

From: [Elizabeth Klein](#)
To: [Garcia, Monica L](#)
Cc: [Gottry, Heather C](#)
Subject: [EXTERNAL] Re: DOI ethics preliminary review
Date: Saturday, January 16, 2021 10:00:27 AM

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Good morning,
See answers below. Happy to connect to answer any questions. I could do 1pm or 4pm today, if that works?

Do you hold any direct or indirect financial interest in Federal lands or resources administered or controlled by the Department?

Not that I am aware of. (b) (6)

I can send along the list if you want to review.

Do you, your spouse and/or minor children retain any claim, permit, lease, small tract entries, or other rights that are granted by the Department in Federal lands?

No

Do you currently serve as an officer, director, trustee, or general partner of any entity not listed on your resume?

I'm on the board of the George Washington Middle School PTA! But I'm guessing that's probably not what you're worried about. So, no.

Please identify your spouse's current employer(s), if applicable.

[Invariant](#)

Are all of your employers for the preceding two calendar years listed on your resume? If not, please provide the name of any employers not on your resume and identify your position with the employer.

I was an adjunct faculty member at American University's Washington Semester Program for the fall of 2019 (Aug-Dec). I taught a Public Law & Society course.

If you provided other personal services to clients (including through your employer), please list all of your clients for the preceding two calendar years, if not already listed on your resume. Please note that personal services can include legal services, consulting services, lobbying services, pro bono, or other uncompensated volunteer activities, etc.

The [State Energy & Environmental Impact Center](#) has entered into attorney/client agreements with several state attorney general offices. I have provided legal advice to some of those offices pursuant to those agreements.

Did you, your employer, or your clients engage with the Department, including any Bureaus or Offices, on matters pending before the Department in the preceding two calendar years? If so, please describe the matters if not already described in your resume.

State attorneys general have filed litigation against DOI and participated in various rulemakings through the comment processes. The State Impact Center has not been a party in any litigation and has not signed any briefs or other litigation filings or any NEPA comments.

On Fri, Jan 15, 2021 at 5:57 PM Garcia, Monica L <monica.garcia@sol.doi.gov> wrote:

Liz,

Hello and good evening! I am the Acting Deputy Director of the Departmental Ethics Office (DEO) in the Office of the Solicitor, U.S. Department of the Interior. The DEO provides ethics services to all employees of the Department, including senior agency leadership. We are working closely with the Agency Review Team on ethics matters related to the upcoming transition.

Your resume was shared with us by the Agency Review Team so we could complete a preliminary ethics review. As part of our review, we ask that you please respond to the questions below:

1. Do you hold any direct or indirect financial interest in Federal lands or resources administered or controlled by the Department?
 - a. If so, please describe.
 - b. Please also review the attached list which identifies certain financial holdings which are prohibited for certain Department employees to hold by statute or supplemental regulation.
 - c. Please note that if you will be working on matters for U.S. Geological Survey, Office of Surface Mining Reclamation and Enforcement, U.S. Bureau of Land Management, Bureau of Ocean Energy Management, Bureau of Safety and Environmental Enforcement, and the Office of Natural Resources Revenue, there may be additional prohibitions that you will need to comply with after appointment, if appointed.
2. Do you, your spouse and/or minor children retain any claim, permit, lease, small tract entries, or other rights that are granted by the Department in Federal lands?
 - a. If so, please describe.
3. Do you currently serve as an officer, director, trustee, or general partner of any entity not listed on your resume?
 - a. If so, please identify and describe your role and position(s), including whether you plan to continue your position(s) after appointment, if appointed.
4. Please identify your spouse's current employer(s), if applicable.
5. Are all of your employers for the preceding two calendar years listed on your resume?
 - a. If not, please provide the name of any employers not on your resume and identify your position with the employer.
6. If you provided other personal services to clients (including through your employer), please list all of your clients for the preceding two calendar years, if not already listed on your resume.

- a. Please note that personal services can include legal services, consulting services, lobbying services, pro bono, or other uncompensated volunteer activities, *etc.*
7. Did you, your employer, or your clients engage with the Department, including any Bureaus or Offices, on matters pending before the Department in the preceding two calendar years?
 - a. If so, please describe the matters if not already described in your resume.

Your responses to these questions will help us to identify whether you will be potentially required to implement significant recusals or require additional consultation outside of the planned onboarding process, if appointed.

Additionally, once we have reviewed your responses to these questions, we would like to schedule a time to follow up and answer any questions that you might have regarding your ethics obligations should you be appointed to a position at the Department. To that end, please let us know which days and times are most convenient for a call. Heather and I will be online this weekend and available for a quick call if you have some availability.

Please do not hesitate to reach out in the interim if we can be of assistance as you prepare responses to the questions above. We look forward to speaking with you. Thank you.

-Monica

Please note: I will be teleworking until further notice

Monica L. Garcia

Acting Deputy Director for Ethics Law & Policy

and Acting Alternate Designated Agency Ethics Official

Departmental Ethics Office | Office of the Solicitor

U.S. Department of the Interior | MIB 5316

(O): (202) 208-0460

(C): (202) 880-4474

Email: monica.garcia@sol.doi.gov

Visit us online at www.doi.gov/ethics

Integrity is Our Mission.

From: [Gottry, Heather C](#)
To: [Elizabeth Klein](#)
Cc: [Garcia, Monica L](#)
Subject: RE: [EXTERNAL] Re: DOI ethics preliminary review
Date: Saturday, January 16, 2021 11:35:00 AM

Liz – Thank you for the quick responses! I will send an invite for a MS Teams video call at 4:00 pm EST today. We look forward to speaking with you. Thanks.

- Heather

Heather C. Gottry
Director & DAEO
Departmental Ethics Office | Office of the Solicitor
U.S. Department of the Interior | MIB 5308
(O) (202) 208-4472
(C) (202) 740-0417
Email: heather.gottry@sol.doi.gov

Visit us online at: www.doi.gov/ethics

Integrity is our mission.

From: Elizabeth Klein <lizjohnsonklein@gmail.com>
Sent: Saturday, January 16, 2021 10:00 AM
To: Garcia, Monica L <monica.garcia@sol.doi.gov>
Cc: Gottry, Heather C <heather.gottry@sol.doi.gov>
Subject: [EXTERNAL] Re: DOI ethics preliminary review

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Good morning,

See answers below. Happy to connect to answer any questions. I could do 1pm or 4pm today, if that works?

Do you hold any direct or indirect financial interest in Federal lands or resources administered or controlled by the Department?

Not that I am aware of: (b) (6) |
I can send along the list if you want to review.

Do you, your spouse and/or minor children retain any claim, permit, lease, small tract entries, or other rights that are granted by the Department in Federal lands?

No

Do you currently serve as an officer, director, trustee, or general partner of any entity not listed on your resume?

I'm on the board of the George Washington Middle School PTA! But I'm guessing that's probably not what you're worried about. So, no.

Please identify your spouse's current employer(s), if applicable.

[Invariant](#)

Are all of your employers for the preceding two calendar years listed on your resume? If not, please provide the name of any employers not on your resume and identify your position with the employer.

I was an adjunct faculty member at American University's Washington Semester Program for the fall of 2019 (Aug-Dec). I taught a Public Law & Society course.

If you provided other personal services to clients (including through your employer), please list all of your clients for the preceding two calendar years, if not already listed on your resume. Please note that personal services can include legal services, consulting services, lobbying services, pro bono, or other uncompensated volunteer activities, etc.

The [State Energy & Environmental Impact Center](#) has entered into attorney/client agreements with several state attorney general offices. I have provided legal advice to some of those offices pursuant to those agreements.

Did you, your employer, or your clients engage with the Department, including any Bureaus or Offices, on matters pending before the Department in the preceding two calendar years? If so, please describe the matters if not already described in your resume.

State attorneys general have filed litigation against DOI and participated in various rulemakings through the comment processes. The State Impact Center has not been a party in any litigation and has not signed any briefs or other litigation filings or any NEPA comments.

On Fri, Jan 15, 2021 at 5:57 PM Garcia, Monica L <monica.garcia@sol.doi.gov> wrote:

Liz,

Hello and good evening! I am the Acting Deputy Director of the Departmental Ethics Office (DEO) in the Office of the Solicitor, U.S. Department of the Interior. The DEO provides ethics services to all employees of the Department, including senior agency leadership. We are working closely with the Agency Review Team on ethics matters related to the upcoming transition.

Your resume was shared with us by the Agency Review Team so we could complete a preliminary ethics review. As part of our review, we ask that you please respond to the questions below:

1. Do you hold any direct or indirect financial interest in Federal lands or resources administered or controlled by the Department?
 - a. If so, please describe.
 - b. Please also review the attached list which identifies certain financial holdings which are prohibited for certain Department employees to hold by statute or supplemental regulation.

- c. Please note that if you will be working on matters for U.S. Geological Survey, Office of Surface Mining Reclamation and Enforcement, U.S. Bureau of Land Management, Bureau of Ocean Energy Management, Bureau of Safety and Environmental Enforcement, and the Office of Natural Resources Revenue, there may be additional prohibitions that you will need to comply with after appointment, if appointed.
2. Do you, your spouse and/or minor children retain any claim, permit, lease, small tract entries, or other rights that are granted by the Department in Federal lands?
 - a. If so, please describe.
3. Do you currently serve as an officer, director, trustee, or general partner of any entity not listed on your resume?
 - a. If so, please identify and describe your role and position(s), including whether you plan to continue your position(s) after appointment, if appointed.
4. Please identify your spouse's current employer(s), if applicable.
5. Are all of your employers for the preceding two calendar years listed on your resume?
 - a. If not, please provide the name of any employers not on your resume and identify your position with the employer.
6. If you provided other personal services to clients (including through your employer), please list all of your clients for the preceding two calendar years, if not already listed on your resume.
 - a. Please note that personal services can include legal services, consulting services, lobbying services, pro bono, or other uncompensated volunteer activities, *etc.*
7. Did you, your employer, or your clients engage with the Department, including any Bureaus or Offices, on matters pending before the Department in the preceding two calendar years?
 - a. If so, please describe the matters if not already described in your resume.

Your responses to these questions will help us to identify whether you will be potentially required to implement significant recusals or require additional consultation outside of the planned onboarding process, if appointed.

Additionally, once we have reviewed your responses to these questions, we would like to schedule a time to follow up and answer any questions that you might have regarding your ethics obligations should you be appointed to a position at the Department. To that end, please let us know which days and times are most convenient for a call. Heather and I will be online this weekend and available for a quick call if you have some availability.

Please do not hesitate to reach out in the interim if we can be of assistance as you prepare responses to the questions above. We look forward to speaking with you. Thank you.

