

From: LNAPPS1.USOGE@oge.gov
To: [Deborah J. Bortot](#)
Subject: IMPORTANT - ACTION NEEDED - Assign New Nominee Report - Arthur B Culvahouse
Date: Tuesday, August 28, 2018 8:37:30 AM

Nominee, Arthur B Culvahouse, is pending.

ACTION: Determine complexity and assign to OGE Reviewer. Package will be delivered to you shortly.

To review electronic materials click the link below.

(b)(6) - Internal agency website

From: LNAPPS1.USOGE@oge.gov
To: [Kimberly L. Sikora Panza](#)
Subject: IMPORTANT - ACTION NEEDED - New Nominee Assigned - Begin Review & Send 1st Set of Comments - Arthur B Culvahouse
Date: Tuesday, August 28, 2018 11:24:17 AM

Nominee, Arthur B Culvahouse, 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.

(b)(6) - Internal agency website

From: [Kimberly L. Sikora Panza](#)
To: [Keith Labeledz](#)
Subject: RE: stupid question
Date: Tuesday, August 28, 2018 3:47:20 PM

Thanks - I thought it might have been a hiccup, but then got terrified I was missing something!

-----Original Message-----

From: Keith Labeledz
Sent: Tuesday, August 28, 2018 3:40 PM
To: Kimberly L. Sikora Panza
Subject: RE: stupid question

I thought I removed that template question but, given some intervening calls while I worked on this document, I must have missed it.

Keith

-----Original Message-----

From: Kimberly L. Sikora Panza
Sent: Tuesday, August 28, 2018 3:26 PM
To: Keith Labeledz
Subject: stupid question

Hi Keith,

I was just assigned this nominee (b)(6) - Internal agency website

, and see in the draft comments you saved in the folder, (b) (5)

Thanks in advance for your input,

Kim

Referral to DOS

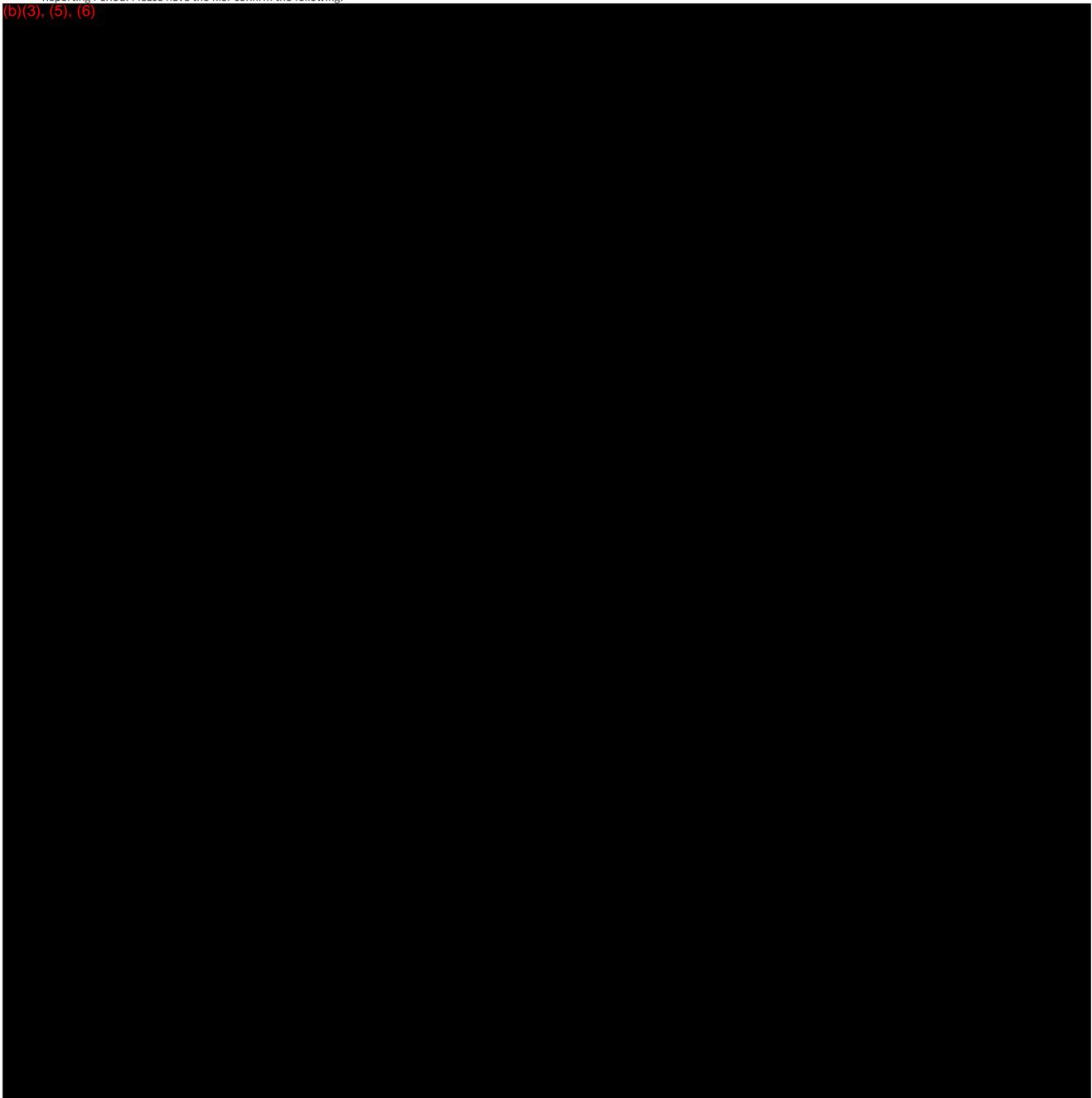
From: Kimberly L. Sikora Panza
Sent: Wednesday, August 29, 2018 1 08 PM
To: Mann, Judy H
Cc: Kimberly L. Sikora Panza
Subject: New prospective nominee - CULVAHOUSE (contains CUI)
CONTROLLED
Hi Judy,

I am the OGE reviewer assigned to review the report for [Arthur Boggess Culvahouse](#). I have the following preliminary questions and comments:

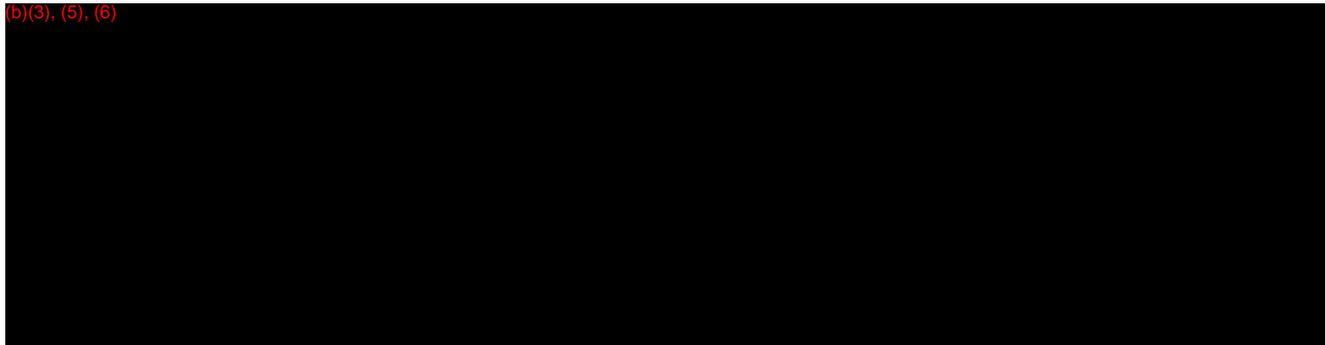
Background Questions

* Reporting Period: Please have the filer confirm the following:

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



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



Thank you in advance for your input and assistance – I look forward to working with you!
Kim

Kimberly L. Sikora Panza
Associate Counsel
U.S. Office of Government Ethics
1201 New York Avenue NW, Suite 500
Washington, DC 20005
202 482 9214

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Referral to DOS

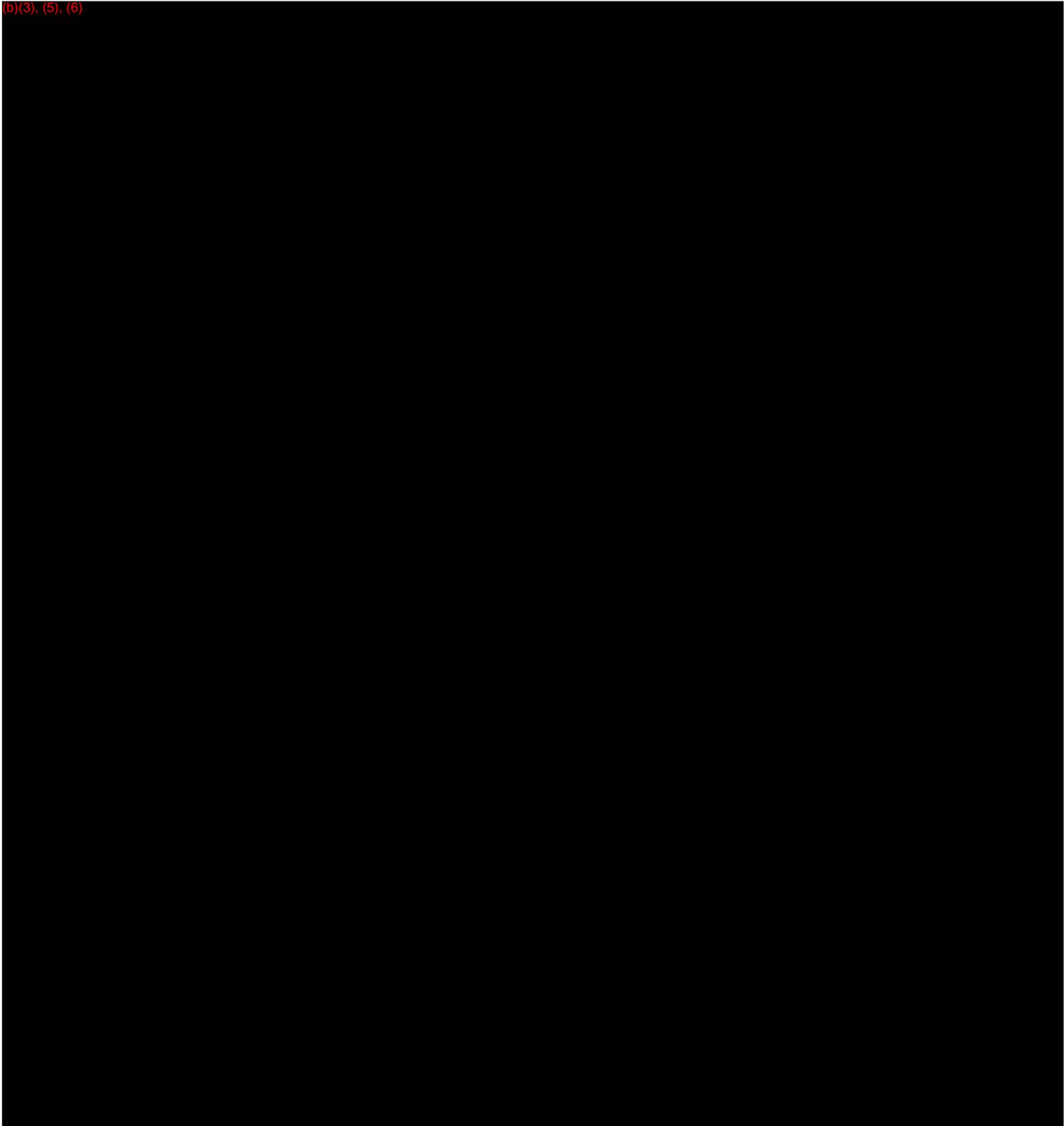


From: [Kimberly L. Sikora Panza](#)
To: [Heather A. Jones](#)
Subject: reporting Qs- culvahouse
Date: Thursday, September 6, 2018 12:35:25 PM
Attachments: [image004.png](#)
[image005.png](#)

