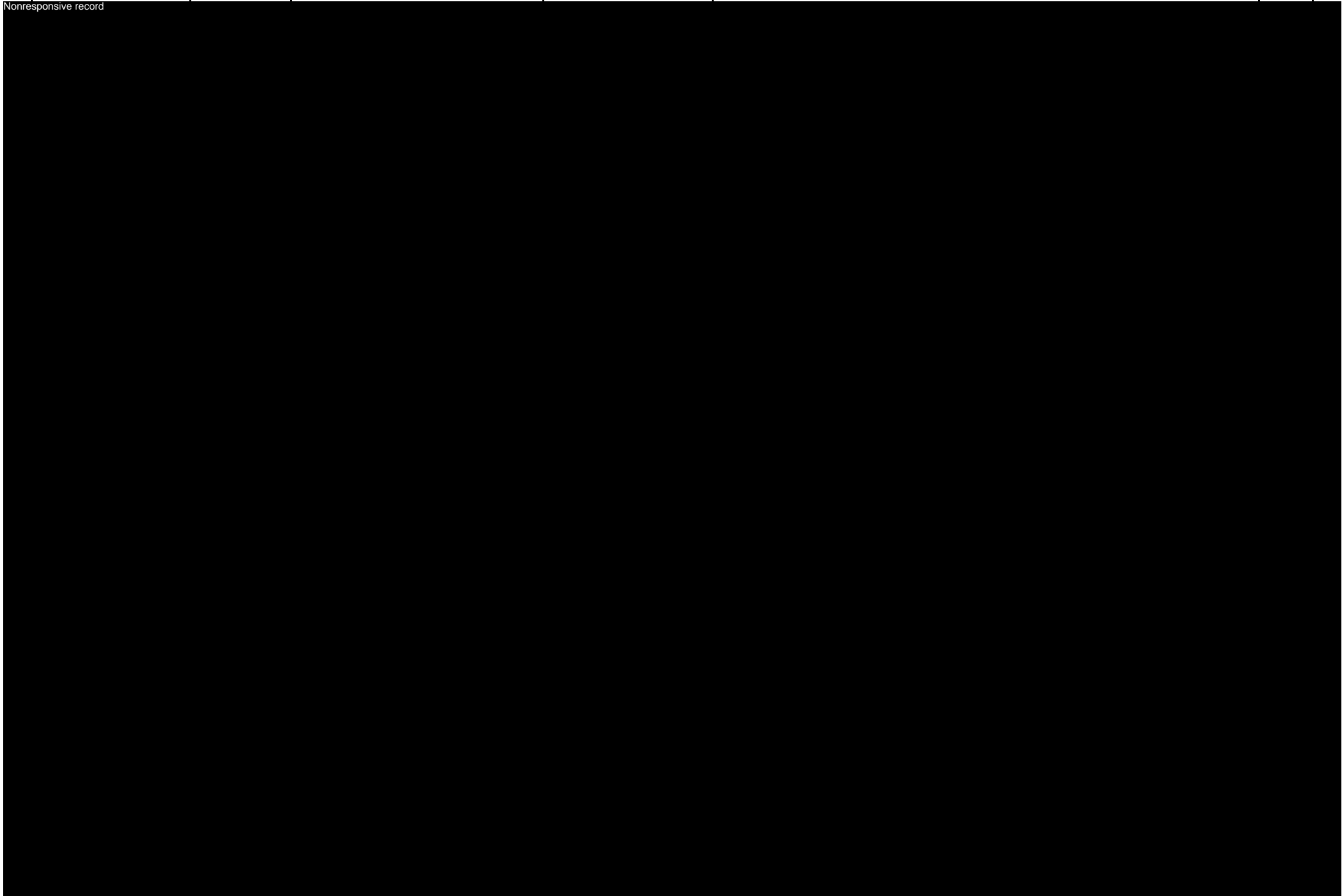
Thanks

From: Teresa L. Williamson
Sent: Tuesday, January 17, 2017 9:49 AM
To: Deborah J. Bortot; Heather A. Jones
Subject: Nominee progress Jan 17
Importance: High

Here's the update for Walt's 10am meeting – if that's still on.

Filer	Date Recd	Agency [Position]	Reviewer	Report Progress	Days Pending
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Nonresponsive record



Puzder, Andrew	1/9/2017	Department Of Labor [Secretary]	Elaine Newton	(b) (5) [Redacted]	8
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Nonresponsive record

Record referred to DOL



From: Seth Jaffe [mailto:sjaffe@oge.gov]
Sent: Tuesday, January 17, 2017 1:33 PM
To: Sadler, Rob - SOL
Cc: Elaine Newton
Subject: RE: DOL Contact information

Rob,

Thank you for the update. Elaine will be back into the office tomorrow and we look forward to the responses - as this is a top priority report.

Thanks again,
Seth

Record referred to DOL



Record referred to DOL



Record referred to DOL



From: Elaine Newton [<mailto:enewton@oge.gov>]
Sent: Tuesday, January 10, 2017 5:25 PM
To: Shapiro, Robert - SOL
Cc: Sadler, Rob - SOL
Subject: RE: DOL Contact information

3:15 tomorrow works for me. Elaine

Record referred to DOL



From: Elaine Newton [<mailto:enewton@oge.gov>]
Sent: Tuesday, January 10, 2017 5:04 PM
To: Shapiro, Robert - SOL; Sadler, Rob - SOL
Cc: Brown, Marilyn - SOL; Elaine Newton
Subject: RE: DOL Contact information

No attachment found in search

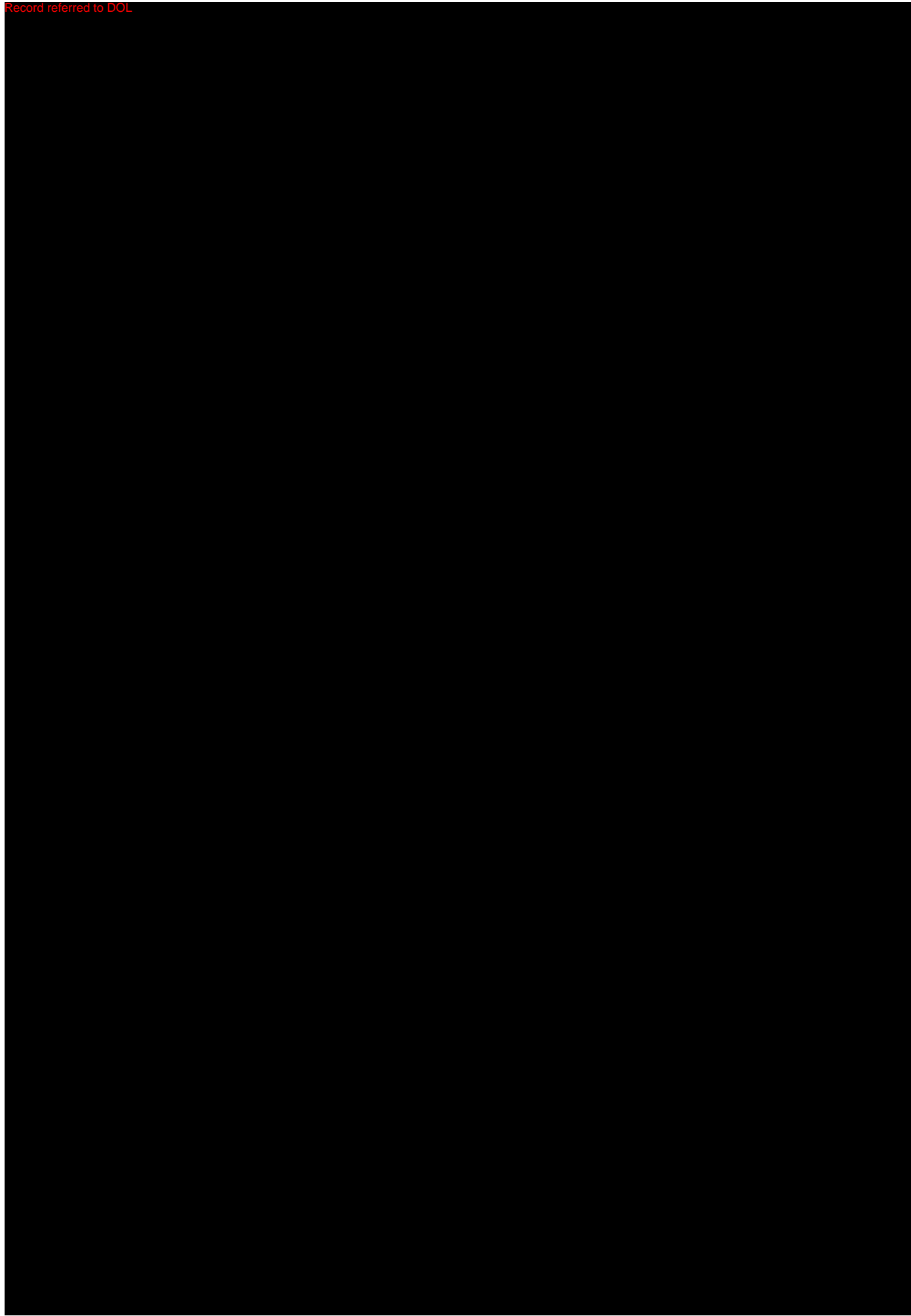
Good Afternoon,

I have added all of my initial comments and questions in the Integrity system. Attached is a Word document with the same comments and questions. If there are any differences, please let me know.

Are you available for a brief call tomorrow to discuss the report? I am available all day, except from 10 to 11:30.

Thanks, Elaine

Elaine Newton
Attorney-Advisor
U.S. Office of Government Ethics
1201 New York Ave., NW, Suite 500
Washington, DC 20005-3915
Telephone: 202-482-9265



From: [Deborah J. Bortot](#)
To: [Elaine Newton](#)
Cc: [Seth Jaffe](#)
Subject: (b)(6) Letter
Date: Wednesday, January 18, 2017 2:27:47 PM
Attachments: (b)(6) [.letter \(pdf version\).pdf](#)
(b)(6) [.letter \(word version\).docx](#)

The sample (b)(6) letter is saved at:

N:\Resources\Sample Letters (including (b)(6)

I've attached both the Word and pdf versions.

2 page attachment withheld in full - (b)(5)



7 page attachment withheld in full - (b)
(3), (4), (5), (6)

From: [Elaine Newton](#)
To: [Seth Jaffe](#)
Subject: FW: Draft Ethics Agreement and Contact Information
Date: Wednesday, January 18, 2017 2:54:16 PM
Attachments: [Puzder Ethic Agreement Draft 1.doc](#)

Record referred to DOL

From: Elaine Newton [mailto:enewton@oge.gov]
Sent: Wednesday, January 18, 2017 2:23 PM
To: Sadler, Rob - SOL; Shapiro, Robert - SOL
Subject: (b)(3), (6) Letter

1 page attachment withheld in full
- (b)(3), (4), (5), (6)

Good Afternoon,

This is just a follow-up to the conversation that I had earlier with Rob. (b)(3), (5), (6)

(b)(3), (5), (6)
(b)(3), (5), (6)). I am also attaching a sample of the letter.

Please let me know if you have any questions.

Thanks, Elaine

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From: [Emory A. Rounds III](#)
To: [Heather A. Jones](#)
Subject: Re: Labor
Date: Thursday, January 19, 2017 3:44:27 PM

Thanks!

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

From: Heather A. Jones
Sent: Thursday, January 19, 2017 3:40 PM
To: Emory A. Rounds III
Subject: Re: Labor

(b)(3), (5), (6)

They are aware of the hearing date. All issues/questions are currently with the filer.

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

From: Emory A. Rounds III
Sent: Thursday, January 19, 2017 1:17 PM
To: Heather A. Jones; Deborah J. Bortot
Subject: Labor

Prospective Labor status? Thanks!

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

Record referred to DOL

From: Hudson, Kian J. [mailto:KHudson@gibsondunn.com]
Sent: Thursday, January 19, 2017 4:00 PM
To: Sadler, Rob - SOL; Shapiro, Robert - SOL
Cc: Mooney, Alexander W.; Fackler, Stephen W.
Subject: Comments on Puzder SF-278

No attachment found in search

Good afternoon, gentlemen:

I've gone through the comments made on the SF-278 on Integrity. While there are still a few that we haven't responded to, I believe the vast majority have the necessary responses and confirmations. Also, please find attached three letters regarding disclosure of assets from (b)(3), (6)

Please let me know if you would like to discuss.

Thanks,

-Kian

Kian Hudson*

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* Admitted only in Indiana; practicing under the supervision of the Principals of the Firm


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From: [Deborah J. Bortot](#)
To: [Elaine Newton](#)
Subject: FW: it was also in the guide
Date: Thursday, January 19, 2017 5:58:05 PM

From: Lorna A. Syme
Sent: Thursday, January 19, 2017 5:47 PM
To: Deborah J. Bortot
Subject: it was also in the guide

Please consult with your ethics official for guidance specific to your situation.

