Monica M. G. Ashar
"Roberts, Blake"
Heather A. Jones
Footnote language
Monday, July 17, 2017 12:40:39 PM

Line 19.3 footnote: Please make the changes below so that the footnote reads as follows:



Monica Ashar Assistant Counsel U.S. Office of Government Ethics 1201 New York Avenue, NW, Suite 500 Washington, DC 20005 Phone: (202) 482-9282

#### Thanks, Blake.

From: Roberts, Blake [mailto:Blake.Roberts@wilmerhale.com]
Sent: Monday, July 17, 2017 2:53 PM
To: Monica M. G. Ashar
Cc: Heather A. Jones
Subject: RE: Fund name

. Working on

your other questions.

From: Monica M. G. Ashar [mailto:mmgashar@oge.gov]
Sent: Monday, July 17, 2017 12:51 PM
To: Roberts, Blake <<u>Blake.Roberts@wilmerhale.com</u>>
Cc: Heather A. Jones <<u>hajones@oge.gov</u>>
Subject: Fund name

#### b)(3), (6)

Monica Ashar Assistant Counsel U.S. Office of Government Ethics 1201 New York Avenue, NW, Suite 500 Washington, DC 20005 Phone: (202) 482-9282

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From: Kimberly L. Sikora Panza [mailto:klspanza@oge.gov] Sent: Friday, August 18, 2017 4:03 PM To: Vahab, Lana L Subject: Your call

Hi Lana,

Thanks for your call.

Now that Ms. Gingrich is done being processed in the nom program, ethics questions are more appropriately directed to your desk officer – could you reach out to your DO with your inquiry?

Thanks! Kim

OGE Confidential Notice: This message may contain Controlled Unclassified Information (CUI) that requires safeguarding or dissemination control under applicable law, regulation, or Government-wide policy. This email, including all attachments, may constitute a Federal record or other Government property that is intended only for the use of the individual or entity to which it is addressed. If you are not the intended recipient or the employee or agent responsible for delivering the transmission to the intended recipient, you are hereby notified that any dissemination, distribution, copying or use of this email or its contents is strictly prohibited. If you have received this email in error, please notify the sender by responding to the email and then immediately delete the email.



From: Kimberly L. Sikora Panza [mailto:klspanza@oge.gov] Sent: Friday, June 09, 2017 4:22 PM To: Vahab, Lana L Subject: RE: UPDTAED EA for Preclearance GINGRICH.docx

Thanks, will be on lookout Monday (just wanted to make sure I knew what was going on because I am about to sign off!)

Have a great weekend! Kim



From: Kimberly L. Sikora Panza [mailto:klspanza@oge.gov] Sent: Friday, June 09, 2017 4:17 PM To: Vahab, Lana L Subject: RE: UPDTAED EA for Preclearance GINGRICH.docx

Who did he send it to? Is it in Integrity?



From: Kimberly L. Sikora Panza [mailto:klspanza@oge.gov] Sent: Friday, June 09, 2017 9:10 AM To: Vahab, Lana L Subject: RE: UPDTAED EA for Preclearance GINGRICH.docx

Thanks for the update. Never a dull moment!



From: Kimberly L. Sikora Panza [mailto:klspanza@oge.gov] Sent: Friday, June 09, 2017 7:15 AM To: Vahab, Lana L Subject: RE: UPDTAED EA for Preclearance GINGRICH.docx

It is hard for me to weigh in on their question without knowing the factual basis behind it. This information is the same that has been on the report since preclearance, so I'm not sure what is prompting this.

Here is the reporting guidance for <sup>1018), (6)</sup>	-	
(b)(3), (6)		
9)(3), (5), (6)		

Referral to DOS		

From: Taylor Swindle <sup>(0) (6)</sup> Sent: Thursday, June 08, 2017 11:52 AM To: Vahab, Lana L Cc: Bess Kelly Subject: Re: UPDTAED EA for Preclearance GINGRICH.docx

Hey Lana,

That's the only feedback our attorney had.

Taylor O. Swindle



From: Bess Kelly (b) (6) Sent: Tuesday, June 06, 2017 2:41 PM To: Vahab, Lana L; Taylor Swindle Subject: RE: UPDTAED EA for Preclearance GINGRICH.docx

Thanks Lana!

Callista is out of the country but I am going to try and get a hold of her and will circle around with you on the document and email asap.

-Bess





From: Taylor Swindle (b) (6) Sent: Wednesday, April 05, 2017 1:44 PM To: Vahab, Lana L; Bess Kelly Subject: RE: Two other things to confirm

Hey Lana,

Bess and I both looked at the questions and can confirm both. Please let us know if you have anything else.

Thank you!

Taylor O. Swindle



Kimberly L. Sikora Panza
<u>"Vahab, Lana L"</u>
THIS IS THE VERSION TO USE
Thursday, April 06, 2017 10:20:33 AM
UPDATED EA for Preclearance GINGRICH.docx

3 page attachment withheld in full - (b) (3), (4), (5), (6)



From: Kimberly L. Sikora Panza [mailto:klspanza@oge.gov]
Sent: Friday, March 31, 2017 12:45 PM
To: Vahab, Lana L
Subject: RE: Talked to post in Holy See

I am free until around 3:30 today. What works for you?



From: Kimberly L. Sikora Panza [mailto:klspanza@oge.gov] Sent: Friday, March 31, 2017 12:04 PM To: Vahab, Lana L Subject: RE: Talked to post in Holy See

Want to talk about stuff. Are you available in ~15 mins?







From: Kimberly L. Sikora Panza [mailto:klspanza@oge.gov]
Sent: Monday, June 12, 2017 8:34 AM
To: Martin, Janice N; Nominees
Cc: Vahab, Lana L
Subject: RE: State Department

Lana,

As you may recall, Heather returned the report in Integrity to David to allow yall to make the necessary changes. I don't see where he has re-submitted the report in Integrity, which I think needs to be done at this point.

Thanks, Kim



From:	Kimberly L. Sikora Panza
То:	<u>"Vahab, Lana L"</u>
Subject:	RE: Some (hopefully) last clarifying questions from OGE
Date:	Wednesday, March 29, 2017 3:29:20 PM

Thanks, pls. let me know when you've made appropriate adjustments to the report and I can review again.



From: Taylor Swindle (b) (6) Sent: Wednesday, March 29, 2017 10:40 AM To: Vahab, Lana L Subject: RE: Some (hopefully) last clarifying questions from OGE

Hey Lana!

See answers below. Let me know if I need to clarify anything further. It gets kind of confusing...

Taylor O. Swindle





From: Kimberly L. Sikora Panza [mailto:klspanza@oge.gov]
Sent: Wednesday, March 29, 2017 4:02 PM
To: Vahab, Lana L
Subject: RE: Reporting income from <sup>(b)(g)(6)</sup>

Thanks. Do you have a second to discuss the status of the answers, report, etc.?

Referral to DOS
From: Taylor Swindle (b) (6)
Sent: Wednesday, March 29, 2017 3:38 PM
<b>To:</b> Vahab. Lana L

Subject: RE: Reporting income from <sup>(b)(3), (6)</sup> Hey Lana, That's correct. Ms. Gingrich only receives <sup>(b)(3), (6)</sup> Thanks!

Taylor O. Swindle



eterral to DOS



From: Kimberly L. Sikora Panza [mailto:klspanza@oge.gov] Sent: Tuesday, March 28, 2017 11:54 AM To: Vahab, Lana L Subject: RE: Reporting income from <sup>(0(0), (0)</sup> Hi Lana,

Thanks for all of the updates. A few comments/questions:

# (b) (5)

Thanks for your continued assistance.





From: Kimberly L. Sikora Panza [mailto:klspanza@oge.gov]

Sent: Tuesday, March 28, 2017 8:44 AM

To: Vahab, Lana L

Subject: RE: Reporting income from (b)(3), (6)

Lana,

Monica said she wasn't able to connect with you yesterday. Re your question, I think reporting can

be done as such:







#### eferral to DOS



From: Kimberly L. Sikora Panza [mailto:klspanza@oge.gov]
Sent: Friday, March 24, 2017 3:02 PM
To: Vahab, Lana L
Subject: reporting

Hi Lana,



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From: Kimberly L. Sikora Panza [mailto:klspanza@oge.gov] Sent: Friday, March 17, 2017 3:21 PM To: Vahab, Lana L Subject: RE: Report

Hi Lana,

Could we chat at 10am?

Thanks

Kim



From: Kimberly L. Sikora Panza [mailto:klspanza@oge.gov] Sent: Friday, March 17, 2017 3:15 PM To: Vahab, Lana L Subject: RE: Report

Lana,

I'm not available for the rest of the day. Could we set a time Monday?

Thanks

Kim

Referral to DOS

From: Kimberly L. Sikora Panza [mailto:klspanza@oge.gov] Sent: Friday, March 17, 2017 2:20 PM To: Vahab, Lana L Subject: RE: Report

In fact, I just got pulled away. Not sure when I'll free up and I'm unavailable after 3:30. Will follow up with you when I'm free

Referral to DOS



From: Kimberly L. Sikora Panza [mailto:klspanza@oge.gov] Sent: Friday, March 17, 2017 12:17 PM To: Vahab, Lana L Subject: Report

Hi Lana,

I wanted to check to see if you had a couple of minutes to discuss the Gingrich report/conflicts analysis. My afternoon looks like it might be getting jammed up with meetings, so I thought I'd seize the moment to see if we could speak now-ish.

Thanks!

Kim

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From:	Teresa L. Williamson
To:	<u>Kimberly L. Sikora Panza; Vahab, Lana L; "Martin, Janice N"</u>
Subject:	Public Financial Disclosure Report of Callista L. Gingrich
Date:	Wednesday, June 14, 2017 9:42:15 AM
Attachments:	Gingrich, Callista L. final278.pdf
	Gingrich, Callista L. finalsenateltr.pdf
	Gingrich Callista L finalFA ndf

Good Morning,

I've attached the financial disclosure package Callista L. Gingrich, who has been nominated by President Trump for the position of United States Ambassador to the Holy See, 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

From:	Kimberly L. Sikora Panza	
To:	Stefan Passantino <sup>(b) (6)</sup>	
Cc:	Ann Donaldson <sup>(b)</sup>	James D. Schultz <sup>(b)</sup> <sup>(6)</sup>
Subject:	RE: Precleared: Callista Gingrich	
Date:	Friday, April 07, 2017 6:11:48 PM	
Attachments:	EA for Preclearance GINGRICH.docx	3 page attachment withheld in full - (b)(3), (4), (5), (6)

Good evening,

Attached please find the ethics agreement for Callista Gingrich.

Best regards,

Kim

From: Heather A. Jones	
Sent: Friday, April 07, 2017 5:18 PM	
To: Stefan Passantino	
Cc: Kimberly L. Sikora Panza; 'Vahab, Lana L'; Mar	tin, Janice N; Mr. David P. Huitema
(b) (6) ; Ann Donaldson (b) (6)	); David J. Apol; Deborah J.
Bortot; Heather A. Jones; James D. Schultz(b) (6)	); Rodrick T. Johnson; Sandra
S. Mabry; Teresa L. Williamson	
Subject: Precleared: Callista Gingrich	

Stefan-

Callista Gingrich is precleared. Kim, please forward the ethics agreement to the White House.

Thanks, Heather

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

Visit OGE's website: <u>www.oge.gov</u> Follow OGE on Twitter: @OfficeGovEthics From:Kimberly L. Sikora PanzaTo:"Vahab. Lana L"Subject:RE: Not to rush you at allDate:Friday, April 07, 2017 2:05:12 PM

#### Fantastic - let's get this done! 🙂



From: Bess Kelly (b) (6) Sent: Friday, April 07, 2017 1:07 PM To: Vahab, Lana L; Taylor Swindle Subject: RE: Not to rush you at all

Hey Lana-

Our goal is to get this back to you asap today!

Bess



Referral to DOS		

From: Heather A. Jones [mailto:hajones@oge.gov] Sent: Thursday, July 13, 2017 11:28 AM To: Vahab, Lana L; Kimberly L. Sikora Panza Cc: Huitema, David P Subject: RE:

Given these facts, I spoke with Dave and we not requirement an amendment and will add this information to our notes.

Thanks, Heather

Referral to DOS		

From: To:	Teresa L. Williamson Monica M. G. Ashar; Emory A. Rounds III; Kimberly L. Sikora Panza; Elaine Newton; Lorna A. Syme; Kimberley H. Kaplan; Wendy G. Pond; Keith Labedz; Christopher J. Swartz
Cc:	LEGTEAM; Megan V. Granahan; Stephanie Nonluecha; Heather A. Jones; Steven Corbally; Sandra S. Mabry; Leigh J. Francis; Vincent Salamone; Grace A. Clark; Jim Robertson; Rachel K. Dowell; Brandon L. Bunderson; Cheryl L. Kane-Piasecki; Deborah J. Bortot; Jack MacDonald; Dale A. Christopher; Nicole Stein; Daniel L. Skalla; Diana Veilleux; Patrick J. Lightfoot; Elizabeth D. Horton; Seth Jaffe; David A. Meyers; Ciara M. Guzman; Patrick Shepherd; Rodrick T. Johnson; Jaideep Mathai
Subject: Date:	NEW NOMINATION - May 25, 2017 Friday, May 26, 2017 8:14:56 AM

### The following nomination has been posted on THOMAS. Please contact the agency if you do not have the final package.

### Please remember to add the applicable Senate Transmittal Letter Template to FDTS before forwarding. Thanks!!

### **NOMINATION - OGE Reviewer: Monica** (*INTEGRITY*)

PN524 — 115th Congress (2017-2018) — George Nesterczuk — Office of

### Personnel Management

George Nesterczuk, of Virginia, to be Director of the Office of Personnel Management for a term of four years, vice Katherine Archuleta, resigned.

Date Received from President: 05/25/2017

Committee: Homeland Security and Governmental Affairs

Latest Action: 05/25/2017 - Received in the Senate and referred to the Committee on Homeland Security and Governmental Affairs. (<u>All Actions</u>)

### NOMINATION - OGE Reviewer: Kim Sikora Panza (INTEGRITY)

PN523 — 115th Congress (2017-2018) — Callista L. Gingrich — Department of State

Callista L. Gingrich, of Virginia, to be Ambassador Extraordinary and Plenipotentiary of the United States of America to the Holy See.