-Monica

Please note: I will be teleworking until further notice

Monica L. Garcia
Acting Deputy Director for Ethics Law & Policy
and Acting Alternate Designated Agency Ethics Official

Departmental Ethics Office | Office of the Solicitor
U.S. Department of the Interior | MIB 5316
(O): (202) 208-0460
(C): (202) 880-4474
Email: monica.garcia@sol.doi.gov

Visit us online at www.doi.gov/ethics

Integrity is Our Mission.

From: [Salotti, Christopher](#)
To: [Gottry, Heather C](#)
Cc: [Garcia, Monica L](#); [Gray, Morgan](#)
Subject: Liz Klein"s paperwork ...
Date: Friday, February 19, 2021 2:16:34 PM
Attachments: [Klein draft senr questionnaire ver 2.18.21 review.docx](#)

Hi Heather and Monica -

Liz mentioned that there was the possibility that OGE would preclear her ethics paperwork today - what are you hearing about that?

Also, I'm attaching a draft copy of her committee questionnaire that we've been working on with her. There is nothing out of the ordinary on this form, but I wanted to make sure you saw it for a brief check against your documents!

Thanks, and let me know your thoughts.

Chris

From: [Gottry, Heather C](#)
To: [Margaret E. Yukins](#)
Cc: [Stephanie Nonluecha](#); [Garcia, Monica L](#)
Subject: RE: [EXTERNAL] Elizabeth Klein Second Round Review Questions - [Message and attachment(s) contain CUI]
Date: Friday, February 12, 2021 12:54:28 PM
Attachments: [DOI Responses - Klein Second Round Review Questions \(2.11.21\).docx](#)

Margaret – Hello! Thank you again for taking the time to speak with us yesterday. Attached please find responses to the Second Round Review Questions. If helpful, we can also provide a copy of her husband's current client list. We are still assessing the 502 recusal and welcome the opportunity to review the samples we discussed. Please do not hesitate to reach out with any questions or if we can be of any assistance. Thanks and hope you have a great weekend!

- Heather

From: Margaret E. Yukins <meyukins@oge.gov>
Sent: Wednesday, February 10, 2021 6:15 PM
To: Gottry, Heather C <heather.gottry@sol.doi.gov>
Cc: Stephanie Nonluecha <snonlue@oge.gov>; Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: RE: [EXTERNAL] Elizabeth Klein Second Round Review Questions - [Message and attachment(s) contain CUI]

Hi Heather,

Both Stephanie and I are free tomorrow any time after 11:00 am and all day Friday. Let us know when works for you.

Thanks,
Margaret

From: Gottry, Heather C [<mailto:heather.gottry@sol.doi.gov>]
Sent: Wednesday, February 10, 2021 2:29 PM
To: Margaret E. Yukins <meyukins@oge.gov>
Cc: Stephanie Nonluecha <snonlue@oge.gov>; Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: RE: [EXTERNAL] Elizabeth Klein Second Round Review Questions - [Message and attachment(s) contain CUI]

Margaret – Hello! We will review and circle back with responses. Would you and Stephanie like to schedule a call to discuss our thinking on a possible 502 authorization? If so, what times work tomorrow and Friday? Many thanks.

- Heather

Heather C. Gottry
Director & DAEO
Departmental Ethics Office | Office of the Solicitor
U.S. Department of the Interior | MIB 5308
(O) (202) 208-4472
(C) (202) 740-0417
Email: heather.gottry@sol.doi.gov

Visit us online at: www.doi.gov/ethics

Integrity is our mission.

From: Margaret E. Yukins <meyukins@oge.gov>

Sent: Wednesday, February 10, 2021 12:47 PM

To: Gottry, Heather C <heather.gottry@sol.doi.gov>; Garcia, Monica L <monica.garcia@sol.doi.gov>

Cc: Stephanie Nonluecha <snonlue@oge.gov>

Subject: [EXTERNAL] Elizabeth Klein Second Round Review Questions - [Message and attachment(s) contain CUI]

<p>This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.</p>
--

CONTROLLED

Email and attachment(s) contain CUI.

Hi Heather and Monica,

Attached are the second round review questions for Elizabeth Klein's 278 report. Please do not hesitate to reach out should you have any questions or concerns.

Best regards,

Margaret

Margaret Dylus-Yukins
Assistant Counsel
Ethics Law & Policy Branch
International Assistance & Outreach Program
U.S. Office of Government Ethics
(202) 482-9222
meyukins@oge.gov <<mailto:meyukins@oge.gov>>
Pronouns: she/her

OGC 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: [Margaret E. Yukins](#)
To: [Gottry, Heather C](#)
Cc: [Stephanie Nonluecha](#); [Garcia, Monica L](#)
Subject: RE: [EXTERNAL] Elizabeth Klein Second Round Review Questions - [Message and attachment(s) contain CUI]
Date: Friday, February 12, 2021 1:01:02 PM

Thank you Heather! Stephanie and I are still putting together a samples list, but plan to get that over to you soon.

From: Gottry, Heather C [mailto:heather.gottry@sol.doi.gov]
Sent: Friday, February 12, 2021 12:54 PM
To: Margaret E. Yukins <meyukins@oge.gov>
Cc: Stephanie Nonluecha <snonlue@oge.gov>; Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: RE: [EXTERNAL] Elizabeth Klein Second Round Review Questions - [Message and attachment(s) contain CUI]

Margaret – Hello! Thank you again for taking the time to speak with us yesterday. Attached please find responses to the Second Round Review Questions. If helpful, we can also provide a copy of her husband's current client list. We are still assessing the 502 recusal and welcome the opportunity to review the samples we discussed. Please do not hesitate to reach out with any questions or if we can be of any assistance. Thanks and hope you have a great weekend!

- Heather

From: Margaret E. Yukins <meyukins@oge.gov>
Sent: Wednesday, February 10, 2021 6:15 PM
To: Gottry, Heather C <heather.gottry@sol.doi.gov>
Cc: Stephanie Nonluecha <snonlue@oge.gov>; Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: RE: [EXTERNAL] Elizabeth Klein Second Round Review Questions - [Message and attachment(s) contain CUI]

Hi Heather,

Both Stephanie and I are free tomorrow any time after 11:00 am and all day Friday. Let us know when works for you.

Thanks,
Margaret

From: Gottry, Heather C [mailto:heather.gottry@sol.doi.gov]
Sent: Wednesday, February 10, 2021 2:29 PM
To: Margaret E. Yukins <meyukins@oge.gov>
Cc: Stephanie Nonluecha <snonlue@oge.gov>; Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: RE: [EXTERNAL] Elizabeth Klein Second Round Review Questions - [Message and attachment(s) contain CUI]

Margaret – Hello! We will review and circle back with responses. Would you and Stephanie like to schedule a call to discuss our thinking on a possible 502 authorization? If so, what times work

From: [Gottry, Heather C](#)
To: [Margaret E. Yukins](#)
Cc: [Stephanie Nonluecha](#); [Garcia, Monica L](#)
Subject: RE: [EXTERNAL] Elizabeth Klein Second Round Review Questions - [Message and attachment(s) contain CUI]
Date: Friday, February 12, 2021 12:54:28 PM
Attachments: [DOI Responses - Klein Second Round Review Questions \(2.11.21\).docx](#)

Margaret – Hello! Thank you again for taking the time to speak with us yesterday. Attached please find responses to the Second Round Review Questions. If helpful, we can also provide a copy of her husband's current client list. We are still assessing the 502 recusal and welcome the opportunity to review the samples we discussed. Please do not hesitate to reach out with any questions or if we can be of any assistance. Thanks and hope you have a great weekend!

- Heather

From: Margaret E. Yukins <meyukins@oge.gov>
Sent: Wednesday, February 10, 2021 6:15 PM
To: Gottry, Heather C <heather.gottry@sol.doi.gov>
Cc: Stephanie Nonluecha <snonlue@oge.gov>; Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: RE: [EXTERNAL] Elizabeth Klein Second Round Review Questions - [Message and attachment(s) contain CUI]

Hi Heather,

Both Stephanie and I are free tomorrow any time after 11:00 am and all day Friday. Let us know when works for you.

Thanks,
Margaret

From: Gottry, Heather C [<mailto:heather.gottry@sol.doi.gov>]
Sent: Wednesday, February 10, 2021 2:29 PM
To: Margaret E. Yukins <meyukins@oge.gov>
Cc: Stephanie Nonluecha <snonlue@oge.gov>; Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: RE: [EXTERNAL] Elizabeth Klein Second Round Review Questions - [Message and attachment(s) contain CUI]

Margaret – Hello! We will review and circle back with responses. Would you and Stephanie like to schedule a call to discuss our thinking on a possible 502 authorization? If so, what times work tomorrow and Friday? Many thanks.

- Heather

Heather C. Gottry
Director & DAEO
Departmental Ethics Office | Office of the Solicitor
U.S. Department of the Interior | MIB 5308
(O) (202) 208-4472
(C) (202) 740-0417
Email: heather.gottry@sol.doi.gov

Visit us online at: www.doi.gov/ethics

Integrity is our mission.

From: Margaret E. Yukins <meyukins@oge.gov>

Sent: Wednesday, February 10, 2021 12:47 PM

To: Gottry, Heather C <heather.gottry@sol.doi.gov>; Garcia, Monica L <monica.garcia@sol.doi.gov>

Cc: Stephanie Nonluecha <snonlue@oge.gov>

Subject: [EXTERNAL] Elizabeth Klein Second Round Review Questions - [Message and attachment(s) contain CUI]

<p>This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.</p>
--

CONTROLLED

Email and attachment(s) contain CUI.

Hi Heather and Monica,

Attached are the second round review questions for Elizabeth Klein's 278 report. Please do not hesitate to reach out should you have any questions or concerns.

Best regards,

Margaret

Margaret Dylus-Yukins
Assistant Counsel
Ethics Law & Policy Branch
International Assistance & Outreach Program
U.S. Office of Government Ethics
(202) 482-9222
meyukins@oge.gov <<mailto:meyukins@oge.gov>>
Pronouns: she/her

OGC 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: [Margaret E. Yukins](#)
To: [Gottry, Heather C](#)
Cc: [Stephanie Nonluecha](#); [Garcia, Monica L](#)
Subject: RE: [EXTERNAL] Elizabeth Klein Second Round Review Questions - [Message and attachment(s) contain CUI]
Date: Friday, February 12, 2021 1:01:02 PM

Thank you Heather! Stephanie and I are still putting together a samples list, but plan to get that over to you soon.