(b)(3), (5), (6)

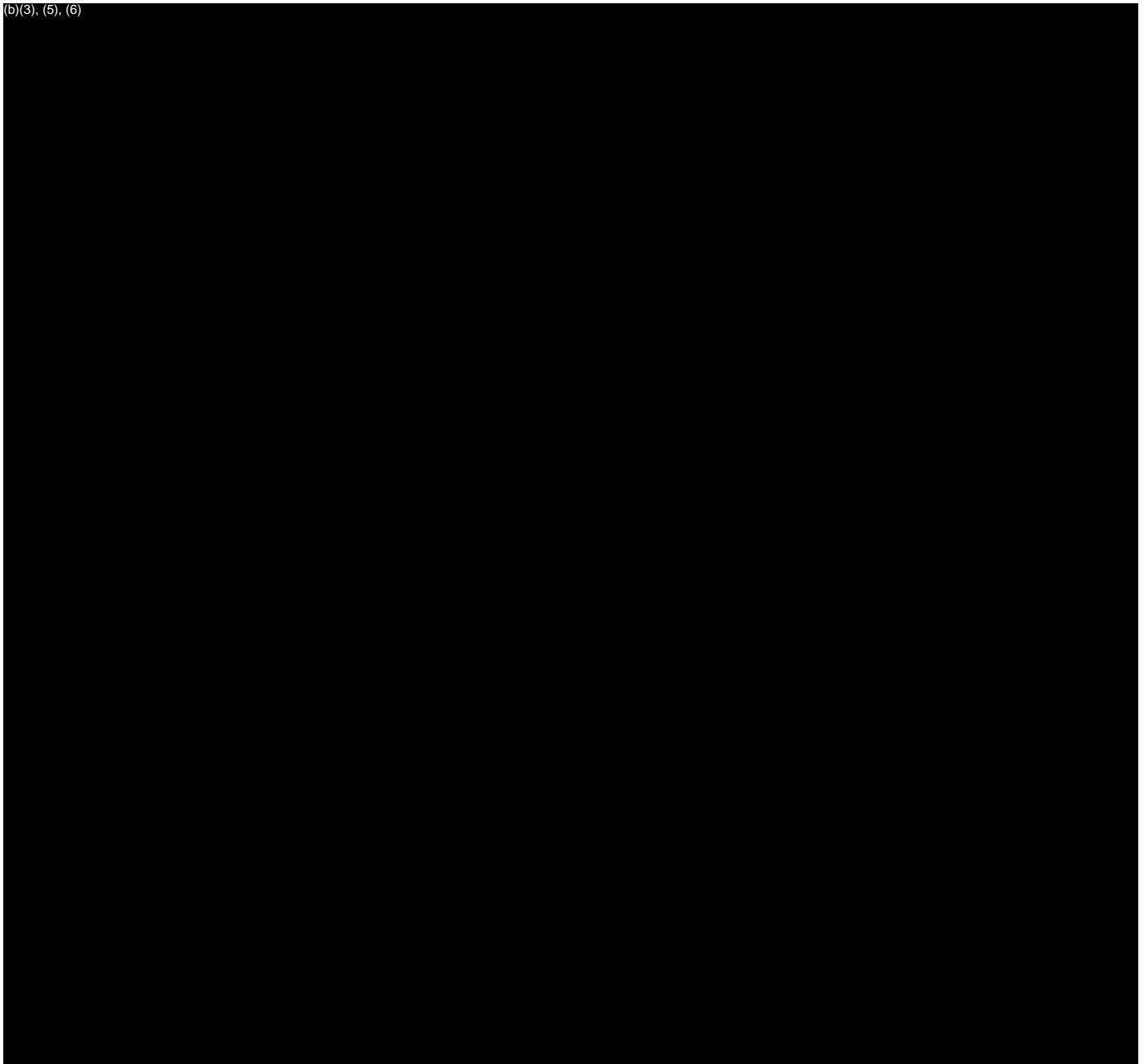


Lorna Syme
Presidential Nominations Branch
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From: [Deborah J. Bortot](#)
To: [Elaine Newton](#)
Subject: (b)(3), (6)
Date: Thursday, January 19, 2017 6:00:17 PM

(b)(3), (5), (6)



From: [Mooney, Alexander W.](#)
To: [Elaine Newton](#); [Hudson, Kian J.](#)
Cc: "[Shapiro, Robert - SOL](#)"; [Sadler, Rob - SOL](#); [Fackler, Stephen W.](#)
Subject: RE: Puzder 278
Date: Saturday, January 21, 2017 1:28:30 PM

Great – we look forward to speaking with you all then. Below is a dial in:

Toll-free dial-in number (U.S. and Canada):

(b) (6)

Conference code:

(b) (6)

Alexander Mooney

GIBSON DUNN

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1050 Connecticut Avenue, N.W., Washington, DC 20036-5306
Tel +1 202.887 3751 • Fax +1 202.530 9584
AMooney@gibsondunn.com • www.gibsondunn.com

From: Elaine Newton [mailto:enewton@oge.gov]
Sent: Saturday, January 21, 2017 9:38 AM
To: Mooney, Alexander W. <AMooney@gibsondunn.com>; Hudson, Kian J. <KHudson@gibsondunn.com>
Cc: 'Shapiro, Robert - SOL' (b) (6); Sadler, Rob - SOL (b) (6); Fackler, Stephen W. <SFackler@gibsondunn.com>
Subject: RE: Puzder 278

Good Morning,

I am available for a call on Monday at 10:30 a.m.

Thanks, Elaine

Elaine Newton

Attorney-Advisor

U.S. Office of Government Ethics

1201 New York Ave., NW, Suite 500

Washington, DC 20005-3915

Telephone: 202-482-9265

From: Mooney, Alexander W. [<mailto:AMooney@gibsondunn.com>]
Sent: Friday, January 20, 2017 4:35 PM
To: Elaine Newton; Hudson, Kian J.
Cc: 'Shapiro, Robert - SOL'; Sadler, Rob - SOL; Fackler, Stephen W.
Subject: RE: Puzder 278

Hi Elaine – I am cc'ing Steve Fackler, who is in the best position to address your (b)(3), (6) questions and determine which (b)(3), (6) may be relevant to your questions. I think it would be most efficient we all have a short call on Monday so we are clear on what you are looking for. Does 10:30 AM work? If so, I can circulate a dial in.

Thanks,

Alex

Alexander Mooney

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AMooney@gibsondunn.com • www.gibsondunn.com

From: Elaine Newton [<mailto:enewton@oge.gov>]
Sent: Friday, January 20, 2017 2:53 PM
To: Hudson, Kian J. <KHudson@gibsondunn.com>; Mooney, Alexander W. <AMooney@gibsondunn.com>
Cc: 'Shapiro, Robert - SOL' (b) (6); Sadler, Rob - SOL <(b) (6)>
Subject: RE: Puzder 278

Good Afternoon:

I have completed entering most of my questions and comments in Integrity. There are a few outstanding questions regarding the filer's (b)(3), (6) and a couple of issues that I need to research on Monday.

(1) I deleted my earlier comments that have been addressed.

(2) Please answer the questions in the General Comments section. Most of these questions are to confirm that we are not inadvertently missing any information.

(b)(3), (5), (6)

Please let me know if you have any questions.

Thanks again,

Elaine

Elaine Newton

Attorney-Advisor

U.S. Office of Government Ethics

1201 New York Ave., NW, Suite 500

Washington, DC 20005-3915

Telephone: 202-482-9265

From: Elaine Newton
Sent: Friday, January 20, 2017 10:33 AM
To: 'KHudson@gibsondunn.com'
Cc: 'Shapiro, Robert - SOL'; Sadler, Rob - SOL; 'amooney@gibsondunn.com'
Subject: Puzder 278

Good Morning,

Thank you for adding comments in Integrity and providing the (b)(3), (6). I hope to respond to your Integrity comments later today. I will send an e-mail to everyone when I have entered my questions and comments in Integrity. I will also be available to review the (b)(3), (6) when you have it.

(b)(3), (5), (6)
[Redacted]

[Redacted]

[Redacted]

[Redacted]

Please let me know if you have any questions.

Thank you,

Elaine

Elaine Newton

Associate Counsel

1 page attachment withheld in full -
(b)(3), (4), (5), (6)

U.S. Office of Government Ethics

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From: [Integrity.gov](https://integrity.gov)
To: [Elaine Newton](#)
Subject: Integrity.gov: Report Pending Action
Date: Monday, January 23, 2017 10:17:04 AM

A 2017 Nominee report for Puzder, Andrew F is pending your action as OGE Nominee Reviewer. The report has been pending for 14 days. You may access the report by logging into integrity at <https://integrity.gov>.

From: [Teresa L. Williamson](#)
To: [Lorna A. Syme](#); [Rachel K. Dowell](#); [Sandra S. Mabry](#); [Keith Labeledz](#); [Leigh J. Francis](#); [Jim Robertson](#); [Jack MacDonald](#); [Stephanie Nonluecha](#); [Megan V. Khaner](#); [Patrick J. Lightfoot](#); [Kimberly L. Sikora Panza](#); [Elaine Newton](#); [Monica M. G. Ashar](#)
Cc: [LEGTEAM](#); [Emory A. Rounds III](#); [Brandon L. Bunderson](#); [Vincent Salamone](#); [Steven Corbally](#); [Grace A. Clark](#); [Cheryl L. Kane-Piasecki](#); [Deborah J. Bortot](#); [Dale A. Christopher](#); [Nicole Stein](#); [Daniel L. Skalla](#); [Elizabeth D. Horton](#); [Wendy G. Pond](#); [Heather A. Jones](#); [Diana Veilleux](#); [Seth Jaffe](#); [David A. Meyers](#); [Ciara M. Guzman](#); [Patrick Shepherd](#); [Rodrick T. Johnson](#); [Kimberley H. Kaplan](#); [Christopher J. Swartz](#); [Jaideep Mathai](#)
Subject: NEW NOMINATION - January 20, 2017
Date: Monday, January 23, 2017 10:58:19 AM
Importance: High

The following nominations have been posted on THOMAS. You will be contacted separately regarding any actions required regarding these nominations.

Thanks! Teresa

NOMINATION - OGE Reviewer: Kim Sikora Panza (*INTEGRITY*) (b)(5)

PN49 — 115th Congress (2017-2018) — **Seema Verma** — **Department of Health and Human Services**
Seema Verma, of Indiana, to be Administrator of the Centers for Medicare and Medicaid Services, vice Marilyn B. Tavenner.

Date Received from President: 01/20/2017

Committee: Finance

Latest Action: 01/20/2017 - Received in the Senate and referred to the Committee on Finance. ([All Actions](#))

NOMINATION - OGE Reviewer: Kim Sikora Panza (*INTEGRITY*) (b)(5)

PN53 — 115th Congress (2017-2018) — **David Friedman** — **Department of State**

David Friedman, of New York, to be Ambassador Extraordinary and Plenipotentiary of the United States of America to Israel.

Date Received from President: 01/20/2017

Committee: Foreign Relations

Latest Action: 01/20/2017 - Received in the Senate and referred to the Committee on Foreign Relations. ([All Actions](#))

NOMINATION - OGE Reviewer: Leigh (*INTEGRITY*) (b)(5)

PN45 — 115th Congress (2017-2018) — **Todd M. Ricketts** — **Department of Commerce**

Todd M. Ricketts, of Illinois, to be Deputy Secretary of Commerce.

Date Received from President: 01/20/2017

Committee: Commerce, Science, and Transportation

Latest Action: 01/20/2017 - Received in the Senate and referred to the Committee on Commerce, Science, and Transportation. ([All Actions](#))

NOMINATION - OGE Reviewer: Stephanie (*INTEGRITY*) (b)(5)

PN42 — 115th Congress (2017-2018) — **Robert Lighthizer** — **Executive Office of the President**

Robert Lighthizer, of Florida, to be United States Trade Representative, with the rank of Ambassador Extraordinary and Plenipotentiary.

Date Received from President: 01/20/2017

Committee: Finance

Latest Action: 01/20/2017 - Received in the Senate and referred to the Committee on Finance. ([All Actions](#))

NOMINATION - OGE Reviewer: Lorna (*INTEGRITY*) (b)(5)

PN39 — 115th Congress (2017-2018) — **David J. Shulkin** — **Department of Veterans Affairs**

David J. Shulkin, of Pennsylvania, to be Secretary of Veterans Affairs.

Date Received from President: 01/20/2017

Committee: Veterans' Affairs

Latest Action: 01/20/2017 - Received in the Senate and referred to the Committee on Veterans' Affairs. ([All Actions](#))

NOMINATION - OGE Reviewer: Elaine (*INTEGRITY*) (b)(5)

PN38 — 115th Congress (2017-2018) — **Andrew F. Puzder** — **Department of Labor**

Andrew F. Puzder, of Tennessee, to be Secretary of Labor.

Date Received from President: 01/20/2017

Committee: Health, Education, Labor, and Pensions

Latest Action: 01/20/2017 - Received in the Senate and referred to the Committee on Health, Education, Labor, and Pensions. ([All Actions](#))

NOMINATION - (b)(5)

PN52 — 115th Congress (2017-2018) — **Terry Branstad** — **Department of State**

Terry Branstad, of Iowa, to be Ambassador Extraordinary and Plenipotentiary of the United States of America to the People's Republic of China.

Date Received from President: 01/20/2017

Committee: Foreign Relations

Latest Action: 01/20/2017 - Received in the Senate and referred to the Committee on Foreign Relations. ([All Actions](#))

NOMINATION - (b)(5)

PN47 — 115th Congress (2017-2018) — **Jay Clayton** — **Securities and Exchange Commission**

Jay Clayton, of New York, to be a Member of the Securities and Exchange Commission for a term expiring June 5, 2021, vice Daniel M. Gallagher, Jr. (term expired).