Date Received from President: 05/25/2017

Committee: Foreign Relations

Latest Action: 05/25/2017 - Received in the Senate and referred to the Committee on Foreign Relations. (All Actions)

### NOMINATION - OGE Reviewer: Lorna (INTEGRITY)

## <u>PN521</u> — 115th Congress (2017-2018) — **Heather L. MacDougall** — **Occupational** Safety and Health Review Commission

Heather L. MacDougall, of Florida, to be a Member of the Occupational Safety and Health Review Commission for a term expiring April 27, 2023. (Reappointment) Date Received from President: 05/25/2017

Committee: Health, Education, Labor, and Pensions

Latest Action: 05/25/2017 - Received in the Senate and referred to the Committee on Health, Education, Labor, and Pensions. (<u>All Actions</u>)

### NOMINATION - OGE Reviewer: Keith (INTEGRITY)

# <u>PN520</u> — 115th Congress (2017-2018) — **Brett Giroir** — **Department of Health** and Human Services

Brett Giroir, of Texas, to be Medical Director in the Regular Corps of the Public Health Service, subject to the qualifications therefor as provided by law and regulations, and to be an Assistant Secretary of Health and Human Services, vice Howard K. Koh, resigned.

Date Received from President: 05/25/2017

Committee: Health, Education, Labor, and Pensions

Latest Action: 05/25/2017 - Received in the Senate and referred to the Committee on Health, Education, Labor, and Pensions. (<u>All Actions</u>)

**NOMINATION - OGE Reviewer: Keith** (*INTEGRITY*)

<u>PN519</u> — 115th Congress (2017-2018) — **Michael Arthur Raynor** — **Department** of State

Michael Arthur Raynor, of Maryland, 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 Federal Democratic Republic of Ethiopia.

Date Received from President: 05/25/2017

Committee: Foreign Relations

Latest Action: 05/25/2017 - Received in the Senate and referred to the Committee on Foreign Relations. (All Actions)

### NOMINATION - OGE Reviewer: Wendy (INTEGRITY)

### <u>PN518</u> — 115th Congress (2017-2018) — **Gilbert B. Kaplan** — **Department of Commerce**

Gilbert B. Kaplan, of the District of Columbia, to be Under Secretary of Commerce for International Trade, vice Stefan M. Selig, resigned.

Date Received from President: 05/25/2017

Committee: Finance

Latest Action: 05/25/2017 - Received in the Senate and referred to the Committee on Finance. (All Actions)

### NOMINATION - OGE Reviewer: Kim Sikora Panza (INTEGRITY)

PN517 — 115th Congress (2017-2018) — David S. Jonas — Department of Energy

David S. Jonas, of Virginia, to be General Counsel of the Department of Energy, vice Steven Croley, resigned.

Date Received from President: 05/25/2017

Committee: Energy and Natural Resources

Latest Action: 05/25/2017 - Received in the Senate and referred to the Committee on Energy and Natural Resources. (<u>All Actions</u>)

### NOMINATION - OGE Reviewer: Keith (INTEGRITY)

### <u>PN516</u> — 115th Congress (2017-2018) — Karen Dunn Kelley — Department of Commerce

Karen Dunn Kelley, of Pennsylvania, to be Under Secretary of Commerce for Economic Affairs, vice Mark Doms, resigned.

Date Received from President: 05/25/2017

Committee: Commerce, Science, and Transportation

Latest Action: 05/25/2017 - Received in the Senate and referred to the Committee on Commerce, Science, and Transportation. (<u>All Actions</u>)

### **NOMINATION - OGE Reviewer: Emory (INTEGRITY)**

### PN515 — 115th Congress (2017-2018) — Neal J. Rackleff — Department of

### Housing and Urban Development

Neal J. Rackleff, of Texas, to be an Assistant Secretary of the Department of Housing and Urban Development, vice Mercedes Marquez.

Date Received from President: 05/25/2017

Committee: Banking, Housing, and Urban Affairs

Latest Action: 05/25/2017 - Received in the Senate and referred to the Committee on Banking, Housing, and Urban Affairs. (<u>All Actions</u>)

### **NOMINATION - OGE Reviewer: Elaine** (*INTEGRITY*)

### <u>PN514</u> — 115th Congress (2017-2018) — **J. Paul Compton Jr. — Department of** Housing and Urban Development

J. Paul Compton, Jr., of Alabama, to be General Counsel of the Department of Housing and Urban Development, vice Helen R. Kanovsky, resigned.

Date Received from President: 05/25/2017

Committee: Banking, Housing, and Urban Affairs

Latest Action: 05/25/2017 - Received in the Senate and referred to the Committee on Banking, Housing, and Urban Affairs. (<u>All Actions</u>)

**NOMINATION - OGE Reviewer: Kim Kaplan** (*INTEGRITY*)

<u>PN513</u> — 115th Congress (2017-2018) — **Richard Ashooh** — **Department of Commerce** 

Richard Ashooh, of New Hampshire, to be an Assistant Secretary of Commerce, vice Kevin Wolf, resigned.

Date Received from President: 05/25/2017

Committee: Banking, Housing, and Urban Affairs

Latest Action: 05/25/2017 - Received in the Senate and referred to the Committee on Banking, Housing, and Urban Affairs. (<u>All Actions</u>)

### NOMINATION - OGE Reviewer: Chris (INTEGRITY)

PN512 — 115th Congress (2017-2018) — Robert R. Hood — Department of Defense

Robert R. Hood, of Georgia, to be an Assistant Secretary of Defense, vice Stephen C. Hedger.

Date Received from President: 05/25/2017

Committee: (See S. Res. 116 - 112th Congress)

Latest Action: 05/25/2017 - Placed on Senate Executive Calendar in the Privileged Nomination section with nominee information requested by the Committee on Armed Services, pursuant to S.Res. 116, 112th Congress. (<u>All Actions</u>)

From:Kimberly L. Sikora PanzaTo:"Vahab, Lana L"Subject:Pate:Date:Thursday, March 30, 2017 10:18:14 AM

Hi Lana,

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

eferral to DOS

From: Kimberly L. Sikora Panza [mailto:klspanza@oge.gov] Sent: Friday, April 07, 2017 11:36 AM To: Vahab, Lana L Subject: Integrity Q

Lana,

Alas, we are correct – there is no way to re-order entries. (We are aware of the interest in that functionality as an enhancement, however, I believe funding also comes into play with things like that/whether we can implement)

On a separate note re this nom, what is the status of the EA – has the filer reviewed?

Kim

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From: Kimberly L. Sikora Panza [mailto:klspanza@oge.gov] Sent: Tuesday, July 25, 2017 12:25 PM To: Vahab, Lana L Subject: RE: I know you are crazy busy

Hi Lana,

Hope you're well.

I'm already totally jammed today, and tomorrow isn't great either because I'm only here a half day bc of Could we perhaps chat on Thursday? If there are specific questions you had that you wanted to share ahead of time, feel free to shoot them to me over email in advance (offering that from an efficiency perspective, in case you have questions about something I don't immediately know off the top of my head!)

Kim

rral to DOS

Referral to DOS	

Thanks!

From: Kimberly L. Sikora Panza Sent: Friday, August 18, 2017 4:03 PM To: Monica M. G. Ashar Subject: heads up

Lana's had some follow up ethics question re defined and the some a couple of weeks ago and she just left me a VM w another). I conferred with Heather and she agreed that now that Gingrich is out of the nom program, the questions are more appropriately desk officer questions - so I reached out to Lana and told her to reach out for DO support.

Didn't want this to come as a surprise to you, so wanted to give you the heads up!

Thanks, Kim

From:	<u>Kimberly L. Sikora Panza</u>
То:	<u>"Vahab, Lana L"</u>
Cc:	Monica M. G. Ashar
Subject:	RE: Got your V/m on Gingrich
Date:	Monday, June 05, 2017 9:45:57 AM

So sorry to hear, Lana! I hope you are well now....I am out today but will check my email again this afternoon.

Kim


Referral to DOS	

From:	Kimberly L. Sikora Panza
То:	Heather A. Jones; Deborah J. Bortot; David J. Apol
Subject:	Gingrich status email
Date:	Thursday, June 08, 2017 11:00:34 AM

FYI, this is the email that I got re Gingrich. Apparently she returns tonight and her people will print the docs for her to review Friday a.m. (see below)



From: Bess Kelly (b) (6) Sent: Wednesday, June 07, 2017 6:05 PM To: Vahab, Lana L Cc: Taylor Swindle Subject: RE: UPDTAED EA for Preclearance GINGRICH.docx

Hi Lana-

Newt and Callista have been on the road in and Callista has not had a chance to get to a computer to read through everything again.

They return tomorrow night and I plan to print all the documents for her review on Friday morning and will get them back to you (and an email as well) ASAP!

Sorry for the delay!

-Bess

Referral to DOS	

From: Bess Kelly (b) (6)

Sent: Tuesday, June 06, 2017 2:41 PM To: Vahab, Lana L; Taylor Swindle Subject: RE: UPDTAED EA for Preclearance GINGRICH.docx

Thanks Lana!

Callista is out of the country but I am going to try and get a hold of her and will circle around with you on the document and email asap.

-Bess



From:Kimberly L. Sikora PanzaTo:"Vahab, Lana L"Subject:RE: Gingrich report done being editedDate:Friday, April 07, 2017 3:59:25 PM

Great, thanks.



From: Kimberly L. Sikora Panza [mailto:klspanza@oge.gov] Sent: Friday, April 07, 2017 3:52 PM To: Vahab, Lana L Subject: RE: Gingrich report done being edited

Lana,

I don't need it right this second, but can you have the filer send back an email to you confirming the statements in that "confirmatory email" I sent?

Thanks, Kim



From: Kimberly L. Sikora Panza [mailto:klspanza@oge.gov]
Sent: Friday, April 07, 2017 3:17 PM
To: Vahab, Lana L
Subject: RE: Gingrich report done being edited

We don't need signed EA right now, just to know that everyone is good with it. (We don't ask to get

## EA signatures until after nomination)

Referral to DOS

From:Kimberly L. Sikora PanzaTo:"Vahab, Lana L"Subject:RE: Gingrich nominationDate:Wednesday, May 31, 2017 4:10:06 PM

I definitely assumed so, but wanted to make it explicit! ③

From: Kimberly L. Sikora Panza [mailto:klspanza@oge.gov]
Sent: Wednesday, May 31, 2017 4:06 PM
To: Vahab, Lana L
Subject: RE: Gingrich nomination
I neglected to ask – please confirm that these interests are not problematic from a conflicts

perspective.

From: Kimberly L. Sikora Panza Sent: Wednesday, May 31, 2017 3:32 PM To: 'Vahab, Lana L' Subject: RE: Gingrich nomination Hi Lana,

Thanks for the additional information. Just to make sure we have everything straight, can you please: ). (5). (6)



Thanks, Kim



From: Kimberly L. Sikora Panza [mailto:klspanza@oge.gov] Sent: Wednesday, May 31, 2017 10:36 AM To: Vahab, Lana L Subject: RE: Gingrich nomination Lana,

(3), (5), (6)



Keep me posted on the other details,

Kim

eferral to DOS

## eferral to DOS

From: Kimberly L. Sikora Panza [mailto:klspanza@oge.gov] Sent: Wednesday, May 31, 2017 9:50 AM To: Vahab, Lana L Subject: RE: Gingrich nomination Hi Lana,

First, please note that Heather just returned the report to David in Integrity, for any changes that need to be made.

Second, in addition to my question below (and the details you've flagged as ones you're collecting), I

wanted to confirm:

Thanks,

Kim

From: Kimberly L. Sikora Panza Sent: Tuesday, May 30, 2017 3:37 PM To: 'Vahab, Lana L' Subject: RE: Gingrich nomination Thanks,

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

Kim rral to DOS From: Kimberly L. Sikora Panza [mailto:klspanza@oge.gov] Sent: Tuesday, May 30, 2017 3:00 PM To: Vahab, Lana L Subject: RE: Gingrich nomination We'll need to get that on the report. (b) (5)

## I am in a meeting starting now, I will try to call you after but the rest of my afternoon is jammed up.

From: Kimberly L. Sikora Panza [mailto:klspanza@oge.gov] Sent: Tuesday, May 30, 2017 12:32 PM To: Vahab, Lana L Subject: RE: Gingrich nomination I've pulled the folder back and it is now sitting on my desk. Please let me know as soon as you get

details re what is going on/missing.



From: Kimberly L. Sikora Panza [mailto:klspanza@oge.gov] Sent: Tuesday, May 30, 2017 9:01 AM To: Vahab, Lana L Subject: RE: Gingrich nomination Hi Lana, I hope you had a nice holiday weekend!

I see the Gingrich report has been certified by David in Integrity, so I believe all we need at this point is the agency transmittal letter.

Thanks again for all of your help on this report!

Kim



From: Kimberly L. Sikora Panza [mailto:klspanza@oge.gov] Sent: Friday, May 26, 2017 8:36 AM To: Vahab, Lana L Subject: Gingrich nomination Good morning, Lana,

As you may already know, Callista Gingrich has been nominated. At this time, we'll need her final documents.

You have already provided me a signed copy of her ethics agreement. Can you please have her sign the 278? Your agency also will need to certify the report. Once that is done, please send me the transmittal letter.

Thank you in advance for your assistance. Kim

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From:	EA Compliance
To:	<u>"Martin, Janice N"</u>
Cc:	EA Compliance
Subject:	GINGRICH EA - 90 Day Reminder - EA Certification Attached
Date:	Wednesday, October 18, 2017 4:05:03 PM
Attachments:	EA Certification (June 2017 version) - Ambassador Gingrich - STATE.pdf

Dear Ms. Martin:

Ms. Callista L. Gingrich was confirmed as Ambassador to the Holy See on October 16, 2017. This is a reminder that Ambassador Gingrich has 90 days from the date of confirmation (October 16, 2017) to comply with the terms of her ethics agreement, unless an extension is granted by the Office of Government Ethics (OGE). Agency ethics officials do not have the authority to extend the compliance deadline; in rare circumstances of unusual hardship, OGE may decide to extend the deadline. See 5 C.F.R. § 2634.802(b). Please advise OGE via eacompliance@oge.gov as soon as possible if an extension will be requested.

Ambassador Gingrich is required to complete and sign the attached Certification of Ethics Agreement Compliance (See OGE's Program Advisory <u>PA 17-03</u>). Ambassador Gingrich should provide the completed and signed Certification to ethics officials as soon as possible but not later than January 16, 2018. The Certification should then be submitted to OGE no later than January 23, 2018, via email to <u>eacompliance@oge.gov</u>.

Thank you for your assistance in this matter, and please contact <u>eacompliance@oge.gov</u> if you have any questions. If you are not the point of contact for this matter, please advise <u>eacompliance@oge.gov</u> and forward this email to the appropriate ethics official.

