

MEMORANDUM

To: Ethics Office
From: FOIA Office
Subject: FOIA Consultation on Ethics Records

The enclosed documents were located during a search for records responsive to FOIA Request 20/002. Please review the records and provide your recommendations for release.

Enclosures



Executive Branch Public Financial Disclosure Report (OGE Form 278e)

SMITH, John Q.
Deputy Secretary of State, Department of State

Other Federal Government Positions Held During the Preceding 12 Months:
None

Electronic Signature - I certify that the statements I have made in this report are true, complete, and correct to the best of my knowledge.
/s/ John Q. Smith [electronically signed on 5/15/14 by John Q. Smith, authenticated by e-FEDS]-Filer received a 45-day filing extension.

Agency Ethics Official's Opinion - On the basis of information contained in this report, I conclude that the filer is in compliance with applicable laws and regulations (subject to any comments below).

/s/ Jonathan P. Doe, Designated Agency Ethics Official [electronically signed on 5/30/14 by Jonathan P. Doe, authenticated by e-FEDS]

Other review conducted by Susan L. Jones, Principal Assistant Administrator.

/s/ Susan L. Jones, Principal Assistant Administrator [electronically signed on 5/27/14 by Susan L. Jones, authenticated by e-FEDS]

U.S. Office of Government Ethics Certification

/s/ OGE Official Signature [electronically signed on 5/30/14 by OGE Official Signature, authenticated by e-FEDS]

Comments of Reviewing Officials:

- 1. Lorem ipsum dolor sit amet, consectetur adipiscing elit, sed do eiusmod tempor incididunt ut labore et dolore magna aliqua.

1. Filer's Positions Held Outside United States Government

ID	Organization Name	City/State	Organization Type	Position Held	From	To
1.1	George and Chapman, LLP	New York, NY	Law Firm	Partner	5/2011	Present
1.2	Widgets Unlimited, Inc.	Grand Rapids, MI	Corporation	Senior Vice President	2/2003	7/2013

2. Filer's Employment Assets and Income

ID	Description	EIF	Value	Income Type	Income Amount
2.1	George and Chapman, LLP			Partnership Share	\$338,150
2.2	Widgets Unlimited Restricted Stock (See Endnote: 2.2.a)		\$50,001-\$100,000		\$0-\$200

3. Filer's Employment Agreements and Arrangements

ID	Employer or Party	City/State	Status and Terms	Date
3.1	Geotronics Corp.	Duluth, MN	I will continue to participate in this defined benefit plan.	3/1997
3.2	Widgets Unlimited, Inc.	New York, NY	I will forfeit my unvested restricted stock upon my separation.	3/2010
3.3	George and Chapman, LLP	New York, NY	Pursuant to the partnership agreement, following my withdrawal from the firm, I will receive a lump sum payment of my capital account. This payment will be calculated as of the date of my resignation.	5/2011

4. Filer's Sources of Compensation Exceeding \$5,000 in a Year - Not required for this type of report

5. Spouse's Employment Assets and Income

ID	Description	EIF	Value	Income Type	Income Amount	Owner
5.1	American Broadcasting Corporation			Salary		S
5.2	American Broadcasting Corporation, Defined Benefit Plan - Value not readily ascertainable			Spouse's Pension		S

6. Other Assets and Income

ID	Description	EIF	Value	Income Type	Income Amount	Owner
6.1	PNECX - Allianz Dividend Value Fund	Y	\$0-\$1,000		\$1,001-\$2,500	DC
6.2	AGTHX - American Funds: Growth Fund of America	Y	\$0-\$1,000		\$1,001-\$2,500	DC
6.3	XOM - Exxon Mobil Corporation		\$50,001-\$100,000	Dividends	\$1,001-\$2,500	
6.4	Positron Capital, Ventures, LP (venture capital fund)		\$250,001-\$500,000			J
6.4.1	. Hydroponics Unlimited, LLC (agricultural products) (See Endnote: 6.4.1.a)		\$15,001-\$50,000		\$0-\$200	J
6.4.2	. Grower's Corn Syrup (Corn Syrup Manufacturer), Dale, IA		\$50,001-\$100,000		\$0-\$200	J
6.5	ABT - Abbott Labs		\$250,001-\$500,000	Dividends	\$5,001-\$15,000	S
6.6	ADP - Automatic Data Processing		\$250,001-\$500,000	Dividends	\$5,001-\$15,000	S