Date Received from President: 01/20/2017

Committee: Banking, Housing, and Urban Affairs

Latest Action: 01/20/2017 - Received in the Senate and referred to the Committee on Banking, Housing, and Urban Affairs. ([All Actions](#))

NOMINATION - (b)(5)

PN46 — 115th Congress (2017-2018) — **Vincent Viola** — **Department of Defense**

Vincent Viola, of New York, to be Secretary of the Army, vice Eric Kenneth Fanning.

Date Received from President: 01/20/2017

Committee: Armed Services

Latest Action: 01/20/2017 - Received in the Senate and referred to the Committee on Armed Services. ([All Actions](#))

NOMINATION - (b)(5)

PN41 — 115th Congress (2017-2018) — **Daniel Coats** — **Office of the Director of National Intelligence**

Daniel Coats, of Indiana, to be Director of National Intelligence, vice James R. Clapper, Jr.

Date Received from President: 01/20/2017

Committee: Intelligence

Latest Action: 01/20/2017 - Received in the Senate and referred to the Select Committee on Intelligence. ([All Actions](#))

NOMINATION - OGE Reviewer: Lorna (INTEGRITY) (b)(5)

PN28 — 115th Congress (2017-2018) — **Steven T. Mnuchin** — **International Monetary Fund**

Steven T. Mnuchin, of California, to be United States Governor of the International Monetary Fund, United States Governor of the African Development Bank, United States Governor of the Inter-American Development Bank, and United States Governor of the International Bank for Reconstruction and Development for a term of five years, vice Jacob Joseph Lew, resigned.

Date Received from President: 01/20/2017

Committee: Foreign Relations

Latest Action: 01/20/2017 - Received in the Senate and referred to the Committee on Foreign Relations. ([All Actions](#))

NOMINATION - OGE Reviewer: Lorna (INTEGRITY) (b)(5)

PN27 — 115th Congress (2017-2018) — **Steven T. Mnuchin** — **European Bank for Reconstruction and Development**

Steven T. Mnuchin, of California, to be United States Governor of the European Bank for Reconstruction and Development, United States Governor of the African Development Fund, and United States Governor of the Asian Development Bank, vice Jacob Joseph Lew, resigned.

Date Received from President: 01/20/2017

Committee: Foreign Relations

Latest Action: 01/20/2017 - Received in the Senate and referred to the Committee on Foreign Relations. ([All Actions](#))

NOMINATION - OGE Reviewer: Lorna (*INTEGRITY*) (b)(5)

PN26 — 115th Congress (2017-2018) — **Steven T. Mnuchin** — **Department of the Treasury**

Steven T. Mnuchin, of California, to be Secretary of the Treasury.

Date Received from President: 01/20/2017

Committee: Finance

Latest Action: 01/20/2017 - Received in the Senate and referred to the Committee on Finance. ([All Actions](#))

NOMINATION - OGE Reviewer: Stephanie (*INTEGRITY*) (b)(5)

PN51 — 115th Congress (2017-2018) — **Nikki R. Haley** — **United Nations**

Nikki R. Haley, of South Carolina, to be Representative of the United States of America to the Sessions of the General Assembly of the United Nations during her tenure of service as Representative of the United States of America to the United Nations.

Date Received from President: 01/20/2017

Committee: Foreign Relations

Latest Action: 01/20/2017 - Received in the Senate and referred to the Committee on Foreign Relations. ([All Actions](#))

NOMINATION - OGE Reviewer: Stephanie (*INTEGRITY*) (b)(5)

PN50 — 115th Congress (2017-2018) — **Nikki R. Haley** — **Department of State**

Nikki R. Haley, of South Carolina, to be the Representative of the United States of America to the United Nations, with the rank and status of Ambassador Extraordinary and Plenipotentiary, and the Representative of the United States of America in the Security Council of the United Nations.

Date Received from President: 01/20/2017

Committee: Foreign Relations

Latest Action: 01/20/2017 - Received in the Senate and referred to the Committee on Foreign Relations. ([All Actions](#))

NOMINATION - OGE Reviewer: Rachel (*INTEGRITY*) (b)(5)

PN48 — 115th Congress (2017-2018) — **Linda E. McMahon** — **Small Business Administration**

Linda E. McMahon, of Connecticut, to be Administrator of the Small Business Administration, vice Maria Contreras-Sweet, resigned.

Date Received from President: 01/20/2017

Committee: Small Business and Entrepreneurship

Latest Action: 01/20/2017 - Received in the Senate and referred to the Committee on Small Business and Entrepreneurship. ([All Actions](#))

NOMINATION - OGE Reviewer: Stephanie (*INTEGRITY*) (b)(5)

PN44 — 115th Congress (2017-2018) — **Scott Pruitt** — **Environmental Protection Agency**

Scott Pruitt, of Oklahoma, to be Administrator of the Environmental Protection Agency.

Date Received from President: 01/20/2017

Committee: Environment and Public Works

Latest Action: 01/20/2017 - Received in the Senate and referred to the Committee on Environment and Public Works. ([All Actions](#))

NOMINATION - OGE Reviewer: Lorna (*INTEGRITY*) (b)(5)

PN43 — 115th Congress (2017-2018) — **Mike Pompeo** — **Central Intelligence Agency**

Mike Pompeo, of Kansas, to be Director of the Central Intelligence Agency, vice John Owen Brennan.

Date Received from President: 01/20/2017

Committee: Intelligence

Latest Action: 01/20/2017 - Considered by Senate. ([All Actions](#))

NOMINATION - OGE Reviewer: Stephanie (*INTEGRITY*) (b)(5)

PN40 — 115th Congress (2017-2018) — **John F. Kelly** — **Department of Homeland Security**

John F. Kelly, of Virginia, to be Secretary of Homeland Security.

Date Received from President: 01/20/2017

Latest Action: 01/20/2017 - **Confirmed by the Senate** by Yea-Nay Vote. 88 - 11. Record Vote Number: 30. ([All Actions](#))

NOMINATION - OGE Reviewer: Megan (INTEGRITY) (b)(5)

PN37 — 115th Congress (2017-2018) — **Elisabeth Prince DeVos** — **Department of Education**

Elisabeth Prince DeVos, of Michigan, to be Secretary of Education.

Date Received from President: 01/20/2017

Committee: Health, Education, Labor, and Pensions

Latest Action: 01/20/2017 - Received in the Senate and referred to the Committee on Health, Education, Labor, and Pensions. ([All Actions](#))

NOMINATION - OGE Reviewer: Jim (INTEGRITY) (b)(5)

PN36 — 115th Congress (2017-2018) — **James Richard Perry** — **Department of Energy**

James Richard Perry, of Texas, to be Secretary of Energy.

Date Received from President: 01/20/2017

Committee: Energy and Natural Resources

Latest Action: 01/20/2017 - Received in the Senate and referred to the Committee on Energy and Natural Resources. ([All Actions](#))

NOMINATION - OGE Reviewer: Sandy (INTEGRITY) (b)(5)

PN35 — 115th Congress (2017-2018) — **Elaine L. Chao** — **Department of Transportation**

Elaine L. Chao, of Kentucky, to be Secretary of Transportation.

Date Received from President: 01/20/2017

Committee: Commerce, Science, and Transportation

Latest Action: 01/20/2017 - Received in the Senate and referred to the Committee on Commerce, Science, and Transportation. ([All Actions](#))

NOMINATION - OGE Reviewer: Monica (INTEGRITY) (b)(5)

PN34 — 115th Congress (2017-2018) — **Benjamin S. Carson Sr.** — **Department of Housing and Urban Development**

Benjamin S. Carson, Sr., of Florida, to be Secretary of Housing and Urban Development.

Date Received from President: 01/20/2017

Committee: Banking, Housing, and Urban Affairs

Latest Action: 01/20/2017 - Received in the Senate and referred to the Committee on Banking, Housing, and Urban Affairs. ([All Actions](#))

NOMINATION - OGE Reviewer: Patrick (INTEGRITY) (b)(5)

PN33 — 115th Congress (2017-2018) — **Thomas Price** — **Department of Health and Human Services**

Thomas Price, of Georgia, to be Secretary of Health and Human Services.

Date Received from President: 01/20/2017

Committee: Finance

Latest Action: 01/20/2017 - Received in the Senate and referred to the Committee on Finance. ([All Actions](#))

NOMINATION - OGE Reviewer: Keith (INTEGRITY) (b)(5)

PN32 — 115th Congress (2017-2018) — **Wilbur L. Ross Jr.** — **Department of Commerce**

Wilbur L. Ross, Jr., of Florida, to be Secretary of Commerce.

Date Received from President: 01/20/2017

Committee: Commerce, Science, and Transportation

Latest Action: 01/20/2017 - Received in the Senate and referred to the Committee on Commerce, Science, and Transportation. ([All Actions](#))

NOMINATION - OGE Reviewer: Lorna (INTEGRITY) (b)(5)

PN31 — 115th Congress (2017-2018) — **Ryan Zinke** — **Department of the Interior**

Ryan Zinke, of Montana, to be Secretary of the Interior.

Date Received from President: 01/20/2017

Committee: Energy and Natural Resources

Latest Action: 01/20/2017 - Received in the Senate and referred to the Committee on Energy and Natural Resources. ([All Actions](#))

NOMINATION - OGE Reviewer: Jack (*INTEGRITY*) ^{(b)(5)}

PN30 — 115th Congress (2017-2018) — **Jeff Sessions** — **Department of Justice**

Jeff Sessions, of Alabama, to be Attorney General.

Date Received from President: 01/20/2017

Committee: Judiciary

Latest Action: 01/20/2017 - Received in the Senate and referred to the Committee on the Judiciary. ([All Actions](#))

NOMINATION - OGE Reviewer: Monica (*INTEGRITY*) ^{(b)(5)}

PN29 — 115th Congress (2017-2018) — **James Mattis** — **Department of Defense**

James Mattis, of Washington, to be Secretary of Defense.

Date Received from President: 01/20/2017

Latest Action: 01/20/2017 - **Confirmed by the Senate** by Yea-Nay Vote. 98 - 1. Record Vote Number: 29. ([All Actions](#))

NOMINATION - OGE Reviewer: Leigh (*INTEGRITY*) ^{(b)(5)}

PN25 — 115th Congress (2017-2018) — **Rex W. Tillerson** — **Department of State**

Rex W. Tillerson, of Texas, to be Secretary of State.

Date Received from President: 01/20/2017

Committee: Foreign Relations

Latest Action: 01/20/2017 - Received in the Senate and referred to the Committee on Foreign Relations. ([All Actions](#))

From: Mooney, Alexander W. [mailto:AMooney@gibsondunn.com]
Sent: Tuesday, January 24, 2017 8:20 PM
To: Elaine Newton; Shapiro, Robert - SOL; Sadler, Rob - SOL
Cc: Hudson, Kian J.
Subject: Puzder 278 information re (b)(3),(6)

Dear Bob, Rob, and Elaine—

(b)(3), (4), (6)

Thanks,
Alex

Alexander Mooney

GIBSON DUNN

Gibson, Dunn & Crutcher LLP
1050 Connecticut Avenue, N.W., Washington, DC 20036-5306
Tel +1 202.887.3751 • Fax +1 202.530.9584
AMooney@gibsondunn.com • www.gibsondunn.com

41 page attachment withheld in full -
(b)(3), (4), (5), (6)

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Record referred to DOL



From: [Elaine Newton](#)
To: "[Mooney, Alexander W.](#)"; [Seth Jaffe](#)
Cc: [Sadler, Rob - SOL](#); [Shapiro, Robert - SOL](#); [Hudson, Kian J.](#); [Fackler, Stephen W.](#)
Bcc: [Elaine Newton](#)
Subject: RE: In preparation for preclearance
Date: Wednesday, February 01, 2017 4:30:32 PM

Mr. Puzder's (b)(3), (5), (6)



(b)(3), (5), (6)



Thanks, Elaine

From: Mooney, Alexander W. [mailto:AMooney@gibsondunn.com]
Sent: Wednesday, February 01, 2017 4:01 PM
To: Seth Jaffe; Elaine Newton
Cc: Sadler, Rob - SOL; Shapiro, Robert - SOL; Hudson, Kian J.; Fackler, Stephen W.
Subject: RE: In preparation for preclearance

Hello all Seth and Elaine,

With respect to the below statement:

(b)(3), (4), (5), (6)



Please advise if this requires further reporting.

Thanks,
Alex
Alexander Mooney

GIBSON DUNN

Gibson, Dunn & Crutcher LLP
1050 Connecticut Avenue, N.W., Washington, DC 20036-5306
Tel +1 202.887.3751 • Fax +1 202.530.9584
AMooney@gibsondunn.com • www.gibsondunn.com

From: Seth Jaffe [mailto:sjaffe@oge.gov]
Sent: Tuesday, January 31, 2017 5:25 PM
To: Mooney, Alexander W. <AMooney@gibsondunn.com>; Fackler, Stephen W. <SFackler@gibsondunn.com>; Hudson, Kian J. <KHudson@gibsondunn.com>;

(b)(6) - Rob Shapiro and Rob Sadler emails

[REDACTED]; Elaine Newton <enewton@oge.gov>; Deborah J. Bortot <djbortot@oge.gov>; Heather A. Jones <hajones@oge.gov>
Cc: Director of OGE <director@oge.gov>
Subject: In preparation for preclearance

Dear folks,

Although we have not yet quite finalized all outstanding issues, to help facilitate OGE preclearance, **please be sure to instruct the nominee to personally review the report carefully once more time prior to preclearance and after all issues appear to be settled**, given that the nominee will be personally responsible for all entries in the report as they currently appear.