Sincerely,

Compliance Division United States Office of Government Ethics 1201 New York Avenue NW Suite 500 Washington, DC 20005

Visit OGE's website: <u>www.oge.gov</u> Follow OGE on Twitter: @OfficeGovEthics



From: Kimberly L. Sikora Panza [mailto:klspanza@oge.gov] Sent: Thursday, April 06, 2017 2:46 PM To: Vahab, Lana L Subject: RE: Gingrich

The system is beating us! ©

Sounds like the system correctly is saying (0)(8). (6)

Since this is the (0)(3), (6)

Does that work?

From: Kimberly L. Sikora Panza [mailto:klspanza@oge.gov] Sent: Thursday, April 06, 2017 2:34 PM To: Vahab, Lana L Subject: RE: Gingrich

That works

Referral to DOS	

From: Kimberly L. Sikora Panza [mailto:klspanza@oge\_gov] Sent: Thursday, April 06, 2017 2:21 PM To: Vahab, Lana L Subject: RE: Gingrich

Lana,

(3), (6)

Thanks, Kim



From: Kimberly L. Sikora Panza [mailto:klspanza@oge.gov] Sent: Wednesday, April 05, 2017 1:13 PM To: Vahab, Lana L Subject: RE: Gingrich

Hi Lana,

I think we re pretty darn close to the finish line!!

3 page attachment withheld in full - (b) (3), (4), (5), (6)

A few things: (b)(3), (5), (6)

Please let me know if you have any questions or would like to discuss Looking forward to getting this across the finish line!

Thanks, Kim

## Referral to DOS



From: Kimberly L. Sikora Panza [mailto:klspanza@oge.gov] Sent: Tuesday, April 04, 2017 3:31 PM To: Vahab, Lana L Subject: RE: Gingrich

## Thanks



From: Kimberly L. Sikora Panza [mailto:klspanza@oge.gov] Sent: Tuesday, April 04, 2017 8:27 AM To: Vahab, Lana L Subject: RE: Gingrich

Hi Lana,

A couple of things:

h (6)

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

Thanks, Kim

# Referral to DOS

From: Kimberly L. Sikora Panza [mailto:klspanza@oge.gov] Sent: Monday, April 03, 2017 1:31 PM To: Vahab, Lana L Subject: Gingrich

Hi Lana,

I hope you had a nice weekend! Just wanted to touch base re the Gingrich report..

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

Thanks, Kim

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page attachment withheld in full - (b) ) (4) (5) (6)

Hi Lana,

I've reviewed the report and it looks like we still need various changes that I requested earlier; specifically

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

Kim



Thanks, Kim.

From: Kimberly L. Sikora Panza Sent: Monday, June 05, 2017 9:53 AM To: Monica M. G. Ashar Subject: FYI

I'll check back in this afternoon to see where things stand on Gingrich and respond to any questions Lana has (so at most if it gets buttoned up, hopefully the most you'll ever have to do is print something)

From:	Kimberly L. Sikora Panza
To:	<u>"Vahab, Lana L"</u>
Subject:	RE: follow up from our call yesterday
Date:	Thursday, March 30, 2017 2:09:17 PM

"Nothing's easy" seems to be my motto for everything lately, I feel your pain!



From: Kimberly L. Sikora Panza [mailto:klspanza@oge.gov] Sent: Thursday, March 30, 2017 1:30 PM To: Vahab, Lana L Subject: RE: follow up from our call yesterday

Thanks for the additional information. I need to review and digest all of this stuff; on the technical reporting front for the **a**, please let me know when you've made the reporting adjustments for the **b** that we discussed.

Thanks! Kim



From: Kimberly L. Sikora Panza [mailto:klspanza@oge.gov]
Sent: Thursday, March 30, 2017 8:15 AM
To: Vahab, Lana L
Subject: RE: follow up from our call yesterday

## Hi Lana,

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

## Thank you,

Lana

Referral to DOS	

From:	Kimberly L. Sikora Panza	
To:	<u>"Vahab, Lana L"</u>	
Subject:	RE: (b)(3), (6)	Follow up
Date:	Thursday, March	30, 2017 11:48:46 AM

Sure, thanks. I think, based on that, it wouldn't need to be on the form. I'm going to put that in my notes though, and when I have future discussions on big picture report stuff, etc. with Heather/Deb I will flag that.

Referral to DOS
From: Kimberly L. Sikora Panza [mailto:klspanza@oge.gov]
Sent: Thursday, March 30, 2017 11:37 AM To: Vahab, Lana L
Subject: RE: Follow up
(b) (5)
al to DOS

From:	Kimberly L. Sikora Panza
To:	<u>"Vahab, Lana L"</u>
Subject:	RE: <sup>(b)(3), (6)</sup>
Date:	Thursday, June 01, 2017 2:21:49 PM

Thanks, Lana. Sounds like we can hopefully get all of the details today and (fingers crossed) get this re-finalized and out the door tomorrow? Let's see how it goes!



From: Taylor Swindle (b) (6) Sent: Thursday, June 01, 2017 12:18 PM To: Vahab, Lana L Subject: RE:

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

Taylor O. Swindle

Referral to DOS	

**Sent:** Thursday, June 01, 2017 10:38 AM **To:** Vahab, Lana L **Subject:** RE: <sup>(b)(3), (6)</sup>

Lana,

)(3), (6)					
Thanks,					
Kim Dos					
From: Taylo	r Swindle (b) (6)				
Sent: Thurs To: Vahab, I Cc: Bess Kel		2:56 AM			
Subject: FV Lana,	í: (b)(3), (6)				
	estion, see below or	n what I asked Bo	b Okun regardin	ng these	l'm not an attorn

Very confused....Happy to send over the agreement for you to take a look at as well.

Taylor O. Swindle

so I'm confused...

From:

To: Taylor Swindle (b) (6)       >         Cc: Bess Kelly < (b) (6)       >         Subject: RE: <sup>(b)(3), (6)</sup> >         They are <sup>(b)(3), (6)</sup> >	
Subject: RE: (D)(6), (6)	
Subject: RE: (D)(6), (6)	
They are <sup>(0(6), (4), (6)</sup>	
OK?	
On May 20, 2017, at 12:27 DM. Taylor Swindle (2) (6)	Mroto
On May 30, 2017, at 12:27 PM, Taylor Swindle (b) (6)	wrote:
Hi Bob,	
Hope you're well today. <sup>(b)(3), (5), (6)</sup>	
I was hoping you could me any and all detail you have on this matter as soon as possible.	send
Thanks so much!	
Taylor O. Swindle   No attachment found in s	earch
(b)(3)(6) .pdf>	

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Kimberly L. Sikora Panza
<u>"Vahab, Lana L"</u>
Emailing: Sample 278e amendment.docx
Wednesday, July 12, 2017 1:20:00 PM
Sample 278e amendment.docx

page attachment withheld in full - (b)

Hi Lana,

Attached is the sample amendment letter.

Thanks Kim

Your message is ready to be sent with the following file or link attachments:

Sample 278e amendment.docx

Note: To protect against computer viruses, e-mail programs may prevent sending or receiving certain types of file attachments. Check your e-mail security settings to determine how attachments are handled.

From:Vahab, Lana LTo:Kimberly L. Sikora PanzaSubject:EA for Preclearance GINGRICH with DH edits.docxDate:Wednesday, April 05, 2017 2:13:09 PMAttachments:EA for Preclearance GINGRICH with DH edits.docx

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

Kim - Please see our edits in track changes. Let me know if you want to discuss.

Best,

Lana

This email is UNCLASSIFIED.

page attachment withheld in full - (b)(3), (4), 5), (6)

HI Kim,

I have not had it reviewed internally yet, but here is what I have so far. Still waiting to hear

Lana

This email is UNCLASSIFIED.

Hi Lana,

OGE will be reviewing the nominee's report for preclearance. **Please be sure to instruct the nominee to** *personally* **review the report carefully once more**, given that the nominee 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 the nominee and ask her to confirm the information below (and please notify us immediately if any item in 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.
- (b)(3), (6)
- For Part 1 and Part 4, the nominee has provided information covering the entire reporting period of January 1, **2015**, to present.
- For Part 2, Part 5, and Part 6 the nominee has provided information covering the entire reporting period of January 1, **2016**, to present.
- (b)(3), (6) ●
- The ethics agreement correctly describes all items addressed in the agreement.

Thanks, Kim

From: Kimberly L. Sikora Panza [mailto:klspanza@oge.gov] Sent: Monday, March 20, 2017 4:37 PM To: Vahab, Lana L Subject: RE: Ambassadorial Candidacy Preclearance Process



Kim



From: Taylor Swindle <sup>(b) (b)</sup> Sent: Monday, March 20, 2017 4:13 PM To: Vahab, Lana L Subject: RE: Ambassadorial Candidacy Preclearance Process

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



Taylor O. Swindle



From: Taylor Swindle (b) (6)

Sent: Monday, March 20, 2017 3:59 PM To: Vahab, Lana L Subject: RE: Ambassadorial Candidacy Preclearance Process

Hey Lana,



Wish I had a better answer for you there.

Taylor O. Swindle



From: Taylor Swindle (b) (6) Sent: Monday, March 20, 2017 12:33 PM To: Vahab, Lana L Subject: RE: Ambassadorial Candidacy Preclearance Process

Hey Lana,



Hope that helps. Let me know if you need other info.

Thanks!

Taylor O. Swindle



From: Taylor Swindle (b) (6) Sent: Friday, March 17, 2017 4:34 PM To: Vahab, Lana L Subject: RE: Ambassadorial Candidacy Preclearance Process

Hi Lana,

Please see below for requested info. Please let me know if this is about what you need.

## Have a great weekend!

Taylor O. Swindle

eferral to DOS



This email is UNCLASSIFIED.

From: Taylor Swindle (b) (6) Sent: Friday, March 10, 2017 2:05 PM To: Vahab, Lana L Subject: RE: Ambassadorial Candidacy Preclearance Process

Yes ma'am!

Taylor O. Swindle



From: Taylor Swindle (b) (6) Sent: Friday, March 10, 2017 2:01 PM To: Vahab, Lana L Subject: RE: Ambassadorial Candidacy Preclearance Process



From: Vahab, Lana L [b) (6) Sent: Friday, March 10, 2017 1:35 PM To: Taylor Swindle (b) (6) Subject: RE: Ambassadorial Candidacy Preclearance Process

HI Taylor,

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

Happy to discuss.

Best,

Lana

Privacy/PII

This email is UNCLASSIFIED.

From: Taylor Swindle (b) (6)

Sent: Friday, March 10, 2017 1:22 PM To: Vahab, Lana L Cc: Bess Kelly Subject: RE: Ambassadorial Candidacy Preclearance Process

Hi Lana,



Hope that helps!

Taylor O. Swindle



From: Taylor Swindle (b) (6) Sent: Friday, March 10, 2017 10:06 AM To: Vahab, Lana L; Bess Kelly Subject: RE: Ambassadorial Candidacy Preclearance Process

Good Morning Lana!





Taylor O. Swindle



From: Bess Kelly (b) (6) Sent: Wednesday, March 08, 2017 6:45 PM To: Vahab, Lana L Cc: Taylor Swindle Subject: RE: Ambassadorial Candidacy Preclearance Process

Lana-

Thank you so much for your time today. I wanted to connect you with Taylor Swindle on our team (cc'd above).

Thank you again,

Bess





From: Kimberly L. Sikora Panza [mailto:klspanza@oge.gov] Sent: Wednesday, June 07, 2017 3:21 PM To: Vahab, Lana L Subject: RE: All info updated

Zoinks – OK, thanks. I'll let my team know.



From: Kimberly L. Sikora Panza [mailto:klspanza@oge.gov] Sent: Wednesday, June 07, 2017 3:10 PM To: Vahab, Lana L Subject: RE: All info updated

Hi Lana,

Just wanted to touch base to see when we can expect the Gingrich finals – want to get this out the door as soon as we can!

Thanks, Kim



From:	Kimberly L. Sikora Panza
To:	<u>"Vahab, Lana L"</u>
Subject:	RE: Additional Questions from OGE
Date:	Thursday, June 01, 2017 9:24:39 AM

Re this





From: Taylor Swindle [10) (6) Sent: Thursday, June 01, 2017 9:07 AM To: Vahab, Lana L; Bess Kelly Subject: RE: Additional Questions from OGE

Hey Lana,

See below. As we discussed last night, we believe it's best if we included

Let us know if you have any other questions.

Thank you!

Taylor O. Swindle
Referral to DOS	

June 13, 2017

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 Callista L. Gingrich, who has been nominated by President Trump for the position of United States Ambassador to the Holy See, 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 APOL DN c=US, o=US, Government, ou=Office of Government Ethics, cn=DAVID APOL 0,9:2342.19200300.100.1.1=95491002981870

Date 2017.06.13 18 19 32 -04'00'

David J. Apol General Counsel

Enclosures

June 9, 2017

Ms. Katherine D. McManus Deputy Legal Adviser and Designated Agency Ethics Official Office of the Legal Adviser Department of State

# Re: Ethics Undertakings

## Dear Ms. McManus:

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

My spouse and I have provided client services in the past through Gingrich Productions, Inc., and my husband may continue to do so. Upon confirmation, I will resign from my position with Gingrich Productions, Inc. My spouse and I will continue to have a financial interest in this entity, but I will not provide services material to the production of income. Instead, I will receive only passive investment income from it. 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 Gingrich Productions, Inc., unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1). I 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). I also will not participate personally and substantially in any particular matter involving specific parties in which I know a client of my spouse is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d). I am the Vice Chairman and an owner of Elected.org, an entity that has no assets and generates no income, and that is currently in the process of being dissolved. Upon confirmation I will resign my position with Elected.org, and I will not perform any services for the entity, except that I will comply with any requirements involving legal filings, taxes and fees that are necessary to dissolve the entity. Until Elected.org is completely dissolved, 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 the entity, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1).

Upon confirmation, I also will resign from my positions with the following entities: The Gingrich Foundation, Inc., the Windy Hill Court Homeowners Association, and the Choir of the Basilica of the National Shrine of the Immaculate Conception. 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).

Before learning of my consideration for a possible nomination to a position as the Ambassador to the Holy See, I entered into an agreement with Regnery Publishing to write a children's book, *Remember the Ladies*. I understand that I may not work on this book or perform any other services for compensation during my appointment to the position of the Ambassador to the Holy See if the Senate confirms my nomination. I will not participate personally and substantially in any particular matter involving specific parties in which I know Regnery Publishing is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

I will retain my position as a trustee of the Callista Gingrich Revocable Trust. I will not receive any fees for the services that I provide as a trustee during my appointment to the position of Ambassador to the Holy See. 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 the Callista Gingrich Revocable Trust, 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).