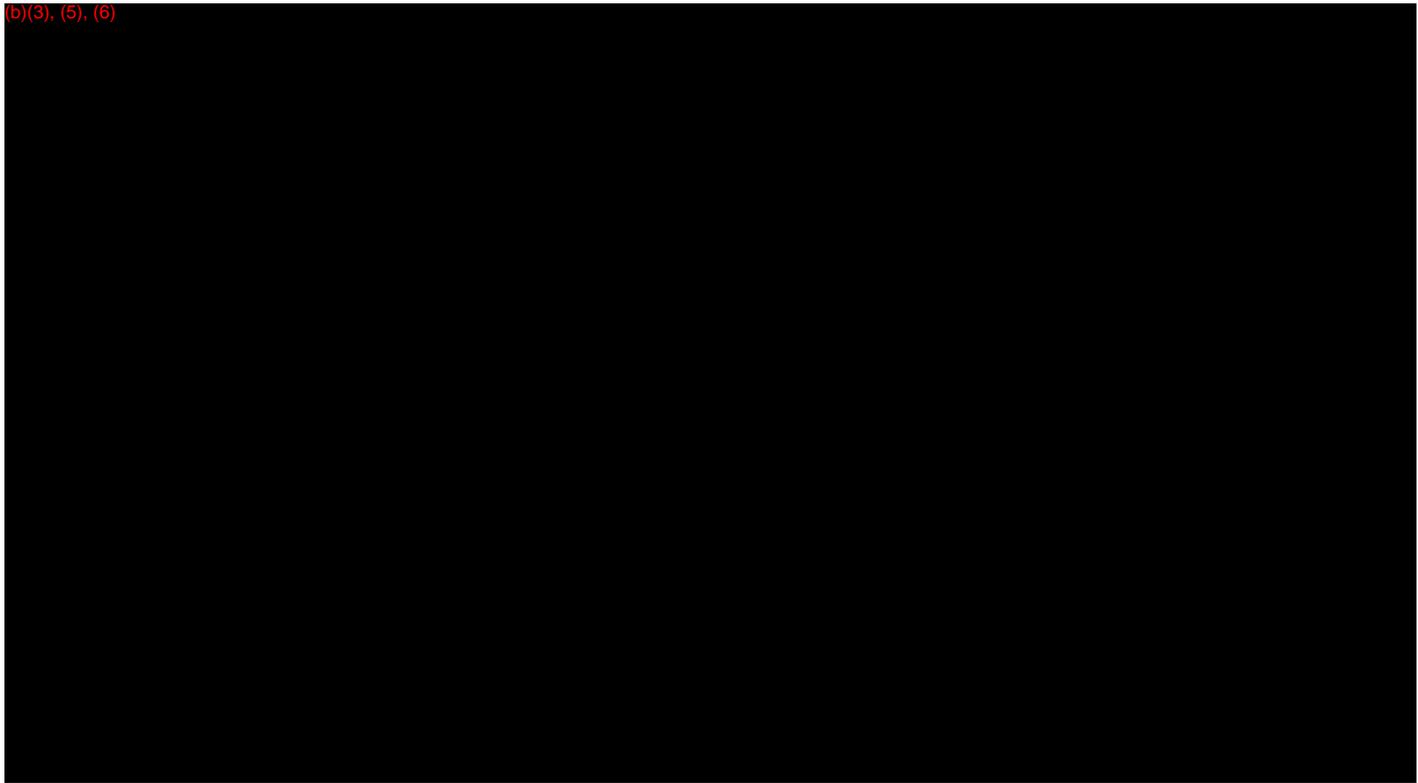
Hi Heather,

I just rec'd input on the Culvahouse report, and have a couple of mostly reporting-type questions I wanted to run by you (I feel like it is easier for me to gather the relevant information and ask via email, but feel free to respond via email or by phone, as you prefer).

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



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



Thanks in advance for your input!!
Kim

Kimberly L. Sikora Panza
Associate Counsel
U.S. Office of Government Ethics
1201 New York Avenue NW, Suite 500
Washington, DC 20005
202.482.9214

From: [Kimberly L. Sikora Panza](#)
To: [Patrick J. Lightfoot](#)
Subject: RE: KSP OOO
Date: Friday, September 7, 2018 3:42:32 PM

I 1,000,000% need it!

From: Patrick J. Lightfoot
Sent: Friday, September 07, 2018 3:42 PM
To: Kimberly L. Sikora Panza
Subject: RE: KSP OOO

Sounds good; thanks for the updates and enjoy the long weekend!

From: Kimberly L. Sikora Panza
Sent: Friday, September 07, 2018 3:41 PM
To: Patrick J. Lightfoot
Subject: KSP OOO

Hey,

I'm out Monday so wanted to give a quick debrief:

- Noms – Wrigley has been nominated, waiting for the finals to come in. If they do, the folder is in the top drawer of my metal file cabinet. I've already saved my notes into FDTs and put the stuff in the folder that I can. Will just need you to print and double check EA and bring forward if it comes in Monday.

Other pending noms: (b)(5), (6)

[REDACTED]
[REDACTED]; Culvahouse, I have follow up Qs into agency. For that stuff, unless a simple Q comes your way (for (b)(5), (6) [REDACTED]), I can handle when I get back.

- CDs - have a monster CD (b)(6) [REDACTED] Way too complicated for you to do anything, I can address when I get back.
- No open DO questions.
- I don't think I have anything else that might come up for you?

Have a great weekend!

Kim

From: [Kimberly L. Sikora Panza](#)
To: "Mann, Judy H"
Subject: RE: Culvahouse [contains CUI]
Date: Tuesday, September 11, 2018 12:25:11 PM

CONTROLLED

Hi Judy,

Thank you for the additional information. I understand that we're down to (b)(3), (6) . Given the specific facts that have been presented to us in this case, (b)(3), (5), (6) . Please note, however, that (b)(3), (5), (6)

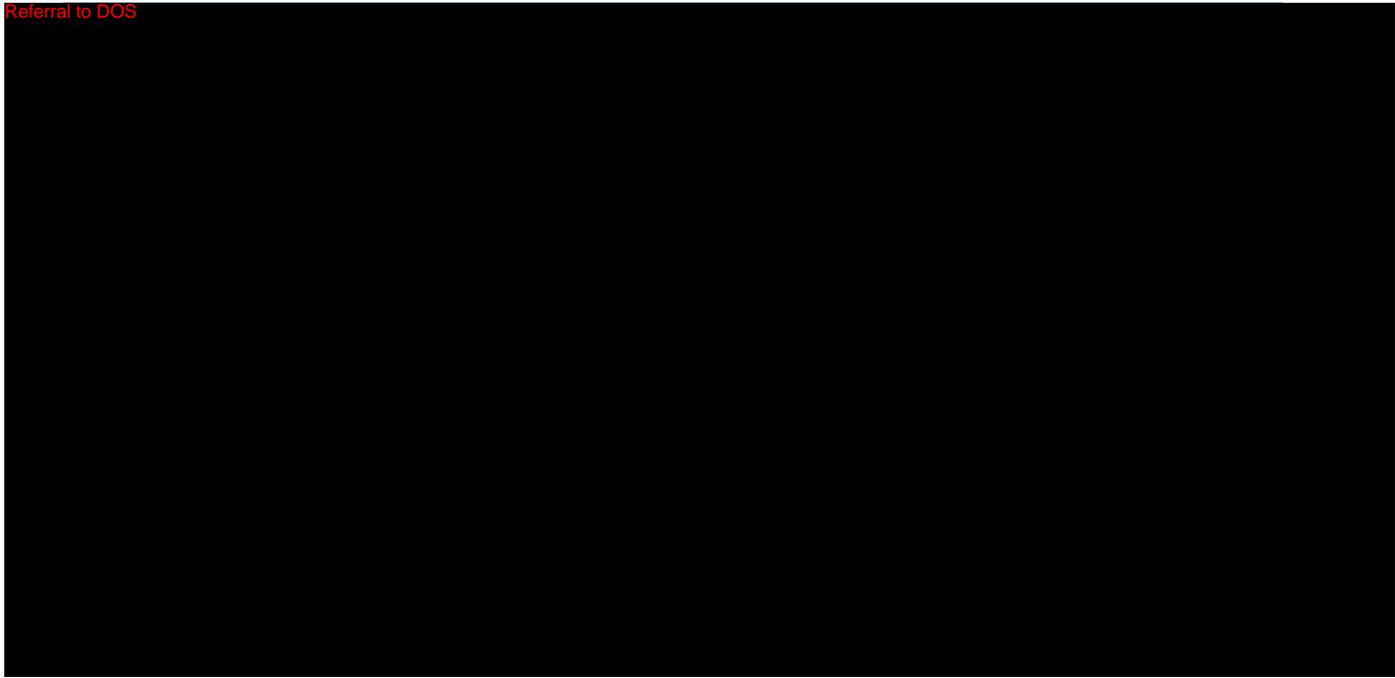
On a separate but related note, the filer will need to disclose (b)(3), (5), (6)

Thanks!

Kim

Kimberly L. Sikora Panza
Associate Counsel
U.S. Office of Government Ethics
1201 New York Avenue NW, Suite 500
Washington, DC 20005
202.482.9214

Referral to DOS



From: Kimberly L. Sikora Panza
Sent: Friday, September 07, 2018 3:11 PM
To: Mann, Judy H
Subject: RE: Culvahouse [contains CUI]

CONTROLLED

Hi Judy,

Thank you for the additional information re (b)(3), (5), (6) . Regarding the (b)(3), (5), (6)

, I have a clarification question. (b)(3), (5), (6)

Thanks in advance for the clarification,

Kim

Kimberly L. Sikora Panza
Associate Counsel

U.S. Office of Government Ethics
1201 New York Avenue NW, Suite 500
Washington, DC 20005
202.482.9214

Referral to DOS



From: Kimberly L. Sikora Panza <klspanza@oge.gov>

Sent: Thursday, September 6, 2018 3:25 PM

To: Mann, Judy H (b) (6) >

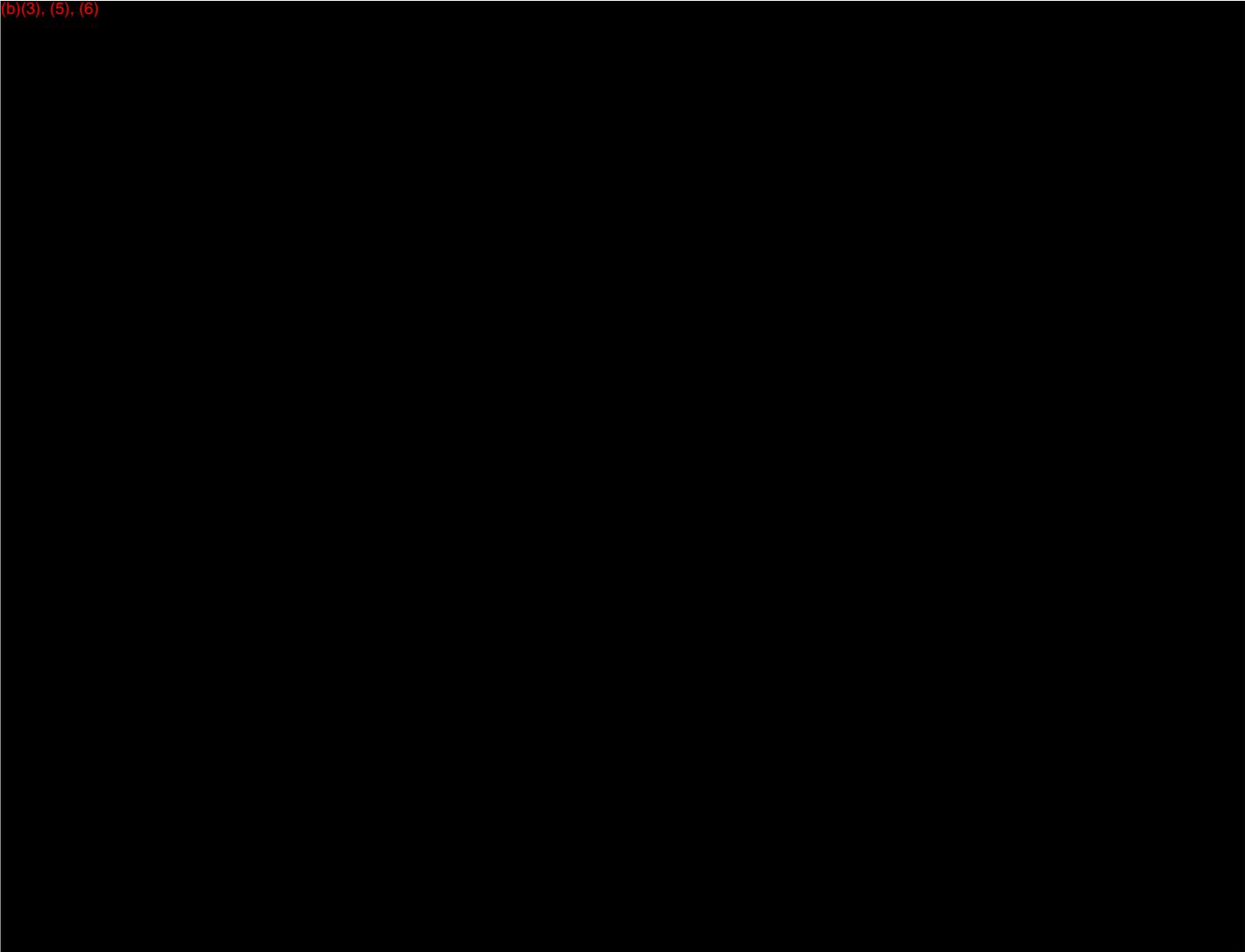
Subject: RE: Culvahouse [contains CUI]

CONTROLLED

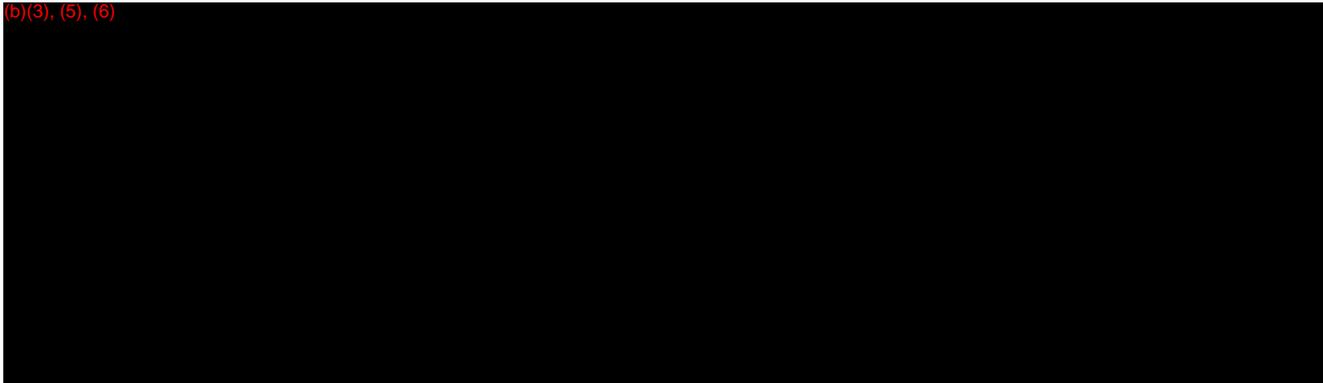
Hi Judy,

Thanks for your email, and thanks to the filer for his thorough responses! I have the following additional comments and questions (below I also respond to the filer's questions):

