

**From:** [Grant Anderson](#)  
**To:** [Diana Veilleux](#)  
**Subject:** RE: 2021 - 11 - 07 - Hunter Biden Art letter to Emory Rounds.pdf  
**Date:** Monday, November 22, 2021 3:49:14 PM

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Patrick and I have a call tomorrow at 2pm on it.

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**From:** Diana Veilleux  
**Sent:** Monday, November 22, 2021 3:46 PM  
**To:** Grant Anderson <[ganderso@oge.gov](mailto:ganderso@oge.gov)>  
**Subject:** FW: 2021 - 11 - 07 - Hunter Biden Art letter to Emory Rounds.pdf

Hi Grant

Can you give me a status update on the work on the response to this letter?

Thanks!

Diana

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**From:** Diana Veilleux  
**Sent:** Tuesday, November 9, 2021 4:35 PM  
**To:** Grant Anderson <[ganderso@oge.gov](mailto:ganderso@oge.gov)>  
**Subject:** 2021 - 11 - 07 - Hunter Biden Art letter to Emory Rounds.pdf

**Note:** attachment follows on next page

Hi Grant

Here is the letter, as discussed.

Diana

**Congress of the United States**  
**House of Representatives**

COMMITTEE ON OVERSIGHT AND REFORM

2157 RAYBURN HOUSE OFFICE BUILDING

WASHINGTON, DC 20515-6143

MAJORITY (202) 225-5051  
MINORITY (202) 225-5074  
<https://oversight.house.gov>

November 7, 2021

The Honorable Emory A. Rounds III  
Director  
U.S. Office of Government Ethics  
1201 New York Avenue NW, Suite 500  
Washington, D.C. 20005

Dear Director Rounds:

As you may be aware, Hunter Biden, the President's 51-year-old son, has recently become an artist. Despite his being a novice, the prices listed for his paintings range between \$75,000—more than the median annual American income—and \$500,000.<sup>1</sup> The prices are not only shocking to the art community, they are shocking also to the American people given Mr. Biden's lack of training as an artist and his previous career as a lobbyist, lawyer, and “unqualified oil-and-gas adviser” who “work[ed] alongside post-Soviet oligarchs.”<sup>2</sup> Nevertheless, recent reporting indicates that people have actually purchased Mr. Biden's art at these exorbitant prices. However, the purchasers' identities are otherwise unknown.<sup>3</sup>

The White House, Mr. Biden, and other parties participating in this scheme have cloaked the identities of Mr. Biden's patrons and refuse to cooperate with congressional or press inquiries into the matter. I write to ask the Office of Government Ethics to bring a halt to these attempts to evade oversight.

While Mr. Biden's creative endeavors are his own to pursue, it is the duty of Congress to investigate potential influence peddling, fraud, and other crimes connected to the presidency. Such offenses become even more egregious when funded by the American taxpayer—we recently learned the federal government has funded Mr. Biden's gallerist, who received over \$500,000 from the federal government.<sup>4</sup>

This problem has characterized much of the President's political career, as *Politico* has recently detailed:

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<sup>1</sup> Graham Bowley and Robin Pogrebin, *A Gallery Sells Hunter Bidens. The White House Says It Won't Know Who's Buying.*, N.Y. TIMES (Aug. 13, 2021).

<sup>2</sup> Casey Michel, *The Emerging Artistry of Hunter Biden*, THE ATLANTIC (Sept. 22, 2021).

<sup>3</sup> Emily Smith and Bruce Golding, *Hunter Biden sells five art prints for \$75K each as NYC show pushed back*, N.Y. POST (Oct. 7, 2021).

<sup>4</sup> Isabel Vincent, *Art gallery repping Hunter Biden received \$500K federal COVID loan, records show*, N.Y. POST (Oct. 9, 2021).