My spouse is a Senior Advisor at Dentons US, LLP, from which he receives a consulting fee. For as long as my spouse continues to work at Dentons US, LLP, I will not participate personally and substantially in any particular matter that to my knowledge has a direct and predictable effect on my spouse's compensation or employment with the firm, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1). I will not participate personally and substantially in any particular matter involving specific parties in which I know Dentons US, LLP or any client of my spouse 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, for the duration of my appointment to the position of the Ambassador to the Holy See, my spouse has agreed not to communicate directly with the United States Embassy in Holy See on behalf of Dentons US, LLP or any client.

My spouse also provides consulting services to Barrick Gold, for which he receives a consulting fee and stock options. 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 Barrick Gold, unless I first obtain a written waiver, pursuant to 18 U.S.C.  $\S 208(b)(1)$ .

My spouse also serves on the advisory board of Blue Ridge Networks, for which he receives stock options and an advisor fee. 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 Blue Ridge Networks, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1).

My spouse also serves on the advisory board of CSC Partners LLC, for which he has received equity in the company. 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 CSC Partners LLC, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1).

My spouse also serves on the advisory board of Pathway Genomics, for which he receives stock options. 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 Pathway Genomics, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1).

In addition, my spouse has a financial interest in The Lubbers Agency. I will not participate personally and substantially in any particular matter that to my knowledge has a direct and predictable effect on this entity, unless I first obtain a written waiver, pursuant to 18 U.S.C.  $\S 208(b)(1)$ .

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, Callista L. Gingrich

From:	Schultz, James D. EOP/WHO
То:	Rodrick T. Johnson
Cc:	Seth Jaffe; Patrick J. Lightfoot; Teresa L. Williamson
Subject:	Re: Certificate of Divestiture Ms. Conway and her spouse, George Conway
Date:	Wednesday, August 09, 2017 4:52:34 PM

Thank you.

James D. Schultz Senior Associate Counsel and Special Assistant to the President Office of White House Counsel (b) (6) (m)

> On Aug 9, 2017, at 4:42 PM, Rodrick T. Johnson <rjohnson@oge.gov> wrote:

>

> Good Afternoon, Mr. Schultz:

>

> Enclosed is a Certificate of Divestiture OGE 2017-111 for Kellyanne E. Conway, Counselor to the President, and Certificate of Divestiture OGE-2017-112 for Ms. Conway and her spouse, George Conway. We would appreciate your forwarding the original certificates to Ms. Conway. Also enclosed is a copy of the certificate for your files.

> The original certificate and one copy for your records will be mailed to you. We would appreciate your forwarding the original certificate to Ms. Conway, upon receipt.

>

> Please confirm receipt of this email by replying to all.

>

> Thanks, Again

> Rodrick Johnson

- >
- >
- >
- >
- >

>

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>

> <Conway, Kallyanne E. CD's 111 - 112.pdf>

OGE regulations provide for a special access provision for Certificates of Divestiture (CDs). You may obtain copies of CDs by completing the fill and print PDF version of the OGE Form 201 and submitting your request to 201forms@oge.gov. OGE has also created an automated tool to request copies of the CDs, available on OGE's website at: https://extapps2.oge.gov/201/Presiden.nsf/ All+Certificates+of+Divestiture.

From:	Daniel L. Skalla
To:	(b)(6) - Sandra Mabry's email address
Subject:	Reassigned WH Reports
Date:	Friday, August 04, 2017 7:02:48 AM
Attachments:	image001.png

Sandy,

The following reports have been reassigned as shown below. Please contact these OGE staff members regarding these reviews.

David:







	<u>Conway, Kellyanne</u>	White House Office [Counselor To The President]	
Nonresponsive recor			

Patrick - please call me.

JAMES D. SCHULTZ Senior Associate Counsel and Special Assistant to the President Office of the White House Counsel

(b) (6) (o) (b) (6) (m)

-----Original Message-----From: Patrick J. Lightfoot [<u>mailto:pjlightf@oge.gov</u>] Sent: Tuesday, July 18, 2017 9:40 AM To: Schultz, James D. EOP/WHO (b) (6) Subject: RE: Conway Responses

Hi Jim,

Just wanted to follow-up on (b) (5)

Thanks!



Patrick - As to question 3, (b) (5), (b) (6)

JAMES D. SCHULTZ

Senior Associate Counsel and Special Assistant to the President Office of the White House Counsel



-----Original Message-----From: Schultz, James D. EOP/WHO Sent: Monday, July 17, 2017 6:15 PM To: 'Patrick J. Lightfoot' <pjlightf@oge.gov> Subject: RE: Conway Responses

o)(4), (5), (6)



JAMES D. SCHULTZ Senior Associate Counsel and Special Assistant to the President Office of the White House Counsel (b) (6) (0) (b) (6) (m)

-----Original Message-----From: Patrick J. Lightfoot [<u>mailto:pjlightf@oge.gov</u>] Sent: Monday, July 17, 2017 3:05 PM To: Schultz, James D. EOP/WHO (b) (6) Subject: RE: Conway Responses

No problem, I've copied the original email below:

From: Patrick J. Lightfoot Sent: Thursday, June 08, 2017 3:09 PM To: 'Schultz, James D. EOP/WHO' Subject: RE: Conway CD request

Hi Jim,

Below are my follow-up questions/comments on Ms. Conway's CD request:

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

Thanks!

--Patrick

-----Original Message-----From: Schultz, James D. EOP/WHO (b) (6) Sent: Monday, July 17, 2017 3:01 PM To: Patrick J. Lightfoot Subject: RE: Conway Responses

Patrick - could you resend me the CD questions? I do not recall them and maybe thought they were the 278 questions. J

JAMES D. SCHULTZ

Senior Associate Counsel and Special Assistant to the President Office of the White House Counsel

(b) (6) (0) (b) (6) (m)

-----Original Message-----From: Patrick J. Lightfoot [<u>mailto:pjlightf@oge.gov</u>] Sent: Monday, July 17, 2017 2:57 PM To: Schultz, James D. EOP/WHO (b) (6) Subject: RE: Conway Responses

Hi Jim,

Following up on the status of this along with the initial questions on Ms. Conway's CD request (sent 6/8).

Thanks!

--Patrick

--

Patrick J. Lightfoot Assistant Counsel, Ethics Law & Policy Branch General Counsel & Legal Policy Division

U.S. Office of Government Ethics 1201 New York Ave NW, Suite 500 Washington, DC 20005 Telephone: (202) 482-9271

Visit OGE's website: >>>www.oge.gov Follow OGE on Twitter: @OfficeGovEthics<<<

-----Original Message-----From: Patrick J. Lightfoot Sent: Monday, June 12, 2017 1:57 PM To: 'Schultz, James D. EOP/WHO' Subject: RE: Conway Responses

No attachment found in search

Hi Jim,

Please see our second round of questions in the attached doc. The notes in red were your responses to initial questions. The report has been returned in Integrity.

--Patrick

-----Original Message-----From: Schultz, James D. EOP/WHO (b) (6) Sent: Monday, June 05, 2017 7:24 PM To: Patrick J. Lightfoot Subject: Conway Responses

bage attachment withheld in full - (b)(3), (4), I, (6)

Patrick - you should have the certified 278 in the morning.

From:	Schultz, James D. EOP/WHO
To:	Patrick J. Lightfoot; De La Vega, Scott
Subject:	RE: New Entrant Report Questions/Edits - Conway
Date:	Wednesday, May 17, 2017 12:40:45 PM

I am working with her private lawyer on it. Should have something this week. J

### JAMES D. SCHULTZ

Senior Associate Counsel and Special Assistant to the President

Office of the White House Counsel

<b>(</b> b)	(6)	(o)
<b>(b)</b>	(6)	(m)

From: Patrick J. Lightfoot [mailto:pjlightf@oge.gov]
Sent: Wednesday, May 17, 2017 11:26 AM
To: Schultz, James D. EOP/WHO ; De La Vega, Scott
Subject: RE: New Entrant Report Questions/Edits - Conway

Hi Jim,

Any updates on the Conway report? Thanks!

--Patrick

From: Schultz, James D. EOP/WHO (b) (6)
Sent: Wednesday, May 03, 2017 4:59 PM
To: Patrick J. Lightfoot; De La Vega, Scott
Subject: RE: New Entrant Report Questions/Edits - Conway

Patrick – can you send back the 278e?

JAMES D. SCHULTZ Senior Associate Counsel and Special Assistant to the President

Office of the White House Counsel

(b) (6) (o) (b) (6) (m)

From: Patrick J. Lightfoot [mailto:pjlightf@oge.gov]
Sent: Friday, April 21, 2017 2:26 PM
To: Schultz, James D. EOP/WHO (b) (6)
>; De La Vega, Scott
(b) (6)

Subject: RE: New Entrant Report Questions/Edits - Conway

Jim and Scott,

Following up on the status of this. Thanks!

Sincerely,

--Patrick J. Lightfoot Assistant Counsel, Ethics Law & Policy Branch General Counsel & Legal Policy Division U.S. Office of Government Ethics 1201 New York Ave NW, Suite 500 Washington, DC 20005 Telephone: (202) 482-9271 Visit OGE's website: <u>>www.oge.gov<</u> Follow OGE on Twitter: @OfficeGovEthics

From: Patrick J. Lightfoot Sent: Tuesday, April 11, 2017 2:33 PM To: (D)(6) - James Schultzs email address '; D)

Subject: New Entrant Report Questions/Edits - Conway

Jim and Scott,

Please see my initial comments, etc. on Kellyanne Conway's New Entrant Report below. The report has been returned in *Integrity*.

Sincerely,

\_\_\_

Patrick J. Lightfoot Assistant Counsel, Ethics Law & Policy Branch General Counsel & Legal Policy Division U.S. Office of Government Ethics 1201 New York Ave NW, Suite 500 Washington, DC 20005 Telephone: (202) 482-9271 *Visit OGE's website: >www.oge.gov< Follow OGE on Twitter: @OfficeGovEthics* 

o)(3), (5), (6)

## QUESTIONS GENERALLY APPLICABLE TO REPORT:

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



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From: Kimberly L. Sikora Panza Sent: Thursday, February 02, 2017 3:33 PM To: 'Bender, Stuart - OE' Cc: Kimberly L. Sikora Panza Subject: Nominee

Hi Stuart,

I look forward to working with you and your team on this report.

I've done an initial review of the report, and have the following preliminary questions.

<u>General</u>







On Feb 2, 2017, at 2:12 PM, Kimberly L. Sikora Panza <<u>klspanza@oge.gov</u>> wrote:

Stuart,

Two quick preliminary questions-

- Do you have a mailing address for the filer or his representative? We would like to mail a physical copy of the Nominee Guide.
- Will you be working on this report, or should I be communicating with someone else on your team?

Thanks,





On Feb 2, 2017, at 1:36 PM, Kimberly L. Sikora Panza <<u>klspanza@oge.gov</u>> wrote:

Stuart,

I'm assigned to this report. I need to review and will send you some preliminary questions this afternoon.



1 page attachment withheld in full (b)(3), (4), (5), (6)

### Hi Stuart,

Thanks for all of the updates to the report, we're making great progress. I've gone through my questions/comments from Thursday, and have included below the ones that I believe are still "open" (many of these are just confirmation points, but I'll need the info to update my notes); I've also added various questions and comments below relating to updated information on the report.

Could you please let me know when you are available to discuss the report/some of these items?

Thanks,

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

From:	Kimberly L. Sikora Panza
То:	<u>"Bender, Stuart - OE"</u>
Subject:	RE: Sorry I missed your call
Date:	Wednesday, February 08, 2017 11:59:22 AM

Hi Stuart,

I am free until shortly before 1pm if you'd like to chat.



Referral to USDA	



On Feb 9, 2017, at 8:10 AM, Kimberly L. Sikora Panza <<u>klspanza@oge.gov</u>> wrote:



Please let me know if you have any questions or would like to discuss.

Kim

From: Kimberly L. Sikora Panza Sent: Wednesday, February 08, 2017 4:17 PM To: 'Bender, Stuart - OE'; 'Tobin, Andrew - OE' Subject: Report

No attachment found in search

Stuart and Andrew-

I think we're making good progress on Mr. Perdue's report. As I reviewed the most recent version of the report, I identified a few new questions/comments and a handful of prior outstanding ones, listed below.





Thanks!

Kim

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<Suggested changes to endnotes [CLEAN].docx>

<Suggested changes to endnotes [REDLINE].docx>

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From:	Kimberly L. Sikora Panza
То:	"Bender, Stuart - OE"; "Tobin, Andrew - OE"
Subject:	chart
Date:	Thursday, February 09, 2017 9:15:44 AM
Attachments:	businesses.docx

age attachment withheld in full - (b)(3), (4),

Stuart and Andrew,

l've put together a Word version of the earlier drawing I shared that shows my understanding of the (b)(3). (6) – pls see attached.



Thanks in advance for your input.



From: Kimberly L. Sikora Panza [mailto:klspanza@oge gov] Sent: Thursday, February 09, 2017 9:51 AM To: Tobin, Andrew - OE (0) (6) Subject: RE: Report

## Hi Andrew,

### Thanks!



Tunink this addresses your easilytease let the know in thissed

Kim



 From: Kimberly L Sikora Panza [mailto:klspanza@oge gov]

 Sent: Wednesday, February 08, 2017 4:17 PM

 To: Bender, Stuart - OE (b) (6)

 Subject: Report

Stuart and Andrew-
Thanks!

Kim

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From:	Kimberly L. Sikora Panza
To:	<u>"Bender, Stuart - OE"</u>
Cc:	<u>"Tobin, Andrew - OE"</u>
Subject:	RE: KimDiscussion with Sonny Perdue"s lawyers regarding (D)(3), (6)
Date:	Tuesday, February 14, 2017 11:51:09 AM

Hi Stuart,

Could you let me know when you have a minute to discuss?

Thanks, Kim

Referral to USDA		





From: Kimberly L. Sikora Panza [mailto:klspanza@oge.gov] Sent: Tuesday, February 14, 2017 2:24 PM To: Tobin, Andrew - OE ; Bender, Stuart - OE Subject: RE: Updated report Hi Andrew,

Thanks for the updates to the report and additional explanations. Please see my further input below



Kim

**From:** Kimberly L. Sikora Panza [mailto:klspanza@oge.gov] Sent: Friday, February 10, 2017 5:27 PM **To:** Bender, Stuart - OE < (b) (6) >; Tobin, Andrew - OE >

<(b) (6)

**Cc:** Monica M. G. Ashar <<u>mmgashar@oge.gov</u>>

Subject: Updated report

Hi Stuart and Andrew,

Thanks for the updates to the report. Here's what I have based on my review of the updated report:

Thanks, and have a great weekend, Kim

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Referral to USDA



From: Kimberly L. Sikora Panza [mailto:klspanza@oge.gov] Sent: Friday, February 24, 2017 4:33 PM To: Bender, Stuart - OE (b) (6)

**Cc:** Tobin, Andrew - OE (b) (6)

Subject: RE: Nominee

Thanks, Stuart, this is helpful. When you receive the written responses from the filer's attorneys, please forward them to us – the information will be helpful for our files (and of course to fully flesh out our understanding of things!)