From: Gottry, Heather C [mailto:heather.gottry@sol.doi.gov]
Sent: Friday, February 12, 2021 12:54 PM
To: Margaret E. Yukins <meyukins@oge.gov>
Cc: Stephanie Nonluecha <snonlue@oge.gov>; Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: RE: [EXTERNAL] Elizabeth Klein Second Round Review Questions - [Message and attachment(s) contain CUI]

Margaret – Hello! Thank you again for taking the time to speak with us yesterday. Attached please find responses to the Second Round Review Questions. If helpful, we can also provide a copy of her husband's current client list. We are still assessing the 502 recusal and welcome the opportunity to review the samples we discussed. Please do not hesitate to reach out with any questions or if we can be of any assistance. Thanks and hope you have a great weekend!

- Heather

From: Margaret E. Yukins <meyukins@oge.gov>
Sent: Wednesday, February 10, 2021 6:15 PM
To: Gottry, Heather C <heather.gottry@sol.doi.gov>
Cc: Stephanie Nonluecha <snonlue@oge.gov>; Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: RE: [EXTERNAL] Elizabeth Klein Second Round Review Questions - [Message and attachment(s) contain CUI]

Hi Heather,

Both Stephanie and I are free tomorrow any time after 11:00 am and all day Friday. Let us know when works for you.

Thanks,
Margaret

From: Gottry, Heather C [mailto:heather.gottry@sol.doi.gov]
Sent: Wednesday, February 10, 2021 2:29 PM
To: Margaret E. Yukins <meyukins@oge.gov>
Cc: Stephanie Nonluecha <snonlue@oge.gov>; Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: RE: [EXTERNAL] Elizabeth Klein Second Round Review Questions - [Message and attachment(s) contain CUI]

Margaret – Hello! We will review and circle back with responses. Would you and Stephanie like to schedule a call to discuss our thinking on a possible 502 authorization? If so, what times work

From: [Gottry, Heather C](#)
To: [Hammer, Christine A](#)
Cc: [Garcia, Monica L](#)
Subject: FW: Biden Administration Ethics Pledge
Date: Sunday, January 24, 2021 12:32:02 PM
Attachments: [Biden Administration Ethics Pledge.pdf](#)

Hello! Attached is another Ethics Pledge form for your records. Thanks.

From: Klein, Elizabeth A <Elizabeth_Klein@ios.doi.gov>
Sent: Saturday, January 23, 2021 4:05 PM
To: Gottry, Heather C <heather.gottry@sol.doi.gov>
Subject: RE: Biden Administration Ethics Pledge

Attached please find my signed pledge.

Thanks,
Liz

From: Gottry, Heather C <heather.gottry@sol.doi.gov>
Sent: Friday, January 22, 2021 4:10 PM
To: Anderson, Robert T <robert_anderson@ios.doi.gov>; Annatoyn, Travis J <travis_annotoyn@ios.doi.gov>; Bledsoe Downes, Ann Marie <ann_bledsoedownes@ios.doi.gov>; Castro, Maria J <maria_castro@ios.doi.gov>; Cherry, Tyler A <tyler_cherry@ios.doi.gov>; Daniel-Davis, Laura E <laura_daniel-davis@ios.doi.gov>; Estenoz, Shannon A <shannon_estenoz@ios.doi.gov>; Gray, Leslie (Morgan) <Leslie_Morgan_Gray@ios.doi.gov>; Jain, Ruchi <ruchi_jain@ios.doi.gov>; Kelly, Katherine P <Kate_Kelly@ios.doi.gov>; Klein, Elizabeth A <Elizabeth_Klein@ios.doi.gov>; Knodel, Marissa S <marissa_knodel@ios.doi.gov>; Alonso, Shantha R <shantha_alonso@ios.doi.gov>; Rezaeerod, Paniz <paniz_rezaeerod@ios.doi.gov>; Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>; Schwartz, Melissa A <melissa_schwartz@ios.doi.gov>; Taylor, Rachael S <rachael_taylor@ios.doi.gov>; Thompson, Margrette (Maggie) K <margrette_thompson@ios.doi.gov>; Touton, Camille (Calimlim) C <mariacamille_touton@ios.doi.gov>; Trujillo, Tanya M <tanya_trujillo@ios.doi.gov>; Van Der Heide Escobar, Jennifer <jennifer_vanderheideescobar@ios.doi.gov>; Wallace, Andrew G <andrew_wallace@ios.doi.gov>; Welles, Caroline R <caroline_welles@ios.doi.gov>; Williams, Martha M <martha_williams@ios.doi.gov>; Robert Anderson <boba@uw.edu>; Travis Annatoyn <travis.annotoyn@gmail.com>; Ann Marie Bledsoe Downes <downes8687@msn.com>; Maria Castro <mariajcastro.biz@gmail.com>; Tyler Cherry <tycherryv@gmail.com>; Laura Daniel Davis <lauradanieldavis1@gmail.com>; Shannon Estenoz <shannonestenoz@gmail.com>; Morgan Gray <gray.morgan@gmail.com>; Ruchi Jain <ruchi.jain1@gmail.com>; Kate Kelly <kate.pierson.kelly@gmail.com>; Elizabeth Klein <lizjohnsonklein@gmail.com>; Marissa Knodel <marissak04@gmail.com>; Shantha Ready <shantha.ready@gmail.com>; Paniz Rezaeerod <prezaeerod@gmail.com>; Alexandra Sanchez <alexandrasanchezresearch@gmail.com>; Melissa Schwartz <melissaannschwartz@gmail.com>; Rachael Sullivan Taylor <rachaelstaylor@yahoo.com>; Maggie Thompson <margrettethompson@gmail.com>; camille.touton@gmail.com; ttcava@gmail.com; jcvandy4@gmail.com; drewwallace2000@gmail.com; crwelles@gmail.com;

mmcolhoun@gmail.com

Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>; Sharrow, Michelle P <michelle.sharrow@sol.doi.gov>; Hammer, Christine A <christine.hammer@sol.doi.gov>

Subject: Biden Administration Ethics Pledge

Good afternoon!

On his first day in office, President Biden issued Executive Order 13989, [Ethics Commitments by Executive Branch Personnel](#). This Executive Order requires all appointees in each executive agency appointed on or after January 20, 2021, to sign an **Ethics Pledge**. Earlier today, the U.S. Office of Government Ethics issued the attached **Ethics Pledge** and we are forwarding it to you for your review and signature.

Please sign and return the attached Ethics Pledge to us as your earliest convenience, but by no later than (b) (3) (A)

As quick summary, by signing the **Ethics Pledge**, you are committing to:

- Not accepting any salary or other cash payment from a former employer to the extent that the eligibility for and payment of such payment is limited to individuals accepting a position in the U.S. Government;
- For two (2) years, not participating in any particular matter involving specific parties (including meetings or other communication) that is directly and substantially related to your former employer(s) or former client(s) within two years prior to the date of your appointment, including regulations and contracts;
- Not accepting gifts from registered lobbyists or lobbying organizations for the duration of your service as an appointee;
- Making hiring or other employment decisions based on the candidate's qualifications, competence, and experience;
- If you were a lobbyist registered under the Lobbying Disclosure Act (LDA) within the two years prior to your date of appointment, not participating in certain particular matters or specific issue areas with which you lobbied, and not seeking or accepting employment with any executive agency with respect to which you lobbied;
- If you were a lobbyist registered under the Foreign Agents Registration Act (FARA) within the two years prior to your date of appointment, not participating in any particular matter on which you engaged in registrable activity, participating in certain particular matters or specific issue areas with which you engaged in registrable activity, and not seeking or accepting employment with any executive agency with respect to which you engaged in registrable activity; or
- If you are a very senior or senior employee when you depart Government service, then for a period of one (1) year following the end of your appointment, not materially assisting others in making communications or appearances that you are prohibited from undertaking yourself by (a) holding yourself out as being available to engage in lobbying activities in support of any such communications or appearances; or (b) engaging in any such lobbying activities.

We will provide further training on the requirements of the Ethics Pledge in your initial ethics training session next week. In the interim, please do not hesitate to contact us if you would like additional guidance on the application of the Ethics Pledge to your particular circumstances.

Finally, please note that we are sending this message to both your official and personal email addresses in the event that you do not yet have access to your official email account.

Thank you.

- Heather

Heather C. Gottry
Director & DAEO
Departmental Ethics Office | Office of the Solicitor
U.S. Department of the Interior | MIB 5308
(O) (202) 208-4472
(C) (202) 740-0417
Email: heather.gottry@sol.doi.gov

Visit us online at: www.doi.gov/ethics

Integrity is our mission.

ETHICS PLEDGE

I recognize that this pledge is part of a broader ethics in government plan designed to restore and maintain public trust in government, and I commit myself to conduct consistent with that plan. I commit to decision-making on the merits and exclusively in the public interest, without regard to private gain or personal benefit. I commit to conduct that upholds the independence of law enforcement and precludes improper interference with investigative or prosecutorial decisions of the Department of Justice. I commit to ethical choices of post-Government employment that do not raise the appearance that I have used my Government service for private gain, including by using confidential information acquired and relationships established for the benefit of future clients.

Accordingly, as a condition, and in consideration, of my employment in the United States Government in a position invested with the public trust, I commit myself to the following obligations, which I understand are binding on me and are enforceable under law:

1. *Lobbyist Gift Ban.* I will not accept gifts from registered lobbyists or lobbying organizations for the duration of my service as an appointee.
2. *Revolving Door Ban — All Appointees Entering Government.* I will not for a period of 2 years from the date of my appointment participate in any particular matter involving specific parties that is directly and substantially related to my former employer or former clients, including regulations and contracts.
3. *Revolving Door Ban — Lobbyists and Registered Agents Entering Government.* If I was registered under the Lobbying Disclosure Act, 2 U.S.C. 1601 *et seq.*, or the Foreign Agents Registration Act (FARA), 22 U.S.C. 611 *et seq.*, within the 2 years before the date of my appointment, in addition to abiding by the limitations of paragraph 2, I will not for a period of 2 years after the date of my appointment:
 - (a) participate in any particular matter on which I lobbied, or engaged in registrable activity under FARA, within the 2 years before the date of my appointment;
 - (b) participate in the specific issue area in which that particular matter falls; or
 - (c) seek or accept employment with any executive agency with respect to which I lobbied, or engaged in registrable activity under FARA, within the 2 years before the date of my appointment.
4. *Revolving Door Ban — Appointees Leaving Government.* If, upon my departure from the Government, I am covered by the post-employment restrictions on communicating with employees of my former executive agency set forth in section 207(c) of title 18, United States Code, and its implementing regulations, I agree that I will abide by those restrictions for a period of 2 years following the end of my appointment. I will abide by these same restrictions with respect to communicating with the senior White House staff.
5. *Revolving Door Ban — Senior and Very Senior Appointees Leaving Government.* If, upon my departure from the Government, I am covered by the post-employment restrictions set forth in sections 207(c) or 207(d) of title 18, United States Code, and those sections' implementing regulations, I agree that, in addition, for a period of 1 year following the end of my appointment, I will not materially assist others in making communications or appearances that I am prohibited from undertaking myself by (a) holding myself out as being available to engage in lobbying activities in support of any such communications or appearances; or (b) engaging in any such lobbying activities.
6. *Revolving Door Ban — Appointees Leaving Government to Lobby.* In addition to abiding by the limitations of paragraph 4, I also agree, upon leaving Government service, not to lobby any covered executive branch official or non-career Senior Executive Service appointee, or engage in any activity on behalf of any foreign government or foreign political party which, were it undertaken on January 20, 2021, would require that I register under FARA, for the remainder of the Administration or 2 years following the end of my appointment, whichever is later.
7. *Golden Parachute Ban.* I have not accepted and will not accept, including after entering Government, any salary or other cash payment from my former employer the eligibility for and payment of which is limited to individuals accepting a position in the United States Government. I also have not accepted and will not accept any non-cash benefit from my former employer that is provided in lieu of such a prohibited cash payment.
8. *Employment Qualification Commitment.* I agree that any hiring or other employment decisions I make will be based on the candidate's qualifications, competence, and experience.
9. *Assent to Enforcement.* I acknowledge that the Executive Order entitled "Ethics Commitments by Executive Branch Personnel," issued by the President on January 20, 2021, which I have read before signing this document, defines certain of the terms applicable to the foregoing obligations and sets forth the methods for enforcing them. I expressly accept the provisions of that Executive Order as a part of this agreement and as binding on me. I understand that the terms of this pledge are in addition to any statutory or other legal restrictions applicable to me by virtue of Federal Government service.

Jan 23, 2021
Date

Signature

Name (Type or Print): Elizabeth Klein

From: [Gottry, Heather C](#)
To: [Klein, Elizabeth A](#)
Cc: [Garcia, Monica L](#)
Subject: Draft Interim Ethics Guidance Memorandum
Date: Monday, January 25, 2021 2:46:25 PM
Attachments: [Interim Ethics Recusal Memo - Klein \(Draft for Review 01.25.21\).docx](#)
[Attachment A to Interim Ethics Guidance Memorandum.docx](#)
[Attachment B to Interim Ethics Guidance Memorandum.docx](#)

Liz – Hello! As promised during our discussion before you onboarded, we have drafted a memorandum for your consideration that provides interim ethics guidance on your recusals.

The draft memorandum was developed using information included on your resume, your responses to our preliminary questions, and our notes from our discussion before you onboarded. As a result, we recognize that it may need to be updated further before it is finalized.

At your convenience, can you please review the draft memorandum? Once you have reviewed, we would like to schedule some time to walk through the recusals discussed in the attached memorandum. You are in the best position to know and identify your personal and imputed financial interests, your “covered relationships,” and your former employers and clients as defined in the Ethics Pledge, and we want to make sure that we have captured all relevant information.

Please let us know how best to find a convenient time on your schedule for us to discuss. Time permitting, we can also discuss during our meeting on financial disclosure tomorrow morning. We greatly appreciate your time and attention and hope that the draft memorandum provides helpful guidance on your recusals. Thank you.

- Heather

Heather C. Gottry
Director & DAEO
Departmental Ethics Office | Office of the Solicitor
U.S. Department of the Interior | MIB 5308
(O) (202) 208-4472
(C) (202) 740-0417
Email: heather.gottry@sol.doi.gov

Visit us online at: www.doi.gov/ethics

Integrity is our mission.

Attachment A

Guidance for Recusal Analysis

To determine whether you may participate in a given matter, you must first determine whether that “matter” is a broad policy directed to the interests of a large and diverse group of persons or one of the two types of “particular matters” -- a “particular matter of general applicability” or a “particular matter involving specific parties.”

In the context of the ethics rules, the unmodified term “matter” refers to virtually all Government work. It includes the consideration of broad policy options that are directed to the interests of a large and diverse group of persons. For instance, health and safety regulations applicable to all employers or a legislative proposal for tax reform. It also includes more narrowly defined “particular matters.”

The term “particular matter” means only matters that involve deliberation, decision, or action that is focused on the interests of (1) specific persons or (2) a discrete and identifiable class of persons. These two types of particular matters are defined separately as “particular matters involving specific parties” and “particular matters of general applicability.” (See diagram on page 2 of this Attachment.)

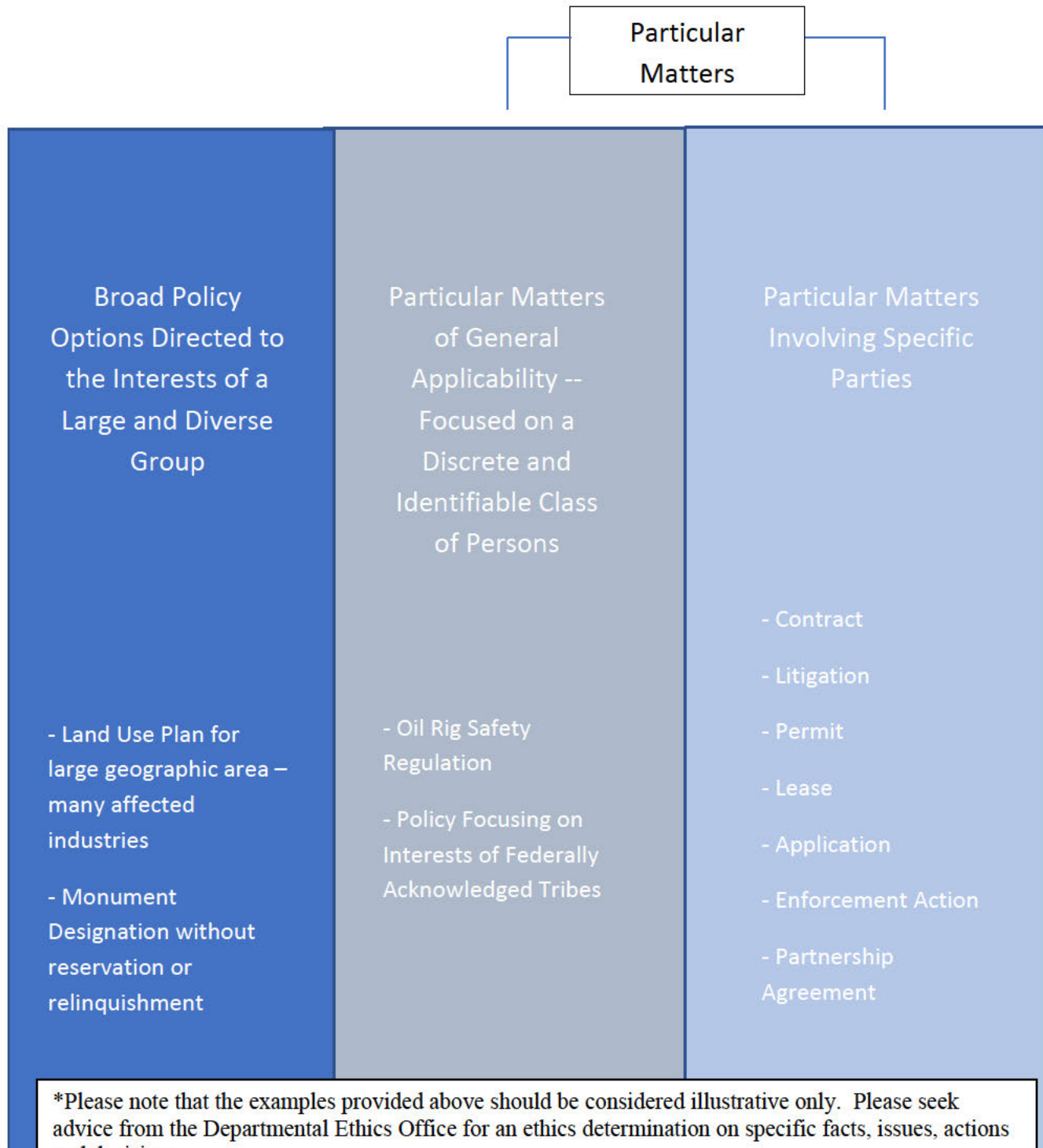
A “particular matter involving specific parties” typically involves a specific proceeding affecting the legal rights of the parties, or an isolatable transaction or related set of transactions between identified parties. Examples include contracts, grants, licenses, investigations, litigation, and partnership agreements. This is the narrowest type of matter.

A “particular matter of general applicability” does not involve specific parties but at least focuses on the interests of a discrete and identifiable class, such as a particular industry or profession. Examples include rulemaking, legislation, or policymaking of general applicability that affect a particular industry or profession. For instance, a regulation prescribing safety standards for operators of oil rigs in the Gulf of Mexico or a regulation applicable to all those who have grazing permits on DOI public lands. On the other hand, a land use plan covering a large geographic area and affecting a number of industries (*e.g.*, agriculture; grazing; mining; timber; recreation; wind, solar, and/or geothermal power generation; etc.) would not constitute a “particular matter of general applicability” but, rather, would still fall within the broader definition of “matter,” as it constitutes a broad policy directed to the interests of a large and diverse group of persons.