7. Transactions

ID	Description	Type	Date	Amount
7.1	CVX - Chevron Corporation	Sale	6/12/13	\$15,001 - \$50,000
7.2	XOM - Exxon Mobil Corporation	Sale	6/12/13	\$15,001 - \$50,000

8. Liabilities

ID	Creditor Name	Type	Amount	Year Incurred	Rate	Term	Owner
8.1	First District Bank	mortgage	\$100,001 - \$250,000	2010	4.10%	30 years	J
8.2	XYZ National Visa	credit card	\$10,001 - \$15,000	2011	variable	revolving	S
8.3	John Doe	personal loan	\$15,001 - \$50,000	2012	prime +1%	on demand	

9. Gifts and Travel Reimbursements

ID	Source Name	City/State	Brief Description	Value
9.1	Mary Smith	Louisville, KY	Electronic organizer (birthday present)	\$380
9.2	Rock Collectors Association	Los Angeles, CA	Airline ticket, hotel room, and meals incident to speech at convention in St. Louis, MO, (August 1 -2, 2012). Personal activity unrelated to official duties.	\$720

Endnotes

ID	Note
2.2.a	Lorem ipsum dolor sit amet, consectetur adipisicing elit, sed do eiusmod tempor incididunt ut labore et dolore magna aliqua.
6.4.1.a	Lorem ipsum dolor sit amet, consectetur adipisicing elit, sed do eiusmod tempor incididunt ut labore et dolore magna aliqua.

Executive Branch Public Financial Disclosure Report (OGE Form 278e)

SMITH, John Q.

Deputy Secretary of State, Department of State

Other Federal Government Positions Held During the Preceding 12 Months:

None

Electronic Signature - I certify that the statements I have made in this report are true, complete, and correct to the best of my knowledge.

/s/ John Q. Smith [electronically signed on 5/15/14 by John Q. Smith, authenticated by e-FEDS]-Filer received a 45-day filing extension.

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6.4.1.a	Lorem ipsum dolor sit amet, consectetur adipisicing elit, sed do eiusmod tempor incididunt ut labore et dolore magna aliqua.

Document 3: Confidential Financial Disclosure Report (OGE Form 450) for Jane J. Smith

OGE Form 450, 5 CFR Part 2634, Subpart I
U.S. Office of Government Ethics (Nov 2019)
Expires 11/30/21

Form Approved
OMB No. 3209-0006

Date Received by Agency

Page Number

CONFIDENTIAL FINANCIAL DISCLOSURE REPORT Executive Branch

Employee's Name (<i>Print last, first, middle initial</i>)		E-mail Address	
Position/Title		Grade	
Agency		Branch/Unit and Address	
Work Phone	Reporting Status New Entrant <input type="checkbox"/> Annual <input type="checkbox"/>		If New Entrant, Date of Appointment to Position (<i>mm/dd/yy</i>)
Check box if Special Government Employee (SGE) <input type="checkbox"/>	An SGE is an executive branch officer or employee who is retained, designated, appointed, or employed to perform temporary duties either on a full-time or intermittent basis, with or without compensation, for a period not to exceed 130 days during any consecutive 365-day period.		
If an SGE, Mailing Address (<i>Number, Street, City, State, ZIP Code</i>)			

Step 1: Read the instructions for Parts I through V on the following pages.

Step 2: For each statement below, check Yes or No to describe your situation.