Have a nice weekend.

# Kim

Referral to USDA

From: Kimberly L. Sikora Panza [mailto:klspanza@oge.gov] Sent: Thursday, February 23, 2017 9:15 AM To: Bender, Stuart - OE < (b) (6)

Cc: Tobin, Andrew - OE (b) (6) Subject: RE: Nominee

Thanks for the update, Stuart!

### eferral to USDA



On Feb 23, 2017, at 9:03 AM, Kimberly L. Sikora Panza <<u>klspanza@oge.gov</u>> wrote:

## Good morning, Stuart,

Checking in to see if you have had any further contact with the filer's attorneys – if you haven't been contacted by them, could you please reach out for a status update? I need to update my team, and know we need to provide current status to the White House tomorrow morning. Thanks!

Kim



On Feb 21, 2017, at 9:23 AM, Kimberly L. Sikora Panza <<u>klspanza@oge.gov</u>> wrote:

## Good morning, Stuart,

I hope you had a nice long weekend – the weather was amazing! Have you heard anything from the filer's attorneys? I wanted to touch base with you before providing my team with a status update. Thanks,

Kim



On Feb 16, 2017, at 7:14 AM, Kimberly L. Sikora Panza <<u>klspanza@oge.gov</u>> wrote:

### Hi Stuart,

Just touching base to see if you were able to connect with the filer's attorneys regarding the trust plans (following on our discussion Tuesday re: the same). Thanks in advance for your input, Kim

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On Feb 28, 2017, at 10:15 AM, Kimberly L. Sikora Panza <<u>klspanza@oge.gov</u>> wrote:

	T WITCICAL THY SCHOULD - TOOK TOT WAT'L TO SPEAKING WITH YOU:	_
Referral to USDA		
Referrar to OODA		
		-

I will clear my schedule - look forward to speaking with you!

On Feb 28, 2017, at 10:09 AM, Kimberly L. Sikora Panza <<u>klspanza@oge.gov</u>> wrote:



202.482.9214.

# On Feb 28, 2017, at 10:06 AM, Kimberly L. Sikora Panza <<u>klspanza@oge.gov</u>> wrote:

Hi Stuart,

I understand that you are in Beltsville doing training right now, so thought I'd send an email.

I have a handful of minor clarification questions regarding the ((truly minor ones for purposes of updating my notes). Could you give me a ring when you are free?

Thanks,

Kim



On Feb 28, 2017, at 7:07 AM, Kimberly L. Sikora Panza <<u>klspanza@oge.gov</u>> wrote:

# Hi Stuart,

I have been working on the EA based on the information you provided below. I will let you know if we have any other questions once I have discussed the draft with Heather/Deb. Thanks! Kim

Referral to USDA



On Feb 28, 2017, at 3:42 PM, Kimberly L. Sikora Panza <<u>klspanza@oge.gov</u>> wrote:

Stuart and Andrew-

1 page attachment withheld in full - (b)(3), (4), (5), (6)

OGE will be reviewing the nominee's report for preclearance. **Please be sure to instruct the nominee to** <u>personally</u> review the report carefully once more, given that the nominee 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 the nominee and instruct him to **review and specifically confirm in writing** (email is OK) each item below.

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

- <!--[if !supportLists]-->• <!--[endif]-->The nominee has personally reviewed all entries in the current version of the report and has affirmed that they are correct.
- <!--[if !supportLists]-->• <!--[endif]-->The information on the attached chart (showing the structure/arrangement of the<sup>(D)(3), (6)</sup> is accurate and complete. **(see attachment)**



<!--[if !supportLists]-->• <!--[endif]-->For Part 1 and Part 4, the nominee has provided information covering the entire reporting period of January 1, **2015**, to

present.

- <!--[if !supportLists]-->• <!--[endif]-->For Part 2, Part 5, and Part 6 the nominee has provided information covering the entire reporting period of January 1, **2016**, to present.
- <!--[if !supportLists]-->• <!--[endif]-->The nominee does not have<sup>(b)(3), (6)</sup>
- <!--[if !supportLists]-->• <!--[endif]-->The ethics agreement correctly describes all items addressed in the agreement.

Thank you for your assistance. Please let us know if you have any questions.

Best regards, Kim

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<Trust structure etc.pdf>

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On Mar 1, 2017, at 7:12 AM, Kimberly L. Sikora Panza <<u>klspanza@oge.gov</u>> wrote:

Thanks, Stuart. Please keep me posted on the status of the EA review by the filer/his representatives.



 To: Bender, Stuart - OE
 (b)
 (6)

 Cc: Tobin, Andrew - OE
 (b)
 (6)

 Subject: RE: Perdue EA
 EA

Hi Stuart.

Thanks for your email.

Thanks for the catch in #1 – absolutely yes to that change.

Re #2, that should be fine – just for consistency's sake, do you want to say "Secretary of Agriculture" consistently in the document? I note that we say just "Secretary" in a few places –

Twice in para 3

<image001.png> And once in penultimate para

<image002.png>

Thanks, Kim



On Feb 28, 2017, at 1:48 PM, Kimberly L. Sikora Panza <<u>klspanza@oge.gov</u>> wrote:

Hi Stuart and Andrew,



Attached please find OGE's draft EA for Mr. Perdue. Can you please share this with the filer and his attorneys/advisors, and let us know your thoughts on the same?

Thanks, Kim

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<Perdue Draft EA OGE Feb 28th.docx>

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## Thanks, Andrew!



From: Kimberly L. Sikora Panza [mailto:klspanza@oge.gov]
Sent: Tuesday, February 28, 2017 3:36 PM
To: Bender, Stuart - OE (b) (6)
Tobin, Andrew - OE (b) (6)

Subject: Nom report

Hi Stuart and Andrew,

I have three minor nits on the nom report, all of which seek just a **\*little**\* more clarity in some of the Endnotes:

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

I am going to send a separate email in a few moments that contains a list of questions we will need the filer to specifically confirm before we can preclear the report. Stay tuned....

Thanks, Kim

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From:	<u>Kimberly L. Sikora Panza</u>
To:	<u>"Bender, Stuart - OE"</u>
Cc:	<u>"Tobin, Andrew - OE"</u>
Subject:	RE: Sonny Perdue"s Draft Ethics Agreement (with his full name in signature block)
Date:	Thursday, March 02, 2017 8:14:54 AM

Hi Stuart,

Thanks for the catch on that! I understand that the Governor is reviewing the contents of the EA and will update my team re the same.

Kim

From:	Kimberly L. Sikora Panza
To:	"Bender, Stuart - OE"
Cc:	"Tobin, Andrew - OE"
Subject:	RE: Kim Governor PerdueRequested Revisions to Draft Ethics Agreement and Confirmation by the Nominee of OGE"s Questions
Date:	Friday, March 03, 2017 10:39:07 AM

Stuart,



I will follow up with you on the other matters we discussed once I have additional input from my team.

Thanks, Kim



On Mar 3, 2017, at 7:56 AM, Kimberly L. Sikora Panza <<u>klspanza@oge.gov</u>> wrote:

Hi Stuart,

Thanks for your message and this additional information. I will review and discuss with my team, and then circle back with you.

Kim

Referral to USDA	



On Mar 3, 2017, at 2:20 PM, Kimberly L. Sikora Panza <<u>klspanza@oge.gov</u>> wrote:

Hi Stuart and Andrew, I found a brief discussion of [0](3), in the following LAs-



Thanks, Kim

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From:Kimberly L. Sikora PanzaTo:"Bender, Stuart - OE"Subject:RE: A Note of Thanks!Date:Monday, March 13, 2017 9:09:07 PM

Thank you, Stuart, for your kind words.... I certainly appreciate everything you and Andrew did on your end re: the report as well!



From:	EA Compliance
To:	"Bender Stuart - OE"
Cc:	"Tobin Andrew - OE"; EA Compliance
Subject:	Perdue ea
Date:	Tuesday, May 02, 2017 2:50:14 PM

#### Dear Mr Bender:

Mr Perdue III was confirmed as Secretary of the U S Department of Agriculture on 4/24/17 This is a reminder that Mr Perdue III has 90 days from the date of appointment to comply with the terms of his ethics agreement, unless an extension is granted by the Office of Government Ethics (OGE) Agency ethics officials do not have the authority to extend the compliance deadline; in rare circumstances of unusual hardship, OGE may decide to extend the deadline See 5 C F R 2634 802(b) Please advise OGE via eacompliance@oge.gov as soon as possible if an extension will be requested

The Designated Agency Ethics Official (DAEO) or the DAEO's designee is required to provide OGE with written confirmation (email is acceptable and preferred) that Mr Perdue III has complied with the terms of his ethics agreement and that compliance was achieved within the 90-day deadline. The DAEO's or designee's confirmation to OGE must be based on written notification of compliance received from Mr Perdue III OGE should receive written confirmation from the DAEO or designee no later than seven days after the expiration of the 90-day deadline. Agencies are, however, encouraged to send written confirmation to OGE as soon as possible Please consult OGE's Legal Advisory LA-14-06 for additional guidance

### Here is the link to the guidance:

https://www2 oge gov/Web/OGE nsf/Legal%20Advisories/ECDADA000D6612BF85257E96005FBF0C/\$FILE/eecbe744513c40b7a3c049def23f2fdd3 pdf? open

Please forward confirmation of compliance to OGE at <u>eacompliance@oge\_gov</u> Thank you for your assistance in this matter, and please contact <u>eacompliance@oge\_gov</u> if you have any questions. If you are not the point of contact for this matter, please advise <u>eacompliance@oge\_gov</u> and forward this email to the appropriate ethics official

Sincerely,

Compliance Division United States Office of Government Ethics 1201 New York Avenue NW Suite 500 Washington, DC 20005

Visit OGE's website: <u>www oge gov</u> Follow OGE on Twitter: @OfficeGovEthics

From:	EA Compliance
To:	<u>"Bender, Stuart - OE"</u>
Cc:	EA Compliance
Subject:	Perdue ea
Date:	Tuesday, May 16, 2017 1:51:48 PM
Attachments:	EA Certification Secretary Perdue- AGRICULTURE.pdf

Dear Mr. Bender,

In accordance with Program Advisory 17-03, we are providing the attached Certification for completion by Secretary Perdue to demonstrate compliance with the provisions of his ethics agreement.

Please ensure that Secretary Perdue completes this form and returns it to OGE by email to <u>eacompliance@oge.gov</u> no later than July 31 as stated in his ethics agreement.

If you have any questions, please contact Doug Chapman at <u>eacompliance@oge.gov</u>.

From: To: Subject: Date:	<u>Schultz, James D. EOP/WHO</u> <u>Elaine Newton</u> RE: OGE Comments on Miller NE Report (2-17-17) Friday, March 24, 2017 11:47:19 AM
Edits were	e made to the report and I believe resubmitted. <sup>(b)(3), (5), (6)</sup>
	SCHULTZ sociate Counsel and Special Assistant to the President the White House Counsel o)
	m)
<b>Sent:</b> Frid <b>To:</b> Schult	ine Newton [mailto:enewton@oge.gov] ay, March 24, 2017 11:10 AM z, James D. EOP/WHO <mark>(b) (6) DGE Comments on Miller NE Report (2-17-17)</mark>
Good Moi	rning,
	king on the status of the report for Stephen Miller. I sent you my initial questions on 17, 2017, and sent the report back to you in Integrity on March 10, 2017.
Please let	me know if you have any questions.
Thanks, El	aine
1201 New Washingto	
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From:	Elaine Newton
To:	"Schultz, James D. EOP/WHO"
Bcc:	Elaine Newton
Subject:	RE: OGE Comments on Miller NE Report (2-17-17)
Date:	Monday, March 27, 2017 12:39:44 PM
Attachments:	OGE Comments on Miller NE Report (3-27-17).docx

2 page attachment wi hheld in full -(b)(3), (4), (5), (6)

Thank you for the revised report on Stephen Miller. I have some follow-up questions (attached) regarding the report. Please let me know if it would be easier to have a short telephone conversation to discuss my questions.

Thanks, Elaine

Elaine Newton Associate Counsel U.S. Office of Government Ethics 1201 New York Ave., NW, Suite 500 Washington, DC 20005-3915 Telephone: 202-482-9265 From:Schultz, James D. EOP/WHOTo:Elaine NewtonSubject:OGE Comments on Miller NE Report (002)Date:Thursday, May 18, 2017 12:29:35 PMAttachments:OGE Comments on Miller NE Report (002).docx

b)(3), (4), (5), (6)

Edits have been made to 278.


From: Schultz, James D. EOP/WHO (b) (6) Sent: Tuesday, April 11, 2017 5:42 PM To: Emory A. Rounds III Cc: De La Vega, Scott Subject: RE: NEW ENTRANT REPORT QUESTIONS #3

All confirmed and it is a (b)(3), (6) Scott, could you have someone change that? I cannot get in to edit.

JAMES D. SCHULTZ Senior Associate Counsel and Special Assistant to the President Office of the White House Counsel



From: Emory A. Rounds III [mailto:earounds@oge.gov]
Sent: Tuesday, April 11, 2017 9:29 AM
To: Schultz, James D. EOP/WHO (b) (6)
Cc: De La Vega, Scott (b) (6)
Subject: NEW ENTRANT REPORT QUESTIONS #3

Good morning!



### Thank you!

### Emory

Emory Rounds Associate Counsel General Counsel and Legal Policy Division Ethics Law and Policy Branch U.S. Office of Government Ethics 1201 New York Avenue, NW, Suite 500 Washington, DC 20005-3917 Telephone: 202-482-9232

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please notify the sender by responding to the email and then immediately delete the email.