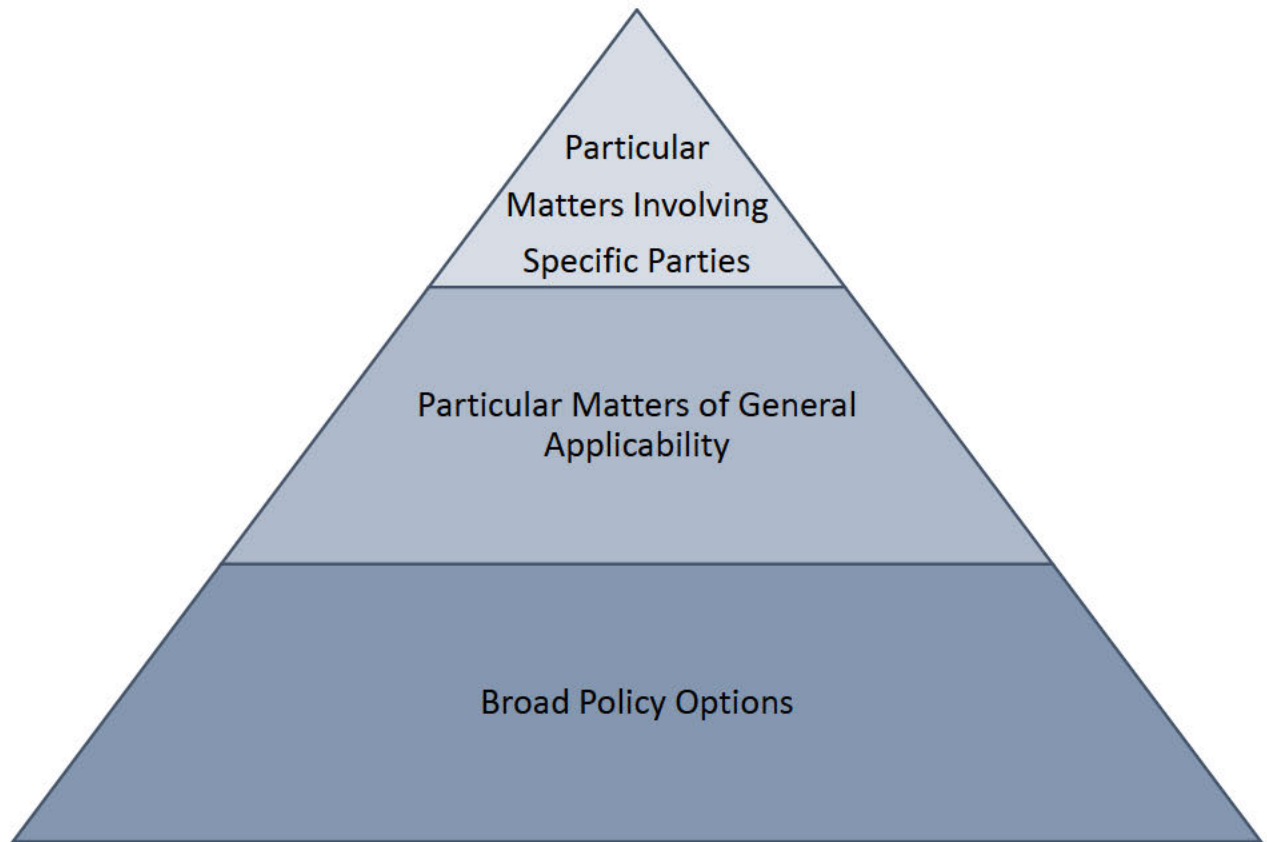
To assist you in complying with his ethics requirements, you and/or your screener must gather sufficient information regarding a matter before the DOI to determine whether the matter constitutes a particular matter involving specific parties or a particular matter of general applicability, or falls into the category of broad policy options that are directed to the interests of

a large and diverse group of persons. Please do not hesitate to contact the DEO with any questions about your recusal obligations discussed above or for further ethics guidance.

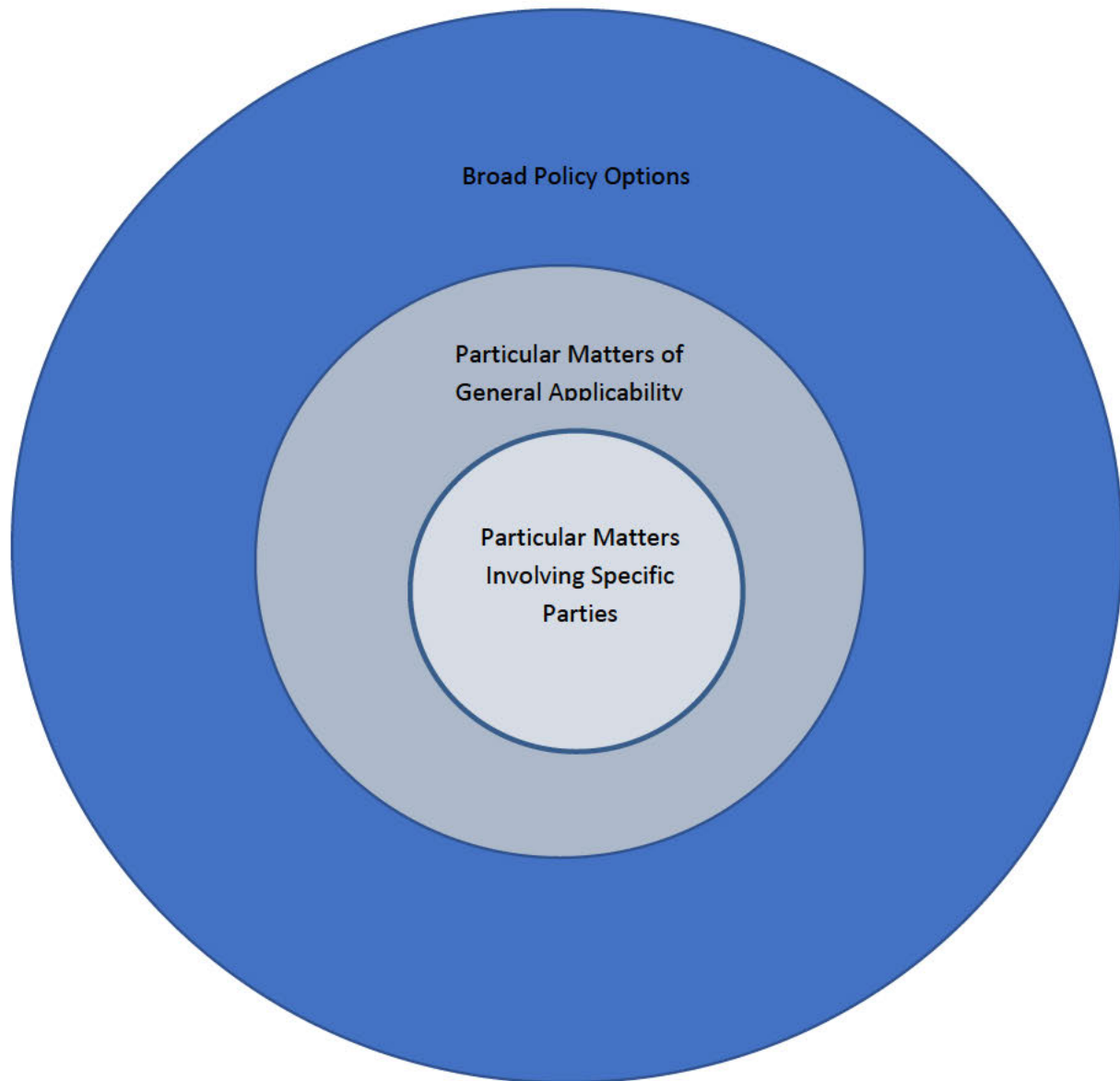
Matters* – Three Types



Three Types of Matters



Three Types of Matters



Attachment B
2021 List of Prohibited Investments



Departmental Ethics Office U.S. Department of the Interior

2021 List of Prohibited Financial Interests for

Office of the Secretary and Office of the Solicitor employees (GS-15 and above) and Office of Natural Resources Revenue employees (at all grades)

The Departmental Ethics Office (DEO) has issued an updated list of prohibited investments for Office of the Secretary and Office of the Solicitor (OS/SOL) employees for 2021. If you are in a **GS-15 or above** position in OS/SOL, this list of prohibited investments applies to you.

This list of prohibited investments also applies to **all** Office of Natural Resources Revenue (ONRR) employees within OS, at all grade levels.

Prohibited investments. All OS/SOL employees GS-15 and above, and all ONRR employees at all grade levels, are prohibited from acquiring or holding “any direct or indirect financial interests in Federal lands or resources administered or controlled by the Department.” Among other things, this prohibition precludes stock or bond investment in many companies that hold Department-granted permits and leases in federal lands.

Each year, ethics officials compile a list of prohibited investments. The 2021 list of prohibited investments is included below and includes investments with oil, gas, solar, wind, geothermal, and mineral rights in federal lands above specified thresholds. Note that many publicly traded companies hold interests in federal lands through private subsidiaries and these subsidiaries are not separately listed. If you have questions about whether investment in certain subsidiaries of publicly traded companies or other privately owned companies is prohibited, please contact an ethics official for additional guidance. Please be aware that the Department’s leasing activity and corporate ownership structures change frequently and this list remains in effect until updated in writing.

What if you have prohibited investments? If you have a prohibited investment, please contact the DEO at once to discuss your options. DOI regulations provide some limited exceptions and waiver authority. If you must sell an investment to comply with ethics laws, you may be able to defer paying capital gains taxes if you obtain a certificate of divestiture from the U.S. Office of Government Ethics **before** you sell.

What if you are GS-14 or below? If you are an OS/SOL employee GS-14 or below, you are not restricted from investing in these companies but if you do so, you must comply with the prohibition on participating in certain government actions affecting your personal financial interests for these and any other investments. Note that the list of prohibited investments applies to all ONRR employees, at all grade levels.

Other supplemental ethics requirements. In addition to complying with all other executive branch ethics requirements, **all** Department employees, their spouses, and their minor children are also prohibited from acquiring or retaining any claim, permit, lease, small tract entries, or other rights that are granted by the Department in Federal lands.

Employees who perform duties or functions under the Surface Mining Control and Reclamation Act of 1977 (SMCRA) are also prohibited from having any interests in underground or surface coal mining operations. If you perform duties or functions under SMCRA, please contact your ethics official for further guidance.

We remain available to provide guidance to assist you in complying with this, and all other, ethics requirements.

Parent Company	Ticker Symbol (NYSE or NASDAQ unless otherwise noted)
AES Corporation	AES
Albemarle Corporation	ALB
Apache Corporation	APA
Arch Resources Incorporated (formerly Arch Coal)	ARCH
Avangrid Incorporated	AGR
Barrick Gold Corporation	GOLD

Berkshire Hathaway Incorporated	BRK.A (Class A) & BRK.B (Class B); & PPWLM on OTC
BHP	BHP & BBL
BP	BP
Brookfield Asset Management Incorporated	BAM
Brookfield Renewable Partners Limited Partnership	BEP
Chesapeake Energy Corporation	CHKAQ on OTC
Chevron Corporation	CVX
Clearway Energy	CWEN
CNOOC Limited	CEO
ConocoPhillips	COP
Crystal Peak Minerals Incorporated	CPMMF on OTC
Devon Energy Corporation	DVN
Dominion Energy Incorporated	D
EDP Renewables SA	EDRVF on OTC
Enel S.p.A.	ENIA
Eni S.p.A.	E
EOG Resources Incorporated	EOG
Eolus Vind	EOLU-B on STO
Equinor ASA	EQNR
Eversource Energy	ES
Exxon Mobil Corporation	XOM
First Solar, Inc.	FSLR

Genesis Energy Limited Partnership	GEL
Grizzly Energy Limited Liability Company	GRZZU on OTC
Hess Corporation	HES
Iberdrola	IBDRY & IBDSF on OTC
Innergex Renewable Energy Incorporated	INGXF on OTC
Intrepid Potash Incorporated	IPI
Itafos	MBCFF on OTC
Kosmos Energy Limited	KOS
Marathon Oil Corporation	MRO
Mosaic Company	MOS
Murphy Oil Corporation	MUR
NextEra Energy Incorporated	NEE
NorthWestern Corporation	NWE
Occidental Petroleum Corporation	OXY
Ormat Technologies Incorporated	ORA
Ørsted AS	DOGEF & DNNGY on OTC
Ovintiv Incorporated (Formerly Encana Corporation)	OVV
Peabody Energy Company	BTU
Royal Dutch Shell	RDS.A (Class A) & RDS.B (Class B)
Solvay SA	SOLVY & SVYSF on OTC
Talos Energy Incorporated	TALO
Tata Chemicals Limited	TATACHEM on NSE
Total SE	TOT

W&T Offshore Incorporated	WTI
WPX Energy Incorporated	WPX

Questions? Please contact an ethics official for more information.