[I]n recent decades, members of the First Family, including Hunter Biden, have repeatedly entered into financial relationships with people who have an interest in influencing their powerful relative — including taking loans from lobbyists; seeking business from labor groups; taking a job with a bank that relied on Biden’s support to pass a personal bankruptcy law loathed by progressives; and, of course, taking a seat on the board of a Ukrainian energy company, Burisma, that faced allegations of corruption, even as Biden headed up U.S. anti-corruption efforts in Ukraine.<sup>5</sup>

Hunter Biden has profited from his father’s public positions of trust in the past,<sup>6</sup> but the support he is currently receiving is alarming. The White House has not shared the agreement it has reached with Georges Bergès, Mr. Biden’s gallerist and “relatively little-known newcomer” to New York’s art scene.<sup>7</sup> The White House and Mr. Bergès have ignored Committee requests for this agreement for months.<sup>8</sup>

Ethics experts have flagged concerns with this secret arrangement.<sup>9</sup> For example, your predecessor, and former chief ethics officer at the White House, Walter Shaub opined, “There is no ethics program in the world that can be built around the head of state’s staff working with a dealer to keep the public in the dark about the identities of individuals who pay vast sums to the leader’s family member for subjectively priced items of no intrinsic value.”<sup>10</sup> Mr. Shaub further wrote, “If this were Trump, Xi or Putin, you’d have no doubt whatsoever that this creates a vehicle for funneling cash to the first family in exchange for access or favors. Nor would you doubt that the appearance of monetizing the presidency was outrageous.”<sup>11</sup>

Public records indicate the federal government has helped finance Mr. Bergès’s latest ventures. According to independent reporting, Georges Bergès Galleries, LLC was approved for loans through the Paycheck Protection Program on April 29, 2020 for \$38,991 and on February 5, 2021 for \$36,170.<sup>12</sup> The loan approved on April 29 was forgiven as of March 8, 2021—during the current Administration—and the status of the February 2021 loan is undisclosed.<sup>13</sup>

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<sup>5</sup> Ben Schreckinger, *‘Hiding the Ball’: Hunter Biden Complicates White House Anti-Corruption Push*, POLITICO (Oct. 12, 2021).

<sup>6</sup> See, e.g., David Von Drehle, *The Hunter Biden story is a troubling tale of privilege*, WASH. POST (Oct. 4, 2019).

<sup>7</sup> *Supra*, n. 1.

<sup>8</sup> Letter from James Comer, Ranking Member, H. Comm. on Oversight and Reform, et al., to Dana Remus, Counsel to the President (July 14, 2021).

<sup>9</sup> Steven Nelson, *‘Did you have another question on something else?’ Psaki annoyed by Hunter Biden ask*, N.Y. POST (Oct. 12, 2021).

<sup>10</sup> Tweet by Walt Shaub, @waltshaub, 3:59 PM, Oct. 13, 2021.

<sup>11</sup> Tweet by Walt Shaub, @waltshaub, 4:02 PM, Oct. 13, 2021.

<sup>12</sup> *Tracking PPP: Search Every Company Approved for Federal Loans*, PROPUBLICA, available at <https://projects.propublica.org/coronavirus/bailouts/search?q=berges> (last visited November 4, 2021).

<sup>13</sup> *Id.*

The Honorable Emory A. Rounds III

November 7, 2021

Page 3

Further, according to the Small Business Administration records, Georges Bergès Galleries, LLC, received an Economic Injury Disaster Loan for \$150,000 on May 28, 2020.<sup>14</sup> This amount reportedly “revised” and increased by \$350,000 just three months ago, “shortly before the gallery exclusively marketed 15 paintings by Hunter Biden.”<sup>15</sup> In total, the gallery—which apparently has only two employees—has received almost \$600,000 in federal funding it will likely not have to pay back.

Mr. Bergès has expressed his desire to become the “lead guy in China” for art,<sup>16</sup> and Mr. Biden has cultivated foreign contacts around the world that would help his gallerist accomplish just that.<sup>17</sup> The White House has previously covered for Mr. Biden regarding his interest in a Chinese private equity firm, and Mr. Biden accompanied his father, who at the time was Vice President, to China on board Air Force Two in 2013.<sup>18</sup>

Mr. Biden and his accomplices both within and outside the White House believe they are insulated from oversight and accountability. As the entity that “oversees the executive branch ethics program” which “works to prevent financial conflicts of interest to help ensure government decisions are made free from personal financial bias,” the Office of Government Ethics is in a prime position to investigate the ethics agreement between the White House, Mr. Biden, and the Bergès Gallery. I therefore urge you to open an investigation into this matter.