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



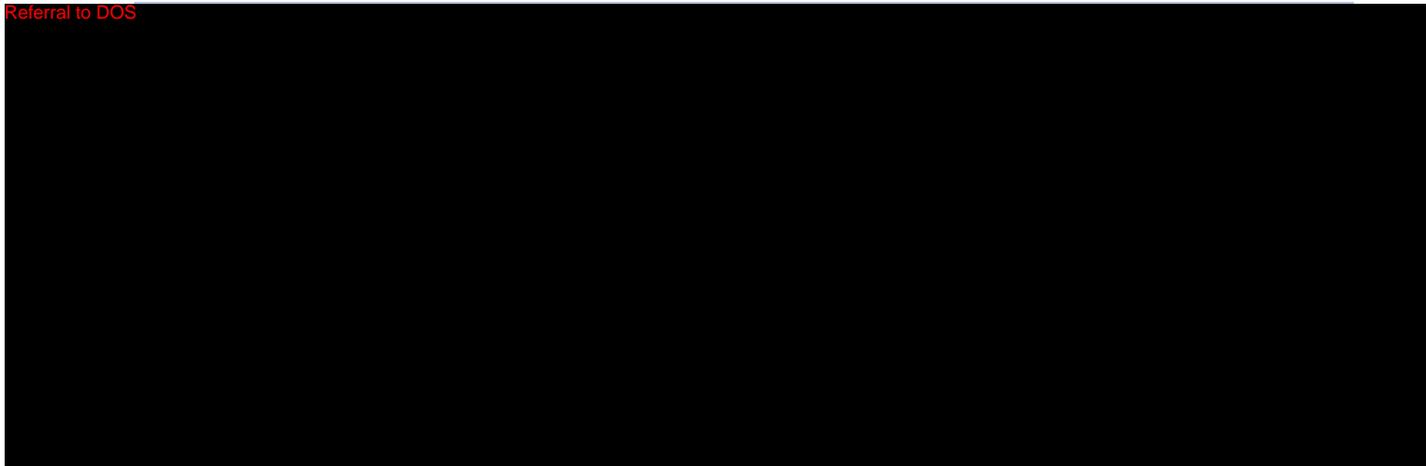
(b)(3), (5), (6)



Thank you again to you and the filer for the hard work on the report!
Kim

Kimberly L. Sikora Panza
Associate Counsel
U.S. Office of Government Ethics
1201 New York Avenue NW, Suite 500
Washington, DC 20005
202.482.9214

Referral to DOS



From: [Kimberly L. Sikora Panza](#)
To: [Heather A. Jones](#)
Subject: RE: Part 3
Date: Wednesday, September 19, 2018 1:53:58 PM
Attachments: [image001.png](#)

No attachment found in search

(b)(6) - personal email



From: Kimberly L. Sikora Panza
Sent: Wednesday, September 19, 2018 1:51 PM
To: Heather A. Jones
Subject: RE: Part 3

That was my feeling. I'm just going to reiterate that (b)(3), (5), (6)




From: Heather A. Jones
Sent: Wednesday, September 19, 2018 1:50 PM
To: Kimberly L. Sikora Panza
Subject: RE: Part 3

(b)(5), (6)



From: Kimberly L. Sikora Panza
Sent: Wednesday, September 19, 2018 12:42 PM
To: Heather A. Jones
Subject: Part 3

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



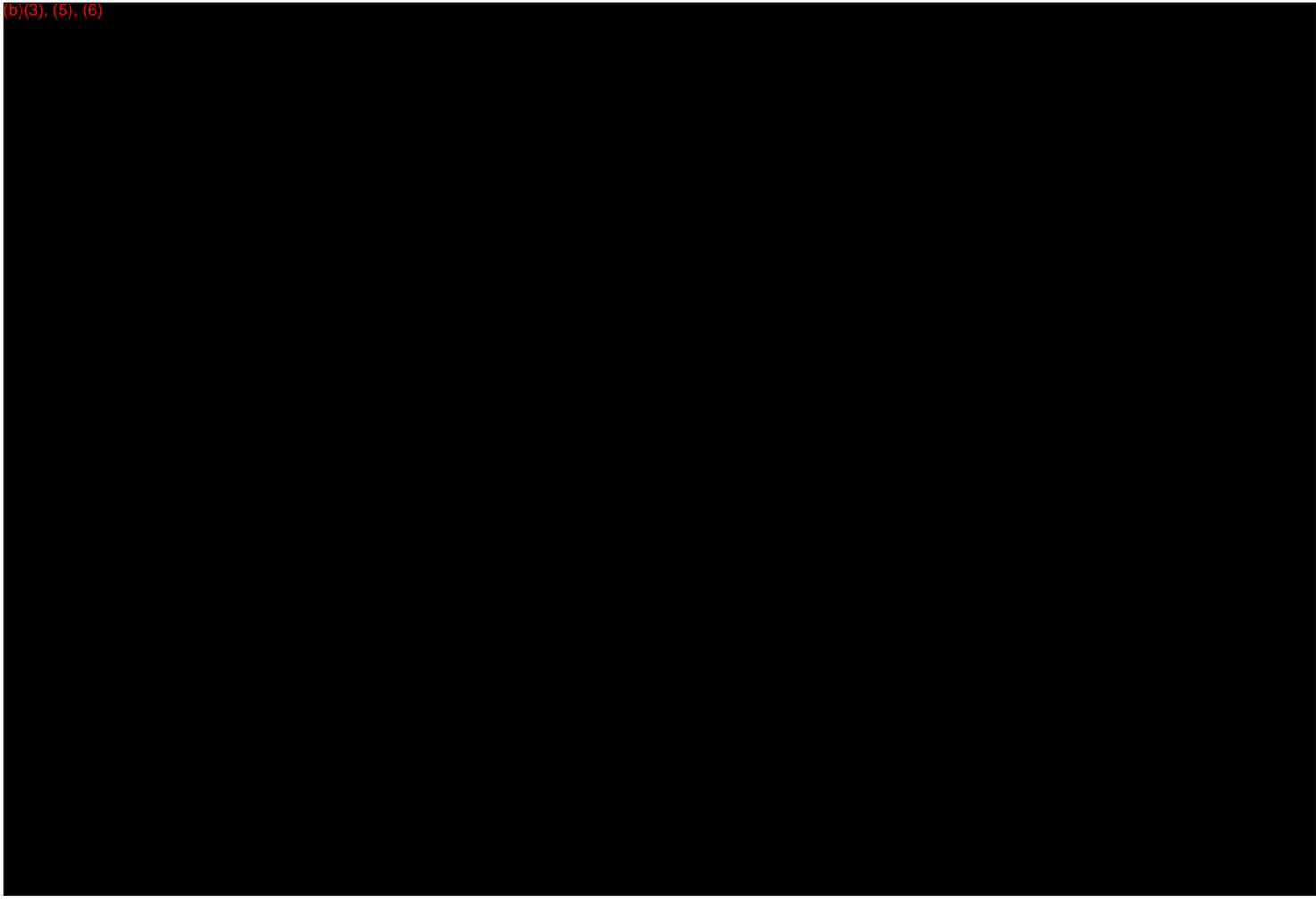
Kimberly L. Sikora Panza
Associate Counsel
U.S. Office of Government Ethics
1201 New York Avenue NW, Suite 500
Washington, DC 20005
202.482.9214

From: [Kimberly L. Sikora Panza](#)
To: [Heather A. Jones](#)
Cc: [Kimberly L. Sikora Panza](#)
Subject: EA language (b) (5)
Date: Thursday, September 20, 2018 9:06:21 AM
Attachments: [Culvahouse Report Sept 19.pdf](#)

276 financial disclosure report withheld in full - (b)(3) - Available at <https://extapps2.oge.gov/201/Presiden.nsf/PAS%20Index?OpenView>

Hi Heather,

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



Could you please let me know your thoughts?

Thanks!

Kim

Kimberly L. Sikora Panza
Associate Counsel
U.S. Office of Government Ethics
1201 New York Avenue NW, Suite 500
Washington, DC 20005
202.482.9214

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



Let me know your thoughts, and if you have a better way to articulat

From: [Kimberly L. Sikora Panza](#)
To: ["Mann, Judy H"](#)
Subject: RE: Culvahouse (contains CUI)
Date: Thursday, September 20, 2018 2:00:56 PM

CONTROLLED

Thanks, Judy. Please also ensure that the filer understands that by so stating in the EA, he will be memorializing his commitment to (b)(3), (5), (6)

On a separate note, sorry I missed your call. If you'd like to give me a ring when you get off your 2pm call, I should be available.

Thanks,
Kim

Kimberly L. Sikora Panza
Associate Counsel
U.S. Office of Government Ethics
1201 New York Avenue NW, Suite 500
Washington, DC 20005
202.482.9214

Referral to DOS

From: Kimberly L. Sikora Panza
Sent: Thursday, September 20, 2018 12:16 PM
To: Mann, Judy H
Subject: RE: Culvahouse (contains CUI)

CONTROLLED

Thanks for the update, Judy, and great timing – I was just about to email you to share language that we'd like to see in the EA re those (b)(5), (6)

(b) (5)

Thanks,
Kim

Kimberly L. Sikora Panza
Associate Counsel
U.S. Office of Government Ethics
1201 New York Avenue NW, Suite 500
Washington, DC 20005
202.482.9214

Referral to DOS

From: Kimberly L. Sikora Panza <klspanza@oge.gov>

Sent: Wednesday, September 19, 2018 4:53 PM

To: Mann, Judy H <(b) (6)>

Subject: RE: Culvahouse (contains CUI)

CONTROLLED

Hi Judy,

Re this question:

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



Thanks,
Kim

Kimberly L. Sikora Panza
Associate Counsel
U.S. Office of Government Ethics
1201 New York Avenue NW, Suite 500
Washington, DC 20005
202.482.9214

Referral to DOS



From: Kimberly L. Sikora Panza <klspanza@oge.gov>

Sent: Wednesday, September 19, 2018 2:03 PM

To: Mann, Judy H <(b) (6)>

Cc: Kimberly L. Sikora Panza <klspanza@oge.gov>

Subject: RE: Culvahouse (contains CUI)

CONTROLLED

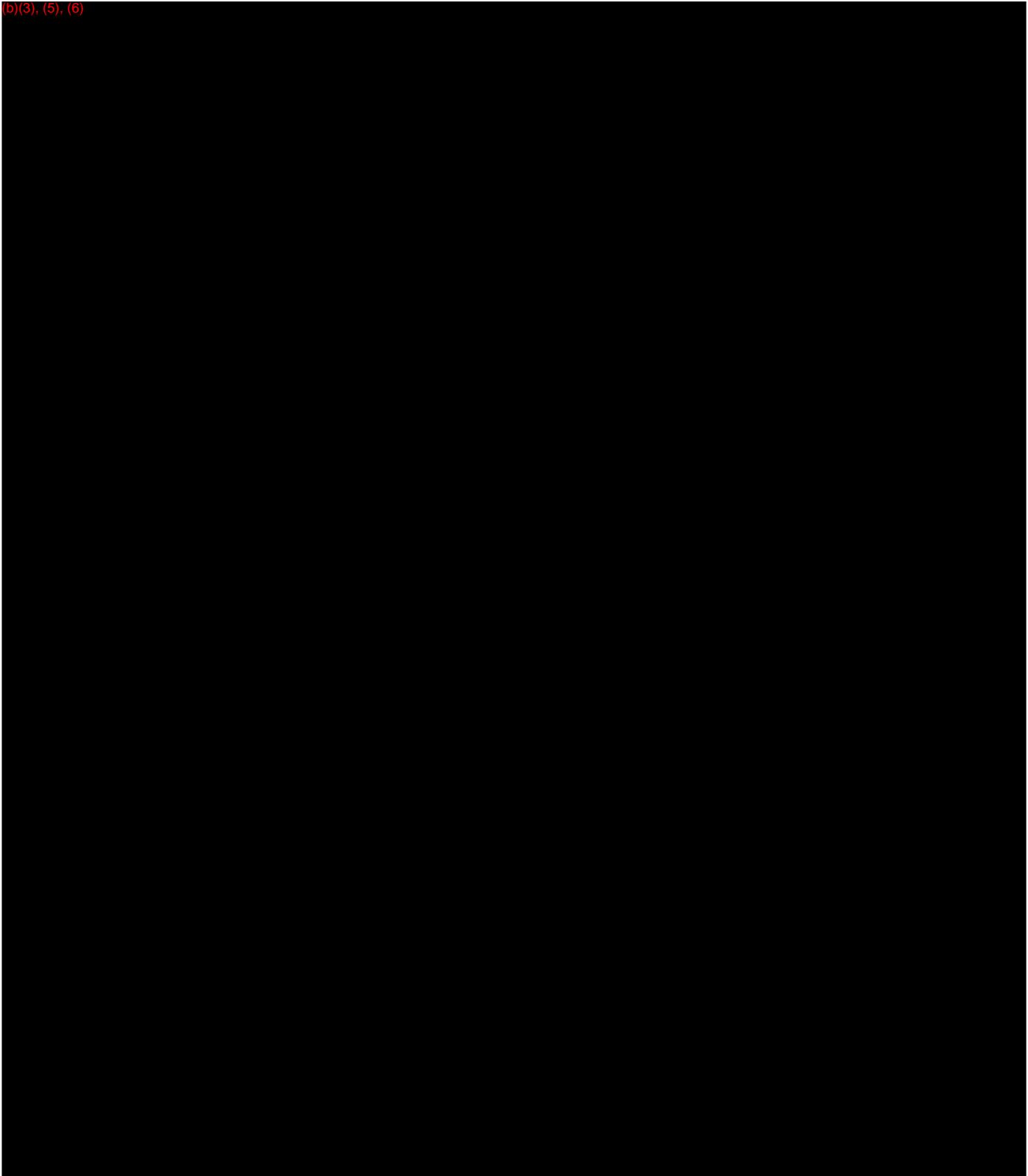
Hi Judy,

Thanks for letting me know the report has been updated. I've reviewed the updated report, and have the following questions and comments:

Outstanding Question

I still have this outstanding question from my earlier round of comments:

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



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

Thank you for your continued input and assistance!
Kim

Kimberly L. Sikora Panza
Associate Counsel
U.S. Office of Government Ethics
1201 New York Avenue NW, Suite 500
Washington, DC 20005
202.482.9214

Referral to DOS

From: Kimberly L. Sikora Panza <klspanza@oge.gov>
Sent: Wednesday, September 19, 2018 9:37 AM
To: Mann, Judy H <(b) (6)>
Subject: RE: Culvahouse (contains CUI)
CONTROLLED
Thanks!