OS/SOL Financial Disclosure Team

- Monica L. Garcia, Financial Disclosure Team Lead, at monica.garcia@sol.doi.gov or (202) 208-0460
- Alisha Avril, Ethics Specialist, at alisha.avril@sol.doi.gov
- Tia Barner, Ethics Specialist, at tia.barner@sol.doi.gov
- Curtis J. Steuber, Attorney Advisor, at curtis.steuber@sol.doi.gov
- LaShanda R. Whaley, Attorney Advisor, at lashanda.whaley@sol.doi.gov

ONRR Deputy Ethics Counselor

- Scott Currie, ONRR Deputy Ethics Counselor at scott.currie@sol.doi.gov or (202) 208-2151

From: [Margaret E. Yukins](#)
To: [Gottry, Heather C](#); [Garcia, Monica L](#)
Cc: [Stephanie Nonluecha](#)
Subject: [EXTERNAL] Elizabeth Klein 278 First Round Review Questions - [Message and attachment(s) contain CUI]
Date: Tuesday, February 2, 2021 2:34:43 PM
Attachments: [Klein_First Round Review Questions.docx](#)
[CUI Coversheet.pdf](#)

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

CONTROLLED

Email and attachment(s) contain CUI.

Hi Heather and Monica,

Attached are the first round review questions for Elizabeth Klein's 278 report. Please feel free to reach out should you have any questions or concerns.

Stephanie Nonluecha (CC'd) will be assisting me in the review of this report.

Best regards,

Margaret

Margaret Dylus-Yukins
Assistant Counsel
Ethics Law & Policy Branch
International Assistance & Outreach Program
U.S. Office of Government Ethics
(202) 482-9222 phone
meyukins@oge.gov <<mailto:meyukins@oge.gov>>
Pronouns: she/her

(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.



CONTROLLED UNCLASSIFIED INFORMATION (CUI)

Use this space to indicate categories/subcategories, special instructions, points of contact, etc., if needed.

The attached document contains CUI that requires protection and safeguarding in a manner that prevents unauthorized disclosure of CUI. (e.g., locked file cabinet, restricted access to CUI, etc.)

If you need additional information regarding the attached document containing CUI, please contact Margaret Yukins at (202) 482-9222 or at meyukins@oge.gov.

ATTENTION

All individuals handling this information are required to protect it from unauthorized disclosure.

Handling, storage, reproduction, and disposition of the attached document(s) must be in accordance with 32 CFR Part 2002 and applicable agency policy.

Access to and dissemination of CUI shall be allowed as necessary and permissible to any individual(s), organization(s), or grouping(s) of users, provided such access or dissemination is consistent with or in furtherance of a Lawful Government Purpose and in a manner consistent with applicable law, regulations, and Government-wide policies.



From: [Gottry, Heather C](#)
To: [Klein, Elizabeth A](#)
Cc: [Garcia, Monica L](#)
Subject: Nominee Financial Disclosure Report
Date: Thursday, February 4, 2021 6:59:36 PM
Attachments: [Klein First Round Review Questions.docx](#)

Liz – Congratulations! We just received notice from the U.S. Office of Government Ethics (OGE) that your Nominee OGE Form 278e, Public Financial Disclosure Report, is ready for our review and we can start the nominee ethics review process.

As part of the process, OGE provided us with a number of first round review questions in the attached document that we would like to discuss once you have had a chance to review. OGE requires that written responses be provided to each request for confirmation or question and we are happy to draft the responses after we touch base.

To that end, we are available when convenient for you to discuss the first round review questions, your Nominee OGE Form 278e, and the nominee ethics review process generally. Please do not hesitate to reach out in the interim if we can be of any assistance. Thank you.

- Heather

Heather C. Gottry
Director & DAEO
Departmental Ethics Office | Office of the Solicitor
U.S. Department of the Interior | MIB 5308
(O) (202) 208-4472
(C) (202) 740-0417
Email: heather.gottry@sol.doi.gov

Visit us online at: www.doi.gov/ethics

Integrity is our mission.

From: [Gottry, Heather C](#)
To: [Klein, Elizabeth A](#)
Cc: [Garcia, Monica L](#)
Subject: Updated Interim Ethics Recusal Guidance Memorandum
Date: Thursday, February 4, 2021 8:27:18 PM
Attachments: [Interim Ethics Recusal Memo - Klein \(Updated Draft for Review 02.04.21\).docx](#)
[Attachment A to Interim Ethics Guidance Memorandum.docx](#)
[Attachment B to Interim Ethics Guidance Memorandum.docx](#)
[Attachment C - Klein Interim Ethics Guidance Memorandum \(Draft for Review 02.04.21\).docx](#)

Liz – Hello again! As promised, attached for your review and consideration please find an updated draft your updated interim ethics recusal guidance memorandum. The updated draft incorporates the information that you kindly provided to us last week regarding your former clients through the State Impact Center and your husband’s current clients.

As I mentioned in my earlier message, we consulted with OGE regarding the scope of your “covered relationship” with your former clients through the State Impact Center for purposes of the recusal in 5 C.F.R. § 2635.502(a). OGE advised that your “covered relationship” extends to the entire state and is not limited to only the Office of the Attorney General. They reached this conclusion based on the high level scope and significant impact that the work of the Office of the Attorney General has in a state. In our discussion, they noted that this analysis was consistent with their approach for former State Attorney Generals who have joined the Executive Branch and were not persuaded that there was a material distinction under 5 C.F.R. § 2635.502(a) between employment and a client relationship. We can brief you further on our discussions with OGE when we meet in the morning.

Since we are now working on your nominee review, I recommend that we closely coordinate your interim ethics guidance memorandum, New Entrant OGE Form 278e (which we have populated in *Integrity*), your Nominee OGE Form 278e, and your ethics agreement. We can discuss next steps further tomorrow.

Thank you and hope you have a great evening!

- Heather

Heather C. Gottry
Director & DAEO
Departmental Ethics Office | Office of the Solicitor
U.S. Department of the Interior | MIB 5308
(O) (202) 208-4472
(C) (202) 740-0417
Email: heather.gottry@sol.doi.gov

Visit us online at: www.doi.gov/ethics

Integrity is our mission.

Attachment A

Guidance for Recusal Analysis

To determine whether you may participate in a given matter, you must first determine whether that “matter” is a broad policy directed to the interests of a large and diverse group of persons or one of the two types of “particular matters” -- a “particular matter of general applicability” or a “particular matter involving specific parties.”

In the context of the ethics rules, the unmodified term “matter” refers to virtually all Government work. It includes the consideration of broad policy options that are directed to the interests of a large and diverse group of persons. For instance, health and safety regulations applicable to all employers or a legislative proposal for tax reform. It also includes more narrowly defined “particular matters.”

The term “particular matter” means only matters that involve deliberation, decision, or action that is focused on the interests of (1) specific persons or (2) a discrete and identifiable class of persons. These two types of particular matters are defined separately as “particular matters involving specific parties” and “particular matters of general applicability.” (See diagram on page 2 of this Attachment.)

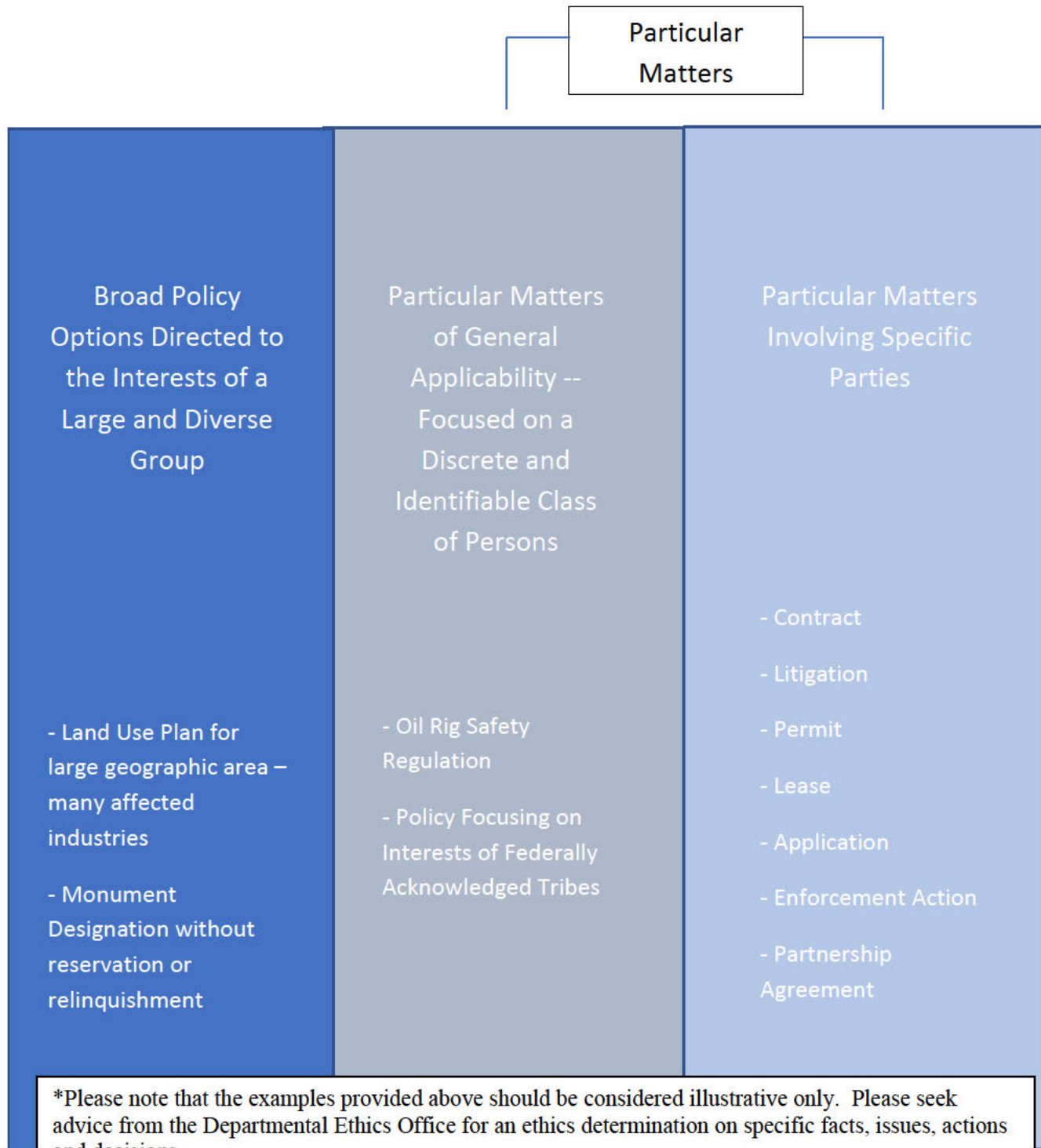
A “particular matter involving specific parties” typically involves a specific proceeding affecting the legal rights of the parties, or an isolatable transaction or related set of transactions between identified parties. Examples include contracts, grants, licenses, investigations, litigation, and partnership agreements. This is the narrowest type of matter.

