

MEMORANDUM

TO: STEPHEN ALEXANDER VADEN  
ACTING GENERAL COUNSEL  
OFFICE OF THE GENERAL COUNSEL  
U.S. DEPARTMENT OF AGRICULTURE

STUART BENDER  
DESIGNATED AGENCY ETHICS OFFICIAL AND  
DIRECTOR, USDA OFFICE OF ETHICS

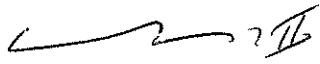
FROM: DONALD F. MCGAHN II  
COUNSEL TO THE PRESIDENT  
THE WHITE HOUSE

SUBJECT: Limited Waiver of Paragraph 7 of the Ethics Pledge

Official: Kristi Boswell  
Senior Advisor  
Office of the Secretary, USDA

After reviewing the U.S. Department of Agriculture's (USDA's) limited waiver request memorandum, I hereby waive the requirements of paragraph 7 of the Ethics Pledge to Ms. Kristi Boswell to allow her to advise the Secretary of Agriculture with respect to the Department of Labor's H-2A visa program involving seasonal agricultural workers. I have determined that it is in the public interest to grant this limited waiver because Ms. Boswell's knowledge and expertise analyzing the laws and regulations comprising the Department of Labor's H-2A visa program, combined with her experience working with American farmers and understanding their unique labor needs, make her an ideal person to assist the Secretary of Agriculture in this task.

In light of the importance of the aforementioned efforts to the Administration and to USDA, a limited waiver of the provisions of paragraph 7 of the Ethics Pledge (contained in Section 1 of Executive Order 13770) is justified for Ms. Boswell to enable her to advise the Secretary of Agriculture. Accordingly, I authorize Ms. Boswell to participate personally and substantially in matters in the specific issue area of the H-2A visa program regarding seasonal agricultural workers. I understand that Ms. Boswell will otherwise comply with the remainder of the requirements imposed by the President's Ethics Pledge and with all preexisting government ethics rules.

  
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Donald F. McGahn II  
Counsel to the President

Dated: 16 May 2017