Kimberly L. Sikora Panza
Associate Counsel
U.S. Office of Government Ethics
1201 New York Avenue NW, Suite 500
Washington, DC 20005
202.482.9214

Referral to DOS

From: Kimberly L. Sikora Panza <klspanza@oge.gov>

Sent: Wednesday, September 19, 2018 9:02 AM

To: Mann, Judy H <(b) (6)>

Subject: Culvahouse (contains CUI)

CONTROLLED

Good morning, Judy,

I am writing to check in on the Culvahouse report – could you please advise where we stand with respect to my outstanding questions/report updates/etc.?

Thanks,

Kim

Kimberly L. Sikora Panza
Associate Counsel
U.S. Office of Government Ethics
1201 New York Avenue NW, Suite 500
Washington, DC 20005
202.482.9214

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From: [Kimberly L. Sikora Panza](#)
To: [Heather A. Jones](#)
Subject: RE: working on email to Judy
Date: Thursday, September 20, 2018 4:44:33 PM

Thx. I will send.

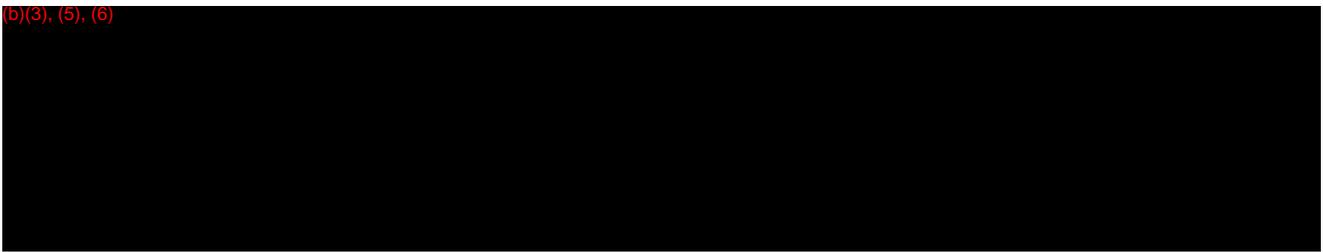
From: Heather A. Jones
Sent: Thursday, September 20, 2018 4:44 PM
To: Kimberly L. Sikora Panza
Subject: RE: working on email to Judy

I like that

From: Kimberly L. Sikora Panza
Sent: Thursday, September 20, 2018 3:40 PM
To: Heather A. Jones
Subject: working on email to Judy

What do you think about the h/l for Part 3 reporting of the (b)(3), (5), (6) :

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



From: [Patrick J. Lightfoot](#)
To: [Kimberly L. Sikora Panza](#)
Subject: RE: KSP OOO Monday
Date: Friday, September 21, 2018 3:29:34 PM

Sounds good!

From: Kimberly L. Sikora Panza
Sent: Friday, September 21, 2018 3:29 PM
To: Patrick J. Lightfoot
Subject: KSP OOO Monday

Noms

(b)(5), (6) . Waiting on agency input for (b)(5), (6) and for Culvahouse. If anything comes in, it should be something I can handle when I get back

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

CD

Have a CD into Elaine for review, it is insanely complicated, if anything comes up w/ that it will have to wait until I get back.

DO Questions

Nada

Other

Have various things going on, but don't anticipate anything that should bother you.

Thanks!!

Kimberly L. Sikora Panza
Associate Counsel
U.S. Office of Government Ethics
1201 New York Avenue NW, Suite 500
Washington, DC 20005
202.482.9214

From: [Kimberly L. Sikora Panza](#)
To: [Heather A. Jones](#)
Date: Wednesday, September 26, 2018 11:02:03 AM
Attachments: [image001.png](#)

No attachment found in search

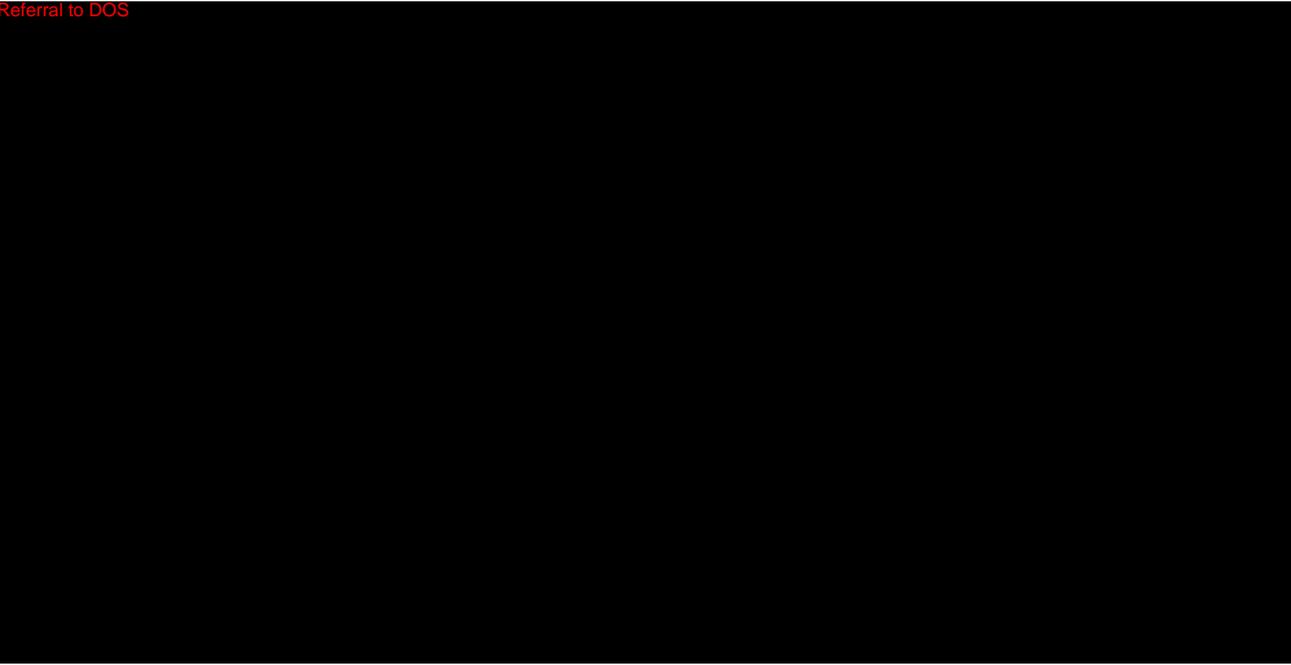
(b)(3), (5), (6)



Referral to DOS



Referral to DOS



From: Kimberly L. Sikora Panza <klspanza@oge.gov>

Sent: Wednesday, September 26, 2018 12:46 PM

To: Mann, Judy H <(b) (6)>

Subject: RE: (b)(3), (b) (contains CUI)

CONTROLLED

Hi Judy,

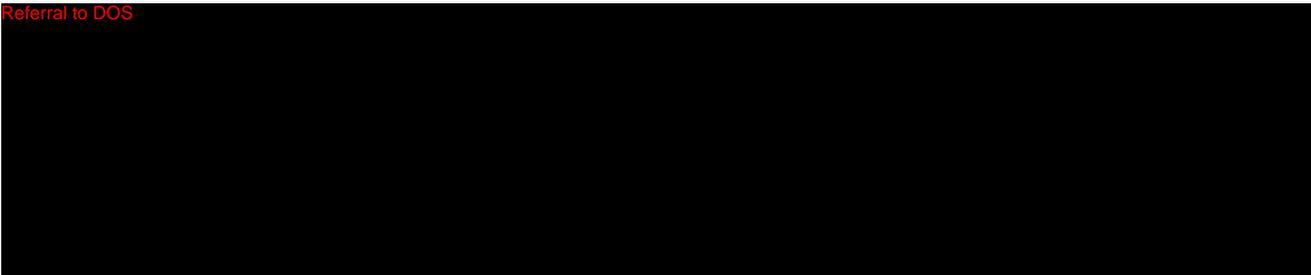
I am booked up for the rest of the day, unfortunately. Could you send the additional info by email? That would probably be the easiest for us to be able to connect, given my schedule.

Thanks,

Kim

Kimberly L. Sikora Panza
Associate Counsel
U.S. Office of Government Ethics
1201 New York Avenue NW, Suite 500
Washington, DC 20005
202.482.9214

Referral to DOS



Referral to DOS



From: Kimberly L. Sikora Panza <klspanza@oge.gov>
Sent: Wednesday, September 26, 2018 11:09 AM
To: Mann, Judy H <(b) (6)>
Subject: RE: (b)(3), (b) (contains CUI)

CONTROLLED

Hi Judy,

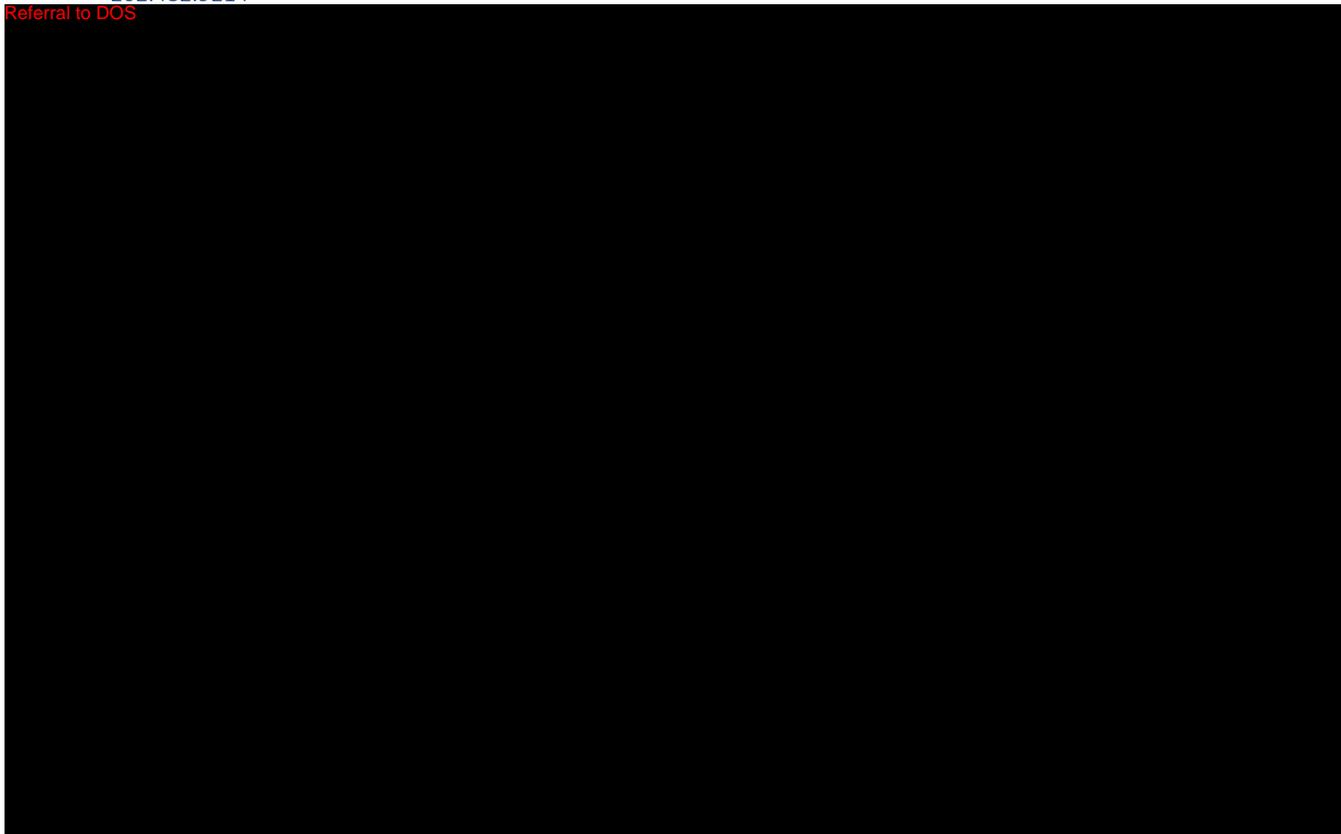
(b)(3), (5), (6)



Kim

Kimberly L. Sikora Panza
Associate Counsel
U.S. Office of Government Ethics
1201 New York Avenue NW, Suite 500
Washington, DC 20005
202.482.9214

Referral to DOS



From: Kimberly L. Sikora Panza <klspanza@oge.gov>
Sent: Tuesday, September 25, 2018 2:50 PM
To: Mann, Judy H <(b) (6)>

Subject: RE: [REDACTED] (contains CUI)

CONTROLLED

Hi Judy,

I've reviewed the input below and the current version of the 278 – I think we're getting really close!