Thank you for your attention to this matter.

Sincerely,



James Comer  
Ranking Member  
Committee on Oversight and Reform

cc: The Honorable Carolyn Maloney, Chairwoman  
Committee on Oversight and Reform

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<sup>14</sup> U.S. Small Business Admin., *COVID-19 EIDL data CSVs*, available at <https://data.sba.gov/dataset/covid-19-eidl> (last visited Nov. 3, 2021).

<sup>15</sup> Adam Andrzejewski, *Taxpayers Subsidize Manhattan Gallery Showcasing Hunter Biden Art*, REALCLEARPOLICY (Oct. 19, 2021).

<sup>16</sup> George Wayne, *Modern Eye for Modern Art*, RESIDENT (Mar. 2, 2015).

<sup>17</sup> See, e.g., *Hunter Biden: What Was He Doing in Chica and Ukraine*, BBC NEWS (Apr. 6, 2021).

<sup>18</sup> Samuel Chamberlain, *White House mum on whether Hunter Biden holding stake in Chinese private equity firm*, N.Y. POST (Oct. 4, 2021).

**From:** [Grant Anderson](#)  
**To:** [Shelley K. Finlayson](#)  
**Subject:** FW: Letters  
**Date:** Wednesday, November 10, 2021 4:44:34 PM  
**Attachments:** [Letter from Rep. Buck to AG Garland \(10.21.21\).pdf](#)

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Note: attachment follows on next page

FYI

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**From:** Grant Anderson  
**Sent:** Wednesday, November 10, 2021 4:44 PM  
**To:** Diana Veilleux <djveille@oge.gov>  
**Cc:** Patrick J. Lightfoot <pjlightf@oge.gov>; Seth Jaffe <sjaffe@oge.gov>  
**Subject:** Letters

Letters from House Oversight (Ranking Member Comer)

Source: <https://republicans-oversight.house.gov/letter>

1. [Letter](#) to OGE Director Rounds Calling for Ethics Investigation into Hunter Biden's artwork (11/7/21)
2. [Letter](#) to Chairwoman Maloney Calling for Hearing on Hunter Biden's Artwork & Ethics Concerns (11/7/21)
3. Follow-Up [Letter](#) to Gallery Owner on Hunter Biden Artwork (9/22/21)
4. Comer [Letter](#) on Hunter Biden Artwork (9/7/21)
5. Comer Requests Info about Biden Family Profiting Off White House from White House Counsel Remus (7/14/21 [Letter](#))
6. Comer Requests Info about Biden Family Profiting Off White House from Archivist of the U.S. (7/14/21 [Letter](#))

Also, please see attached for a letter from Rep. Buck to AG Garland (10/21/21).

**KEN BUCK**  
4TH DISTRICT OF COLORADO

2455 RAVBURN HOUSE OFFICE BUILDING  
WASHINGTON, DC 20515  
(202) 225-4676  
FAX: (202) 225-5870

**DISTRICT OFFICE:**  
900 CASTLETON RD., SUITE 112  
CASTLE ROCK, CO 80109  
PHONE: (720) 639-9165  
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5626 19TH STREET, SUITE A  
GREELEY, CO 80634  
PHONE: (970) 702-2136  
FAX: (970) 702-2951



**Congress of the United States**  
**House of Representatives**  
**Washington, DC 20515-0605**

**HOUSE JUDICIARY COMMITTEE**  
SUBCOMMITTEE ON IMMIGRATION  
AND CITIZENSHIP  
SUBCOMMITTEE ON ANTITRUST, COMMERCIAL  
AND ADMINISTRATIVE LAW - **RANKING MEMBER**

**HOUSE FOREIGN AFFAIRS COMMITTEE**  
SUBCOMMITTEE ON ASIA, THE PACIFIC,  
AND NONPROLIFERATION

October 21, 2021

The Honorable Merrick Garland  
Attorney General  
United States Department of Justice  
950 Pennsylvania Avenue, NW  
Washington, D.C. 20530-0001

Dear Attorney General Garland,

I write to urge you to appoint a special counsel in the investigation of Hunter Biden's foreign financial interests and the potential involvement of President Joe Biden.