From:	Mabry, Sandra S. EOP/WHO
То:	Ciara M. Guzman
Subject:	RE: NE 278e for Hope Hicks
Date:	Wednesday, August 30, 2017 10:36:10 AM
Attachments:	WHO response to OGE Comments (Hicks) sent to OGE.docx



Ciara, responses are attached. Thanks, Sandy

-----Original Message-----From: Ciara M. Guzman [mailto:cmguzman@oge.gov] Sent: Wednesday, August 30, 2017 8:15 AM To: Mabry, Sandra S. EOP/WHO <(b) (6) Subject: RE: NE 278e for Hope Hicks

Hi Sandy,

Ciara

-----Original Message-----From: Mabry, Sandra S. EOP/WHO(b) (6) Sent: Thursday, August 24, 2017 10:04 AM To: Ciara M. Guzman Subject: RE: NE 278e for Hope Hicks

Ciara, just left a voice message for you. Please call to discuss responses to questions on Hope Hicks' report. Thanks, Sandy (b) (6)

-----Original Message-----From: Mabry, Sandra S. EOP/WHO Sent: Wednesday, August 23, 2017 4:11 PM To: 'Ciara M. Guzman' <cmguzman@oge.gov> Subject: NE 278e for Hope Hicks

Ciara, I left a voice message for you. Please call me to discuss responses. Thanks, Sandy (b) (6)

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From:	EA Compliance
To:	(b)(6) - Janice Kaye's email address
Cc:	EA Compliance; (0)(6) - Monique Ricker's email address
Subject:	FW: ea Lighthizer
Date:	Thursday, May 18, 2017 10:07:26 AM
Attachments:	EA Certification U.S Trade Representative Lighthizer - TRADE REP.pdf

residen.nsf/E0AB2EA501037D8F852581C6002C2077/ FILE/Lighthizer%20all%20EA%20Certification.pdf

From: EA Compliance Sent: Thursday, May 18, 2017 9:51 AM To: <sup>D(6) - Jance Reyst email address</sup> Cc: EA Compliance; <sup>D(6) - Monique Ricker's email address</sup> Subject: ea Lighthizer

Dear Ms. Kaye:

Ambassador Lighthizer was confirmed as United States Trade Representative on May 11, 2017. This is a reminder that Ambassador Lighthizer has 90 days from the date of confirmation (May 11, 2017) to comply with the terms of his ethics agreement, unless an extension is granted by the Office of Government Ethics (OGE). Agency ethics officials do not have the authority to extend the compliance deadline; in rare circumstances of unusual hardship, OGE may decide to extend the deadline. See 5 C.F.R. § 2634.802(b). Please advise OGE via <u>eacompliance@oge.gov</u> as soon as possible if an extension will be requested.

Ambassador Lighthizer is required to complete and sign the attached Certification of Ethics Agreement Compliance (See OGE's Program Advisory <u>PA 17-03</u>). The Secretary should provide the completed and signed Certification to ethics officials as soon as possible but not later than August 09, 2017. The Certification should then be submitted to OGE no later than August 16, 2017 via email to <u>eacompliance@oge.gov</u>.

Thank you for your assistance in this matter, and please contact <u>eacompliance@oge.gov</u> if you have any questions. If you are not the point of contact for this matter, please advise <u>eacompliance@oge.gov</u> and forward this email to the appropriate ethics official.

Sincerely,

Compliance Division United States Office of Government Ethics 1201 New York Avenue NW Suite 500 Washington, DC 20005

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From:	LNAPPS1.USOGE@oge.gov	
To:	Douglas L. Chapman; Elaine E. Abbott; Michelle M. Walker	
Cc:	EA Compliance	
Subject:	Ethics Agreement Compliance 45-day reminder	
Date:	Sunday, June 18, 2017 1:18:47 AM	

Hello, Please send the following individuals their 45-day reminder.

Robert E Lighthizer, confirmed 5/11/2017 Agency: Office Of The US Trade Representative Nonresponsive network records

Have a nice ethical day!

From:CDTo:Stephanie NonluechaSubject:FW: CD Request for Ambassador LighthizerDate:Monday, June 19, 2017 2:36:31 PMAttachments:lighthizer nominee report.pdf<br/>Amb Lighthizer CD request.pdf

276 inflational disclosure report withrheid in full\* (0)(3) - Available at https://extapps2.oge.gov/201/Presiden.nsf/PAS%20Index? OpenView.

> automated tool to request to 2010/ms@cgg.got. COE has also created automated tool to request copies of the CDs, available on OGE's bsite at: https://extapps2.oge.gov/201/Presiden.nst/All+Certificates +Divestiture.





Thanks for your help.

Elaine

-----Original Message-----From: Rachel K. Dowell Sent: Monday, June 12, 2017 4:12 PM To: 'Kaye, Janice A. EOP/USTR' Cc: Elaine Newton Subject: FW: CD Request for Ambassador Lighthizer

Thanks, Janice. Forwarding this on - the assigned reviewer will let you know if any additional information is needed.



Michelle/Elaine:

Janice Kaye from the Office of the U.S. Trade Representative called to inquire about an EA compliance extension for Robert Lighthizer, US Trade Representative. (b) (5)

She will be submitting the formal request via letter emailed to <u>eacompliance@oge.gov</u>. Please keep an eye out for it and let me know when it comes in.

Also, Ms. Kaye is aware that Mr. Lighthizer must still submit a certification by the original due date stating what provisions of his EA he has complied with and then a second certification after he has complied with the remaining provisions, in accordance with PA-17-03.

As always, please let me know if you have any questions,

Doug

# **Doug Chapman**

Chief, Program Review Branch U.S. Office of Government Ethics 1201 New York Avenue, NW Suite 500 Washington, DC 20005 202-482-9223

Referral to USTR		

From:	EA Compliance
To:	"Kaye, Janice A. EOP/USTR"
Cc:	EA Compliance
Subject:	Ambassador Lighthizer certification of ethics agreement
Date:	Thursday, August 03, 2017 3:14:30 PM

Dear Ms. Kaye,

Thank you for the Certification of Ethics Agreement of Ambassador Lighthizer.

Sincerely,

OGE Compliance Division

Referral to USTR

# Nonresponsive records

From: Daniel L. Skalla [mailto:dlskalla@oge.gov]
Sent: Monday, August 14, 2017 11:05 AM
To: Kaye, Janice A. EOP/USTR (b) (6)
Cc: Grace A. Clark <gaclark@oge.gov>; 278Tracking <278Tracking@oge.gov>
Subject: RE: Lighthizer 278-T (8/2/17)

# Hi Janice,

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

Thanks, Dan

teferral to USTR

From: Daniel L. Skalla [mailto:dlskalla@oge.gov]
Sent: Monday, August 14, 2017 10:17 AM
To: Kaye, Janice A. EOP/USTR (b) (6)
Cc: Grace A. Clark <gaclark@oge.gov>; 278Tracking<<u>278Tracking@oge.gov</u>>;

**Subject:** Lighthizer 278-T (8/2/17)

### Hi Janice,



Thank you,

Dan Skalla Chief, Financial Disclosure Branch Compliance Division U.S. Office of Government Ethics 1201 New York Ave., NW, Suite 500 Washington, DC 20005-3917 Tel. 202.482.9222 Fax 202.482.9238

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From:	EA Compliance
To:	<u>"Kaye, Janice A. EOP/USTR"</u>
Cc:	EA Compliance
Subject:	RE: request for compliance extension for Ambassador Robert E. Lighthizer
Date:	Thursday, October 26, 2017 3:00:43 PM

Dear Ms. Kaye,

Thank you for the ethics agreement certification compliance from Ambassador Lighthizer.

Sincerely,

The Compliance Division



-----Original Message-----From: EA Compliance [<u>mailto:eacompliance@oge.gov</u>] Sent: Thursday, October 5, 2017 1:53 PM To: Kaye, Janice A. EOP/USTR (b) (6) Cc: EA Compliance <eacompliance@oge.gov> Subject: RE: request for compliance extension for Ambassador Robert E. Lighthizer

Dear Ms. Kaye:

Ambassador Lighthizer's was confirmed on 5/11/2017. The Ambassador sent his first Ethics Agreement Compliance (Certification) on 8/2/2017. This is a reminder that the second Ethics Agreement Compliance (Certification) needs to be completed and signed by October 5, 2017. The Certification should then be submitted to OGE no later than October 12, 2017. The second Certification was for the element that was given an approving extension, the Ambassador's Cornerstone Concentrated 30 Investment Account and the London Company Large Cap Value Account.

Thank you for your assistance in this matter, and please contact eacompliance@oge.gov if you have any questions. If you are not the point of contact for this matter, please advise eacompliance@oge.gov and forward this email to the appropriate ethics official.

Sincerely,

Compliance Division United States Office of Government Ethics 1201 New York Avenue NW Suite 500 Washington, DC 20005

-----Original Message-----From: EA Compliance Sent: Monday, July 31, 2017 2:07 PM To: 'Kaye, Janice A. EOP/USTR' Cc: EA Compliance Subject: RE: request for compliance extension for Ambassador Robert E. Lighthizer

Hi Janice,

Attached is OGE's letter approving an extension of Ambassador Lighthizer's ethics agreement compliance due date, as it applies to the

We are sending the hard copy letter via US mail. Also attached are the Certification of Ethics Agreement Compliance documents he'll be required to complete and submit. Please let us know if you have any questions.

Sincerely,

Doug Chapman Chief, Program Review Branch U.S. Office of Government Ethics 1201 New York Avenue, NW Suite 500 Washington, DC 20005 202-482-9223



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From:	<u>Ciara M. Guzman</u>
To:	"Mabry Sandra S. EOP/WHO"
Subject:	RE: BANNON
Date:	Thursday, October 26, 2017 12:13:47 PM

Sandy, I just returned the report. Thanks.

Ciara

From: Mabry, Sandra S. EOP/WHO (6) Sent: Thursday, October 26, 2017 12:09 PM To: Ciara M. Guzman Subject: RE: BANNON

Ciara, I just left a phone message for you. Please return Bannon's report to the WH so I can update it. Thanks, Sandy

From: Ciara M. Guzman [mailto:cmguzman@oge.gov]

Sent: Monday, October 23, 2017 1:36 PM To: Mabry, Sandra S. EOP/WHO (b) (6)

Subject: FW: BANNON

Hi Sandy,

Please see below Mr. Schultz's email. Per our conversation, I have highlighted the items that need further clarification and/or were not addressed in the current version of the report. We can discuss later this week. Additionally, on a second email Mr.

Schultz indicated that (b)(3), (c) include this when editing the report. Thanks.

Ciara

From: Lori Kelly Sent: Wednesday, October 11, 2017 8:02 AM To: Ciara M. Guzman Cc: 278Tracking Subject: FW: BANNON Ui Ciara

Hi Ciara,

James emailed this to me and I see in FDTS the report is assigned to you. I forwarded the NE report to you in Integrity. Lori

From: Schultz, James D. EOP/WHO (b) (6) Sent: Tuesday, October 10, 2017 5:00 PM To: Lori Kelly Subject: BANNON Lori – please find the responses.

o)(3), (5), (6

JAMES D. SCHULTZ Senior Associate Counsel and Special Assistant to the President Office of the White House Counsel



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-----Original Message-----From: Kimberly L. Sikora Panza Sent: Thursday, April 06, 2017 9:55 AM To: Elaine Newton Subject: FW: COD PACKAGE

OGE regulations provide for a special access provision for Certificates of Divestiture (CDs). You may obtain copies of CDs by completing the fill and print PDF version of the OGE Form 201 and submitting your request to 201forms@oge.gov. OGE has also created an automated tool to request copies o he CDs, available on OGE's website at: https://extapps2.oge.gov/201/Presiden.ne All+Cer ificates+of+Divestiture.

Hi Elaine-

Here's the electronic copy, per your VM(b) (6)

Thanks Kim



Sent: Monday, March 06, 2017 11:01 AM To: David J. Apol Subject: COD PACKAGE



Dave - Attached please find the COD package for Mr. Bannon. His draft 278 is available for review on integrity. Jim

JAMES D. SCHULTZ

Senior Associate Counsel and Special Assistant to the President Office of the White House Counsel



From:	Kimberly L. Sikora Panza
To:	David J. Apol
Subject:	FW: Bannon CD request
Date:	Tuesday, April 11, 2017 7:09:02 AM

Hi Dave,

Below please find Jim's responses to your questions.

I am available to discuss at your convenience.

Kim

From: Schultz, James D. EOP/WHC(b) (6) Sent: Monday, April 10, 2017 3:04 PM To: Kimberly L. Sikora Panza Subject: RE: Bannon CD request

### Hi Jim,

The CD package is with Dave right now, and he wanted me to ask you these follow up questions:

Office of the White House Counsel

m)

From: Kimberly L. Sikora Panza [<u>mailto:klspanza@oge.gov]</u> Sent: Friday, April 7, 2017 1:25 PM To: Schultz, James D. EOP/WHO (b) (6)

Subject: RE: Bannon CD request

### Hi Jim,

) (6)

The CD package is with Dave right now, and he wanted me to ask you these follow up questions:



Thank you in advance for your input on these additional questions related to the CD. (As you know, I also am the reviewer for Mr. Bannon's New Entrant report; we will be sending questions on his report (not related to the CD) separately.)

Kim

From: Schultz, James D. EOP/WHO (b) (6) Sent: Thursday, April 06, 2017 11:46 AM To: Kimberly L. Sikora Panza Subject: Re: Bannon CD request

Jim. I believe I responded. (b) (5), (b) (6)

. Any update on the COD?

James D. Schultz

Senior Associate Counsel and Special Assistant to the President

## Office of White House Counsel

)

(b) (6)

On Apr 4, 2017, at 3:39 PM, Kimberly L. Sikora Panza <<u>klspanza@oge.gov</u>> wrote:

Hi Jim,

	I have one additional question
	Thanks,
	Kim
	From: Schultz, James D. EOP/WHQ(b) (6) Sent: Tuesday, April 04, 2017 9:48 AM To: Kimberly L. Sikora Panza Subject: RE: Bannon CD request
	Yes.
	JAMES D. SCHULTZ
	Senior Associate Counsel and Special Assistant to the President
	\\/hite House Counsel (o)
	(D) (m)
	From: Kimberly L. Sikora Panza [mailto:klspanza@oge.gov] Sent: Tuesday, April 4, 2017 9:47 AM To: Schultz, James D. EOP/WHO(b) (6) Subject: RE: Bannon CD request
	Good morning, Jim,
	Thanks for your email. I am available to speak now, if you are free – is the (b) (6) number the best number to reach you?
	Thanks,
	Kim
	From: Schultz, James D. EOP/WHQ(b) (6) Sent: Tuesday, April 04, 2017 9:22 AM To: Kimberly L. Sikora Panza Subject: RE: Bannon CD request
	Kim – as you know, Steve's 278 has been finalized. Can we talk this morning regardin the COD?
	JAMES D. SCHULTZ
	Senior Associate Counsel and Special Assistant to the President
(6	Senior Associate Counsel and Special Assistant to the President Office of the White House Counsel

To: Schultz, James D. EOP/WHO (b) (6)

### **Subject:** RE: Bannon CD request

Good afternoon, Jim,

I hope you are well.