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



Thanks,

Kim

Kimberly L. Sikora Panza

Associate Counsel

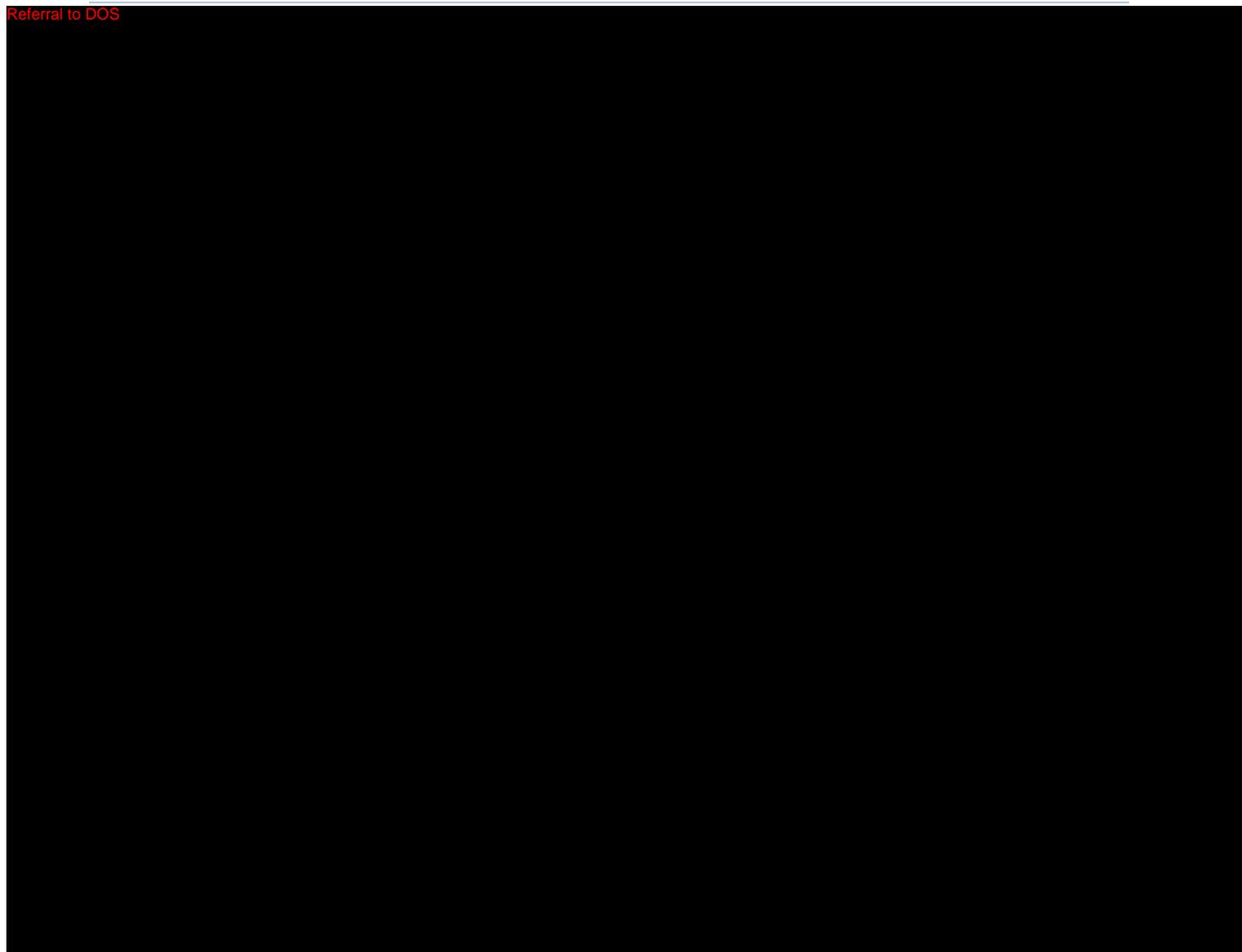
U.S. Office of Government Ethics

1201 New York Avenue NW, Suite 500

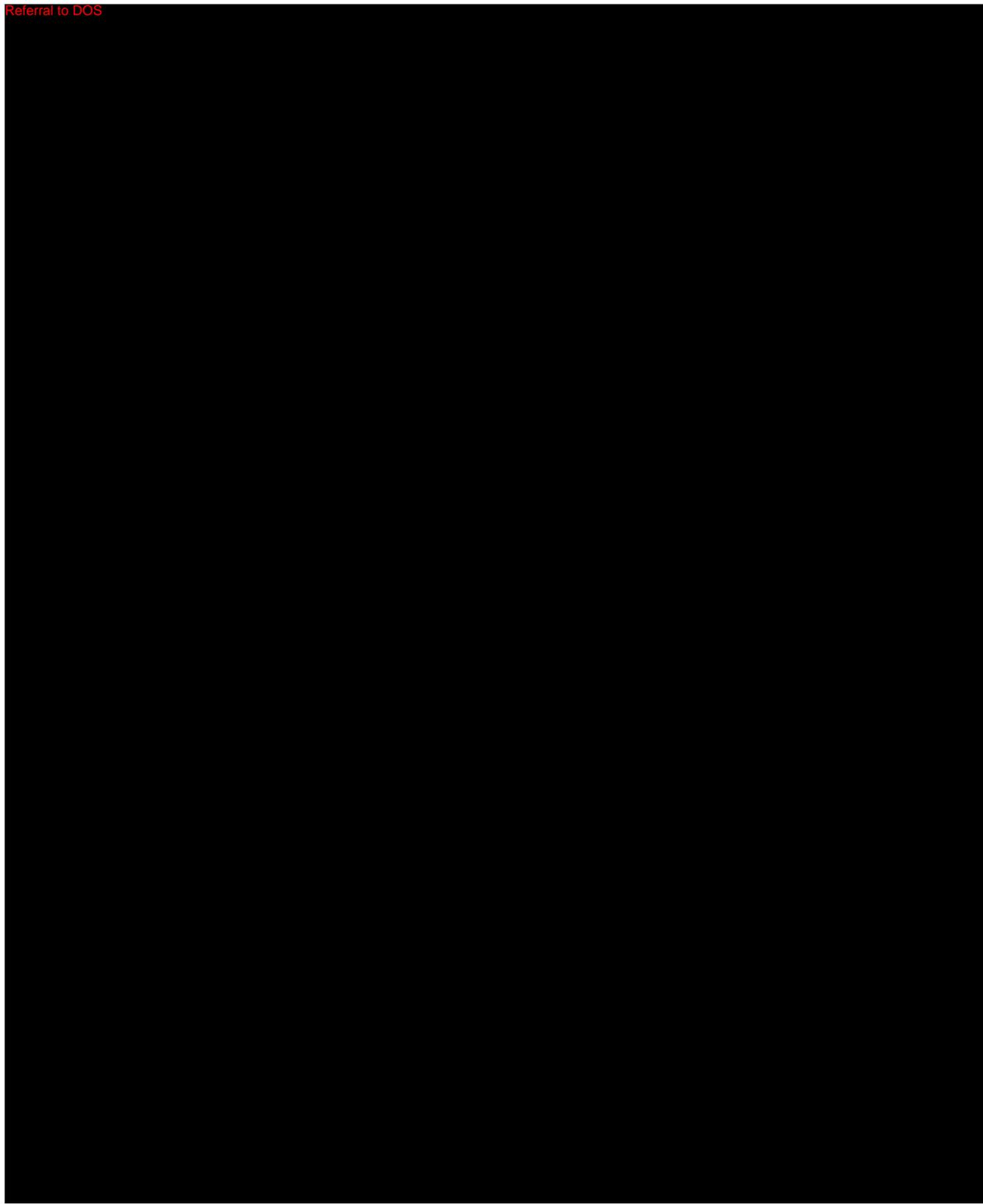
Washington, DC 20005

202.482.9214

Referral to DOS



Referral to DOS



From: Kimberly L. Sikora Panza <klspanza@oge.gov>

Sent: Friday, September 21, 2018 4:01 PM

To: Mann, Judy H <(b) (6)>

Subject: RE: (b)(3), (b) (contains CUI)

CONTROLLED

Thanks. I will stay tuned to hear from you re the other questions, and for a draft EA.

Thanks,

Kim

Kimberly L. Sikora Panza
Associate Counsel
U.S. Office of Government Ethics
1201 New York Avenue NW, Suite 500
Washington, DC 20005
202.482.9214

Referral to DOS
[Redacted]

From: Kimberly L. Sikora Panza <klspanza@oge.gov>
Sent: Thursday, September 20, 2018 5:02 PM
To: Mann, Judy H <(b) (6)>
Subject: (b)(3), (6) (contains CUI)
CONTROLLED

Hi Judy,

It was nice chatting with you earlier. (b)(3), (5), (6)
[Redacted]

Thanks,
Kim

Kimberly L. Sikora Panza
Associate Counsel
U.S. Office of Government Ethics
1201 New York Avenue NW, Suite 500
Washington, DC 20005
202.482.9214

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



Thank you again for your input and assistance on this report.

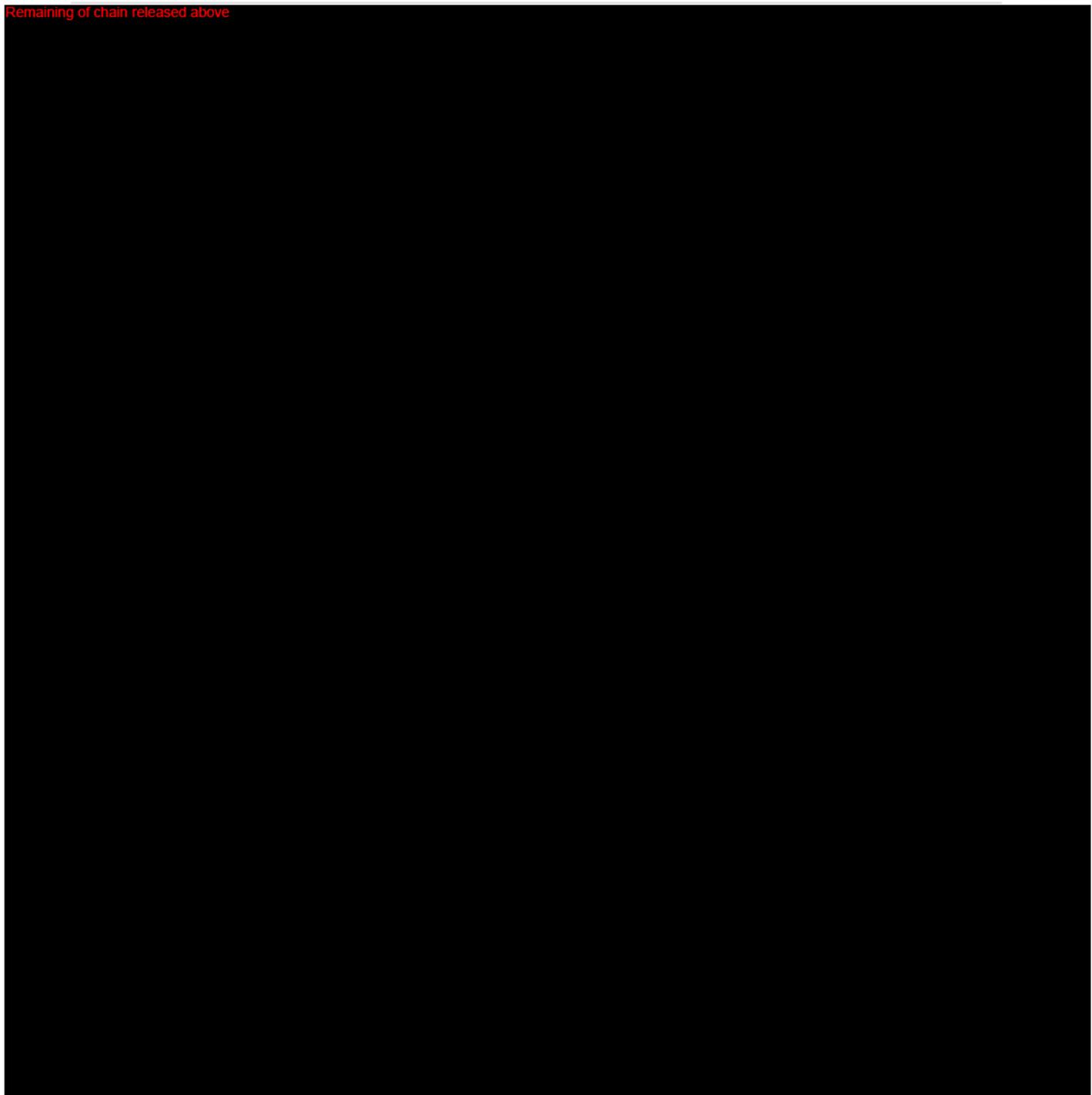
Kim

Kimberly L. Sikora Panza
Associate Counsel
U.S. Office of Government Ethics
1201 New York Avenue NW, Suite 500
Washington, DC 20005
202.482.9214

Referral to DOS



Remaining of chain released above



From: Kimberly L. Sikora Panza <klspanza@oge.gov>
Sent: Monday, October 01, 2018 6:07 PM
To: Mann, Judy H (b) (6)
Subject: Culvahouse report (contains CUI)

CONTROLLED

Hi Judy,

Just wanted to touch base re the Culvahouse report. I know that you were discussing the (b)(3), (b) issue with the filer – can you please let me know the status of things? Also, I am happy to review a draft EA as soon as you have one available. I realize there may still be some question marks/placeholders, but we can work through the other stuff in the interim.