I. I have reportable assets or sources of income for myself, my spouse, or my dependent children.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
II. I have reportable liabilities (debts) for myself, my spouse, or my dependent children.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
III. I have reportable outside positions for myself.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
IV. I have reportable agreements or arrangements for myself.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
NOTE: Statement V is for <u>annual</u> filers only. It does not apply to new entrants and SGEs.		
V. I have reportable gifts or travel reimbursements for myself, my spouse, or my dependent children.	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Step 3: If you selected Yes for any statement, you must describe the reportable interests that you have in the corresponding Part (I, II, III, IV, or V) of the form.

Step 4: Sign and date the form.

Step 5: Submit the completed form to your ethics office.

I certify that the statements I have made on this form and all attached statements are true, complete, and correct to the best of my knowledge.

Signature of Employee <i>Jane Smith</i>	Date (<i>mm/dd/yy</i>) <i>1/6/20</i>
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FOR REVIEWERS' USE ONLY:

On the basis of information contained in this report, I conclude that the filer is in compliance with applicable laws and regulations, except as noted in the "comments" box below.	
Signature and Title of Supervisor/Other Intermediate Reviewer (<i>if required by the agency</i>)	Date (<i>mm/dd/yy</i>)
E-mail Address	Phone Number
Signature and Title of Agency's Final Reviewing Official <i>George Scott</i>	Date (<i>mm/dd/yy</i>) <i>1/31/20</i>
Comments of Reviewing Officials	
(Check box if continued on additional page <input type="checkbox"/>)	

Employee's Name (Print last, first, middle initial)	Page Number
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Part I: Assets and Income

Report for Yourself, Spouse, and Dependent Child: <ul style="list-style-type: none"> Assets held for investment or the production of income that ended the reporting period with a value greater than \$1,000. In addition, annual filers must report assets from which more than \$1,000 in income was received during the reporting period. Reportable assets include, but are not limited to: <ul style="list-style-type: none"> Assets such as stocks, bonds, annuities, trust holdings, partnership interests, life insurance, investment real estate, or a privately-held trade or business Sector mutual funds: those funds invested in a particular industry, business, or location, such as ABC Electronics Fund or XYZ Canada Fund (report the full name of the fund, not just the family fund name) Holdings of retirement plans, such as 401(k)s or IRAs, investment life insurance, or variable annuities (report each holding unless listed in the Do Not Report section) Defined benefit pension plans provided by a former employer (include the name of the employer) 	Do Not Report: <ul style="list-style-type: none"> Federal Government retirement benefits Thrift Savings Plan Certificates of deposit, savings or checking accounts Term life insurance Money market mutual funds and money market accounts Your personal residence, unless you rent it out U.S. Government Treasury bonds, bills, notes, and savings bonds Diversified mutual funds, such as ABC Equity Value Fund or XYZ Large Capital Fund Diversified funds within an employee benefit plan Money owed to you, your spouse, or dependent child by a spouse, parent, sibling, or child
Also Report: <ul style="list-style-type: none"> <u>For yourself:</u> (1) all sources of salary, fees, commissions, and other earned income greater than \$1,000, (2) honoraria greater than \$1,000, and (3) other non-investment income such as scholarships, prizes, and gambling income greater than \$1,000 <u>For your spouse:</u> (1) all sources of salary, fees, commissions, and other earned income greater than \$1,000, and (2) honoraria greater than \$1,000 	Do Not Report: <ul style="list-style-type: none"> Dependent child's earned income Veterans' benefits Federal Government salary Social Security benefits

Important Definitions

Diversified Mutual Fund – A mutual fund that does not have a stated policy of concentrating its investments in one industry, business, or single country other than the United States.
Sector Mutual Fund – A mutual fund that concentrates its investments in an industry, business, single country other than the United States, or bonds of a single state within the United States.
Diversified Fund within an Employee Benefit Plan – An employee benefit plan fund that has a written policy of varying investments without concentration in one industry, business, or single country other than the United States.
Dependent Child – A son, daughter, stepson or stepdaughter who is either unmarried and under age 21 and living in the filer's house, or considered dependent under the U.S. tax code.