I am writing to touch base regarding the Bannon CD, and follow up re: a signed version of the report and my clarification questions below. At your convenience, could you please let me know the status of things?

Thank you in advance for your input.

Best regards,

Kim

From: Kimberly L. Sikora Panza Sent: Wednesday, March 15, 2017 12:44 PM To: 'Schultz, James D. EOP/WHO' Subject: RE: Bannon CD request

Thank you for the additional information. Could you please let me know when the signed version of the report is available?

I also would appreciate your help clarifying a few items on the report. Could you please provide a brief description of the following companies:

(5), (6)

Thank you in advance for your input.

Best regards,

Kim

From: Schultz, James D. EOP/WHO(b) (6) Sent: Monday, March 13, 2017 9:26 AM To: Kimberly L. Sikora Panza Subject: Re: Bannon CD request

The report will be available shortly.

James D. Schultz

Senior Associate Counsel and Special Assistant to the President

Office of White House Counsel

(b) (6) (m)

On Mar 8, 2017, at 2:48 PM, Kimberly L. Sikora Panza <<u>klspanza@oge.gov</u>> wrote:

Good afternoon,

I am the OGE reviewer assigned to review the CD request for Mr. Bannon. I have the following questions regarding the CD request – thank you in



Finally, for your future reference, attached please find the sample CD request format, which asks questions regarding the various pieces of information we need to process a CD request. Most agencies submit CD requests using this form, and using the form can help streamline the CD review process on our end.

Thank you in advance for your input.

Best regards,

Kim

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From:	Schultz, James D. EOP/WHO
To:	Rodrick T. Johnson
Cc:	Elaine Newton; Sandra S. Mabry; Teresa L. Williamson; Kimberly L. Sikora Panza
Subject:	RE: Certificate of Divestiture for Stephen K. Bannon
Date:	Wednesday, April 12, 2017 11:02:38 AM

We are in receipt of Mr. Bannon's COD.

## JAMES D. SCHULTZ

Senior Associate Counsel and Special Assistant to the President Office of the White House Counsel



Good Morning, Mr. Schultz:

Attached is the **Certificate of Divestiture** OGE-2017-031 for Stephen K. Bannon, Assistant to the President and Chief Strategist to the President. We would appreciate your forwarding the original certificate to Mr. Bannon. Also enclosed is a copy of the certificate for your files.

The original certificate and one copy for your records will be mailed to you. We would appreciate your forwarding the original certificate to Mr. Bannon, upon receipt.

Please confirm receipt of this email by replying to all.

Thanks, Again Rodrick Johnson

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From:	Kimberly L. Sikora Panza
To:	"Schultz James D. EOP/WHO"
Subject:	RE: Bannon New Entrant Report
Date:	Friday, July 14, 2017 3:57:39 PM

Good afternoon, Jim,

I am writing to follow up on the Bannon report – at your convenience, could you please let me know the status?

Thanks,

Kim

From: Kimberly L. Sikora Panza Sent: Monday, June 26, 2017 4:31 PM To: 'Schultz, James D. EOP/WHO' Subject: RE: Bannon New Entrant Report Good afternoon, Jim,

I am writing to touch base re the Bannon report – at your convenience, could you please let me know the status?

Thanks,

Kim

From: Kimberly L. Sikora Panza Sent: Friday, June 16, 2017 9:54 AM To: 'Schultz, James D. EOP/WHO' Subject: RE: Bannon New Entrant Report Good morning, Jim,

I hope you are well. I am writing to check in on the Bannon report - could you please let me know the status at your convenience?

Thanks!

Kim From: Schultz, James D. EOP/WHC(0).(6) Sent: Tuesday, June 06, 2017 4:08 PM To: Kimberly L. Sikora Panza Subject: Re: Bannon New Entrant Report Sorry. Got pulled into something else. I'm trying to get his done this week.

James D. Schultz Senior Associate Counsel and Special Assistant to the President Office of White House Counsel

On Jun 6, 2017, at 4:05 PM, Kimberly L. Sikora Panza <<u>klspanza@oge.gov</u>> wrote:

Good afternoon, Jim, I am writing to touch base on the Bannon report – at your convenience, could you please let me know the status? Thank you, Kim

From: Kimberly L. Sikora Panza Sent: Thursday, May 25, 2017 4:29 PM To: Schultz, James D. EOP/WHO Subject: RE: Bannon New Entrant Report Good afternoon, Jim,

I am writing to touch base on the Bannon New Entrant Report. At your convenience, could you please let me know the status?

Thanks,

Kim

From: Kimberly L. Sikora Panza Sent: Tuesday, May 16, 2017 11:04 AM To: 'Mabry, Sandra S. EOP/WHO' Cc: Schultz, James D. EOP/WHO Subject: RE: Bannon New Entrant Report Thanks!

From: Mabry, Sandra S. EOP/WHO (b) (6) Sent: Tuesday, May 16, 2017 10:56 AM To: Kimberly L. Sikora Panza Cc: Schultz, James D. EOP/WHO Subject: RE: Bannon New Entrant Report Kim, Jim is working on this one. I have copied him on this email. Sandy

From: Kimberly L. Sikora Panza [mailto:klspanza@oge.gov] Sent: Tuesday, May 16, 2017 8:02 AM To: Mabry, Sandra S. EOP/WHO (b) (6) Subject: FW: Bannon New Entrant Report Hi Sandy, Are you also working on the Bannon report? If so, at your convenience, could you please provide a status update? Thanks! Kim From: Kimberly L. Sikora Panza Sent: Thursday, May 04, 2017 2:08 PM Cc: Mabry, Sandra S. EOP/WHO'; Moust Subject: Bannon New Entrant Report Kimberly L. Sikora Panza

Good afternoon,

I am the OGE reviewer assigned to review the New Entrant report for Steve Bannon. Please see below for my preliminary

questions/comments based on my review of the report. I look forward to working with y

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

\*\*\* Best regards, Kim Sikora Panza

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From:Heather A. JonesTo:"Jane Halprin";Subject:How to SubmitDate:Friday, March 10, 2017 5:56:59 PMAttachments:Submit Report.docx

ttachment released below

Heather Jones (b) (6)

Office of Government Ethics

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# Submitting a Nominee Report after Nomination

1. Log into *Integrity*, <u>https://integrity.gov</u>.

2. On the "**My Tasks**" page, click the "**Sign**" button next to your Nominee report. The report will open in a new window.

E MY TASKS	N	/Iy Ta	sks								
<u>My Tasks</u>		MY CURR	ENT REPORTS								
SETTINGS		YEAR	ITEM	TYPE	AGENCY	GROUP	POSITION	DUE DATE	STATUS	DATE FILED	ACTION
		2016	Nominee Report	278	Sample Agency	Sample Agency, Nominee Group	Sample Position		Draft, Pre-Cleared	03/18/16	Sign

3. Click the "Submit Report" link on the lower left side of the page.

=	General Information: Filer, Sam	nle		
💄 Filer, Sample	Scheral Information Ther, camp	pro-		
REVIEW REPORT	REPORT SUMMARY			
General Information General Comments Filer's Federal Positions	FILER SNAPSHOT			
Filer's Positions	Filer: Filer, Sample	Item: Nominee Report	Status: Draft, Pre-Cleared	
Filer's Employment-Related Assets and Income	Agency: Sample Agency Position:	Report type: 278 Report Year: 2016	Spouse: Yes	
Filer's Employment-Related Arrangements	Sample Position			
Filer's Sources of Compensation	REVIEWER & FILER INFORMATION			
Spouse's Employment Related Assets and Income	Filer Category: PAS	Public Availability:	Agency Reviewer:	
Other Assets and Income	Filer Status:	Fubic Availability.	OGE Reviewer:	
Liabilities	Amendment:			
Report Data (Summary)				
Submit Report	DUE DATES & EXTENSIONS			
Filledue view	DUE DATES & EXTENSIONS			

4. The "Submit OGE Form 278e" page will display. Scroll down your report to check for accuracy.

≡ ▲ Filer, Sample	Submit OGE Form 278e.
REVIEW REPORT	TO SUBMIT YOUR OGE FORM 278E, CHECK THE BOX AT THE BOTTOM OF THIS PAGE AND SELECT THE "SUBMIT OGE FORM 278E" BUTTON.
General Information General Comments Filer's Federal Positions Filer's Positions	Nominee Report   U.S. Office of Government Ethics; 5 C.F.R. part 2634   Form Approved: OMB No. (3209-0001) (March 2014) Executive Branch Personnel Public Financial Disclosure Report (OGE Form 278e)
Filer's Employment-Related Assets and Income Filer's Employment-Related Arrangements	Electronic Signature - I certify that the statements I have made in this form are true, complete and correct to the best of my knowledge.
Filer's Sources of Compensation Spouse's Employment Related Assets and Income Other Assets and Income	/s/ Filer, Sample [electronically signed on 03/18/16 by Filer, Sample in Integrity.gov]
Liabilities Report Data (Summary)	Other review conducted by
Submit Report Printable View	U.S. Office of Government Ethics Certification

5. Scroll to the bottom of the page and check the box next to the "I certify..." statement.



6. Checking the box will enable the "Submit OGE Form 278e" button. Click the button.

Submit Executive Branch Public Financial Disclosure Report	(OGE Form 278e)
	nize that my eSignature (Electronic or Digital Signature) shall be given the same legal status as a signature made with a pen. I further recognize that the eSigna t is in electronic form. I hereby consent to the use of eSignature.
I understand that my eSignature is applied to the information	in that I have provided and not the presentation formatting of the information on the screen or printed page.
✓ I certify that the statements I have made in this report a	re true, complete, and correct to the best of my knowledge.
	Submit OGE Form 278e

7. A message will display that the report has been submitted. You may now close the report.

Your Nominee Report has been signed. You may now close this window.
---

From:Monica M. G. AsharTo:"Jane Halprin"; Heather A. Jones; Kimberly L. Sikora PanzaCc:Patrick CarneySubject:RE: Precleared: Ajit PaiDate:Monday, March 13, 2017 10:08:35 AM

Thanks, Jane.



From: Heather A. Jones [mailto:hajones@oge.gov]
Sent: Monday, March 13, 2017 9:47 AM
To: Jane Halprin (b) (6) >; Kimberly L. Sikora Panza <<u>klspanza@oge.gov</u>>
Cc: Patrick Carney (b) (6) >; Monica M. G. Ashar <<u>mmgashar@oge.gov</u>>
Subject: RE: Precleared: Ajit Pai

Jane-

The Chairman's letter can not be on Commission letterhead because he is not acting in his official capacity but rather is acting in his personal capacity. Can you have him sign a letter that is not on letterhead? (also please don't include his personal address because the letter will be posted on the internet.)

Thanks, Heather



From: Heather A. Jones [mailto:hajones@oge.gov]
Sent: Friday, March 10, 2017 2:22 PM
To: Jane Halprin (b) (6)
## Subject: RE: Precleared: Ajit Pai

## Thanks.



Ajit Pai was nominated yesterday and he has been precleared. I have attached his 278e signed on November 30, 2016 and an updated ethics agreement.

Thanks, Heather

## NOMINATION - OGE Reviewer: Kim Sikora Panza (INTEGRITY)

PN89 — 115th Congress (2017-2018) — Ajit Varadaraj Pai — Federal Communications Commission Ajit Varadaraj Pai, of Kansas, to be a Member of the Federal Communications Commission for a term of five years from July 1, 2016. (Reappointment) Date Received from President: 03/07/2017 Committee: Commerce, Science, and Transportation Latest Action: 03/07/2017 - Received in the Senate and referred to the Committee on Commerce, Science, and Transportation. (All Actions)

**Heather Jones** 

(202) 482-9316 Office of Government Ethics

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From:	EA Compliance
To:	(b)(6) - Jane Halprin's email address
Cc:	EA Compliance
Subject:	PAI EA - 90 Day Reminder - EA Certification Attached
Date:	Thursday, October 05, 2017 4:03:42 PM
Attachments:	EA Certification (June 2017 version) - Member Pai - FCC.pdf

Dear Ms. Halprin:

Mr. Ajit V. Pai was confirmed for the position of Member, Federal Communications Commission on October 2, 2017. This is a reminder that Member Pai has 90 days from the date of confirmation (October 2, 2017) to comply with the terms of his ethics agreement, unless an extension is granted by the Office of Government Ethics (OGE). Agency ethics officials do not have the authority to extend the compliance deadline; in rare circumstances of unusual hardship, OGE may decide to extend the deadline. See 5 C.F.R. § 2634.802(b). Please advise OGE via eacompliance@oge.gov as soon as possible if an extension will be requested.

Member Pai is required to complete and sign the attached Certification of Ethics Agreement Compliance (See OGE's Program Advisory <u>PA 17-03</u>). Member Pai should provide the completed and signed Certification to ethics officials as soon as possible but not later than January 2, 2018. The Certification should then be submitted to OGE no later than January 9, 2018, via email to <u>eacompliance@oge.gov</u>.

Thank you for your assistance in this matter, and please contact <u>eacompliance@oge.gov</u> if you have any questions. If you are not the point of contact for this matter, please advise <u>eacompliance@oge.gov</u> and forward this email to the appropriate ethics official.

Sincerely,

Compliance Division United States Office of Government Ethics 1201 New York Avenue NW Suite 500 Washington, DC 20005

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From: To:	Kimberley H. Kaplan (b)(6) - James Schultz's email address	
Cc:	(b)(6) - Scott DeLaVega's email address	
Subject:	Reed Cordish New Entrant report	26 page attachment withheld in full - (b)(3), (4), (5),
Date:	Friday, May 12, 2017 12:50:19 PM	(6)
Attachments:	OGE Comments on Cordish New Entrant Report.docx	

Jim,

I am the OGE reviewer for Mr. Cordish's New Entrant report. OGE's initial list of comments/questions regarding Mr. Cordish's report is attached.

Thanks, Kim

Kim H. Kaplan Senior Government Ethics Specialist U.S. Office of Government Ethics (202) 482-9269 phone (202) 482-9238 fax khkaplan@oge.gov

Visit OGE's website: <u>www.oge.gov</u> Follow OGE on Twitter: @OfficeGovEthics

From:	Kimberley H. Kaplan
То:	"Schultz, James D. EOP/WHO"
Subject:	RE: CORDISH
Date:	Wednesday, July 19, 2017 10:47:44 AM

Thanks, Jim.

