### Resolved Interaction

**Interaction Number:** 15399

**Initiation Date:** 2018-06-11

**Title:** Question about ethics complaint (Huffington Post)

**Question:**
I'm writing about a new complaint to OGE filed by the American Democracy Legal Fund, requesting the agency investigate EPA Administrator Scott Pruitt's use of his office to obtain a Chick-fil-A franchise and a short-term job with the nonprofit Concordia for his wife.

Does the OGE plan to fulfill the request?

**Update:**

**Categories:** Misuse of Position

**Origin Of Interaction:** Email

**Source:** Non-Agency Press

**First Name:** Alexander C.

**Last Name:** Kaufman

**Title:** Reporter, Huffington Post

**Position:**

**Email:** [b] (6)

**Phone:** [b] (6)

**Other Contact Notes:**

**Assignment:** Elizabeth D. Horton

**Watching:**

**Temporary Notes:**

**created by:** Elizabeth D. Horton

---

### Resolution Information

**Resolution Date:** 2018-06-11

**Resolution Category:** Resolved

**Response:** I informed the reporter on background that OGE was not aware of such a complaint. *(Assigned to: Elizabeth D. Horton)*

**Complexity (level):** 1

[Click to view/hide complexity guidelines]

**Time Spent (hours):** 0-1 hour

**Contributor:**

---

**Interaction History Log**
<table>
<thead>
<tr>
<th>Closed</th>
<th>06/11/2018 03:16:17 PM by Elizabeth D. Horton</th>
</tr>
</thead>
<tbody>
<tr>
<td>Now Assigned: Elizabeth D. Horton</td>
<td>06/11/2018 03:16:17 PM by Elizabeth D. Horton</td>
</tr>
</tbody>
</table>

Division(s) assigned: I00
**Resolved Interaction**

**Interaction Number: 15489**

<table>
<thead>
<tr>
<th>Field</th>
<th>Value</th>
</tr>
</thead>
<tbody>
<tr>
<td>Initiation Date</td>
<td>2018-06-19</td>
</tr>
<tr>
<td>Title</td>
<td>Question about complaint (E&amp;E News)</td>
</tr>
</tbody>
</table>
| Question            | Elizabeth,

Hi, it's Kevin Bogardus with E&E News.

I'm working on a story about the Campaign Legal Center filing a complaint with the EPA Inspector General about Administrator Pruitt. Here is CLC's letter linked below.

http://www.campaignlegalcenter.org/sites/default/files/Complaint%20to%20EPA%20%20CLC%20%20June%202019%202018.pdf

CLC says it also sent this letter to the Office of Government Ethics.

I have a few questions about this, which are:

— Has OGE received this letter?

— Does OGE plan to investigate the allegations against Administrator Pruitt using EPA resources to try to secure his wife a Chick-fil-A franchise?

Please get back to me as soon as possible. My deadline is 12:30 pm EST today but the sooner you get back to me, the more it helps my reporting. Thank you for your help.

<table>
<thead>
<tr>
<th>Update</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Categories</td>
<td>Ethics Program Administration</td>
</tr>
<tr>
<td>Origin Of Interaction</td>
<td>Email</td>
</tr>
<tr>
<td>Source</td>
<td>Non-Agency</td>
</tr>
<tr>
<td>Source</td>
<td>Press</td>
</tr>
<tr>
<td>First Name</td>
<td>Kevin</td>
</tr>
<tr>
<td>Last Name</td>
<td>Bogardus</td>
</tr>
<tr>
<td>Title</td>
<td>Reporter, E&amp;E News</td>
</tr>
<tr>
<td>Position</td>
<td></td>
</tr>
<tr>
<td>Email</td>
<td><a href="mailto:bg071445@ogc.gov">bg071445@ogc.gov</a></td>
</tr>
<tr>
<td>Phone</td>
<td></td>
</tr>
<tr>
<td>Other Contact Notes</td>
<td></td>
</tr>
<tr>
<td>Assignment</td>
<td>Elizabeth D. Horton</td>
</tr>
<tr>
<td>Watching</td>
<td></td>
</tr>
<tr>
<td>Temporary Notes</td>
<td></td>
</tr>
<tr>
<td>created by</td>
<td>Elizabeth D. Horton</td>
</tr>
</tbody>
</table>

**Resolution Information**

Resolution Date: 2018-06-18
<table>
<thead>
<tr>
<th>Resolution Category:</th>
<th>Resolved</th>
</tr>
</thead>
<tbody>
<tr>
<td>Response:</td>
<td>I told the reporter on background that we were not aware of the letter and referred him to OGE's 6/15 letter to the EPA's OIG. <em>(Assigned to: Elizabeth D. Horton)</em></td>
</tr>
<tr>
<td>Complexity (level):</td>
<td>1</td>
</tr>
<tr>
<td>Time Spent (hours):</td>
<td>0-1 hour</td>
</tr>
<tr>
<td>Contributor:</td>
<td></td>
</tr>
</tbody>
</table>