I'm sending you a list of some of the nominee's material representations on which we are relying. Please forward this message to the nominee and instruct him to notify us prior to preclearance, and after resolving any outstanding issues, if any item in this list is incorrect.

Among other material representations, we are relying on the following:

(b)(3), (5), (6)
[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

(b)(3), (5), (6)

Thank you,
Seth

Seth H. Jaffe
Chief, Ethics Law & Policy Branch
U.S. Office of Government Ethics
(202) 482-9303

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Record referred to DOL



From: [Hudson, Kian J.](#)
To: [Elaine Newton](#); [Seth Jaffe](#); [Mooney, Alexander W.](#); [Fackler, Stephen W.](#); (b)(6) - Rob Shapiro and Rob Sadler emails
[\[REDACTED\]](#); [Deborah J. Bortot](#); [Heather A. Jones](#)
Cc: [Director of OGE](#)
Subject: RE: In preparation for preclearance
Date: Thursday, February 02, 2017 11:06:19 AM

Good morning all,

(1) The month Mr. Puzder's position with the (b)(3), (6) began is now indicated on the Form 278e.

(b)(3), (4), (5), (6)
[REDACTED]

(b)(3), (5), (6)

Please let us know if any other changes need to be made to the Form 278e.

Many thanks,

-Kian

From: Elaine Newton [mailto:enewton@oge.gov]
Sent: Wednesday, February 1, 2017 3:31 PM
To: Hudson, Kian J. ; Seth Jaffe ; Mooney, Alexander W. ; Fackler, Stephen W. ; (b)(6) - Rob Shapiro and Rob Sadler emails
[\[REDACTED\]](#) ; Deborah J. Bortot ; Heather A. Jones
Cc: Director of OGE
Subject: RE: In preparation for preclearance

Good Afternoon:

There are two outstanding items on the 278 report:

(b)(3), (5), (6)
[REDACTED]

There are also three other items that will need to be addressed before preclearance:

(b)(3), (5), (6)
[REDACTED]

NOTE: Confirm no outstanding issues and then delete all comments and questions that have been entered in Integrity

NOTE: Respond to the "In preparation for preclearance" e-mail that was sent 1/31/17 from Seth Jaffe

If you have any questions, please let me know.

Thanks, Elaine

Elaine Newton

Attorney-Advisor

U.S. Office of Government Ethics

1201 New York Ave., NW, Suite 500

Washington, DC 20005-3915

Telephone: 202-482-9265

From: Hudson, Kian J. [<mailto:KHudson@gibsondunn.com>]

Sent: Wednesday, February 01, 2017 12:57 PM

To: Seth Jaffe; Mooney, Alexander W.; Fackler, Stephen W.; (b)(6) - Rob Shapiro and Rob Sadler emails

[REDACTED] Elaine Newton; Deborah J. Bortot; Heather A. Jones

Cc: Director of OGE

Subject: RE: In preparation for preclearance

Good afternoon, everyone:

This new language has been added to the OGE Form 278e on Integrity.

Thanks,

-Kian

From: Seth Jaffe [<mailto:sjaffe@oge.gov>]

Sent: Wednesday, February 1, 2017 11:51 AM

To: Mooney, Alexander W. <AMooney@gibsondunn.com>; Fackler, Stephen W.

<SFackler@gibsondunn.com>; Hudson, Kian J. <KHudson@gibsondunn.com>;

(b)(6) - Rob Shapiro and Rob Sadler emails

[REDACTED] Elaine Newton <enewton@oge.gov>; Deborah J. Bortot <djbortot@oge.gov>; Heather A. Jones <hajones@oge.gov>

Cc: Director of OGE <director@oge.gov>

Subject: RE: In preparation for preclearance

Dear folks,

I just wanted to get you all the new language for Part 3 of the report for Integrity that is consistent with the latest draft ethics agreement OGE sent for review. This is to facilitate preclearance as soon as possible after all issues have been resolved.

Also, I included my previous email preparing for preclearance and we will still need confirmation of the items on that list prior to preclearance.

Thanks,

Seth

New language for Part 3 in Integrity to replace the language currently on Part 3 in Integrity:

Line 1:

(b)(3), (4), (5), (6)

Line 2:

(b)(3), (5), (6)

From: [Elaine Newton](#)
To: "[Shapiro, Robert - SOL](#)"; [Deborah J. Bortot](#); [Heather A. Jones](#); [Seth Jaffe](#); [Director of OGE](#)
Cc: [Sadler, Rob - SOL](#); [Rikleem, Rachel S - SOL](#); [Mancher, Zachary D - SOL](#)
Subject: RE: Puzder - (b)(3), (6)
Date: Thursday, February 02, 2017 12:29:18 PM

Bob,

(b)(3), (5), (6)

Thanks, Elaine

Elaine Newton
Attorney-Advisor
U.S. Office of Government Ethics
1201 New York Ave., NW, Suite 500
Washington, DC 20005-3915
Telephone: 202-482-9265

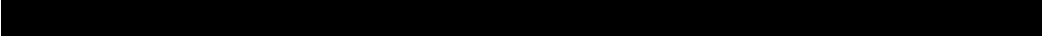
Record referred to DOL

Record referred to DOL



From: Mooney, Alexander W. [<mailto:AMooney@gibsondunn.com>]
Sent: Wednesday, February 01, 2017 7:52 PM
To: Shapiro, Robert - SOL; Sadler, Rob - SOL
Cc: Fackler, Stephen W.; Hudson, Kian J.
Subject: (b)(3), (6)

Bob and Rob -- please see the attached policy and feel free to share with OGE. (b)(3), (5), (6)



Thanks,
Alex

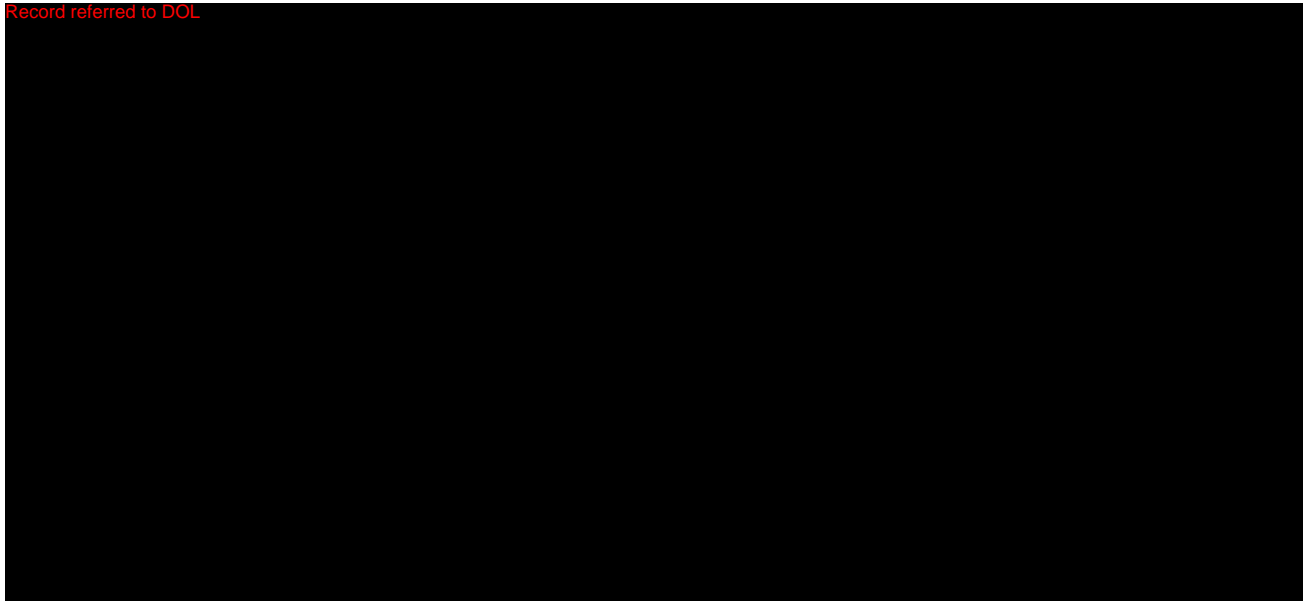
Alexander Mooney

GIBSON DUNN

Gibson, Dunn & Crutcher LLP
1050 Connecticut Avenue, N.W., Washington, DC 20036-5306
Tel +1 202.887.3751 • Fax +1 202.530.9584
AMooney@gibsondunn.com • www.gibsondunn.com

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Record referred to DOL



From: "Mooney, Alexander W." <AMooney@gibsondunn.com>
Date: February 2, 2017 at 12:54:07 PM EST
To: "Shapiro, Robert - SOL" <(b) (6)>, "Sadler, Rob - SOL" <(b) (6)>
Cc: "Fackler, Stephen W." <SFackler@gibsondunn.com>, "Hudson, Kian J." <KHudson@gibsondunn.com>
Subject: RE: (b)(3), (6)

Thank you Bob. We were actually mistaken about the date of (b) (6). Please let us know if any further information is needed.

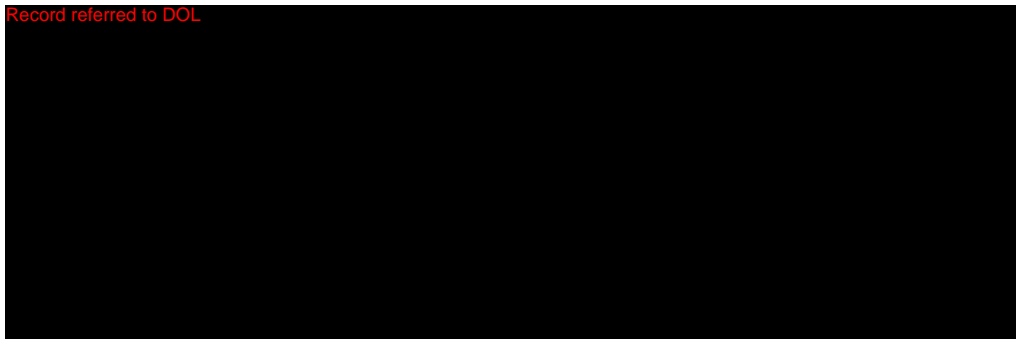
Best,
Alex

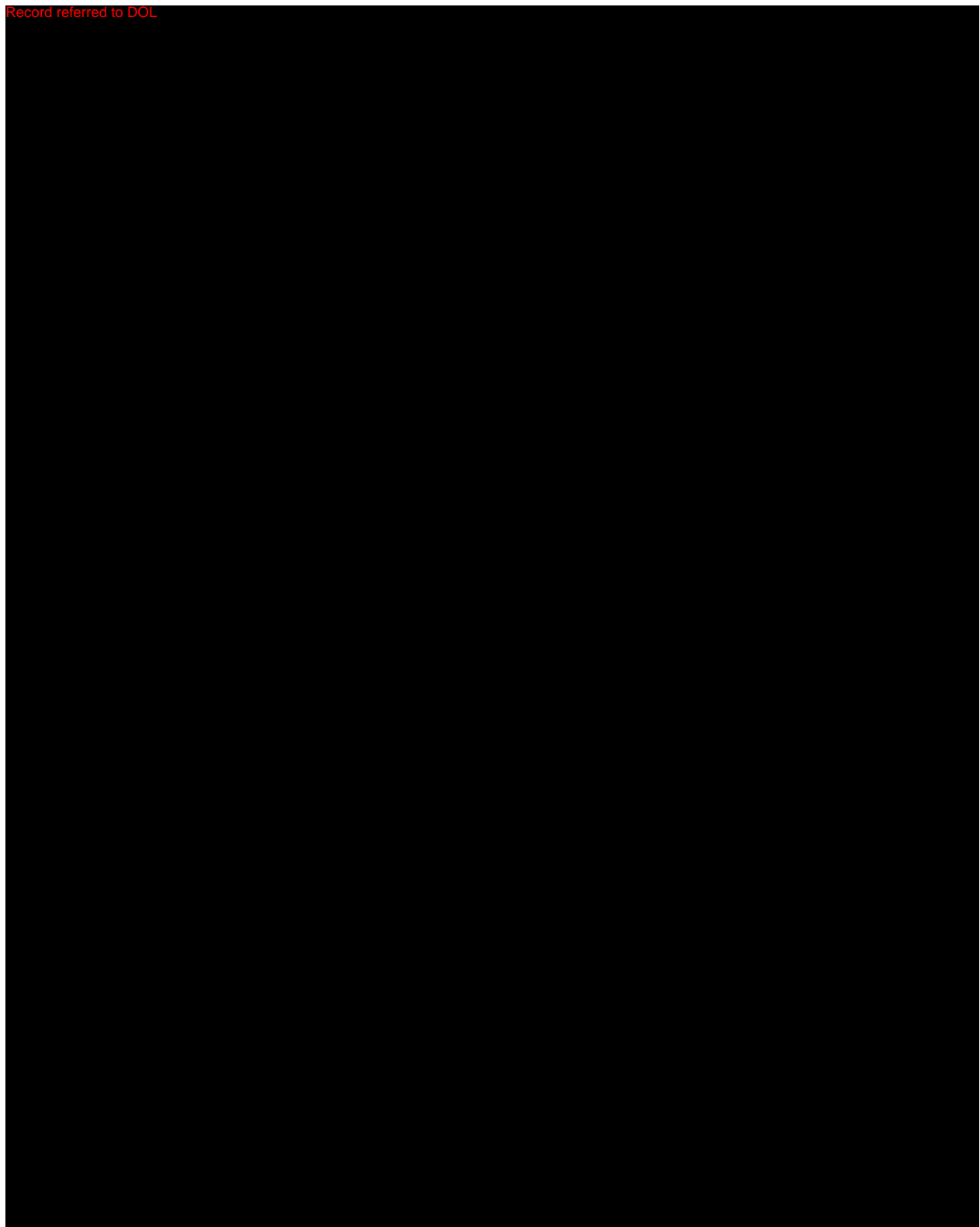
Alexander Mooney

GIBSON DUNN

Gibson, Dunn & Crutcher LLP
1050 Connecticut Avenue, N.W., Washington, DC 20036-5306
Tel +1 202.887.3751 • Fax +1 202.530.9584
AMooney@gibsondunn.com • www.gibsondunn.com

Record referred to DOL





From: [Heather A. Jones](#)
To: [Kimberly L. Sikora Panza](#)
Subject: Valuation
Date: Thursday, February 02, 2017 2:23:06 PM

(b) (5)



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

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On Feb 2, 2017, at 7:21 PM, Fackler, Stephen W. <SFackler@gibsondunn.com> wrote:

We are available at 11 AM Eastern. We assume that Bob or Rob will send around the dial-in information.