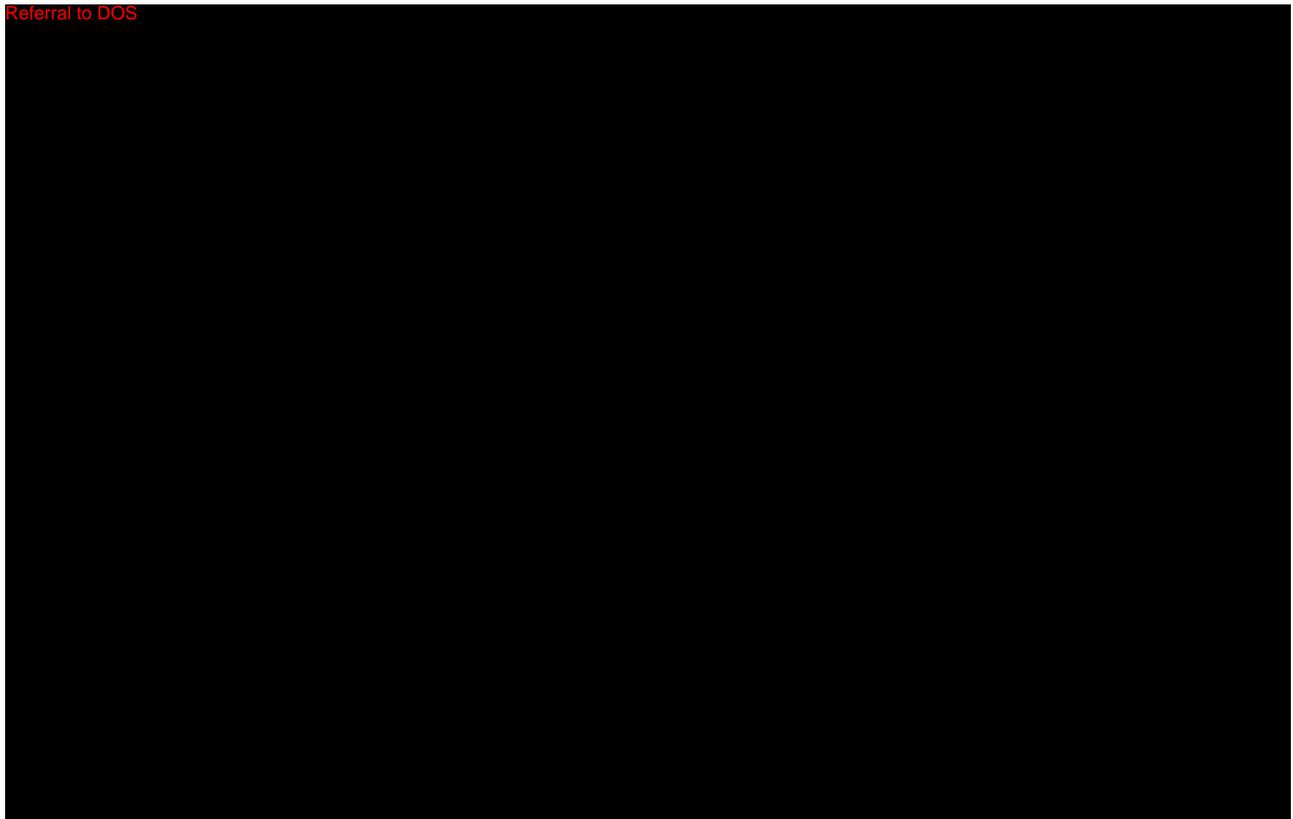
Thanks,
Kim

Kimberly L. Sikora Panza
Associate Counsel
U.S. Office of Government Ethics
1201 New York Avenue NW, Suite 500

Washington, DC 20005
202.482.9214

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Referral to DOS



From: [Kimberly L. Sikora Panza](#)
To: [Patrick J. Lightfoot](#)
Subject: KSP OOO
Date: Thursday, October 4, 2018 4:19:28 PM
Attachments: [KSP OOO Oct 5.docx](#)

Attachment released below

See attached. Thanks!

KSP 000

Pending noms: (in bottom drawer)

- (b)(5), (6) [redacted]
- Culvahouse. This is in pretty good shape, we are waiting for the filer to confirm (b)(3), (5), (6) [redacted]
[redacted]
[redacted]
(b) (5) [redacted]
[redacted]
[redacted]
[redacted] (b)(5), (6) [redacted]
[redacted] but I doubt things will come together like that!). Judy is out of the office tomorrow too, but will checking email periodically – since she is going to be sporadic, it would be nice to flip whatever Qs we have to her earlier rather than later just to give her time to see them and flip to filer. All materials you need are in the folder.

Cleared noms: (in top drawer, notes have been saved in FDTs for these)

- (b)(5), (6) [redacted]
[redacted]
[redacted]
[redacted]
(b)(5), (6) [redacted] also p-c but is stale)

No pending DO questions

Can't think of anything else that should bother you.

Referral to DOS

From: Kimberly L. Sikora Panza <klspanza@oge.gov>
Sent: Wednesday, October 10, 2018 9:32 AM
To: Mann, Judy H (b) (6)
Subject: RE: Draft Ethics Agreement-Culvahouse [Message and attachment(s) contain CUI]

CONTROLLED

Hi Judy,

Thanks, I appreciate you reaching out so we can get this report buttoned up!

Re your question, thanks for your eagle eyes. "Interest" is from an earlier EA with a similar situation, but I just went back to the EA Guide and we use "interests," so let's use that (plural 'interests').

Kim

Kimberly L. Sikora Panza
Associate Counsel
U.S. Office of Government Ethics
1201 New York Avenue NW, Suite 500
Washington, DC 20005
202.482.9214

Referral to DOS

From: Kimberly L. Sikora Panza <klspanza@oge.gov>
Sent: Tuesday, October 09, 2018 10:31 AM
To: Mann, Judy H (b) (6)
Subject: RE: Draft Ethics Agreement-Culvahouse [Message and attachment(s) contain CUI]

CONTROLLED
Email and attachment(s) contain CUI.

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

Hi Judy,

I know you're out and only periodically checking messages, but just wanted to touch base to see if you'd heard from the filer re: that EA language, since I think that is the only thing holding up the report.

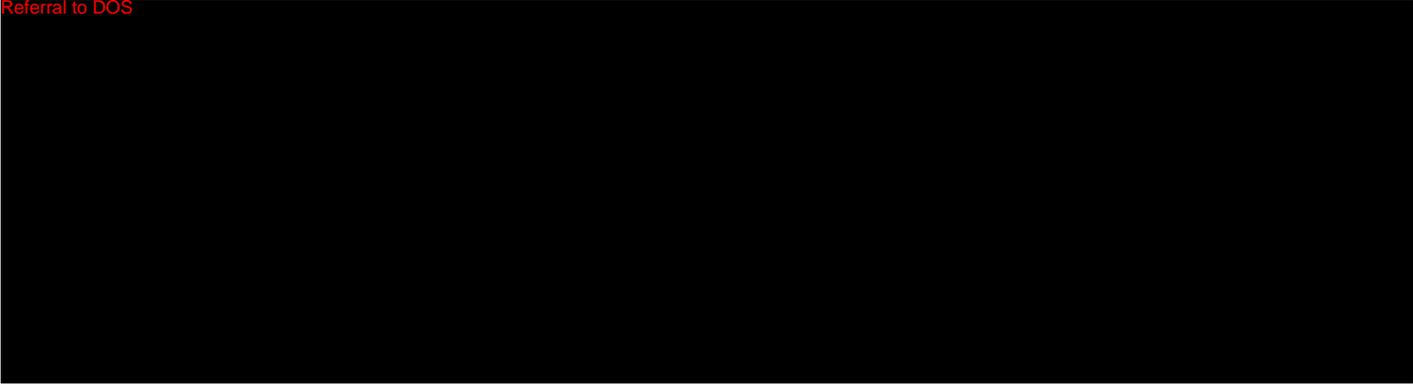
Also, we have just a couple of minor adjustments on the EA – please see attached version (changes shown in track changes).

Thanks,
Kim

Kimberly L. Sikora Panza
Associate Counsel

U.S. Office of Government Ethics
1201 New York Avenue NW, Suite 500
Washington, DC 20005
202.482.9214

Referral to DOS



From: Kimberly L. Sikora Panza <klspanza@oge.gov>
Sent: Thursday, October 4, 2018 4:14 PM
To: Mann, Judy H (b) (6)
Subject: RE: Draft Ethics Agreement-Culvahouse [contains CUI]

CONTROLLED

Definitely – I appreciate you sending the draft! I think it looks pretty good, I may have a couple of minor adjustments – right now I have the EA into Heather for review, so I'll hold off on sharing any comments until I get her input as well.

FYI, I am out of the office tomorrow. Patrick is my backup, should anything come up (his contact info will be on my OOO message).

Thanks!
Kim

Kimberly L. Sikora Panza
Associate Counsel
U.S. Office of Government Ethics
1201 New York Avenue NW, Suite 500
Washington, DC 20005
202.482.9214

Referral to DOS



Referral to DOS

From: Kimberly L. Sikora Panza <klspanza@oge.gov>
Sent: Thursday, October 4, 2018 4:02 PM
To: Mann, Judy H <(b) (6)>
Subject: RE: Draft Ethics Agreement-Culvahouse [contains CUI]

CONTROLLED

Thanks for the clarification, Judy! We'll assume this is the case for now; I appreciate you sharing once you've received final confirmation from the filer.

Kimberly L. Sikora Panza
Associate Counsel
U.S. Office of Government Ethics
1201 New York Avenue NW, Suite 500
Washington, DC 20005
202.482.9214

Referral to DOS

From: Kimberly L. Sikora Panza <klspanza@oge.gov>
Sent: Thursday, October 4, 2018 8:03 AM
To: Mann, Judy H <(b) (6)>
Subject: RE: Draft Ethics Agreement-Culvahouse [contains CUI]

CONTROLLED

Thanks, Judy (b)(3), (5), (6)

Thank you for the clarification,
Kim

Kimberly L. Sikora Panza
Associate Counsel
U.S. Office of Government Ethics
1201 New York Avenue NW, Suite 500
Washington, DC 20005
202.482.9214

Referral to DOS

From: [Kimberly L. Sikora Panza](#)
To: ["Mann, Judy H"](#)
Subject: RE: Draft Ethics Agreement-Culvahouse [contains CUI]
Date: Thursday, October 11, 2018 7:11:47 AM