In December 2020, Hunter Biden confirmed he was a target of a Justice Department criminal tax investigation led by the U.S. Attorney in Delaware. Recently released emails indicate there have been significant developments in the case. Emails between Hunter Biden and his business partner, Eric Schwerin, reference the payment of bills for both President Biden and Hunter Biden, and Schwerin notes that he was transferring money from Joe Biden. Further, a text from a Secret Service agent allegedly referring to a payment to a foreign escort, says, "Come on H this is linked to Celtic's account." H is Hunter Biden, and Celtic was the Secret Service code name for President Biden.<sup>1</sup>

These emails link President Biden to his son's accounts and indicate a commingling of funds in accounts where money was coming from dubious foreign sources. These recent revelations also call into question President Biden's repeated claims that he was unaware and uninvolved in his son's past dealings. It is now apparent that President Biden could be directly implicated in the ongoing investigations into his son's money transfers and dealings, raising serious questions regarding whether then Vice President Joe Biden was aware of and possibly benefitted from the influence peddling operation led by his son.

Hunter Biden's influence peddling activities do not appear to be limited to the Obama-Biden Administration. Hunter Biden's gallerist has priced his artworks at \$75,000 for drawings and \$500,000 for paintings.<sup>2</sup> A prominent art critic recently noted that "[t]hat's a pricing echelon that would put Hunter, a person with no formal artistic training, in the very top tier of emerging artists."<sup>3</sup>

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<sup>1</sup> <https://nypost.com/2021/06/22/did-joe-inadvertently-pay-for-hunter-bidens-wild-night-at-chateau-marmont/>

<sup>2</sup> <https://news.artnet.com/opinion/hunter-biden-art-1988251>

<sup>3</sup> <https://www.theatlantic.com/ideas/archive/2021/09/hunter-bidens-art-show-is-a-window-into-a-very-murky-world/620154/>

Further raising concerns that his art sales are part of an influence peddling scheme is the fact that in 2019, Hunter sought and failed to find gallery representation.<sup>4</sup> This was at a time when his father was not in office and not performing well in the Democratic primaries. Presumably no gallery was willing to represent him because they did not believe there would be a market for his works of art. The underlying assets have not changed since 2019. Hunter Biden is still producing the same quality of artwork and still possesses no noted talent or artistic education. What has changed is that Hunter Biden's father is now the President of the United States. As an art expert recently noted, “[t]here is no way to sell original Hunter Biden paintings for \$500,000 without some number of your collectors wanting to be able to say that they are affiliated with Biden.”<sup>5</sup> Or as art professor at the School of the Art Institute of Chicago framed the issue, “You’re paying for the brush with fame. That’s like a campaign contribution, right?”<sup>6</sup>

As you likely know, the art market has become one of the world’s most utilized pipelines for anonymous laundering of dirty money into legitimate assets. For example, the U.S. Senate Permanent Subcommittee on Investigations released a report last year showing how Russian oligarchs used the art market to dodge U.S. sanctions.<sup>7</sup> Hunter’s art sales raise serious ethical and legal issues. A recent report noted that “this is a situation without modern precedent: A presidential family member is bartering something intangible, something without any intrinsic value whatsoever—except the undeniable value of the painter’s last name. He’s selling abstract, two-dimensional images, and charging tens or even hundreds of thousands of dollars, while potentially hiding the identity of the people he’s selling them to.”<sup>8</sup>

It is now more critical than ever to appoint a special counsel who can lead this investigation in an impartial way. As outlined in 28 CFR § 600, the Attorney General has the right to appoint a Special Counsel to investigate and prosecute matters and individuals that present a conflict of interest for the Department when it is in the public interest.<sup>9</sup> Allowing the investigation to continue to be handled according to the normal practices of the Department means that Senate-confirmed political appointees who can only be removed from office by the President are now overseeing an investigation into his son’s, and possibly his, financial dealings related to a prior, or possibly ongoing, influence peddling scheme.