**Interaction History Log**

<table>
<thead>
<tr>
<th>Closed</th>
<th>06/19/2018 01:27:36 PM by Elizabeth D. Horton</th>
</tr>
</thead>
<tbody>
<tr>
<td>Now Assigned:</td>
<td>Elizabeth D. Horton 06/19/2018 01:27:36 PM by Elizabeth D. Horton</td>
</tr>
</tbody>
</table>

 Division(s) assigned: IOO

(b)(6) Network Location Information
Resolved Interaction

**Interaction Number:** 17504

**Initiation Date:** 2019-06-07

**Title:** PA IG coordinated with OGE on Pruitt Chick-fil-A investigation

**Question:** Hi, it's Kevin Bogardus with E&E News.

I'm working on a story about this letter from the EPA Inspector General to Sen. Udall (https://www.tomudall.senate.gov/imo/media/doc/Final%20Response%20to%20RM%20form%20Udall.pdf), which was shared in a press release yesterday (please see below). I had a few questions about this, which are:

- The letter says EPA IG "coordinated" with the Office of Government Ethics on the EPA IG investigation of former EPA Administrator Scott Pruitt using his official position and his staff to seek business opportunities with Chick-fil-A and Concordia. What did that coordination entail? Interviews held jointly by EPA IG and OGE? Advice and guidance from OGE? Please be specific as possible.

Please get back to me as soon as possible. My deadline is noon EST today but the sooner you get back to me, the more it helps my reporting. Thank you for your help.

Kevin Bogardus
E&E News Reporter

**Update:**

**Categories:** Misuse of Position

**Origin Of Interaction:** Email

**Source:** Non-Agency Press

**First Name:** Kevin

**Last Name:** Bogardus

**Title:** Bogardus, E&E News

**Position:** Reporter, E&E News

**Email:** [REDACTED]

**Phone:** [REDACTED] K. Bogardus phone numbers

**Other Contact Notes:**

**Assignment:** Patrick Shepherd

**Watching:**

**Temporary Notes:**

**created by:** Patrick Shepherd

---

**Resolution Information**

**Resolution Date:** 2019-06-07

**Resolution Category:** Resolved

**Response:** Shared with reporter that OGE does not comment on individual cases. (Assigned to: Patrick Shepherd)

**Complexity (level):**

[Click to view/hide complexity guidelines]
Interaction History Log

<table>
<thead>
<tr>
<th>Status</th>
<th>Date/Time</th>
<th>By</th>
</tr>
</thead>
<tbody>
<tr>
<td>Closed</td>
<td>06/07/2019 10:45:21 AM</td>
<td>Patrick Shepherd</td>
</tr>
<tr>
<td>Now Assigned</td>
<td>06/07/2019 10:45:21 AM</td>
<td>Patrick Shepherd</td>
</tr>
</tbody>
</table>

Division(s) assigned: PCD
June 15, 2018

Arthur A. Elkins, Jr.
Inspector General
U.S. Environmental Protection Agency
Office of Inspector General
1200 Pennsylvania Avenue, N.W. (2410T)
Washington, DC 20460

Dear Inspector General Elkins:

As the supervising ethics office for the Executive branch, the U.S. Office of Government Ethics (OGE) leads an ethics program designed to prevent conflicts of interest on the part of Executive branch employees. In an April 6, 2018, letter to Kevin Minoli, Principal Deputy General Counsel and Designated Agency Ethics Official of the U.S. Environmental Protection Agency (EPA), I raised concerns about the various reported actions of Scott Pruitt, Administrator of the EPA as they may have constituted violations of the Standards of Ethical Conduct for Employees of the Executive Branch (Standards of Conduct) and Executive Order 13770.¹ I now write to you to request that your office investigate new allegations in addition to those identified in my April 6 letter.²

A variety of sources raise concerns about the Administrator’s use of his position. Specifically, recent reports raise additional questions regarding the Administrator’s use of subordinates’ time to search for housing and furniture for the Administrator.³ Recent news reports further allege that the Administrator used his security detail to complete other personal errands for him on official time.⁴ Additionally, recent articles suggest that Administrator used a staff member and his official position to seek business opportunities for his wife with

---

Chick-fil-A, among others. These reports raise concerns about whether the Administrator misused his position.

Based on correspondence from Mr. Minoli, your letter to Congress, and OGE’s communications with your office in which we have provided technical assistance at your request on several issues related to that investigation, I know that you are already looking into the alleged conduct I raised in my April 6 letter. OGE now requests that you also investigate and analyze the newly alleged conduct described above. Further, it is our understanding that you plan to issue a report concerning the previous (and possibly new) allegations. We ask you to complete your report, as soon as possible, so that we can decide whether to begin a formal corrective action proceeding in order to make a formal recommendation to the President.

As noted to Mr. Minoli, the American public needs to have confidence that ethics violations, as well as the appearance of ethics violations, are investigated and properly addressed. The efficacy of, and public trust in, our Government demands it. If you have any questions, please do not hesitate to contact my office.

Sincerely,

[Signature]

David J. Apol
Acting Director and General Counsel

cc: Kevin Minoli, Principal Deputy General Counsel and Designated Agency Ethics Official, U.S. Environmental Protection Agency

---


7 5 C.F.R. §§ 2635.702, .705(b).


10 5 C.F.R. § 2638.504.