Best, Steve

Stephen W. Fackler

GIBSON DUNN

Gibson, Dunn & Crutcher LLP
1881 Page Mill Road, Palo Alto, CA 94304-1211
Tel +1 650.849.5385 • Fax +1 650.849.5085
SFackler@gibsondunn.com • www.gibsondunn.com

From: Seth Jaffe [<mailto:sjaffe@oge.gov>]

Sent: Thursday, February 2, 2017 2:48 PM

To: 'Shapiro, Robert - SOL' <(b) (6)>; Mooney, Alexander W. <AMooney@gibsondunn.com>; Fackler, Stephen W. <SFackler@gibsondunn.com>; Hudson, Kian J. <KHudson@gibsondunn.com>; Sadler, Rob - SOL <(b) (6)>; Elaine Newton <enewton@oge.gov>; Deborah J. Bortot <djbortot@oge.gov>; Heather A. Jones <hajones@oge.gov>; Bopp, Michael D. <MBopp@gibsondunn.com>

Cc: Director of OGE <director@oge.gov>

Subject: Call tomorrow

Dear folks,

Based on new information we have received today it appears that there are still a

(b) (5)

We need to have a call to discuss these new and still unresolved issues.

Can we do a call tomorrow at 11:00am? Hopefully 11:00am will work, but if not how about 1:00pm?

Thanks,
Seth

Record referred to DOL



From: Seth Jaffe [<mailto:sjaffe@oge.gov>]
Sent: Wednesday, February 01, 2017 12:51 PM
To: 'AMooney@gibsondunn.com'; 'SFackler@gibsondunn.com'; 'KHudson@gibsondunn.com'; Shapiro, Robert - SOL; Sadler, Rob - SOL; Elaine Newton; Deborah J. Bortot; Heather A. Jones
Cc: Director of OGE
Subject: call today
Importance: High

Dear folks,

We should have a call to discuss any remaining issues. Folks here at OGE are available for a call beginning today anytime between 1:00pm – 4:00pm EST. Otherwise the call would have to be after 8:00pm EST.

Maybe Labor or Gibson Dunn could set up the call-in number?

Thanks,
Seth

Seth H. Jaffe
Chief, Ethics Law & Policy Branch
U.S. Office of Government Ethics
(202) 482-9303

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From: [Seth Jaffe](#)
To: ["Sadler, Rob - SOL"; Shapiro, Robert - SOL; Elaine Newton](#)
Subject: RE: Updates
Date: Monday, February 06, 2017 9:38:23 AM

Bob,

Can we give you a call now?

Seth

Record referred to DOL



Record referred to DOL



Record referred to DOL



From: [Elaine Newton](#)
To: [Seth Jaffe](#)
Cc: [Elaine Newton](#)
Subject: FW: Terms of Ethics Agreement (Puzder)
Date: Monday, February 06, 2017 10:28:11 AM
Attachments: [Revised EA 2-6-17 \(EN comments\).doc](#)

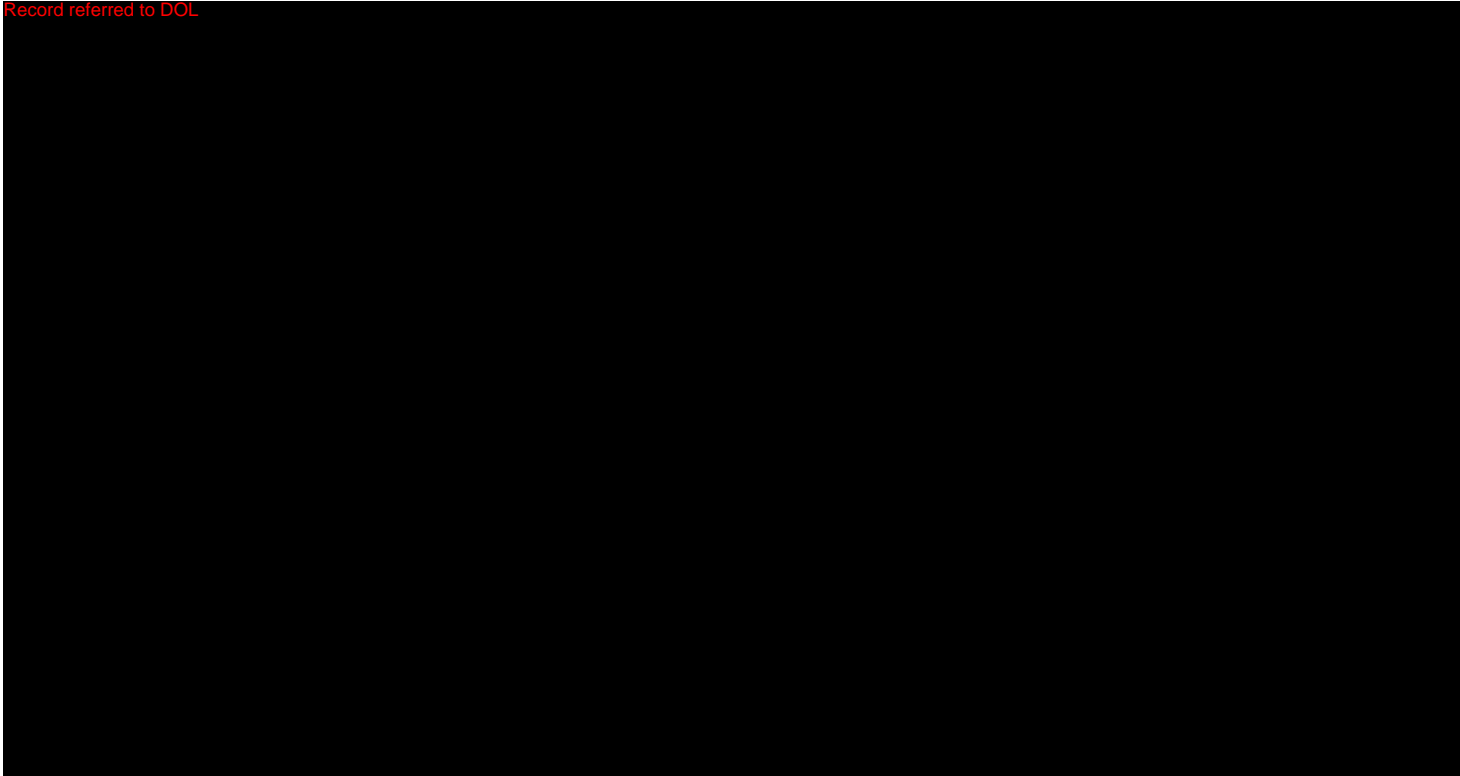
9 page attachment withheld in full - (b)
(3), (4), (5), (6)

Seth,

I added two comments to the latest version of the ethics agreement. Is this sufficient?

Record referred to DOL





From: [Elaine Newton](#)
To: "[Sadler, Rob - SOL](#)"; [Seth Jaffe](#); [Mooney, Alexander W. \(AMooney@gibsondunn.com\)](#); [Hudson, Kian J. \(KHudson@gibsondunn.com\)](#)
Cc: [Fackler, Stephen W. \(SFackler@gibsondunn.com\)](#); [Shapiro, Robert - SOL](#); [Rikleen, Rachel S - SOL](#); [Director of OGE](#); [Deborah J. Bortot](#); [Heather A. Jones](#); [Seth Jaffe](#)
Subject: RE: Revised Ethics Agreement
Date: Monday, February 06, 2017 11:36:53 AM
Attachments: [Revised EA 2-6-17.doc](#)

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

Good Morning,

Per this morning's discussion, attached is a revised ethics agreement.

Thanks, Elaine

Elaine Newton
Associate Counsel
U.S. Office of Government Ethics
1201 New York Ave., NW, Suite 500
Washington, DC 20005-3915
Telephone: 202-482-9265

Record referred to DOL

From: [Elaine Newton](#)
To: [Director of OGE](#); [Seth Jaffe](#)
Bcc: [Elaine Newton](#)
Subject: FW: Revised EA 2-6-17 (2).doc
Date: Monday, February 06, 2017 4:54:24 PM

Below is the e-mail from Mr. Puzder's attorney.

Record referred to DOL

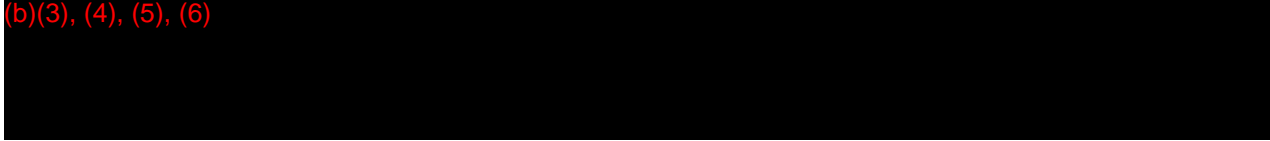


From: Fackler, Stephen W. [<mailto:SFackler@gibsondunn.com>]
Sent: Monday, February 06, 2017 4:37 PM
To: Shapiro, Robert - SOL
Cc: Sadler, Rob - SOL; Fackler, Stephen W.; Mooney, Alexander W.; Hudson, Kian J.
Subject: RE: Revised EA 2-6-17 (2).doc

(b)(3), (4), (5), (6)



(b)(3), (4), (5), (6)



Let me know if you have any questions.

Best, Steve

Stephen W. Fackler

GIBSON DUNN

Gibson, Dunn & Crutcher LLP

1881 Page Mill Road, Palo Alto, CA 94304-1211

Tel +1 650.849.5385 • Fax +1 650.849.5085

SFackler@gibsondunn.com • www.gibsondunn.com

Record referred to DOL



Record referred to DOL

From: Elaine Newton [<mailto:enewton@oge.gov>]
Sent: Monday, February 06, 2017 4:13 PM
To: Shapiro, Robert - SOL
Cc: Sadler, Rob - SOL; Seth Jaffe
Subject: RE: Revised EA 2-6-17 (2).doc

Bob,

The revised language may be sufficient if (b)(3), (5), (6)

Please let me know if you have any questions.

Thanks, Elaine

Elaine Newton
Associate Counsel
U.S. Office of Government Ethics
1201 New York Ave., NW, Suite 500
Washington, DC 20005-3915
Telephone: 202-482-9265

Record referred to DOL

Record referred to DOL

From: Fackler, Stephen W. [<mailto:SFackler@gibsondunn.com>]
Sent: Monday, February 06, 2017 1:34 PM
To: Shapiro, Robert - SOL; Sadler, Rob - SOL
Cc: Fackler, Stephen W.
Subject: Revised EA 2-6-17 (2).doc

No attachment was found in search

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From: [Elaine Newton](#)
To: [Director of OGE](#)
Cc: [Seth Jaffe](#)
Bcc: [Elaine Newton](#)
Subject: Revised EA
Date: Monday, February 06, 2017 5:35:35 PM
Attachments: [Revised EA 2-6-17 \(530pm\).doc](#)

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

Stephen Fackler sent the following to Bob Shapiro this evening. Based on this, I (b)(3), (5), (6)

Attached is the revised EA.

Elaine

From: Fackler, Stephen W. [<mailto:SFackler@gibsondunn.com>]
Sent: Monday, February 06, 2017 4:37 PM
To: Shapiro, Robert - SOL
Cc: Sadler, Rob - SOL; Fackler, Stephen W.; Mooney, Alexander W.; Hudson, Kian J.
Subject: RE: Revised EA 2-6-17 (2).doc

(b)(3), (5), (6)

Let me know if you have any questions.

