I spoke to him this afternoon. Sandy

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 Williamson
Presidential Nominations Branch
U.S. Office of Government Ethics
1201 New York Avenue, NW - Suite 500
Washington, DC 20005
202-482-9283
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.
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) [D (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
Thank you

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.

I hope this helps

Seth

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

How is the report coming along?
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>Nonresponsive record</td>
<td></td>
<td></td>
<td></td>
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</tr>
<tr>
<td>Puzder, Andrew</td>
<td>1/9/2017</td>
<td>Department Of Labor [Secretary]</td>
<td>Elaine Newton</td>
<td>(b) (5)</td>
<td>8</td>
</tr>
<tr>
<td>----------------</td>
<td>---------</td>
<td>--------------------------------</td>
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</tr>
</tbody>
</table>

Nonresponsive record
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
3:15 tomorrow works for me. Elaine
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
Record referred to DOL
The sample letter is saved at:
N:\Resources\Sample Letters (including letter (pdf version).pdf, letter (word version).docx)

I’ve attached both the Word and pdf versions.
Good Afternoon,

This is just a follow-up to the conversation that I had earlier with Rob. I am also attaching a sample of the letter. Please let me know if you have any questions.

Thanks, Elaine

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Thanks!

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

Prospective Labor status? Thanks!
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

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 [redacted].

Please let me know if you would like to discuss.
Thanks,

-Kian

Kian Hudson*

GIBSON DUNN

Gibson, Dunn & Crutcher LLP
1050 Connecticut Avenue NW
Washington, DC 20036
Tel +1 202.887.3783 Fax +1 202.530.9572
KHudson@gibsondunn.com • www.gibsondunn.com
* Admitted only in Indiana; practicing under the supervision of the Principals of the Firm

This message may contain confidential and privileged information. If it has been sent to you in error, please reply to advise the sender of the error and then immediately delete this message.
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.

Lorna Syme
Presidential Nominations Branch
U.S. Office of Government Ethics
1201 New York Ave., NW, Suite 500
Washington, DC 20005-3917
Telephone: (202) 482-9277
Facsimile: (202) 482-9237

Visit OGE’s website: >http://www.oge.gov<<
Follow OGE on Twitter: @OfficeGovEthics
Great – we look forward to speaking with you all then. Below is a dial in:

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

Conference code:

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
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
GIBSON DUNN

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’; Sadler, Rob - SOL
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
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][i]DII, (b), (c). 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][i]DII, (b), (c) when you have it.  

Please let me know if you have any questions.  

Thank you,  

Elaine  

Elaine Newton  
Associate Counsel
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.
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)

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)

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)

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)

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)

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)
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 -  

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 -  

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 -  

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 -  

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)

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)

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)**

**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)**


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)**

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

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

**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)**

**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)**

**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)**
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)

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)

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)

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)

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)

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)

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)

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)
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)
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)
PN25 — 115th Congress (2017-2018) — Rex W. Tillerson — Department of State
Rex 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)
Dear Bob, Rob, and Elaine—

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
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 +1 202.530.9804
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>;
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)
Thank you,
Seth

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

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This message may contain confidential and privileged information. If it has been sent to you in error, please reply to advise the sender of the error and then immediately delete this message.
Record referred to DOL
Good morning all,

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

[Redacted: (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. ; 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)

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

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

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.; 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>; Elaine Newton <enewton@oge.gov>; Deborah J. Bortot <djibortot@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:
Line 2:
Bob,

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: Wednesday, February 01, 2017 7:52 PM
To: Shapiro, Robert - SOL; Sadler, Rob - SOL
Cc: Fackler, Stephen W.; Hudson, Kian J.
Subject: Bob and Rob -- please see the attached policy and feel free to share with OGE.

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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Thank you Bob. We were actually mistaken about the date of [blurred]. 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
Heather Jones
(202) 482-9316
Office of Government Ethics

Visit OGE's website: www.oge.gov
Follow OGE on Twitter: @OfficeGovEthics
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' <AMooney@gibsondunn.com>; Mooney, Alexander W. <AMooney@gibsondunn.com>; Fackler, Stephen W. <SFackler@gibsondunn.com>; Hudson, Kian J. <KHudson@gibsondunn.com>; Sadler, Rob - SOL <b>(b) (6) (8)>; Elaine Newton <enewton@oge.gov>; Deborah J. Bortot <djibortot@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 few matters that need to be resolved. 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

---

From: Seth Jaffe [mailto:sjffe@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 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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Bob,

Can we give you a call now?

Seth
Record referred to DOL
Seth,

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

Record referred to DOL
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
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)
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
Bob,

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

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
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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

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
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

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.

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
Attached is the revised EA incorporating today’s discussions. At the top of page 2, 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

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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'; Sadler, Rob - SOL; 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 <sjaffe@oge.gov>
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'; Sadler, Rob - SOL; Seth Jaffe <sjaffe@oge.gov>
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,

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'; Sadler, Rob - SOL <b>(6)>
Subject: RE: Integrity Revisions

Good Morning,

For Part 3, [b](5)

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 <b>(6)>
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)

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'; Sadler, Rob - SOL [b](6)
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)
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)
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

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Great. Thanks, Bob!

Here’s what we’ll need:

Walt
Walter M. Shaub, Jr.
Director
Record referred to DOL
Bob,

Attached is a revised ethics agreement.

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
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.
Thanks. And feel free to call me Andy.

Sent from my iPhone
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.

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

Respectfully submitted,

Andrew F. Puzder
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

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
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.
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
Rob,

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

Elaine

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!
Good Afternoon,

The draft looks fine. I did a quick scan of the holdings and noticed a couple of typos. Please let me know if you have any questions.

Thanks, Elaine
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
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

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
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,

[Signature]

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. Aeropostale Holdings N.V.
10. Air Products & Chemicals Inc.
11. Amerian 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.
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
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