Reportable Information – Go to the last page to see examples of how to report assets and income.

Specific stock, bond, sector mutual fund, type/location of real estate, etc. (Indicate the full name of each specific asset or investment. You may add the ticker symbol to the full name.) Name of Employer or Business; Source of Fees, Commissions, or Honoraria (Include brief description.) You may distinguish any entry for a family member by preceding it with S for spouse, DC for dependent child, or J for jointly held.	No longer held
1	<input type="checkbox"/>
2	<input type="checkbox"/>
3	<input type="checkbox"/>
4	<input type="checkbox"/>
5	<input type="checkbox"/>

Employee's Name (<i>Print last, first, middle initial</i>)	Page Number
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Part I: Assets and Income
Continuation Page

Specific stock, bond, sector mutual fund, type/location of real estate, etc. (<i>Indicate the full name of each specific asset or investment. You may add the ticker symbol to the full name.</i>) Name of Employer or Business; Source of Fees, Commissions, or Honoraria (<i>Include brief description.</i>) You may distinguish any entry for a family member by preceding it with S for spouse, DC for dependent child, or J for jointly held.	No longer held
1	<input type="checkbox"/>
2	<input type="checkbox"/>
3	<input type="checkbox"/>
4	<input type="checkbox"/>
5	<input type="checkbox"/>
6	<input type="checkbox"/>
7	<input type="checkbox"/>
8	<input type="checkbox"/>
9	<input type="checkbox"/>
10	<input type="checkbox"/>
11	<input type="checkbox"/>
12	<input type="checkbox"/>
13	<input type="checkbox"/>
14	<input type="checkbox"/>
15	<input type="checkbox"/>
16	<input type="checkbox"/>
17	<input type="checkbox"/>
18	<input type="checkbox"/>
19	<input type="checkbox"/>
20	<input type="checkbox"/>

Employee's Name (<i>Print last, first, middle initial</i>)	Page Number
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Part II: Liabilities

Report for Yourself, Spouse, and Dependent Child:	Do Not Report:
<ul style="list-style-type: none"> If you are a new entrant filer, liabilities that exceeded \$10,000 at the end of the reporting period If you are an annual filer, liabilities that exceeded \$10,000 during the reporting period 	<ul style="list-style-type: none"> Any liability, such as a mortgage, a student loan, or a credit card account, from a financial institution or business entity granted on terms made available to the general public Loans secured by automobiles, household furniture, or appliances, unless the loan exceeds the purchase price of the item it secures Liabilities that you owe to your spouse or to the parent, sibling, or child of you, your spouse, or your dependent child

Reportable Information – Go to the last page to see examples of how to report liabilities.

Name of creditor (<i>include city and state where creditor is located</i>)	Type of liability (<i>personal loan, margin account, etc.</i>)
1	
2	

Part III: Outside Positions

Report for Yourself:	Do Not Report:
<ul style="list-style-type: none"> All positions outside the U.S. Government held at any time during the reporting period, whether or not you were compensated and whether or not you currently hold that position. Positions include an officer, director, employee, trustee, general partner, proprietor, representative, executor, or consultant of any of the following: <ul style="list-style-type: none"> Corporation, partnership, trust, or other business entity Non-profit or volunteer organization Educational institution State or Local Government 	<ul style="list-style-type: none"> Any position with a <ul style="list-style-type: none"> Religious entity Social entity Fraternal entity Political entity Any position held by your spouse or dependent child Any position that you hold as part of your official duties

Reportable Information – Go to the last page to see examples of how to report outside positions.