Best, Steve
Stephen W. Fackler

GIBSON DUNN

Gibson, Dunn & Crutcher LLP
1881 Page Mill Road, Palo Alto, CA 94304-1211
Tel +1 650.849.5385 • Fax +1 650.849.5085
SFackler@gibsondunn.com • www.gibsondunn.com

From: [Elaine Newton](#)
To: [Seth Jaffe](#)
Cc: [Deborah J. Bortot](#); [Heather A. Jones](#)
Bcc: [Elaine Newton](#)
Subject: FW: Revised EA
Date: Monday, February 06, 2017 6:11:05 PM
Attachments: [Revised EA 2-6-17 \(555pm\).doc](#)

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

In addition to the email on the changes to Part 3, I will include a copy of the Director's e-mail on the CD timing, and request that Mr. Puzder personally review the "In preparation for preclearance" email that Seth sent. Please let me know if I am missing anything.

Thanks, Elaine

From: Elaine Newton
Sent: Monday, February 06, 2017 6:07 PM
To: Fackler, Stephen W. (SFackler@gibsondunn.com); Mooney, Alexander W. (AMooney@gibsondunn.com); 'Shapiro, Robert - SOL'; Director of OGE
Cc: Sadler, Rob - SOL; Hudson, Kian J. (KHudson@gibsondunn.com); Deborah J. Bortot; Heather A. Jones; Seth Jaffe
Subject: Revised EA

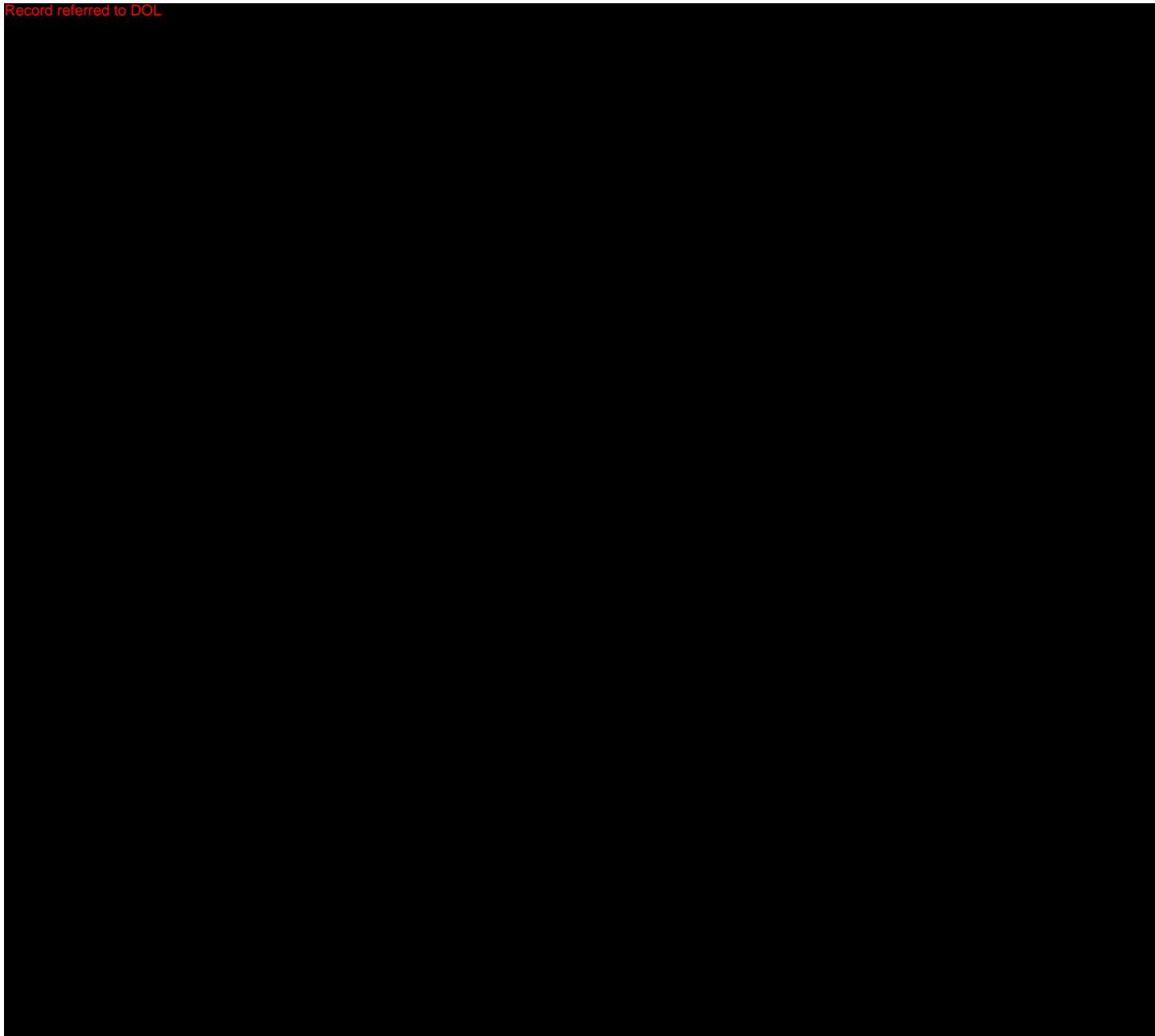
Attached is the revised EA incorporating today's discussions. At the top of page 2, "(b) (5)" I believe this will be the final change on the EA. Tomorrow morning, I will send an email with the changes that must be made to Part 3, Agreement and Arrangements, of the 278.

Please let me know if you have any questions.

No attachment was found in search

Thanks, Elaine

Elaine Newton
Associate Counsel
U.S. Office of Government Ethics
1201 New York Ave., NW, Suite 500
Washington, DC 20005-3915
Telephone: 202-482-9265



From: Elaine Newton [mailto:enewton@oge.gov]
Sent: Monday, February 06, 2017 6:07 PM
To: Fackler, Stephen W. (SFackler@gibsondunn.com); Mooney, Alexander W. (AMooney@gibsondunn.com); Shapiro, Robert - SOL; Director of OGE
Cc: Sadler, Rob - SOL; Hudson, Kian J. (KHudson@gibsondunn.com); Deborah J. Bortot; Heather A. Jones; Seth Jaffe
Subject: Revised EA

Attached is the revised EA incorporating today's discussions. At the top of page 2, (b) (5) [REDACTED] I believe this will be the final change on the EA. Tomorrow morning, I will send an email with the changes that must be made to Part 3, Agreement and Arrangements, of the 278.

Please let me know if you have any questions.

No attachment was found in search [REDACTED]

Thanks, Elaine

Elaine Newton
Associate Counsel
U.S. Office of Government Ethics
1201 New York Ave., NW, Suite 500
Washington, DC 20005-3915
Telephone: 202-482-9265

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From: [Elaine Newton](#)
To: "[Fackler, Stephen W.](#)"; [Hudson, Kian J.](#); [Mooney, Alexander W.](#)
Cc: "[Shapiro, Robert - SOL](#)"; [Sadler, Rob - SOL](#); [Seth Jaffe](#)
Subject: RE: Integrity Revisions
Date: Tuesday, February 07, 2017 2:47:36 PM

Sorry for the confusion. Mr. Puzder should send the email to Robert Shapiro as Designated Agency Ethics Official at the Department of Labor and Bob can forward the email to OGE.

Thanks, Elaine

From: Fackler, Stephen W. [<mailto:SFackler@gibsondunn.com>]
Sent: Tuesday, February 07, 2017 2:44 PM
To: Elaine Newton; Hudson, Kian J.; Mooney, Alexander W.
Cc: 'Shapiro, Robert - SOL'; Sadler, Rob - SOL; Seth Jaffe; Fackler, Stephen W.
Subject: RE: Integrity Revisions

Thank you. I will confirm with him, but when we last spoke about this topic, Mr. Puzder is prepared to send that email. Exactly to whom should that email be sent? I have heard different things on that point.

Stephen W. Fackler

GIBSON DUNN

Gibson, Dunn & Crutcher LLP
1881 Page Mill Road, Palo Alto, CA 94304-1211
Tel +1 650.849.5385 • Fax +1 650.849.5085
SFackler@gibsondunn.com • www.gibsondunn.com

From: Elaine Newton [<mailto:enewton@oge.gov>]

Sent: Tuesday, February 7, 2017 11:30 AM

To: Hudson, Kian J. <KHudson@gibsondunn.com>; Fackler, Stephen W. <SFackler@gibsondunn.com>; Mooney, Alexander W. <AMooney@gibsondunn.com>

Cc: 'Shapiro, Robert - SOL' <(b) (6)>; Sadler, Rob - SOL <(b) (6)>; Seth Jaffe <sjaffe@oge.gov>

Subject: RE: Integrity Revisions

Thank you for making the changes. I do not have any additional questions or comments regarding the report. The only item we need before we can begin preclearance is an e-mail from the Nominee to the agency ethics official confirming that he has reviewed the list of some of the material representations on which we are relying and that those material representations are correct.

Thanks,

Elaine

From: Hudson, Kian J. [<mailto:KHudson@gibsondunn.com>]
Sent: Tuesday, February 07, 2017 1:40 PM
To: Elaine Newton; Fackler, Stephen W.; Mooney, Alexander W.
Cc: 'Shapiro, Robert - SOL'; Sadler, Rob - SOL; Seth Jaffe
Subject: RE: Integrity Revisions

Good afternoon all,

The suggested changes to the SF-278e have been made in Integrity. Please confirm that no other changes to the SF-278 need to be made.

Thanks,

-Kian

From: Elaine Newton [<mailto:enewton@oge.gov>]

Sent: Tuesday, February 7, 2017 11:07 AM

To: Hudson, Kian J. <KHudson@gibsondunn.com>; Fackler, Stephen W. <SFackler@gibsondunn.com>; Mooney, Alexander W. <AMooney@gibsondunn.com>

Cc: 'Shapiro, Robert - SOL' <(b) (6)>; Sadler, Rob - SOL <(b) (6)>; Seth Jaffe <sjaffe@oge.gov>

Subject: RE: Integrity Revisions

Hi Kian,

The dates these agreements began are the appropriate dates for the 278 report.

Elaine

From: Hudson, Kian J. [<mailto:KHudson@gibsondunn.com>]

Sent: Tuesday, February 07, 2017 11:04 AM

To: Elaine Newton; Fackler, Stephen W.; Mooney, Alexander W.

Cc: 'Shapiro, Robert - SOL'; Sadler, Rob - SOL; Seth Jaffe

Subject: RE: Integrity Revisions

Hi Elaine,

(b)(3), (5), (6)
[Redacted]

[Redacted]. Can you confirm that the dates these agreements began are the appropriate ones for the SF-278?

Many thanks,

-Kian

From: Elaine Newton [<mailto:enewton@oge.gov>]

Sent: Tuesday, February 7, 2017 10:49 AM

To: Hudson, Kian J. <KHudson@gibsondunn.com>; Fackler, Stephen W. <SFackler@gibsondunn.com>; Mooney, Alexander W. <AMooney@gibsondunn.com>

Cc: 'Shapiro, Robert - SOL' (b) (6) [Redacted]; Sadler, Rob - SOL <(b) (6) [Redacted]>; Seth Jaffe <sjaffe@oge.gov>

Subject: RE: Integrity Revisions

Good Morning,

For Part 3, (b) (5) [Redacted]

Elaine

From: Hudson, Kian J. [<mailto:KHudson@gibsondunn.com>]

Sent: Tuesday, February 07, 2017 10:36 AM

To: Elaine Newton; Fackler, Stephen W.; Mooney, Alexander W.