-----Original Message-----From: Schultz, James D. EOP/WHO [16] Sent: Wednesday, July 19, 2017 9:51 AM To: Kimberley H. Kaplan Subject: RE: CORDISH

It has been submitted back to you for review. Thanks. J

JAMES D. SCHULTZ Senior Associate Counsel and Special Assistant to the President Office of the White House Counsel (b) (6) (0) (b) (6) (m)

-----Original Message-----From: Kimberley H. Kaplan [<u>mailto:khkaplan@oge.gov</u>] Sent: Tuesday, July 18, 2017 5:58 PM To: Schultz, James D. EOP/WHO (b) (6) Subject: RE: CORDISH

Hi Jim,

He completed his divestitures of (b)(3), (6) last month and made edits to the report. The report is pending with WHCO. Once you re-submit it, we'll be able to continue on with our part.

Thanks! Kim

Kim H. Kaplan Senior Government Ethics Specialist U.S. Office of Government Ethics (202) 482-9269 phone (202) 482-9238 fax khkaplan@oge.gov

Visit OGE's website: >www.oge.gov Follow OGE on Twitter: @OfficeGovEthics<

-----Original Message-----From: Schultz, James D. EOP/WHO (b) (6) Sent: Tuesday, July 18, 2017 5:20 PM To: Kimberley H. Kaplan Subject: RE: CORDISH

Kim - where do we stand on Reed?

JAMES D. SCHULTZ

Senior Associate Counsel and Special Assistant to the President Office of the White House Counsel

) (6) (m)

Original Message	
From: Kimberley H. Kaplan [mailto:khkaplan@oge.gov]	
Sent: Tuesday, May 30, 2017 8:54 AM	
To: Schultz, James D. EOP/WHO (b) (6)	
Cc: McAvoy, Ryan P. EOP/WHO (b) (6)	; Walsh, Michael < (b) (6)
Subject: RE: CORDISH	

Thanks, Jim. I will follow up with Ryan.

Best, Kim

Kim H. Kaplan Senior Government Ethics Specialist U.S. Office of Government Ethics (202) 482-9269 phone (202) 482-9238 fax khkaplan@oge.gov

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-----Original Message-----From: Schultz, James D. EOP/WHO (b) (6) Sent: Monday, May 29, 2017 2:15 PM To: Kimberley H. Kaplan Cc: McAvoy, Ryan P. EOP/WHO; Walsh, Michael Subject: RE: CORDISH

Hi Kim - I am asking Ryan McAvoy, who has joined us as a staff assistant to get this calendared for some time after 11 on Wednesday. Michael Walsh, who is personal counsel for Cordish, will also call in. Please let Ryan know what works. J

JAMES D. SCHULTZ Senior Associate Counsel and Special Assistant to the President Office of the White House Counsel (b) (6) (o)

(b) (6) (0) (0) (0) (0)

-----Original Message-----From: Kimberley H. Kaplan [mailto:khkaplan@oge.gov] Sent: Friday, May 26, 2017 3:33 PM To: Schultz, James D. EOP/WHO (b) (6) Subject: RE: CORDISH

Jim,

Heather Jones and I would like to schedule a call with you for next week to discuss further Cordish

. What is your availability on Tuesday or Wednesday?

Other comments from OGE are below --

Thanks, Kim

Kim H. Kaplan Senior Government Ethics Specialist U.S. Office of Government Ethics (202) 482-9269 phone (202) 482-9238 fax khkaplan@oge.gov

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-----Original Message-----From: Schultz, James D. EOP/WHO (b) (6) Sent: Monday, May 22, 2017 2:27 PM To: Kimberley H. Kaplan Subject: CORDISH

hment withheld in full - (b)(3), (4), (5), (6)

Kim - please see attached. I will be certifying the 278 shortly. J

JAMES D. SCHULTZ Senior Associate Counsel and Special Assistant to the President Office of the White House Counsel (b) (6) (o)



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From:	<u>Lorna A. Syme</u>
То:	Vincent Salamone
Subject:	FW: Cohn Reinvestment
Date:	Wednesday, May 10, 2017 6:30:14 PM
Attachments:	image002.png

L

Subject: Date: Attachments:	FW: Cohn Reinvestment Wednesday, May 10, 2017 6:30:14 PM image002.png	1 page attachment withheld in full - (b)(3), (5), (6)
Original Mess From: Mullis, Dia Sent: Wednesday, To: Lorna A. Sym Subject: Re: Cohn	nna <mark>(b) (6)</mark> May 10, 2017 6:15 PM e	
Lorna,		
We need to make	tomorrow. If we can'	t get the full list, could we get that one tonight?
Thanks very much	. Feel free to call my cell at (b) (6)	
Dianna		
> > Lorna,	, at 6:28 PM, Mullis, Dianna <mark>(b) (6)</mark>	wrote:
<pre>&gt; Have you had a &gt;  &gt; Thank you. &gt;</pre>	chance to take a look at the remaining fund	ls? We crossed off <sup>(b)(6)</sup> last week.
> Dianna		
	y, May 03, 2017 5:28 PM me (lasyme@oge.gov)	
> Hi Lorna,		
> > I sent these to Ji	m late last week, but thought it might make	e sense to send them to you directly as well. (b)(3), (4), (5), (6)





>

> > > Thanks! > > Lorna > > > From: Deborah J. Bortot > Sent: Wednesday, April 05, 2017 6:52 PM > To: Lorna A. Syme > Subject: FW: Cohn Reinvestment >> Lorna, >> Please take a look at these funds and contact Jim. > > Thanks, > Deb >> From: Schultz, James D. EOP/WHO (b) (6) > Sent: Wednesday, April 05, 2017 5:02 PM > To: Deborah J. Bortot > Subject: FW: Cohn Reinvestment > > Deb - who is the right person to deal with on this? Also, should I talk with you on a > > JAMES D. SCHULTZ > Senior Associate Counsel and Special Assistant to the President Office > of the White House Counsel (o) (m) > From: Mullis, Dianna (b) (6) > Sent: Wednesday, April 5, 2017 4:16 PM > To: Schultz, James D. EOP/WHO > > Subject: Cohn Reinvestment > > Jim, >> Can you lease please ask OGE to confirm (b) (5), (b) (6) Our particular concern is with Thank you.

- >
- > Best,
- > Dianna
- >
- > [cid:image001.png@01D2AE23.FF7064D0]
- >
- > Dianna M. Mullis
- > Associate

> Steptoe direct cell >+1 202 429 3902 fax > > Steptoe & Johnson LLP >1330 Connecticut Avenue, NW > Washington, DC 20036 > www.steptoe.com<<u>http://www.steptoe.com</u>> > > > > This message and any attached documents contain information from the law firm Steptoe & Johnson LLP that may be confidential and/or privileged. If you are not the intended recipient, please do not read, copy, distribute, or use this information. If you have received this transmission in error, please notify the sender immediately by reply email and then delete this message. > > > > > > OGE Confidential Notice: This email, including all attachments, may constitute a Federal record or other

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> <image002.png>

From: To:	Vincent Salamone (b)(6) - Stefan Passantino's email address (b)(6) - Scott DeLaVega's email address	(b)(6) - James Schultz's email address	(b)(6) - Sandra Mabry's email address
Subject: Date: Attachments:	First round of comments - Cohn Tuesday, June 13, 2017 5:12:18 PM OGE Comments on Gary Cohn.docx		4 page attachment withheld in full - (b) (3), (5), (6)

I am the OGE reviewer for Gary Cohn's public financial disclosure report. I've completed my initial review of the report and the attached document contains my first round of comments.

I am also returning the filer's report to you in the Integrity system to allow you to make revisions as appropriate. Please let me know if you have any questions.

Thank you,

Vincent Salamone U.S. Office of Government Ethics Phone: (202) 482-9274

Visit OGE's website: <u>www.oge.gov</u> Follow OGE on Twitter: @OfficeGovEthics -----Original Message-----From: Deborah J. Bortot Sent: Friday, January 13, 2017 2:30 PM To: Vincent Salamone Subject: FW: GDC

Vince,

Could you reach out to Bob?

Thanks, Deb

-----Original Message-----From: Rizzi, Robert (b) (6) Sent: Friday, January 13, 2017 12:17 PM To: Deborah J. Bortot Subject: GDC

Deb-have you gotten any input regarding Gary Cohn from Don McGahn? We understand that this is a priority for the transition but not sure how this is being handled. We would be happy to help move this as quickly as we can. Thanks.

Bob Rizzi Steptoe & Johnson LLP Washington Office (direct) (cell)

Schultz, James D. EOP/WHO
Vincent Salamone
Responses to OGE Comments (7-10-17)
Monday, July 10, 2017 4:13:37 PM
Responses to OGE Comments (7-10-17).docx

e attachment withheld in full - (b)(3), (5),

Attached please find the responses to your inquiries and comments. J

From:	Schultz, James D. EOP/WHO
To:	Lorna A. Syme
Subject:	FW: OGE Comments/Questions on CD request and New Entrant Report - Powell
Date:	Thursday, March 09, 2017 9:12:02 AM
Attachments:	Powell Responses to OGE (3-9-17) (2).docx

Please see attached. Jim

JAMES D. SCHULTZ

Senior Associate Counsel and Special Assistant to the President

Office of the White House Counsel





Jim,

Attached please find our responses to OGE's questions.

Best, Dianna

Dianna M. Mullis Associate

Steptoe

direct cell +1 202 429 3902 fax

Steptoe & Johnson LLP 1330 Connecticut Avenue, NW Washington, DC 20036 www.steptoe.com

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From: Schultz, James D. EOP/WHO [mailto<sup>(b)</sup> (6)
Sent: Monday, March 06, 2017 12:46 PM
To: Mullis, Dianna
Subject: FW: OGE Comments/Questions on CD request and New Entrant Report - Powell

JAMES D. SCHULTZ Senior Associate Counsel and Special Assistant to the President Office of the White House Counsel

o) m)

> **From:** Lorna A. Syme [mailto:lasyme@oge.gov] Sent: Wednesday, March 1, 2017 11:19 AM To: Schultz, James D. EOP/WHO (b) (6) Subject: OGE Comments/Questions on CD request and New Entrant Report - Powell

Hi Jim,

I am the OGE reviewer for Dina Powell's Certificate of Divesture request and new entrant financial disclosure report. I've completed my initial review of the report and certificate of divestiture and have attached my comments. Please let me know if you have any questions or would like to discuss.

>

Thank you,

Lorna

Lorna Syme Presidential Nominations Branch U.S. Office of Government Ethics 1201 New York Ave., NW, Suite 500 Washington, DC 20005-3917 Telephone: (202) 482-9277 Facsimile: (202) 482-9237

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2 page attachment withheld in full - (b)(4), (5), (6)

Hi Lorna,

I can confirm that the (b)(5

Attached please find responses to your questions below. We are still tracking down information regarding the (0) (6)

Dianna

From: Lorna A. Syme [mailto:lasyme@oge.gov] Sent: Thursday, March 09, 2017 6:32 PM To: Mullis, Dianna Subject: Powell

Dianna:

I know you are confirming the notational allocation issue. These are my other questions -I thought it might be more useful to email them to you. Let me know if you still want to talk at 10am tomorrow or if you wish to look these over and talk later in the day (or feel free to respond by email).



b)(5), (6)

Thank you,

Lorna

Lorna Syme

From:	Lorna A. Syme
To:	(b)(6) - Christopher Swartz's email address
Subject:	FW: Powell
Date:	Thursday, March 30, 2017 11:35:39 AM

Chris:

I am returning the Powell report (Jim returned it to me last night). I had returned it to Stefan on 3/16 and Dianna from Steptoe has indicated that she is willing to make the changes (I had worked with her on questions regarding the CD/278e).

Thanks! Lorna

From: Mullis, Dianna [mailto(b) (6) Sent: Thursday, March 16, 2017 10:57 AM To: Lorna A. Syme; More Senter Senter

Thanks, Lorna. We will make those changes and let you know when they are complete.

Jim – Let me know if you want to make the changes on your end (in which case I will send you details and language), or if we can access the report to do so.

Dianna

From: Lorna A. Syme [mailto:lasyme@oge.gov] Sent: Thursday, March 16, 2017 10:50 AM To: '', Mullis, Dianna Subject: Powell

Jim and Dianna:

I just returned the Powell report to Stefan in Integrity. This will allow you to access the report and make changes.



Please let me know when you have made the changes to the report in Integrity. This will allow me to review the revised report before you send it back to OGE.

Thanks, and please let me know if you have any questions.

Lorna

From:	Lorna A. Syme
То:	Might Schultz Grand Busice ; "Mabry, Sandra S. EOP/WHO"; "Schultz, James D. EOP/WHO"
Subject:	RE: Dina Powell - new entrant report
Date:	Wednesday, July 05, 2017 1:08:10 PM

Any update on the status of our questions for Ms. Powell's report?

Thanks.

Lorna

From: Lorna A. Syme Sent: Tuesday, May 09, 2017 12:29 PM To: (b)(6) - Scott DeLaVega's email address '; 'Mabry, Sandra S. EOP/WHO' Subject: FW: Dina Powell - new entrant report

Just checking the status.

Thanks!

Lorna

From: Lorna A. Syme Sent: Monday, April 24, 2017 3:11 PM To: "1015 Sould Elever and Education of the sent address of the sent

Good Afternoon:

Just checking the status of the questions we sent regarding Dina Powell's new entrant report.

Thank you.

Lorna

From: Lorna A. Syme	
Sent: Thursday, April 13, 2017 12:15 PM	
To: (b)(6) - Scott DeLaVega's email address : (b)(6) - James Schultz's email address ;	
Subject: Dina Powell - new entrant report	
-	3 page attachment withheld in full -
Jim and Scott:	(b)(5), (6)

Our Director has reviewed the new entrant report for Dina Powell. We will need responses to the attached questions. We will also require some revisions to the report (also discussed in the attached document).

Thanks!

Lorna

From:	Schultz, James D. EOP/WHO
To:	Lorna A. Syme
Subject:	Powell Responses
Date:	Wednesday, July 12, 2017 1:43:43 PM
Attachments:	DP RESPONSES TO OGE QUESTIONS 7-11 pdf.pdf

4 page attachment withheld i - (b)(4), (5), (6)

Lorna - Please find the dina Powell response. J

JAMES D. SCHULTZ

Senior Associate Counsel and Special Assistant to the President Office of the White House Counsel D) (6) (0)



Jim:

Please forward the report to us.

Lorna

Lorna Syme Presidential Nominations Branch U.S. Office of Government Ethics 1201 New York Ave., NW, Suite 500 Washington, DC 20005-3917 Telephone: (202) 482-9277 Facsimile: (202) 482-9237

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