A “particular matter of general applicability” does not involve specific parties but at least focuses on the interests of a discrete and identifiable class, such as a particular industry or profession. Examples include rulemaking, legislation, or policymaking of general applicability that affect a particular industry or profession. For instance, a regulation prescribing safety standards for operators of oil rigs in the Gulf of Mexico or a regulation applicable to all those who have grazing permits on DOI public lands. On the other hand, a land use plan covering a large geographic area and affecting a number of industries (*e.g.*, agriculture; grazing; mining; timber; recreation; wind, solar, and/or geothermal power generation; etc.) would not constitute a “particular matter of general applicability” but, rather, would still fall within the broader definition of “matter,” as it constitutes a broad policy directed to the interests of a large and diverse group of persons.

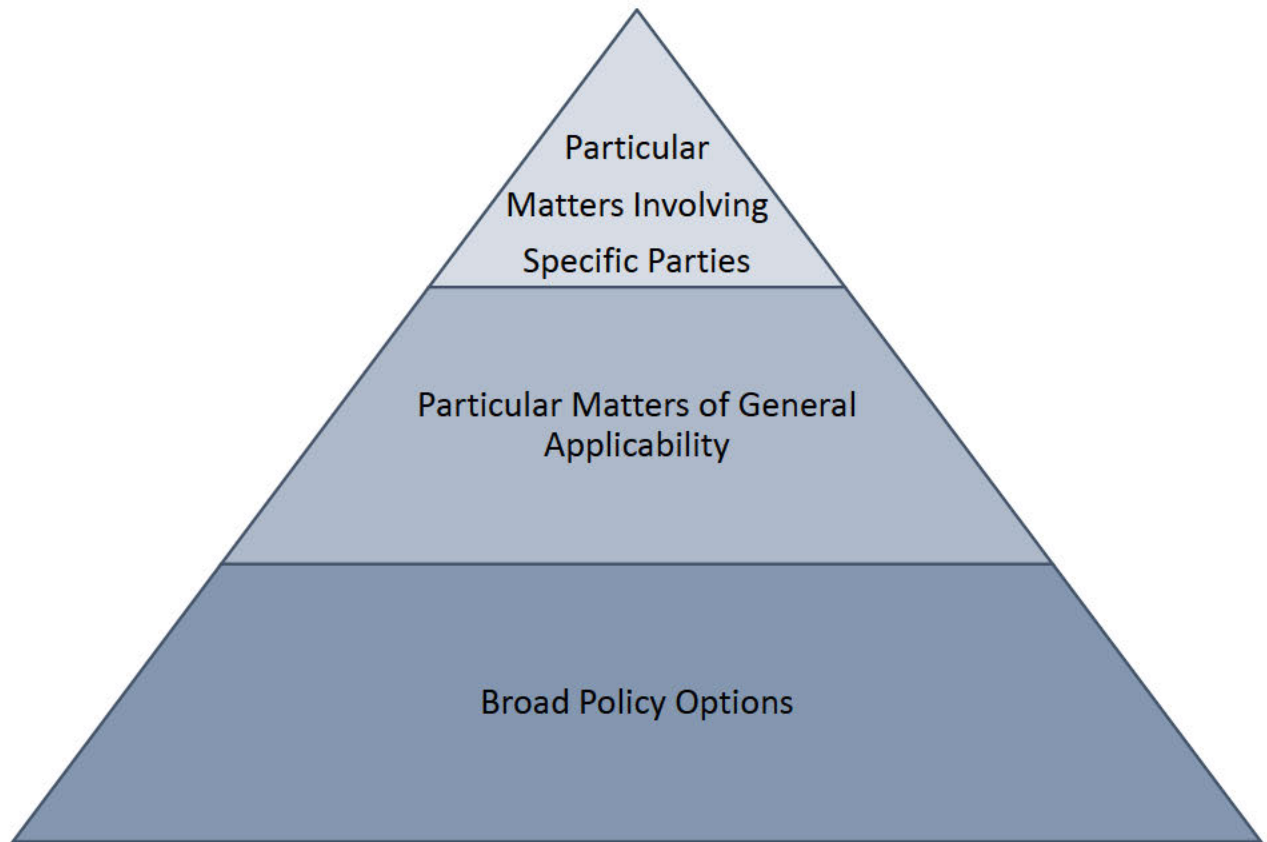
To assist you in complying with his ethics requirements, you and/or your screener must gather sufficient information regarding a matter before the DOI to determine whether the matter constitutes a particular matter involving specific parties or a particular matter of general applicability, or falls into the category of broad policy options that are directed to the interests of

a large and diverse group of persons. Please do not hesitate to contact the DEO with any questions about your recusal obligations discussed above or for further ethics guidance.

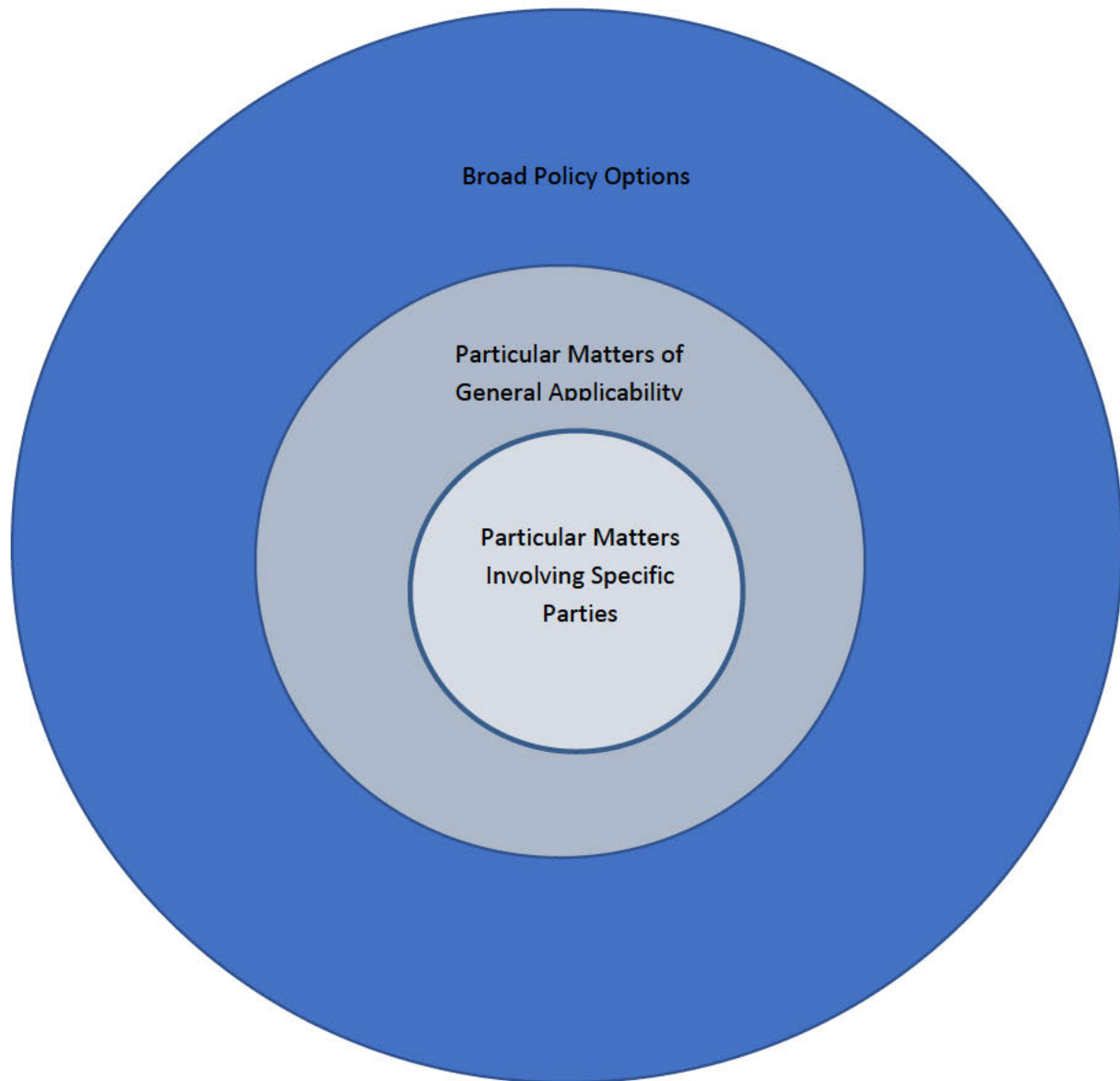
Matters* – Three Types



Three Types of Matters



Three Types of Matters



Attachment B
2021 List of Prohibited Investments



Departmental Ethics Office U.S. Department of the Interior

2021 List of Prohibited Financial Interests for

Office of the Secretary and Office of the Solicitor employees (GS-15 and above) and Office of Natural Resources Revenue employees (at all grades)

The Departmental Ethics Office (DEO) has issued an updated list of prohibited investments for Office of the Secretary and Office of the Solicitor (OS/SOL) employees for 2021. If you are in a **GS-15 or above** position in OS/SOL, this list of prohibited investments applies to you.

This list of prohibited investments also applies to **all** Office of Natural Resources Revenue (ONRR) employees within OS, at all grade levels.

Prohibited investments. All OS/SOL employees GS-15 and above, and all ONRR employees at all grade levels, are prohibited from acquiring or holding “any direct or indirect financial interests in Federal lands or resources administered or controlled by the Department.” Among other things, this prohibition precludes stock or bond investment in many companies that hold Department-granted permits and leases in federal lands.