The current situation is untenable. An independent investigation by a prosecutor not reporting to nor subject to being overruled by political appointees at the Department is the only way to ensure the investigation is protected from any undue influence. The Department faces an unavoidable conflict of interest and cannot guarantee that the investigation would be conducted free from explicit or implicit political interference. The position of Special Counsel exists for this very situation.

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<sup>4</sup> <https://news.artnet.com/opinion/hunter-biden-art-1988251>

<sup>5</sup> <https://news.artnet.com/opinion/hunter-biden-art-1988251>

<sup>6</sup> <https://www.politico.com/newsletters/west-wing-playbook/2021/07/27/we-asked-art-critics-about-hunters-paintings-493751>

<sup>7</sup> <https://www.hsgac.senate.gov/imo/media/doc/2020-07-29%20PSI%20Staff%20Report%20-%20The%20Art%20Industry%20and%20U.S.%20Policies%20that%20Undermine%20Sanctions.pdf>

<sup>8</sup> <https://www.theatlantic.com/ideas/archive/2021/09/hunter-bidens-art-show-is-a-window-into-a-very-murky-world/620154/>

<sup>9</sup> <https://www.law.cornell.edu/cfr/text/28/600.1>

No person is above the law, not even the President of the United States of America. I strongly urge you to appoint a Special Counsel to conduct a thorough investigation into the allegations made against the Biden Family. I appreciate your attention to this pressing matter.

Sincerely,

A handwritten signature in black ink that reads "Ken Buck". The signature is written in a cursive, flowing style.

Ken Buck  
Member of Congress



**From:** [Patrick J. Lightfoot](#)  
**To:** [Grant Anderson](#)  
**Subject:** RE: Excerpt (2 of 3) from CQ's transcript of the House Judiciary Committee hearing  
**Date:** Wednesday, November 10, 2021 4:13:45 PM

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Thanks!

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**From:** Grant Anderson  
**Sent:** Wednesday, November 10, 2021 4:13 PM  
**To:** Patrick J. Lightfoot <[pjlighft@oge.gov](mailto:pjlighft@oge.gov)>  
**Subject:** FW: Excerpt (2 of 3) from CQ's transcript of the House Judiciary Committee hearing

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**From:** Grant Anderson  
**Sent:** Friday, October 22, 2021 6:53 PM  
**To:** LEGTEAM <[legteam@oge.gov](mailto:legteam@oge.gov)>  
**Subject:** Excerpt (2 of 3) from CQ's transcript of the House Judiciary Committee hearing

Please see below for an excerpt from CQ's [transcript](#) of the House Judiciary Committee [hearing](#) yesterday (2 of 3 – Qs related to Hunter Biden art sales).

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**KEN BUCK**: Thank you, Mr. Chairman. Mr. Attorney General, I'd like to direct your attention to the easel behind me. The first painting is a Claude Monet.

**MERRICK GARLAND**: I'm sorry, I can't read any of the words.

**KEN BUCK**: You don't need to.

**MERRICK GARLAND**: OK.

**KEN BUCK**: You just need to look at this great painting right here.

**MERRICK GARLAND**: It's a very beautiful paint.

**KEN BUCK**: It is beautiful and it is listed at Christie's for \$700,000. Now, Claude Monet was the founder of the Impressionist movement, something I didn't know until I researched it. The second painting is a Degas, another world-renowned artist. And this painting sold for \$500,000. The third painting, you may recognize his name, is a Hunter Biden.

**MERRICK GARLAND**: I don't recognize the painting.

**KEN BUCK**: The Hunter Biden painting sold for \$500,000 also. Now, you may think that's such an

exclusive -- that when Hunter Biden is in such exclusive company, that he would have a background artistic training, for example. But you would be wrong if you thought that. And you might think that he had some sort of apprenticeship with a world-renowned artist, but you would be wrong again if you thought that.

Or perhaps that he has been selling his works for years. And again, unfortunately, you would be wrong. It turns out that in 2019, Hunter Biden couldn't find a gallery to list his art. And what happened in 2020 that changed all that, his dad became president of the United States. Now, a single piece of art from Hunter Biden sells for more than the average American home.