Cc: 'Shapiro, Robert - SOL'; Sadler, Rob - SOL; Seth Jaffe

Subject: RE: Integrity Revisions

Hi Elaine,

We'd like to confirm that the following dates are the ones you are looking for on the (b)(3), (5), (6) [Redacted]
[Redacted]
[Redacted]
[Redacted]
[Redacted]
[Redacted]

Many thanks,

-Kian

From: Elaine Newton [<mailto:enewton@oge.gov>]

Sent: Tuesday, February 7, 2017 9:37 AM

To: Fackler, Stephen W. <SFackler@gibsondunn.com>; Mooney, Alexander W. <AMooney@gibsondunn.com>; Hudson, Kian J. <KHudson@gibsondunn.com>

Cc: 'Shapiro, Robert - SOL' (b) (6) [Redacted]; Sadler, Rob - SOL (b) (6) [Redacted]; Seth Jaffe <sjaffe@oge.gov>

Subject: Integrity Revisions

Good Morning,

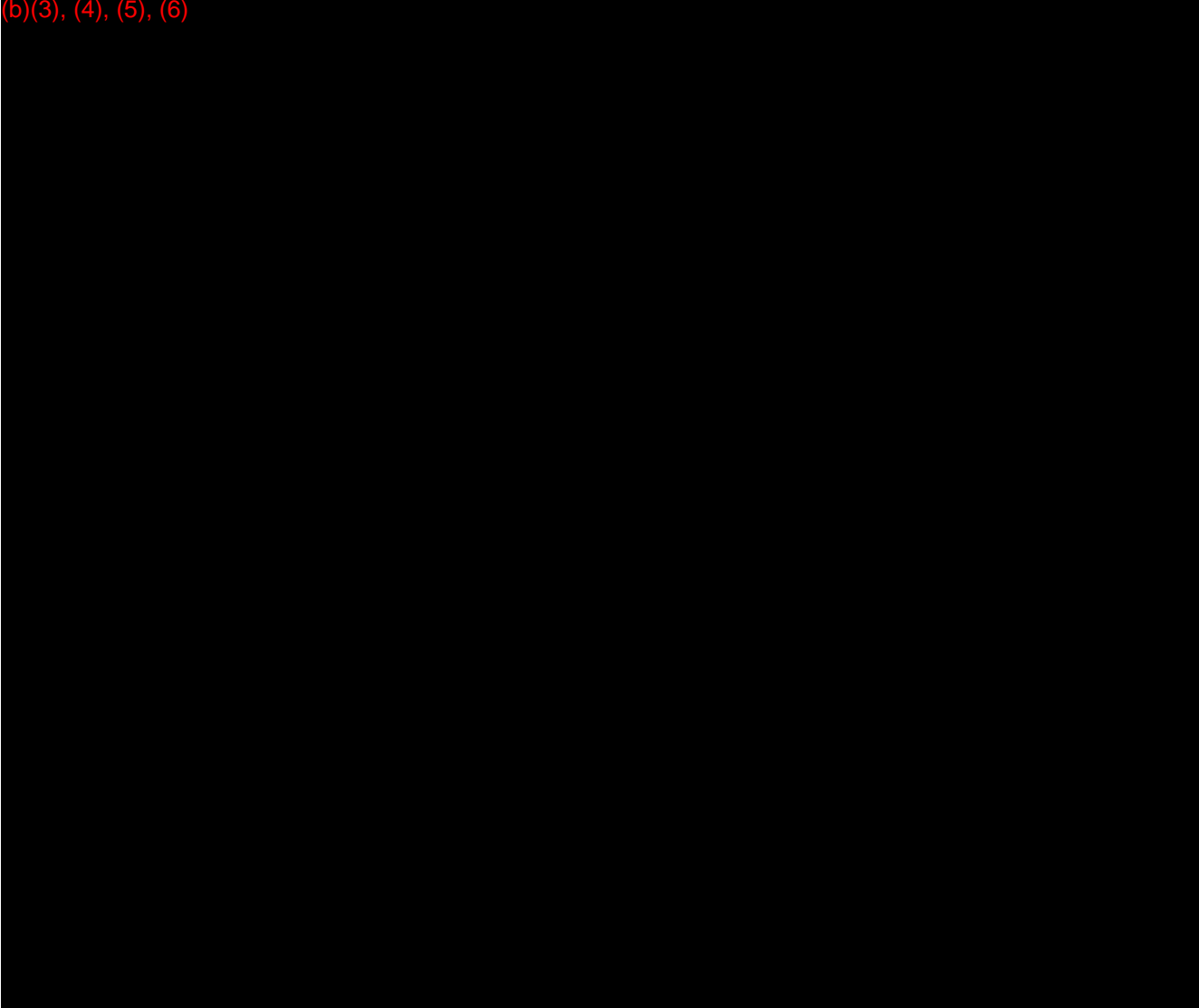
Below are the additions and changes that must be made to the Integrity report. I have also attached two e-mails: (1) the January 27, 2017, e-mail from Walter Shaub discussing the timing for requesting a CD ("Availability this weekend"). (b)(3), (5), (6) [Redacted]

Attachments included in this set of records

the February 3, 2017, e-mail from Seth Jaffe discussing the information that the Nominee must personally review prior to preclearance ("In preparation for preclearance").

Integrity Changes

(b)(3), (4), (5), (6)



Please let me know if you have any questions.

Thanks,

Elaine

Elaine Newton

Associate Counsel

U.S. Office of Government Ethics

1201 New York Ave., NW, Suite 500

Washington, DC 20005-3915

Telephone: 202-482-9265

From: Elaine Newton

Sent: Monday, February 06, 2017 6:07 PM

To: Fackler, Stephen W. (SFackler@gibsondunn.com); Mooney, Alexander W. (AMooney@gibsondunn.com); 'Shapiro, Robert - SOL'; Director of OGE

Cc: Sadler, Rob - SOL; Hudson, Kian J. (KHudson@gibsondunn.com); Deborah J. Bortot; Heather A. Jones; Seth Jaffe

Subject: Revised EA

Attached is the revised EA incorporating today's discussions. At the top of page 2, (b) (5)

(b) (5) .” I believe this will be the final change on the EA. Tomorrow morning, I will send an email with the changes that must be made to Part 3, Agreement and Arrangements, of the 278.

Please let me know if you have any questions.

Thanks, Elaine

Elaine Newton

Associate Counsel

U.S. Office of Government Ethics

1201 New York Ave., NW, Suite 500

Washington, DC 20005-3915

Telephone: 202-482-9265

No attachment was found in search

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From: [Walter M. Shaub](#)
To: ["Shapiro, Robert - SOL"; Seth Jaffe; Elaine Newton](#)
Cc: [Heather A. Jones; Deborah J. Bortot; Sadler, Rob - SOL; Nicole Stein; Nelson Cabrera Jr.; Suzanne L. Meyer](#)
Subject: RE: Availability this weekend
Date: Friday, January 27, 2017 6:15:16 PM

Great. Thanks, Bob!

(b)(5), (6) [Redacted]

[Redacted]

[Redacted] Here's what we'll need:

(b)(5), (6) [Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

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[Redacted]

[Redacted]

[Redacted]

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

Record referred to DOL



From: Walter M. Shaub [<mailto:wmschaub@oge.gov>]
Sent: Friday, January 27, 2017 4:20 PM

To: Shapiro, Robert - SOL; Seth Jaffe; Elaine Newton
Cc: Heather A. Jones; Deborah J. Bortot
Subject: RE: Availability this weekend
Bob,

No attachment produced in search

Attached is a revised ethics agreement.

(b)(3), (5), (6)

[Redacted]

I will monitor my blackberry over the weekend, as will Seth and Heather. Elaine has the ability to log into the system remotely if we let her know that we have received an update.

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

Record referred to DOL

[Redacted]

Record referred to DOL

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From: [Puzder, Andy](#)
To: [Shapiro, Robert - SOL](#)
Cc: [Elaine Newton](#); [Seth Jaffe](#); [Fackler, Stephen W.](#)
Subject: Re: OGE Request
Date: Tuesday, February 07, 2017 3:08:42 PM

Thanks. And feel free to call me Andy.

Sent from my iPhone

Record referred to DOL



From: Puzder, Andy [(b) (6)]
Sent: Tuesday, February 07, 2017 2:59 PM
To: Shapiro, Robert - SOL; enewton@oge.gov; sjaffe@oge.gov
Cc: Fackler, Stephen W.
Subject: OGE Request

Dear Mr. Shapiro:

At your request, I am confirming the following material representations on which the Office of Government Ethics may rely.

1. I have personally reviewed all entries in the current version of my report on Form 278e and I affirm that they are correct.

[(b)(3), (6)]

4. For Part 1 and Part 4, I have provided information covering the entire reporting period of January 1, 2015, to present.

5. For Part 2, Part 5, and Part 6, I have provided information covering the entire reporting period of January 1, 2016, to present.

6. Except as expressly reported in the OGE Form 278e, [(b)(3), (6)]

[(b)(3), (6)]

(b)(3), (6)

8. The ethics agreement correctly describes all items addressed in the agreement.

Respectfully submitted,

Andrew F. Puzder

From: [Elaine Newton](#)
To: (b)(6) Stefan Passantino
Cc: (b)(6) James Schultz & Ann Donaldson email; [Shapiro, Robert - SOL](#); ["Sadler, Rob - SOL"; Seth Jaffe](#)
Subject: RE: PRECLEARED: Andrew F. Puzder
Date: Tuesday, February 07, 2017 5:11:04 PM
Attachments: [EA for preclearance-\[Puzder\].doc](#)

Attached is the precleared ethics agreement for Mr. Puzder. Please let me know if you have any questions.

Thanks, Elaine

Elaine Newton
Associate Counsel
U.S. Office of Government Ethics
1201 New York Ave., NW, Suite 500
Washington, DC 20005-3915
Telephone: 202-482-9265

9 page attachment withheld in full -
Final version available at <https://extapps2.oge.gov/201/Presiden.nsf/PAS%20Index?OpenView>

From: Seth Jaffe
Sent: Tuesday, February 07, 2017 4:49 PM
To: (b)(6) Stefan Passantino
Cc: (b)(6) James Schultz & Ann Donaldson email; Elaine Newton; Shapiro, Robert - SOL; 'Sadler, Rob - SOL'; Deborah J. Bortot; Heather A. Jones; Sandra S. Mabry; Keith Labeledz; Teresa L. Williamson; Rodrick T. Johnson; David J. Apol
Subject: PRECLEARED: Andrew F. Puzder

Stefan, Andrew F. Puzder is precleared.

Elaine, please forward the ethics agreement to Stefan.

Thanks!
Seth

Seth H. Jaffe
Chief, Ethics Law & Policy Branch
U.S. Office of Government Ethics
(202) 482-9303

From: [Integrity.gov](https://integrity.gov)
To: [David J. Apol](#)
Subject: Integrity.gov: Report Pending Action
Date: Wednesday, February 08, 2017 11:17:09 AM

A 2017 Nominee report for Puzder, Andrew F is pending your action as OGE Nominee Certifying Official. You may access the report by logging into integrity at <https://integrity.gov>.

Record referred to DOL



From: Seth Jaffe [mailto:sjaffe@oge.gov]
Sent: Wednesday, February 08, 2017 2:51 PM
To: Shapiro, Robert - SOL; Elaine Newton
Cc: Sadler, Rob - SOL
Subject: RE: Any update?

Bob,

Yes they have. They were sent at 12:12pm and the receipt was confirmed.

Thank you for your great work on this!

Seth

Record referred to DOL



Record referred to DOL



From: [Elaine Newton](#)
To: "[Sadler, Rob - SOL](#)"
Subject: RE: Public Financial Disclosure Report of Andrew F. Puzder
Date: Wednesday, February 08, 2017 3:02:32 PM

Rob,

Thank you!! Please let me know when you are ready for OGE to review the draft CD documents.

Elaine

Record referred to DOL



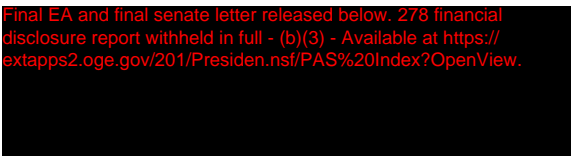
From: Teresa L. Williamson [<mailto:twillia@oge.gov>]
Sent: Wednesday, February 08, 2017 2:36 PM
To: Elaine Newton; Sadler, Rob - SOL
Subject: Public Financial Disclosure Report of Andrew F. Puzder

Good Afternoon,

I've attached the financial disclosure package for Andrew F. Puzder, who has been nominated by President Trump for the position of Secretary, Department of Labor.

Thanks!

Final EA and final senate letter released below. 278 financial disclosure report withheld in full - (b)(3) - Available at <https://extapps2.oge.gov/201/Presiden.nsf/PAS%20Index?OpenView>.



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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From: [Elaine Newton](#)
To: "[Rikleen, Rachel S - SOL](#)"
Cc: [Sadler, Rob - SOL](#); [Shapiro, Robert - SOL](#); [Mancher, Zachary D - SOL](#); [Brown, Marilyn - SOL](#)
Subject: RE: Draft CD request paperwork
Date: Wednesday, February 15, 2017 2:09:31 PM

Good Afternoon,

The draft looks fine. I did a quick scan of the holdings and noticed a couple of typos (b)(3), (5), (6)

[Redacted]

[Redacted]

Please let me know if you have any questions.

Thanks, Elaine

Record referred to DOL

[Redacted]

From: [Heather A. Jones](#)
To: [Deborah J. Bortot](#); [Seth Jaffe](#); [Elaine Newton](#)
Subject: Puzder
Date: Wednesday, February 15, 2017 3:28:13 PM

There are reports on twitter and Fox News that Puzder is withdrawing.

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

Visit OGE's website: www.oge.gov
Follow OGE on Twitter: [@OfficeGovEthics](#)

UNITED STATES OFFICE OF
GOVERNMENT ETHICS



February 8, 2017

The Honorable Lamar Alexander
Chairman
Committee on Health, Education,
Labor, and Pensions
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 Andrew F. Puzder, who has been nominated by President Trump for the position of Secretary, Department of Labor.


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
SHAUB**

Walter M. Shaub, Jr.
Director

 Digitally signed by WALTER SHAUB
DN c=US, o=U.S. Government, ou=Office of
Government Ethics, cn=WALTER SHAUB,
0.9.2342.19200300.100.1.1=95491000364655
Date 2017.02.08 12 06 37 -05'00'

Enclosures



February 7, 2017

Mr. Robert A. Shapiro
Alternate Designated Agency Ethics Official
U.S. Department of Labor
200 Constitution Ave., NW, Rm. N2700
Washington, DC 20210

Dear Mr. Shapiro:

The purpose of this letter is to describe the steps that I will take to avoid any actual or apparent conflict of interest in the event that I am confirmed for the position of Secretary of the U.S. Department of Labor.

As required by 18 U.S.C. § 208(a), I will not participate personally and substantially in any particular matter in which I know that I have a financial interest directly and predictably affected by the matter, or in which I know that a person whose interests are imputed to me has a financial interest directly and predictably affected by the matter, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2). I understand that the interests of the following persons are imputed to me: any spouse or minor child of mine; any general partner of a partnership in which I am a limited or general partner; any organization in which I serve as officer, director, trustee, general partner or employee; and any person or organization with which I am negotiating or have an arrangement concerning prospective employment.