Organization (<i>include city and state where organization is located</i>)	Type of organization	Position	No longer held
1			<input type="checkbox"/>
2			<input type="checkbox"/>
3			<input type="checkbox"/>
4			<input type="checkbox"/>
5			<input type="checkbox"/>
6			<input type="checkbox"/>

Employee's Name (<i>Print last, first, middle initial</i>)	Page Number
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Part IV: Agreements or Arrangements

Report Your Agreements or Arrangements for: <ul style="list-style-type: none"> Continuing participation in an employee pension or benefit plan maintained by a current or former employer A leave of absence Future employment, including date you accepted employment offer Continuation of payment by a current or former employer (including severance payments) 	Do Not Report: <ul style="list-style-type: none"> Any agreement or arrangement related to your employment by the Federal Government Spouse's and dependent child's agreements or arrangements Continuing participation in a defined contribution plan, such as a 401(k) plan, to which an employer is no longer making contributions
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Reportable Information – Go to the last page to see examples of how to report agreements and arrangements.

Entity with which you have an agreement or arrangement (<i>include city and state where entity is located</i>)	Terms of Agreement or Arrangement
1	
2	
3	
4	

Part V: Gifts and Travel Reimbursements

Fill out this part only if you are filing an Annual Report. If you are a new entrant or an SGE, skip this part.

Report for Yourself, Spouse, and Dependent Child: <ul style="list-style-type: none"> Any gifts or travel reimbursements (items such as lodging, transportation, and food) totaling more than \$390* from any one source during the reporting period; include where you traveled, the purpose, and date(s) of the trip for travel gifts and reimbursements <p>*If you received more than one gift from one source:</p> <ol style="list-style-type: none"> Determine the value of each item you received from that source Ignore each item valued at \$156 or less Add the value of those items valued at more than \$156; if the total is more than \$390, then you must list those items on this form 	Do Not Report: <ul style="list-style-type: none"> Anything received from relatives, the U.S. Government, D.C., state, or local governments Bequests and other forms of inheritance Gifts and travel reimbursements given to your agency in connection with your official travel Gifts of hospitality (food, lodging, entertainment) at the donor's residence or personal premises Anything received by your spouse or dependent child totally independent of their relationship to you
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Reportable Information – Go to the last page to see examples of how to report gifts and travel reimbursements.

Source	Description
1	
2	
3	

Jane Smith
List of Recusals

Until the date indicated for the specific entity, unless first authorized by the DAEO, I am recused from particular matters involving specific parties in which any of the following entities either is a party or represents a party.

- Widgets Unlimited, January 3, 2021
- National Widgets Association, January 2, 2021

Document 5: Email exchange between an OGE desk officer and an agency ethics official

From: [Jennifer Matis](#)
To: ["Sally, Robin"](#)
Subject: RE: OGE Issues Legal Advisory on Executive Order 13770, "Ethics Commitments by Executive Branch Appointees"
Date: Wednesday, February 08, 2017 4:10:37 PM

Hi Robin,

All pledge questions are being referred to ELPB. One of them will respond, but it might be several days.

Thanks,

Jen

Jennifer Matis

Assistant Counsel

Legal, External Affairs and Performance Branch

U.S. Office of Government

Ethics 202-482-9216

jennifer.matis@oge.gov

Visit OGE's website: www.oge.gov

Follow OGE on Twitter: [@OfficeGovEthics](https://twitter.com/OfficeGovEthics)

From: Sally, Robin [\[mailto:Robin.Sally@wop.gov\]](mailto:Robin.Sally@wop.gov)
Sent: Wednesday, February 08, 2017 1:11 PM
To: Jennifer Matis
Subject: FW: OGE Issues Legal Advisory on Executive Order 13770, "Ethics Commitments by Executive Branch Appointees"

Hi Jen, I have a question about the new ethics requirements in the Executive Order. If an Obama appointee is still currently in one of the political positions for which they signed the Obama Pledge, but they are merely a hold-over and were not appointed by the Trump Administration, does that employee sign the new pledge?