This art arrangement is so suspicious that the Obama administration **ethics** czar, Walter Shaub, tweeted on July 10th of this year, "Hunter Biden should cancel this art sale because he knows the prices are based on his dad's job. Shame on POTUS if he doesn't ask Hunter to stop." By the way, Mr. Attorney General, this was the same Hunter Biden who's being investigated by your department and the IRS for tax fraud.

Selling fakes or selling or having a fake skill set is nothing new to Hunter Biden. When his dad was vice president, Hunter Biden received \$50,000 a month from a Ukrainian oligarch to sit on a board of an energy company. What was Hunter Biden's background in energy? Nada, nothing, zilch. Soon after he received his dad -- soon after, he and his dad got off Air Force Two in China, Hunter Biden became a private equity guru and assisted with a Chinese private equity firm linked to the Chinese central bank.

You might ask what his background was with Pacific Rim Investments or the Chinese central bank, nothing. With his dubious track record and quandering minds, my question why any art gallery would want to sell Hunter Biden's art? Well, this particular art gallery had its COVID relief loan more than doubled by the Biden administration.

In a survey of more than 100 art galleries in New York's 10th Congressional District, this particular art gallery received by far the largest SBA disaster loan. And as an aside, Mr. Attorney General, the member who represents the 10th Congressional District is none other than Chairman Nadler. Mr. Attorney General, who buys Hunter Biden's art?

Who benefits? What benefits do they receive from the Biden administration? The American people want to know. I have sent a letter to the Department of Justice before your tenure, asking them to appoint a special counsel to investigate Hunter Biden. I have today sent a letter to you and I am asking you now, will you appoint a special counsel to investigate Hunter Biden?

**MERRICK GARLAND**: I'm not -- for the same reason that I'm not able to respond to questions about investigations of the former president or of anyone else, I'm not able to discuss any investigations pending or otherwise with respect to any citizen of the United States.

**KEN BUCK**: Mr. Attorney General, I worked for the Department of Justice for 15 years. You are

allowed to tell us whether you will appoint a special counsel. You may not tell us whether you are investigating or not investigating a particular matter, but you are allowed to tell us whether you will appoint a special counsel. And that's my question.

**MERRICK GARLAND**: Well, apparently, I just received a letter today from you and we'll be taking it under advisement. But I wasn't aware that you had sent me a letter.

**KEN BUCK**: OK, I appreciate it. Mr. Chairman, I yield back, but I would like to first place into the record two articles, one from Vox, "Why Obama's former **ethics** czar is highly critical of Hunter Biden's lucrative art sales". And the second from the New York Post, "Art gallery repping Hunter Biden received \$500,000 federal COVID loan, records show."

**JERROLD NADLER**: Without objection. The gentleman yields back?

**KEN BUCK**: I yield back, yes.

**JERROLD NADLER**: The gentleman yields back. Mr. Swalwell.

**ERIC SWALWELL**: General Garland, you may not get these four hours back, but you may get some art history credit for today. . . .

**From:** [Seth Jaffe](#)  
**To:** [Patrick J. Lightfoot](#)  
**Subject:** Call  
**Date:** Tuesday, November 9, 2021 4:39:24 PM  
**Attachments:** [2021 - 11 - 07 - Hunter Biden Art letter to Emory Rounds.pdf](#)

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Note: letter attachment released  
above

Patrick,

Per our conversation.

Seth

**From:** [Diana Veilleux](#)  
**To:** [Seth Jaffe](#)  
**Subject:** Call Today  
**Date:** Tuesday, November 9, 2021 3:51:42 PM  
**Attachments:** [2021 - 11 - 07 - Hunter Biden Art letter to Emory Rounds.pdf](#)

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Note: letter attachment released above

Hi Seth

I assume we are having our monthly call today. If so, I would like to talk to you about the attached letter. Please do not share or discuss this letter with anyone before we talk (I will explain why).

Thanks!