Upon confirmation, I will resign from my positions with CKE Restaurants Holdings, Inc. ("CKE Restaurant"). CKE Restaurant is controlled by CKE Holdings, L.P. ("CKE LP"). I have a partnership interest in CKE LP, in the form of Class A Units and vested and unvested Class B Units. Except for these units, I do not have any stocks, securities, or other equity interests in CKE Restaurant, CKE LP, or any of their affiliates, subsidiaries, or parent entities. I do not have any deferred compensation, and I will not receive any severance payment or partnership distribution. Before I assume the duties of the position of Secretary, I will receive my 2016 bonus. I will forfeit this bonus if I do not receive it before I assume the duties of the position of Secretary. Before I assume the duties of the position of Secretary, I will also receive outstanding relocation benefits owed to reimburse me for moving to Tennessee in 2016, including costs associated with the sale of my house that was finalized in 2017. I will forfeit any portion of these relocation benefits that I have not received as of the date I assume the duties of the position of Secretary.

Upon resignation, I will forfeit my unvested Class B Units. CKE LP and one of its subsidiaries, CKE Holding Corporation, Inc. ("CKE CORP"), will purchase my Class A Units and my vested Class B Units. To accomplish this purchase, CKE LP will issue me an amount of CKE CORP stock estimated to be equal in value to my Class A Units and vested Class B Units, based on an internal valuation of the company as of December 31, 2016. CKE CORP will then purchase this CKE CORP stock from me. I will receive full payment from CKE CORP for the purchase of this stock before I assume the duties of the

position of Secretary, or I will forfeit any portion of the payment that I have not received and any stock that I continue to hold as of the date I assume the duties of the position of Secretary.

During my appointment as Secretary, I will not participate personally and substantially in any particular matter in which I know CKE Restaurant or CKE Holdings, is a party or represents a party, unless: (a) during the first two years of my appointment, I first receive a written waiver pursuant to 5 C.F.R. § 2635.503(c); or, thereafter, (b) I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d). Consistent with 5 C.F.R. § 2635.102(k), this recusal also applies to any entity that owns a 50% or greater interest in CKE Restaurant or CKE Holdings, as well as to any entity in which either CKE Restaurant or CKE Holdings has a 50% or greater ownership interest. During my initial ethics briefing, pursuant to 5 C.F.R. § 2638.305, I will provide you with a list of all such entities.

In January 2017, I resigned from my positions with the International Franchise Association and the American Enterprise Institute. For a period of one year after my resignation from each of these entities, I will not participate personally and substantially in any particular matter involving specific parties in which I know that entity is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

I will divest my interests in the entities identified in Attachment A within 90 days of my confirmation and the entities identified in Attachment B within 180 days of my confirmation. The reason for extending the timeframe to 180 days for the entities identified in Attachment B is that they are illiquid investment funds and it may take longer to divest them. I am, however, committed to divesting all of these entities as promptly as is reasonably practicable, and I may not need the entire 90-day or 180-day period to complete all divestitures. As to the entities subject to the 180-day deadline, you have advised me that you may be willing to consider a brief extension of up to 60 days for a subset of these entities, provided that I demonstrate that I have made substantial progress toward completing the divestiture of all of these entities by the end of the 180-day time period. With regard to each of these entities, I will not participate personally and substantially in any particular matter that to my knowledge has a direct and predictable effect on the financial interests of the entity—or, in the case of an investment fund, the entity or any of its underlying assets—until I have divested it, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(2). Preexisting confidentiality agreements as to some of the entities identified in Attachment B limit the release of information regarding their underlying assets; however, during my initial ethics briefing, pursuant to 5 C.F.R. § 2638.305, I will work with you to develop an effective recusal mechanism for particular matters affecting any of these investment funds or any underlying asset.

I understand that I may be eligible to request a Certificate of Divestiture for qualifying assets and that a Certificate of Divestiture is effective only if obtained prior to divestiture. Regardless of whether I receive a Certificate of Divestiture, I will ensure that

Mr. Robert A. Shapiro
Alternate Designated Agency Ethics Official
Page 3

all divestitures discussed in this agreement occur within the agreed upon timeframes and that all proceeds are invested in non-conflicting assets.

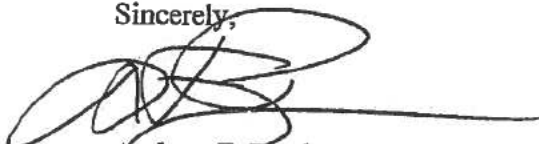
If I have a managed account or otherwise use the services of an investment professional during my appointment, I will ensure that the account manager or investment professional obtains my prior approval on a case-by-case basis for the purchase of any assets other than cash, cash equivalents, investment funds that qualify for the exemption at 5 C.F.R. § 2640.201(a), obligations of the United States, or municipal bonds.

I will meet in person with you during the first week of my service in the position of Secretary in order to complete the initial ethics briefing required under 5 C.F.R. § 2638.305. Within 90 days of my confirmation, I will also document my compliance with this ethics agreement by notifying you in writing when I have completed the steps described in this ethics agreement.

I understand that as an appointee I will be required to sign the Ethics Pledge (Exec. Order no. 13770) and that I will be bound by the requirements and restrictions therein in addition to the commitments I have made in this ethics agreement.

I have been advised that this ethics agreement will be posted publicly, consistent with 5 U.S.C. § 552, on the website of the U.S. Office of Government Ethics with ethics agreements of other Presidential nominees who file public financial disclosure reports.

Sincerely,



Andrew F. Puzder

ATTACHMENT A

1. 3M Co.
2. Abbott Laboratories
3. AbbVie Inc.
4. Accor S.A.
5. ACS Actividades de Construccion y Servicios
6. Adecco Group AG
7. Adidas AG
8. Aegon N.V.
9. Aercap Holdings N.V.
10. Air Products & Chemicals Inc.
11. Alerian MLP ETF
12. Altria Group Inc.
13. AmBev S.A.
14. America Movil S.A.B. de C.V.
15. Amgen Inc.
16. Analog Devices Inc.
17. Apollo Investment Corp.
18. Apple Inc.
19. Ares Capital Corp.
20. Arthur J Gallagher & Co.
21. Astellas Pharma Inc.
22. AstraZeneca Plc
23. Atos Origin S.A.
24. AT&T Inc.
25. Automatic Data Processing Inc.
26. Axa S.A.
27. Banco Bilbao Vizcaya Argentaria S.A.
28. Bank of America Corp.
29. Barclays Plc
30. Baxter International Inc.
31. Bayer AG
32. BB&T Corp.
33. Berkshire Hathaway Inc.
34. BG Group Plc
35. BHP Billiton Plc
36. BlackRock Inc.
37. Brookfield Property Partners LLP
38. Buckeye Partners LP
39. Care Capital Properties
40. Carlsberg A/S
41. Carrefour S.A.
42. Cisco Systems Inc.

43. Check Point Software Technologies Ltd.
44. Chevron Corp.
45. China Mobile Ltd.
46. CK Hutchison Holdings Ltd.
47. Coca Cola Co.
48. Colony Starwood Homes REIT
49. Credit Suisse X-Links Cushing MLP Infrastructure ETN
50. Crestwood Equity
51. Crown Castle Intl. Corp.
52. Daimler AG
53. DBS Group Holdings Ltd.
54. DCP Midstream Partners MLP
55. Delek Logistics
56. Denso Corp.
57. Deutsche Boerse ADR
58. Deutsche Post AG
59. Diageo Plc
60. DNB ASA
61. E.ON SE
62. Embraer S.A.
63. Emerson Electric Co.
64. Enable Midstream Partners MLP
65. Enbridge Energy Partners MLP
66. Energy Transfer Equity LP
67. Energy Transfer Partners MLP
68. Enerjex Resources Inc.
69. Engie
70. Enlink Midstream Partners MLP
71. Enterprise Products
72. EQT Midstream Partners MLP
73. Ericsson
74. European Aeronaut
75. Exxon Mobil Corp.
76. Fastenal Co.
77. Fidelity National Financial Inc.
78. Fifth Street Senior Floating Rate Corp.
79. Financial Select Sector SPDR
80. First Trust Water ETF
81. Ford Motor Co.
82. Fresenius Medical Care AG
83. GEA Group AG
84. Gemalto N.V.
85. General Electric Co.
86. Genesis Energy MLP
87. Global Logistic Properties Ltd.

88. Guggenheim S&P Global Water ETF
89. Hasbro Inc.
90. Health Care REIT Inc.
91. Heineken N.V.
92. Hershey Co.
93. Hitachi Ltd.
94. Home Depot Inc.
95. Holcim Ltd.
96. HSBC Holdings Plc
97. IHS Markit Ltd.
98. Illinois Tool Works Inc.
99. Infineon Technologies AG
100. Intel Corp.
101. Intesa Sanpaolo S.p.A.
102. iShares MSCI Mexico Capped ETF
103. iShares NASDAQ biotechnology ETF
104. Johnson & Johnson
105. JP Morgan Chase & Co.
106. Julius Baer Group Ltd.
107. Kimberly-Clark Corp.
108. Kinder Morgan Inc.
109. Komatsu Ltd.
110. Koninklijke Philips N.V.
111. Kraft Foods Group Inc.
112. Lixil Group Corp.
113. LMP Corporate Loan Fund Inc.
114. Lockheed Martin Corp.
115. LyondellBasell Industries N.V.
116. Macquarie Infrastructure Corp.
117. Magellan Midstream
118. Marsh & McLennan Companies Inc.
119. Matthews Japan Fund
120. Maxim Integrated Products Inc.
121. Mazda Motor Corp.
122. McDonald's Corp.
123. Medtronic Plc
124. Merck & Co Inc.
125. Microsoft Corp.
126. MPLX MLP
127. Murata Manufacturing Co. Ltd.
128. National Grid Plc
129. Neuberger Berman MLP Income Fund
130. New Media Investment Group Inc.
131. New Residential Investment Corp. REIT
132. New Senior Investment Group REIT

133. Newcastle Investment Corp.
134. NextEra Energy Inc.
135. Nippon Telegraph and Telephone Corp.
136. Novartis AG
137. Occidental Petroleum Corp.
138. ONEOK Inc.
139. Orange S.A.
140. Otsuka Holdings Co. Ltd.
141. Panasonic Corp.
142. Paychex Inc.
143. Pearson Plc
144. Pepsico Inc.
145. Pfizer Inc.
146. Phillips 66 Partners MLP
147. Philip Morris International Inc.
148. Plains All American Pipeline
149. Plains GP Holdings LP
150. PNC Financial Services Group
151. Porsche Automobil Holding SE
152. Powershares Global Water Portfolio
153. Powershares Water Resources Portfolio
154. Procter & Gamble Co.
155. Public Storage REIT
156. QUALCOMM Inc.
157. Realty Income Corp.
158. Remy International Inc.
159. Repsol S.A.
160. Roche Holding Ltd.
161. Royal DSM N.V.
162. Royal Dutch Shell Plc
163. Royal KPN N.V.
164. Schlumberger Ltd.
165. Secom Co. Ltd.
166. Seiko Epson Corp.
167. Senior Housing Properties Trust
168. Seven & i Holdings Co. Ltd.
169. Sky Plc
170. Smith & Nephew Plc
171. Smucker J.M. Co.
172. Societe Generale S.A.
173. Sony Corp.
174. SPDR S&P China ETF
175. Spectra Energy Corp.
176. Sumitomo Mitsui Banking Corp.
177. Suntory Beverage & Food Ltd.

178. Syngenta AG
179. T. Rowe Price Group Inc.
180. Tallgrass Energy Partners MLP
181. Taiwan Semiconductor Manufacturing Co. Ltd.
182. Targa Resources Partners
183. Target Corp.
184. TC Pipelines MLP
185. Teekay Offshore Partners LP
186. Tesoro Logistics MLP
187. Texas Instruments Inc.
188. Time Warner Inc.
189. Toray Industries Inc.
190. Total S.A.
191. Toyota Motor Corp.
192. Trend Micro Inc.
193. Twitter
194. Unibail-Rodamco SE
195. Union Pacific Corp.
196. United Technologies Corp.
197. US Bancorp
198. Ventas Inc.
199. Verizon Communications
200. Vivendi SA
201. Vodafone Group Plc
202. Walt Disney Co.
203. WEC Energy Group Inc.
204. Welltower Inc. REIT
205. Western Gas Equity Partners MLP
206. Western Gas Partners LP
207. The Williams Companies Inc.
208. William Hill Plc
209. Williams Partners MLP
210. WisdomTree Japan Hedged Equity Fund ETF
211. WisdomTree Trust India
212. WisdomTree Trust Japan
213. WPP Plc

ATTACHMENT B

Investment funds that will be divested as soon as practicable:

1. Alphakeys KKR Energy
2. Alphakeys Millenium III
3. Altair Commercial Real Estate Lending Fund LLC
4. Altair Healthcare Real Estate Fund LLC
5. Apollo ANRP Co-Investors II (B) LP
6. Apollo Co-Investors VIII (B) LP
7. Apollo European Credit Fund LP
8. Atlas Enhanced Fund LP
9. Solamere Capital Fund II LP
10. Solamere Holdco I LLC
11. Solamere Portfolio Company Investments II LLC
12. Solamere 2016 Holdco I LLC
13. Solus LLC