From: News and Info for Ethics Officials [\[mailto:oge-ethicsinfo@LISTSERV.GSA.GOV\]](mailto:oge-ethicsinfo@LISTSERV.GSA.GOV) **On Behalf Of** Ethics Mailinglist
Sent: Monday, February 06, 2017 3:45 PM
To: OGE-ETHICSINFO@LISTSERV.GSA.GOV
Subject: [EXTERNAL] OGE Issues Legal Advisory on Executive Order 13770, "Ethics Commitments by Executive Branch Appointees"

OGE Issues Legal Advisory on Executive Order 13770, "Ethics Commitments by Executive Branch Appointees"

On February 6, 2017, OGE issued a legal advisory on Executive Order 13770, "Ethics Commitments by Executive Branch Appointees." In this advisory, OGE is making available for agency use a copy of the Executive Order and the Ethics Pledge form. Further, OGE explains the extent to which its legal advisories applicable to Executive Order 13490 may be read as being applicable to Executive Order 13770.

The legal advisory is available on OGE's website at:

[https://www.oge.gov/web/oge.nsf/All+Advisories/F5470156962CE0E6852580BF00752A17/\\$FILE/LA-17-02%20\(final\).pdf?open](https://www.oge.gov/web/oge.nsf/All+Advisories/F5470156962CE0E6852580BF00752A17/$FILE/LA-17-02%20(final).pdf?open)

NOTIFICATION OF FUTURE EMPLOYMENT DISCUSSIONS OR AGREEMENT AND RECUSAL STATEMENT

Section 17 of the Stop Trading on Congressional Knowledge Act of 2012 (STOCK Act) requires certain employees to file a statement notifying their agency ethics official of any negotiation for, or agreement of, future employment or compensation with a non-federal entity no later than three business days after commencement of the negotiation or agreement. Public filers also must file a recusal statement whenever there is a conflict of interest or appearance of a conflict of interest with the entity, unless the employee obtains a written waiver. An employee may elect to file a notification and recusal statement before negotiations have commenced and before an agreement of future employment or compensation is reached.

NOTIFICATION OF POST-EMPLOYMENT DISCUSSIONS OR AGREEMENT

Name of Employee	
Agency/Office	
Date of Discussion, Negotiation, or Agreement	
Name(s) of Non-Federal Entity or Entities Disclose each non-federal entity with which you anticipate negotiating for, are negotiating for, or have an agreement of future employment or compensation.	

RECUSAL STATEMENT

For as long as I am seeking, negotiating for, or have an agreement of, employment or compensation with any entity listed above, I will comply with all applicable recusal obligations under 5 C.F.R. part 2635 and, where applicable, 18 U.S.C. § 208. I understand that it is my responsibility to consult an agency ethics official if I have questions regarding these recusal obligations.

Employee Signature	Date Submitted
<i>Joseph Barney</i>	<i>1/29/20</i>
Agency Ethics Official Signature	Date Received
<i>George Scott</i>	<i>1/31/20</i>

Document 7: Email exchange between an OGE financial disclosure reviewer and an agency ethics official regarding a nominee financial disclosure report

From: [Hernandez, Maria P.](#)
To: [Jim Robertson](#)
Subject: RE: One More
Date: Thursday, January 12, 2017 3:34:27 PM

And the beneficiary is the LLC.

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

From: Hernandez, Maria P. Sent:
Thursday, January 12, 2017 3:29 PM To:
Jim Robertson <jfrobert@oge.gov>
Cc: Hernandez, Maria P. <Maria_P_Hernandez@fof.gov>
Subject: RE: One More

Even if the asset is owned by Larry Stevens LLC and he is not a managing partner?

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

From: Jim Robertson [<mailto:jfrobert@oge.gov>]
Sent: Thursday, January 12, 2017 3:28 PM
To: Hernandez, Maria P. <Maria_P_Hernandez@fof.gov>
Subject: RE: One More

We'll list it as a sub asset of Larry Stevens. Need to know the kind of insurance policy (universal, whole, variable, term); if term, we don't need to report it at all. If variable, then we need to know the underlying assets; We'll also need his proportional valuation amount (the cash surrender value, not the face value), and income amount, (if greater than \$201 for the reporting period).