Diana

Note: letter attachment released above

**From:** [Diana Veilleux](#)  
**To:** [Gwen Cannon-Jenkins](#)  
**Subject:** FW: Letter to Director Rounds from Ranking Member James Comer  
**Date:** Monday, November 8, 2021 10:24:00 AM  
**Attachments:** [2021 - 11 - 07 - Hunter Biden Art letter to Emory Rounds.pdf](#)

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Hi Gwen

Please add this letter to the Director's Read File.

Thanks!

Diana

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**From:** Shelley K. Finlayson  
**Sent:** Monday, November 8, 2021 7:13 AM  
**To:** Diana Veilleux <[djveille@oge.gov](mailto:djveille@oge.gov)>  
**Subject:** FW: Letter to Director Rounds from Ranking Member James Comer

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**From:** Vinyard, Ashlee [[mailto:\(b\)\(6\)](mailto:(b)(6)@oge.gov)]  
**Sent:** Sunday, November 7, 2021 8:50 PM  
**To:** Shelley K. Finlayson <[skfinlay@oge.gov](mailto:skfinlay@oge.gov)>; Contact OGE <[contactoge@oge.gov](mailto:contactoge@oge.gov)>  
**Cc:** Greenberg, Jake (b)(6); Davis, Carlton (b)(6)  
**Subject:** Letter to Director Rounds from Ranking Member James Comer

Good evening,

Please see the attached letter to Director Rounds from Congressman James Comer, Ranking Member of the House Committee on Oversight and Reform. Thank you for your assistance in getting this letter to the Director and we appreciate your prompt and full reply. Please acknowledge receipt of this letter.

Thank you,  
Ashlee

Ashlee Vinyard | Director of Operations  
Committee on Oversight and Reform | Ranking Member James Comer  
2105 Rayburn | Washington, DC 20515 | (202) 225-5074

Note: letter attachment  
released above

**From:** [Shelley K. Finlayson](#)  
**To:** [Emory A. Rounds III](#)  
**Subject:** FW: Letter to Director Rounds from Ranking Member James Comer  
**Date:** Monday, November 8, 2021 7:13:15 AM  
**Attachments:** [2021 - 11 - 07 - Hunter Biden Art letter to Emory Rounds.pdf](#)

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**From:** Vinyard, Ashlee [mailto:(b)(6)]  
**Sent:** Sunday, November 7, 2021 8:50 PM  
**To:** Shelley K. Finlayson <skfinlay@oge.gov>; Contact OGE <contactoge@oge.gov>  
**Cc:** Greenberg, Jake (b)(6) Davis, Carlton  
(b)(6)  
**Subject:** Letter to Director Rounds from Ranking Member James Comer

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Thank you,  
Ashlee

Ashlee Vinyard | Director of Operations  
Committee on Oversight and Reform | Ranking Member James Comer  
2105 Rayburn | Washington, DC 20515 | (202) 225-5074

Note: letter attachment released above

**From:** [Shelley K. Finlayson](#)  
**To:** [Diana Veilleux](#)  
**Subject:** FW: Letter to Director Rounds from Ranking Member James Comer  
**Date:** Monday, November 8, 2021 7:13:09 AM  
**Attachments:** [2021 - 11 - 07 - Hunter Biden Art letter to Emory Rounds.pdf](#)

---

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**From:** Vinyard, Ashlee [mailto:(b)(6)]  
**Sent:** Sunday, November 7, 2021 8:50 PM  
**To:** Shelley K. Finlayson <skfinlay@oge.gov>; Contact OGE <contactoge@oge.gov>  
**Cc:** Greenberg, Jake (b)(6) Davis, Carlton  
(b)(6)  
**Subject:** Letter to Director Rounds from Ranking Member James Comer

Good evening,

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Thank you,  
Ashlee

Ashlee Vinyard | Director of Operations  
Committee on Oversight and Reform | Ranking Member James Comer  
2105 Rayburn | Washington, DC 20515 | (202) 225-5074



Note: Letter attachment  
released above

**From:** [Shelley K. Finlayson](#)  
**To:** [Director of OGE](#)  
**Subject:** FW: Letter to Director Rounds from Ranking Member James Comer  
**Date:** Sunday, November 7, 2021 9:34:42 PM  
**Attachments:** [2021 - 11 - 07 - Hunter Biden Art letter to Emory Rounds.pdf](#)