CONTROLLED

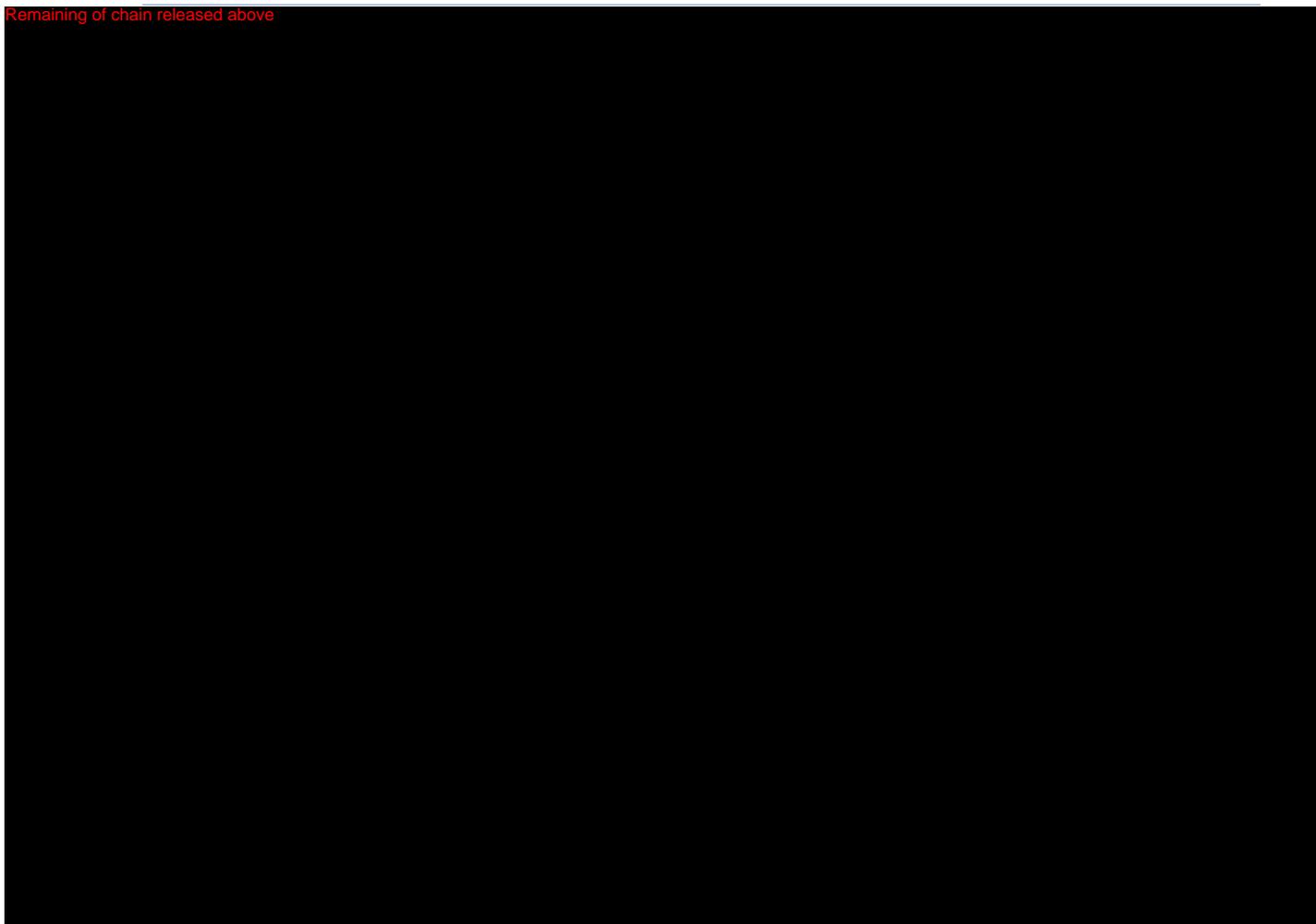
Judy,

I still need to send the "confirmatory email" for the filer to review, and confirm. I will send that shortly.

Kim

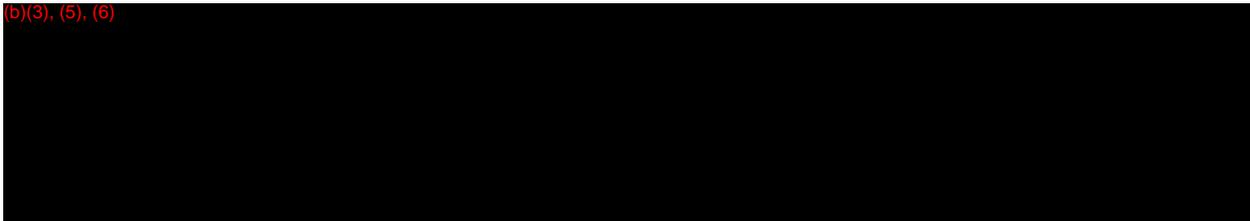
Kimberly L. Sikora Panza
Associate Counsel
U.S. Office of Government Ethics
1201 New York Avenue NW, Suite 500
Washington, DC 20005
202.482.9214

Remaining of chain released above



From: [Kimberly L. Sikora Panza](#)
To: [Heather A. Jones](#)
Subject: Culvahouse
Date: Thursday, October 11, 2018 9:41:06 AM

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



Thanks,
Kim

From: [Kimberly L. Sikora Panza](#)
To: [Heather A. Jones](#)
Subject: FW: Confirmatory Email - CULVAHOUSE [contains CUI]
Date: Thursday, October 11, 2018 4:24:45 PM

Referral to DOS



From: Kimberly L. Sikora Panza <klspanza@oge.gov>
Sent: Thursday, October 11, 2018 7:36 AM
To: Mann, Judy H (b) (6)
Cc: Kimberly L. Sikora Panza <klspanza@oge.gov>
Subject: Confirmatory Email - CULVAHOUSE [contains CUI]

CONTROLLED

Dear Judy,

OGE will be reviewing the nominee's report for preclearance. **Please be sure to instruct him to personally review the report carefully once more**, given that he will be personally responsible for all entries in the report as they currently appear.

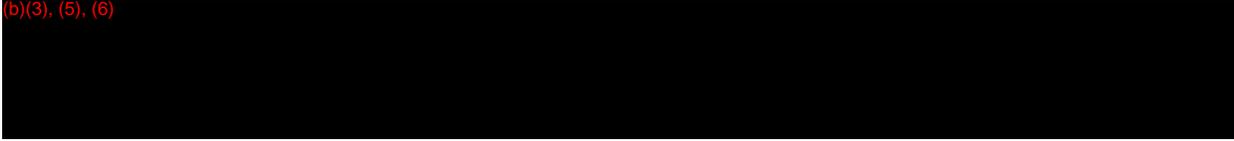
Before OGE reviews this report for "preclearance," I'm sending you a list of some of the nominee's material representations on which we are relying. Please forward this message to him and instruct him to confirm each item (or notify us immediately if any item on this list is incorrect).

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

- The nominee has personally reviewed all entries in the current version of the report and has affirmed that they are correct.
- The nominee is not a trustee of any trust.

- For Part 1 and Part 4, the nominee has provided information covering the entire reporting period of January 1, **2016**, to date of signing.
- For Part 2, Part 5, and Part 6 the nominee has provided information covering the entire reporting period of January 1, **2017**, to date of signing.

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

A large black rectangular redaction box covers the majority of the page content between the first and second bullet points.

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

Thank you again for all of your assistance on this report.

Best regards,
Kim

Kimberly L. Sikora Panza
Associate Counsel
U.S. Office of Government Ethics
1201 New York Avenue NW, Suite 500
Washington, DC 20005
202.482.9214

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From: [Heather A. Jones](#)
To: [Scott Gast](#) (b) (6)
Cc: [Kimberly L. Sikora Panza](#); "[Mann, Judy H](#)"; [Mr. David P. Huitema](#) (b) (6); [David J. Apol](#); [Deborah J. Bortot](#); [Heather A. Jones](#); [Keith Labez](#); [Teresa L. Williamson](#)
Subject: Precleared: Arthur B. Culvahouse - (Contains CUI)
Date: Thursday, October 11, 2018 4:48:11 PM

CONTROLLED

Scott-

Arthur B. Culvahouse has been precleared. Kim, please send the ethics agreement to the White House.

Thanks,
Heather

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

Visit OGE's website: www.oge.gov
Follow OGE on Twitter: [@OfficeGovEthics](https://twitter.com/OfficeGovEthics)

From: Nicholson, Jennifer (b) (6) [REDACTED]
Sent: Monday, October 15, 2018 11:24 AM
To: Mann, Judy H (b) (6) [REDACTED]
Cc: Hampton, Tommye L (b) (6) [REDACTED]; Schlom, Evan N. (b) (6) [REDACTED] >
Subject: Culvahouse Signed Letter re Ethics Undertakings

Dear Ms. Mann -- Attached please find Arthur B. Culvahouse Jr.'s signed letter to Mr. Richard Visek regarding Ethics Undertakings

O'Melveny

Jennifer J. Nicholson

Executive Assistant

(b) (6) [REDACTED]

O: (b) (6) [REDACTED]

O'Melveny & Myers LLP
1625 Eye Street, NW
Washington, DC 20006

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

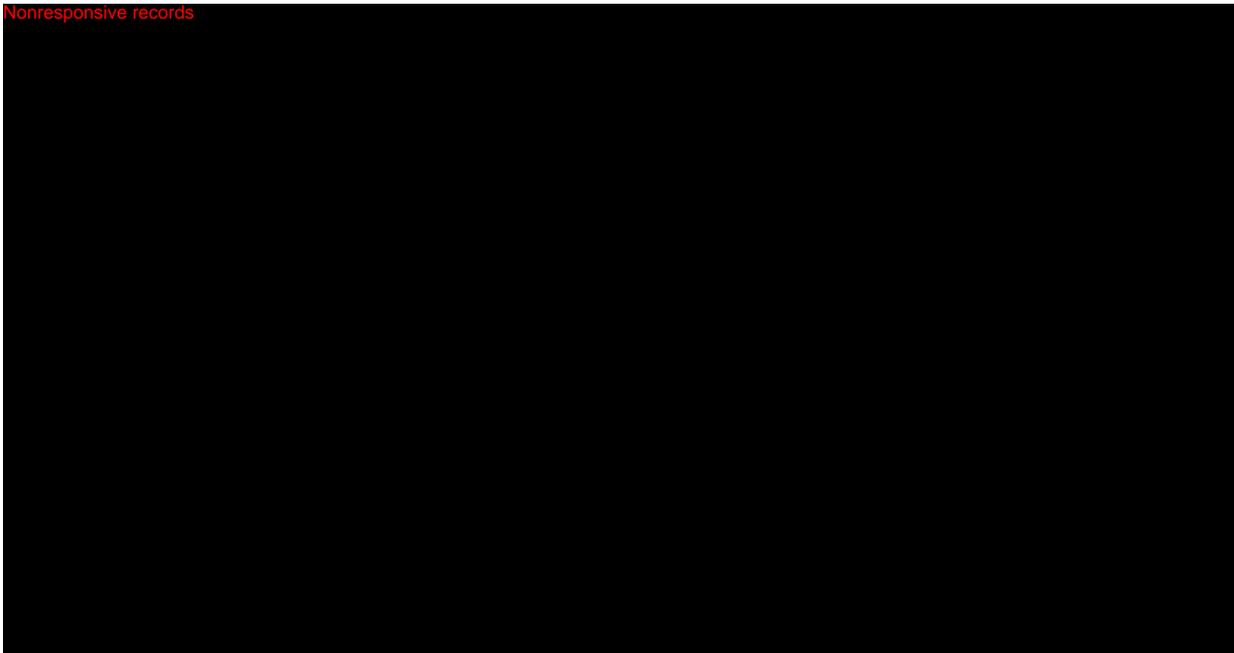
From: [Teresa L. Williamson](#)
To: [Christopher J. Swartz](#); [Elaine Newton](#); [Heather A. Jones](#); [Jack MacDonald](#); [Jim Robertson](#); [Kimberly L. Sikora Panza](#); [Kimberley H. Kaplan](#); [Lorna A. Syme](#); [Maura Leary](#); [Megan V. Granahan](#); [Monica M. G. Ashar](#); [Stephanie Nonluecha](#)
Cc: [Deborah J. Bortot](#); [Heather A. Jones](#)
Subject: Intent to Nominate
Date: Thursday, November 8, 2018 12:56:10 PM

As mentioned in this morning nominee meeting, I wanted to give you a heads up that the below nominees have an "Intent to Nominate" listed on the White House's website.

The President may nominate some or all of them next week. We don't start our process until we get the formal nomination, so that could be as early as next Tuesday/Wednesday. No action needed from you til then.

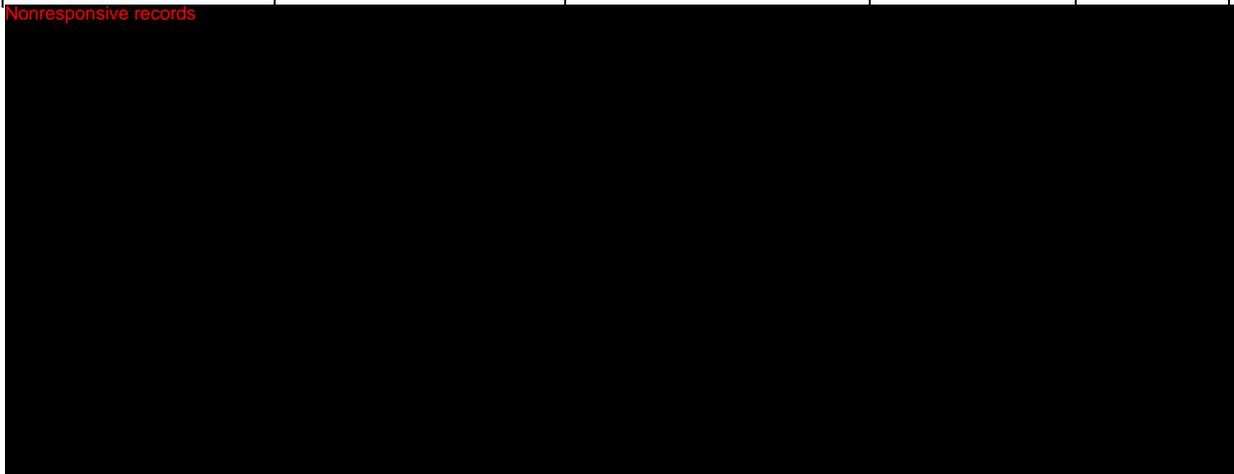
Thanks!
Teresa

Nonresponsive records



Culvahouse, Arthur	Department of State	Ambassador to Australia	Kim Sikora Panza	11/05/18
---------------------------	---------------------	-------------------------	-------------------------	----------

Nonresponsive records



Nonresponsive records



From: [Patrick J. Lightfoot](#)
To: [Kimberly L. Sikora Panza](#)
Subject: RE: KSP OOO
Date: Wednesday, November 14, 2018 5:15:37 PM

Only updates were on Carter, who got nominated yesterday. Requested finals from NEA (cc'ed you on all those emails)...awaiting updates them presently.