Jim

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

From: Hernandez, Maria P. [mailto:Maria_P_Hernandez@fof.gov]
Sent: Thursday, January 12, 2017 3:16 PM
To: Jim Robertson
Subject: Fwd: One More

Sent from my iPhone

From: Harry Star <star@mac.com<<mailto:harrystar@pc.com>>>
Date: January 12, 2017 at 3:12:12 PM EST
To: "Hernandez, Maria P. "
<Maria_P_Hernandez@fof.gov<mailto:Maria_P_Hernandez@fof.gov>>
Subject: One More

Thank you for work on my financial disclosure report, Maria. I look forward to working with you if and when I am confirmed.

In answer to your questions about my assets, Larry Stevens LLC also has a life insurance policy. It is not a trust. It is on my parents' lives, and the beneficiary is the LLC.

As noted, I own 32.6% of Larry Stevens, but do not exercise any management control. How would you like me to report that one? If you need to reach me this week, my cell number is 212-980-3345.

HS

Joseph Barney; SF 278
Responses to OGE Reviewer Round 3 Notes
March 14, 2017

Round 3 notes, based on version of the report saved on 1/7/17 (10:00 am)

Part 1

- *[pending from draft 1- line entries updated]* In round 1, I noted that certain positions in Part 1 are not reflected in Part 2. Subsequent rounds have revised Part 2; however, the following positions are not associated with Part 2 entries as revised. Please confirm that the filer does not have any equity or income with these entities. I just need a “confirmed” response for our records. **[CONFIRMED EXCEPT FOR LINES 2 AND 6 -- SPECIFIC RESPONSES TO THOSE BELOW]**
 - line 2: First United National Bank **INCOME SHOWN FOR FIRST UNITED BANCORP, INC. [PARENT].**
 - line 8: National Savings Bank, National/Fiduciary Bank, Inc. **THIS IS LISTED IN PART 2.**
 - line 17: International Aviation Worldwide GmbH
 - line 30: Tyco and its holding company
 - line 43: International Aviation Korea, LLC
 - line 50: Manning Eli LP **[Note: Updated Name to Manning Eli Consulting Worldwide LP]**
- *[pending from draft 1, repeated in draft 2]* line 1: Good Guy Foundation. Please provide the starting month. If the filer cannot ascertain the month, please note in your response. **PROVIDED.**
- *[new]* line 60: Goodest Guy Education Foundation. A trustee position with this entity is reported at line 1 for the same period of time. Are the director and trustee positions separate? If not, the entries can be combined. If so, please provide the starting month for this director position. If the filer cannot ascertain the month, please note in your response. **ENTITY NAMES CORRECTED.**

Part 2

- *[related to comment pending from draft 1]* line 1: Oscar Aluminum. The report has been updated with some additional interests related to Oscar Aluminum. However, for our records, we need specific confirmation that the filer does not have any items from my original “please-confirm” list that were not subsequently added. Therefore, please confirm that the filer does not have any of the following with Oscar Aluminum:
 - anticipated bonus (i.e., the filer’s first Annual report, once in the position, will not reflect any bonus received during 2017)
 - anticipated severance
 - cash balance pension plan
 - deferred compensation
 - defined benefit plan
 - phantom stock

Joseph Barney; SF 278

Responses to OGE Reviewer Round 3 Notes

March 14, 2017

- restricted stock units
- split-dollar life insurance
- stock options
- stock appreciation rights

STOCK OPTION ENTRY ADDED. CONFIRM THAT THE FILER HAS NONE OF THE OTHER KINDS OF INCOME LISTED.

- [new] line 22: Smith Miller & Co. LLC
 - Please explain why a value is not readily ascertainable. For example, it may be that the value is fully dependent on interests otherwise reported.
 - If the income is not readily ascertainable either, please note that and explain.

ENTITY REMOVED, AS THE FILER OWNS NO EQUITY AND HAS RECEIVED NO INCOME FROM IT DURING THE PAST TWO YEARS.