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Sent from my Verizon, Samsung Galaxy smartphone

----- Original message -----  
From: "Vinyard, Ashlee" (b)(6)  
Date: 11/7/21 8:49 PM (GMT-05:00)  
To: "Shelley K. Finlayson" <skfinlay@oge.gov>, Contact OGE <contactoge@oge.gov>  
Cc: "Greenberg, Jake" (b)(6) "Davis, Carlton"  
(b)(6)  
Subject: Letter to Director Rounds from Ranking Member James Comer

Good evening,

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Thank you,  
Ashlee

Ashlee Vinyard | Director of Operations  
Committee on Oversight and Reform | Ranking Member James Comer  
2105 Rayburn | Washington, DC 20515 | (202) 225-5074

**From:** [Seth Jaffe](#)  
**To:** [Diana Veilleux](#)  
**Subject:** RE: Draft response letter to Ranking Member Comer (v4) djv.docx  
**Date:** Monday, November 29, 2021 10:05:28 AM

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Diana,

Thank you very much.

Seth

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**From:** Diana Veilleux  
**Sent:** Monday, November 29, 2021 10:05 AM  
**To:** Seth Jaffe <[sjaffe@oge.gov](mailto:sjaffe@oge.gov)>  
**Subject:** RE: Draft response letter to Ranking Member Comer (v4) djv.docx

Hi Seth

I think your comments are good. Suggest we finalize the draft and send it on to Shelley to look at. I am happy to do that.

Diana

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**From:** Seth Jaffe  
**Sent:** Monday, November 29, 2021 9:51 AM  
**To:** Diana Veilleux <[djveille@oge.gov](mailto:djveille@oge.gov)>  
**Subject:** RE: Draft response letter to Ranking Member Comer (v4) djv.docx

Note: attachment withheld in full - (b)(5), two pages.

Hi Diana,

I have reviewed the draft. I have: 1) fixed typos, 2) (b)(5) deliberative process [REDACTED], 3) added a comment, and 4) suggested some modified language in a couple of places.

Please let me know if you would like to discuss.

Thanks,  
Seth

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**From:** Diana Veilleux  
**Sent:** Wednesday, November 24, 2021 4:21 PM  
**To:** Seth Jaffe <[sjaffe@oge.gov](mailto:sjaffe@oge.gov)>  
**Subject:** Draft response letter to Ranking Member Comer (v4) djv.docx

Note: attachment withheld in full - (b)(5), two pages.

Hi Seth

Here is my revised version of the art letter. The footnote numbering is off but I assume that will shift if all of the changes are accepted.

Have a great Thanksgiving!

Diana



December 27, 2021

The Honorable James Comer  
Ranking Member  
Committee on Oversight and Reform  
United States House of Representatives  
2105 Rayburn House Office Building  
Washington, DC 20515

Dear Ranking Member Comer:

This responds to your letter to the U.S. Office of Government Ethics (OGE) dated November 7, 2021, raising concerns related to the sale of artwork by the President's adult son and requesting that OGE consider opening an investigation into the matters raised.

While OGE is charged with oversight of the executive branch ethics program, its authority is limited to executive branch officers and employees.<sup>1</sup> The ethics laws and rules OGE administers do not apply to individuals who are not executive branch employees, even if they are related to or associated with an executive branch employee.<sup>2</sup> In this situation, because the subject of your concerns is not an executive branch employee, the ethics laws and rules under OGE's jurisdiction do not apply.

I trust that this is responsive to your letter. If you require additional information or have questions, please contact OGE's Chief of Staff, Shelley K. Finlayson, at 202-482-9314.

Sincerely,

Emory A. Rounds, III  
Director

cc: The Honorable Carolyn Maloney, Chairwoman  
Committee on Oversight and Reform  
United States House of Representatives

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<sup>1</sup> 5 U.S.C. app. § 402(a).

<sup>2</sup> Public financial disclosure report filers, including the President, are required to report the financial interests of their dependent children. 5 U.S.C. app. § 102(e)(1). We note that the subject of your concerns is not a dependent; therefore, the reporting requirement would not apply.