From: Kimberly L. Sikora Panza
Sent: Tuesday, November 13, 2018 4:22 PM
To: Patrick J. Lightfoot
Subject: KSP OOO

Active Nom – (b)(5), (6)

Preleared Noms – Carter and Culvahouse are two noms who were on Teresa's recent Intent to Nominate email. I've pasted the notes in FDTS, and we've rec'd the signed EA already (saved in the N drive; I've double checked against the precleared versions already). So once we get the formal word re nomination, pls reach out to the agencies and we just need the report re-signed by the filer and then certified.

I have other things going on, but nothing I expect to bother you.

Kimberly L. Sikora Panza
Associate Counsel
U.S. Office of Government Ethics
1201 New York Avenue NW, Suite 500
Washington, DC 20005
202.482.9214

From: [Teresa L. Williamson](#)
To: [Megan V. Granahan](#); [Jim Robertson](#); [Monica M. G. Ashar](#); [Kimberly L. Sikora Panza](#); [Christopher J. Swartz](#)
Cc: [Patrick J. Lightfoot](#); [Lorna A. Syme](#); [Kimberley H. Kaplan](#); [Keith Labeledz](#); [Wendy G. Pond](#); [Rachel K. McRae](#); [Maura Leary](#); [Elaine Newton](#); [Jack MacDonald](#); [Stephanie Nonluecha](#); [Steven Corbally](#); [Deborah J. Bortot](#); [Heather A. Jones](#); [Diana Veilleux](#); [LEGTEAM](#); [Dale A. Christopher](#); [Elizabeth D. Horton](#); [Seth Jaffe](#); [Grace A. Clark](#)
Subject: NEW NOMINATIONS – NOVEMBER 16, 2018
Date: Friday, November 16, 2018 8:18:28 AM

The following nominations have been posted on CONGRESS.GOV. Please contact the agency for the final package.

Reminder - If you are backing up another reviewer please contact the agency for the final package so that the package can start moving through the process.

Please remember to add the date the final package was received to the routing slip before forwarding. Thanks!!

NOMINATION - OGE Reviewer: Megan (*INTEGRITY*)

[PN2650](#) — 115th Congress (2017-2018) — **Matthew H. Tueller** — **Department of State**

Matthew H. Tueller, of Utah, a Career Member of the Senior Foreign Service, Class of Minister-Counselor, to be Ambassador Extraordinary and Plenipotentiary of the United States of America to the Republic of Iraq.

Date Received from President: 11/15/2018

Committee: Foreign Relations

Latest Action: 11/15/2018 - Received in the Senate and referred to the Committee on Foreign Relations. ([All Actions](#))

NOMINATION - OGE Reviewer: Jim (*INTEGRITY*)

[PN2649](#) — 115th Congress (2017-2018) — **Alan R. Swendiman** — **Peace Corps**

Alan R. Swendiman, of North Carolina, to be Deputy Director of the Peace Corps, vice Carlos J. Torres.

Date Received from President: 11/15/2018

Committee: Foreign Relations

Latest Action: 11/15/2018 - Received in the Senate and referred to the Committee on Foreign Relations. ([All Actions](#))

NOMINATION - OGE Reviewer: Monica (*INTEGRITY*)

[PN2648](#) — 115th Congress (2017-2018) — **Lana J. Marks** — **Department of State**

Lana J. Marks, of Florida, to be Ambassador Extraordinary and Plenipotentiary of the United States of America to the Republic of South Africa.

Date Received from President: 11/15/2018

Committee: Foreign Relations

Latest Action: 11/15/2018 - Received in the Senate and referred to the Committee on Foreign Relations. ([All Actions](#))

NOMINATION - OGE Reviewer: Megan (*278C*)

[PN2647](#) — 115th Congress (2017-2018) — **Brett P. Giroir** — **Department of State**

Brett P. Giroir, of Texas, to be Representative of the United States on the Executive

Board of the World Health Organization, vice Thomas Frieden, resigned.

Date Received from President: 11/15/2018

Committee: Foreign Relations

Latest Action: 11/15/2018 - Received in the Senate and referred to the Committee on Foreign Relations. ([All Actions](#))

NOMINATION - OGE Reviewer: Chris (INTEGRITY)

[PN2646](#) — 115th Congress (2017-2018) — **James S. Gilmore** — **Department of State**

James S. Gilmore, of Virginia, to be U.S. Representative to the Organization for Security and Cooperation in Europe, with the rank of Ambassador.

Date Received from President: 11/15/2018

Committee: Foreign Relations

Latest Action: 11/15/2018 - Received in the Senate and referred to the Committee on Foreign Relations. ([All Actions](#))

NOMINATION - OGE Reviewer: Kim Sikora Panza (INTEGRITY)

[PN2645](#) — 115th Congress (2017-2018) — **Arthur B. Culvahouse Jr.** — **Department of State**

Arthur B. Culvahouse, Jr., of Tennessee, to be Ambassador Extraordinary and Plenipotentiary of the United States of America to the Commonwealth of Australia.

Date Received from President: 11/15/2018

Committee: Foreign Relations

Latest Action: 11/15/2018 - Received in the Senate and referred to the Committee on Foreign Relations. ([All Actions](#))

NOMINATION - OGE Reviewer: Megan (INTEGRITY)

[PN2644](#) — 115th Congress (2017-2018) — **Kate Marie Byrnes** — **Department of State**

Kate Marie Byrnes, of Florida, a Career Member of the Senior Foreign Service, Class of Minister-Counselor, to be Ambassador Extraordinary and Plenipotentiary of the United States of America to the Republic of Macedonia.

Date Received from President: 11/15/2018

Committee: Foreign Relations

Latest Action: 11/15/2018 - Received in the Senate and referred to the Committee on Foreign Relations. ([All Actions](#))

NOMINATION - OGE Reviewer: Jim (INTEGRITY)

[PN2643](#) — 115th Congress (2017-2018) — **John P. Abizaid** — **Department of State**

John P. Abizaid, of Nevada, to be Ambassador Extraordinary and Plenipotentiary of the United States of America to the Kingdom of Saudi Arabia.

Date Received from President: 11/15/2018

Committee: Foreign Relations

Latest Action: 11/15/2018 - Received in the Senate and referred to the Committee on Foreign Relations. ([All Actions](#))

NOMINATION - OGE Reviewer: Chris (INTEGRITY)

[PN2642](#) — 115th Congress (2017-2018) — **L. E. Sola** — **Federal Maritime Commission**

L. E. Sola, of Florida, to be a Federal Maritime Commissioner for a term expiring June 30, 2023, vice William P. Doyle, term expired.

Date Received from President: 11/15/2018

Committee: Commerce, Science, and Transportation

Latest Action: 11/15/2018 - Received in the Senate and referred to the Committee on Commerce, Science, and Transportation. ([All Actions](#))

NOMINATION - OGE Reviewer: Megan (*INTEGRITY*)

[PN2641](#) — 115th Congress (2017-2018) — **Daniel B. Maffei** — **Federal Maritime Commission**

Daniel B. Maffei, of New York, to be a Federal Maritime Commissioner for a term expiring June 30, 2022. (Reappointment)

Date Received from President: 11/15/2018

Committee: Commerce, Science, and Transportation

Latest Action: 11/15/2018 - Received in the Senate and referred to the Committee on Commerce, Science, and Transportation. ([All Actions](#))

From: [Kimberly L. Sikora Panza](#)
To: ["Mann, Judy H"](#)
Subject: Culvahouse nomination (contains CUI)
Date: Friday, November 16, 2018 9:06:10 AM

CONTROLLED

Good morning, Judy,

As you may know, Mr. Culvahouse has been nominated:

[PN2645](#) — 115th Congress (2017-2018) — **Arthur B. Culvahouse Jr. —**

Department of State

Arthur B. Culvahouse, Jr., of Tennessee, to be Ambassador Extraordinary and Plenipotentiary of the United States of America to the Commonwealth of Australia.

Date Received from President: 11/15/2018

Committee: Foreign Relations

Latest Action: 11/15/2018 - Received in the Senate and referred to the Committee on Foreign Relations. ([All Actions](#))

We already have his signed Ethics Agreement; at this time, could you please have him re-sign and submit the report in Integrity? Your agency will then need to certify, and we'll need a transmittal letter as well.

Thanks!

Kim

Kimberly L. Sikora Panza
Associate Counsel
U.S. Office of Government Ethics
1201 New York Avenue NW, Suite 500
Washington, DC 20005
202.482.9214

From: [Integrity.gov](https://integrity.gov)
To: [Deborah J. Bortot](#)
Subject: Integrity.gov: Report Pending Action
Date: Friday, November 16, 2018 12:58:01 PM

A 2018 Nominee report for Culvahouse, Arthur Boggess is pending your action as OGE Nominee Program Manager. You may access the report by logging into integrity at <https://integrity.gov>.

From: [Teresa L. Williamson](#)
To: [Kimberly L. Sikora Panza](#); [Mann, Judy H](#); [Hampton, Tommye L](#)
Subject: Public Financial Disclosure Report - Arthur B. Culvahouse, Jr. (Attachments Contain CUI)
Date: Tuesday, November 20, 2018 11:10:55 AM
Attachments: [OGE CUI Coversheet.pdf](#)
[Culvahouse, Jr., Arthur B. finalEA.pdf](#)
[Culvahouse, Jr., Arthur B. final278.pdf](#)
[Culvahouse, Jr., Arthur B. finalsenateftr.pdf](#)

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>

CONTROLLED

Attachments contain CUI. When the attachments are removed, this email is uncontrolled unclassified information.

Good Morning,

I've attached the financial disclosure package for Arthur B. Culvahouse, Jr., who has been nominated by President Trump for the position of United States Ambassador to Australia, Department of State.

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

October 15, 2018

Mr. Richard Visek
Principal Deputy Legal Adviser and
Designated Agency Ethics Official
Office of the Legal Adviser
Department of State

Re: Ethics Undertakings

Dear Mr. Visek:

I am committed to the highest standards of ethical conduct for government officials. If confirmed as the Ambassador to Australia, 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.

I understand that a heightened prospect of a conflict of interest could exist as to companies that maintain a presence in Australia, because they may be more likely than other companies to seek official assistance from or make contact with the Embassy or otherwise be affected by policies and engagement implemented by the Embassy. I will remain alert to the possible need to recuse where appropriate.

Out of an abundance of caution, in order to avoid potential conflicts of interest I have decided that within 90 days of my confirmation, I will divest all assets in my defined contribution plan that do not qualify for the exemption at 5 C.F.R. § 2640.201(a). Until I divest these assets, I will not participate personally and substantially in any particular matter that to my knowledge has a direct and predictable effect on my financial interest in any of these assets, 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).

Upon confirmation, I will resign from my Of Counsel position with O'Melveny & Myers LLP. If O'Melveny & Myers LLP decides to pay me a bonus for work I performed during 2018, I will not accept the bonus and will forfeit it, unless I receive the bonus before I assume the duties of the position of Ambassador to Australia. If I receive the bonus, I will not participate personally and substantially in any particular matter involving specific parties in which I know O'Melveny & Myers LLP is a party or represents a party for a period of two years from the date on which I receive the bonus. I will continue to receive payments under the O'Melveny & Myers LLP Partnership Agreement Retirement Benefit pursuant to the O'Melveny & Myers LLP

Partnership Agreement. The amount of this Benefit can be increased based on an inflation index or decreased if O'Melveny & Myers LLP does not achieve certain revenues. Accordingly, 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 O' Melveny & Myers LLP, unless I first obtain a written waiver, pursuant to 18 U.S.C. §208(b)(1). I also will not participate personally and substantially in any particular matter involving specific parties in which I know a former client of mine is a party or represents a party for a period of one year after I last provided service to that client, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

Upon confirmation, I will resign from my positions with the following entities: The Brookings Institution; Howard H. Baker Jr. Center for Public Policy; The University of Tennessee Knoxville; and Leadership Board, U.S. Chamber of Commerce, Center for Capital Market Competitiveness. 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).

In addition, I will recuse myself from participation on a case-by-case basis in any particular matter involving specific parties in which I determine that a reasonable person with knowledge of the relevant facts would question my impartiality in that matter, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

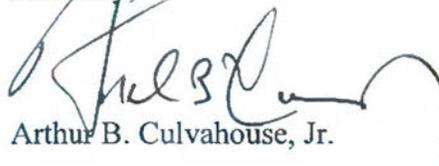
I have a managed account, and I will direct the account manager to obtain my prior approval on a case-by-case basis for the purchase of any assets other than cash, cash equivalents, investment funds that qualify for the exemption at 5 C.F.R. § 2640.201(a), obligations of the United States, or municipal bonds. I will monitor whether the account manager is following this direction regarding prior approval.

I will receive a live ethics briefing from a member of the ethics office after my confirmation but no later than 15 days after my appointment as required under 5 C.F.R. § 2638.305, unless granted an extension under that regulation. Within 90 days of my confirmation, I will 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,



Arthur B. Culvahouse, Jr.

UNITED STATES OFFICE OF
GOVERNMENT ETHICS



November 19, 2018

The Honorable Bob Corker
Chairman
Committee on Foreign Relations
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 Arthur B. Culvahouse, Jr., who has been nominated by President Trump for the position of United States Ambassador to Australia, Department of State.

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,

David J. Apol
General Counsel

Enclosures