Each year, ethics officials compile a list of prohibited investments. The 2021 list of prohibited investments is included below and includes investments with oil, gas, solar, wind, geothermal, and mineral rights in federal lands above specified thresholds. Note that many publicly traded companies hold interests in federal lands through private subsidiaries and these subsidiaries are not separately listed. If you have questions about whether investment in certain subsidiaries of publicly traded companies or other privately owned companies is prohibited, please contact an ethics official for additional guidance. Please be aware that the Department’s leasing activity and corporate ownership structures change frequently and this list remains in effect until updated in writing.

What if you have prohibited investments? If you have a prohibited investment, please contact the DEO at once to discuss your options. DOI regulations provide some limited exceptions and waiver authority. If you must sell an investment to comply with ethics laws, you may be able to defer paying capital gains taxes if you obtain a certificate of divestiture from the U.S. Office of Government Ethics **before** you sell.

What if you are GS-14 or below? If you are an OS/SOL employee GS-14 or below, you are not restricted from investing in these companies but if you do so, you must comply with the prohibition on participating in certain government actions affecting your personal financial interests for these and any other investments. Note that the list of prohibited investments applies to all ONRR employees, at all grade levels.

Other supplemental ethics requirements. In addition to complying with all other executive branch ethics requirements, **all** Department employees, their spouses, and their minor children are also prohibited from acquiring or retaining any claim, permit, lease, small tract entries, or other rights that are granted by the Department in Federal lands.

Employees who perform duties or functions under the Surface Mining Control and Reclamation Act of 1977 (SMCRA) are also prohibited from having any interests in underground or surface coal mining operations. If you perform duties or functions under SMCRA, please contact your ethics official for further guidance.

We remain available to provide guidance to assist you in complying with this, and all other, ethics requirements.

Parent Company	Ticker Symbol (NYSE or NASDAQ unless otherwise noted)
AES Corporation	AES
Albemarle Corporation	ALB
Apache Corporation	APA
Arch Resources Incorporated (formerly Arch Coal)	ARCH
Avangrid Incorporated	AGR
Barrick Gold Corporation	GOLD

Berkshire Hathaway Incorporated	BRK.A (Class A) & BRK.B (Class B); & PPWLM on OTC
BHP	BHP & BBL
BP	BP
Brookfield Asset Management Incorporated	BAM
Brookfield Renewable Partners Limited Partnership	BEP
Chesapeake Energy Corporation	CHKAQ on OTC
Chevron Corporation	CVX
Clearway Energy	CWEN
CNOOC Limited	CEO
ConocoPhillips	COP
Crystal Peak Minerals Incorporated	CPMMF on OTC
Devon Energy Corporation	DVN
Dominion Energy Incorporated	D
EDP Renewables SA	EDRVF on OTC
Enel S.p.A.	ENIA
Eni S.p.A.	E
EOG Resources Incorporated	EOG
Eolus Vind	EOLU-B on STO
Equinor ASA	EQNR
Eversource Energy	ES
Exxon Mobil Corporation	XOM
First Solar, Inc.	FSLR

Genesis Energy Limited Partnership	GEL
Grizzly Energy Limited Liability Company	GRZZU on OTC
Hess Corporation	HES
Iberdrola	IBDRY & IBDSF on OTC
Innergex Renewable Energy Incorporated	INGXF on OTC
Intrepid Potash Incorporated	IPI
Itafos	MBCFF on OTC
Kosmos Energy Limited	KOS
Marathon Oil Corporation	MRO
Mosaic Company	MOS
Murphy Oil Corporation	MUR
NextEra Energy Incorporated	NEE
NorthWestern Corporation	NWE
Occidental Petroleum Corporation	OXY
Ormat Technologies Incorporated	ORA
Ørsted AS	DOGEF & DNNGY on OTC
Ovintiv Incorporated (Formerly Encana Corporation)	OVV
Peabody Energy Company	BTU
Royal Dutch Shell	RDS.A (Class A) & RDS.B (Class B)
Solvay SA	SOLVY & SVYSF on OTC
Talos Energy Incorporated	TALO
Tata Chemicals Limited	TATACHEM on NSE
Total SE	TOT

W&T Offshore Incorporated	WTI
WPX Energy Incorporated	WPX

Questions? Please contact an ethics official for more information.

OS/SOL Financial Disclosure Team

- Monica L. Garcia, Financial Disclosure Team Lead, at monica.garcia@sol.doi.gov or (202) 208-0460
- Alisha Avril, Ethics Specialist, at alisha.avril@sol.doi.gov
- Tia Barner, Ethics Specialist, at tia.barner@sol.doi.gov
- Curtis J. Steuber, Attorney Advisor, at curtis.steuber@sol.doi.gov
- LaShanda R. Whaley, Attorney Advisor, at lashanda.whaley@sol.doi.gov

ONRR Deputy Ethics Counselor

- Scott Currie, ONRR Deputy Ethics Counselor at scott.currie@sol.doi.gov or (202) 208-2151

From: [Gottry, Heather C](#)
To: [Klein, Elizabeth A](#)
Cc: [Garcia, Monica L](#)
Subject: Draft Responses to OGE First Round Questions
Date: Friday, February 5, 2021 6:19:21 PM
Attachments: [DOI Responses - Klein First Round Review Questions \(Draft for Review 02.05.21\).docx](#)
[Klein - Nominee OGE Form 278e \(Draft for Review 02.05.21\).pdf](#)

Liz – Hello! Thank you for taking time to walk through OGE’s first round review questions with us today. As promised, attached for your review please find draft responses to each request for confirmation or question as well as a copy of your updated Nominee OGE Form 278e. Can you please review and let us know if you have any edits or questions? If the attached look good, then we will send to OGE. We are considering how to scope and draft the authorization that we discussed and should have a draft ready to discuss early next week. Please do not hesitate to reach out in the interim if we can be of any assistance. Thank you and hope you have a great weekend.

- Heather

Heather C. Gottry
Director & DAEO
Departmental Ethics Office | Office of the Solicitor
U.S. Department of the Interior | MIB 5308
(O) (202) 208-4472
(C) (202) 740-0417
Email: heather.gottry@sol.doi.gov

Visit us online at: www.doi.gov/ethics

Integrity is our mission.

From: [Gottry, Heather C](#)
To: [Margaret E. Yukins](#)
Cc: [Stephanie Nonluecha](#); [Garcia, Monica L](#)
Subject: RE: [EXTERNAL] Elizabeth Klein 278 First Round Review Questions - [Message and attachment(s) contain CUI]
Date: Friday, February 5, 2021 7:06:20 PM
Attachments: [DOI Responses - Klein First Round Review Questions \(02.05.21\).docx](#)

Margaret – Hello! Attached please find responses to OGE’s First Round Review Questions. We have updated Ms. Klein’s Nominee OGE Form 278e as noted in the responses. We are also considering whether it may be appropriate to grant Ms. Klein an authorization for her 502 client recusals. Please let us know if it would be helpful to set up a time to discuss further. Thank you and hope you both have a great weekend!

- Heather

Heather C. Gottry
Director & DAEO
Departmental Ethics Office | Office of the Solicitor
U.S. Department of the Interior | MIB 5308
(O) (202) 208-4472
(C) (202) 740-0417
Email: heather.gottry@sol.doi.gov

Visit us online at: www.doi.gov/ethics

Integrity is our mission.

From: Margaret E. Yukins <meyukins@oge.gov>
Sent: Tuesday, February 2, 2021 2:33 PM
To: Gottry, Heather C <heather.gottry@sol.doi.gov>; Garcia, Monica L <monica.garcia@sol.doi.gov>
Cc: Stephanie Nonluecha <snonlue@oge.gov>
Subject: [EXTERNAL] Elizabeth Klein 278 First Round Review Questions - [Message and attachment(s) contain CUI]

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

CONTROLLED

Email and attachment(s) contain CUI.

Hi Heather and Monica,

Attached are the first round review questions for Elizabeth Klein’s 278 report. Please feel free to reach out should you have any questions or concerns.

Stephanie Nonluecha (CC'd) will be assisting me in the review of this report.

Best regards,

Margaret

Margaret Dylus-Yukins
Assistant Counsel
Ethics Law & Policy Branch
International Assistance & Outreach Program
U.S. Office of Government Ethics
(202) 482-9222 phone
meYukins@oge.gov <<mailto:meYukins@oge.gov>>
Pronouns: she/her

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: [Gottry, Heather C](#)
To: [Klein, Elizabeth A](#)
Cc: [Garcia, Monica L](#)
Subject: RE: Draft Responses to OGE First Round Questions
Date: Wednesday, February 10, 2021 7:19:48 PM
Attachments: [Klein_Second Round Review Questions.docx](#)

Liz - Hello! Please accept my apologies for the delay in getting back to you. I have actually attempted to send two responses to your message, but discovered that there is a problem with my Outlook permanently deleting rather than sending a number of my email messages. I am hoping that the Help Desk can quickly resolve this issue, and that, once they do, you do not receive repeated messages from me.

We are still working on drafting and scoping the authorization we discussed. OGE has requested that we coordinate with them on the authorization as well as any limitations established by the authorization. We are scheduled to meet with them tomorrow afternoon and I hope to have a more comprehensive update after that call.

Additionally, we received the attached Second Round Review Questions from OGE this afternoon. Once you have had a chance to review, we are available when convenient discuss drafting the responses back to OGE. Please do not hesitate to reach out in the interim if we can be of any assistance. Thank you.

- Heather

Heather C. Gottry
Director & DAEO
Departmental Ethics Office | Office of the Solicitor
U.S. Department of the Interior | MIB 5308
(O) (202) 208-4472
(C) (202) 740-0417
Email: heather.gottry@sol.doi.gov

Visit us online at: www.doi.gov/ethics

Integrity is our mission.

From: Klein, Elizabeth A <Elizabeth_Klein@ios.doi.gov>
Sent: Tuesday, February 9, 2021 11:46 AM
To: Gottry, Heather C <heather.gottry@sol.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: RE: Draft Responses to OGE First Round Questions

Hi there!
Just checking in on the status of the draft authorization that we discussed.
Thanks,
Liz

From: Gottry, Heather C <heather.gottry@sol.doi.gov>
Sent: Friday, February 5, 2021 7:00 PM
To: Klein, Elizabeth A <Elizabeth_Klein@ios.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: RE: Draft Responses to OGE First Round Questions

Great! I will send to OGE tonight. Thank you for the quick review.

From: Klein, Elizabeth A <Elizabeth_Klein@ios.doi.gov>
Sent: Friday, February 5, 2021 6:46 PM
To: Gottry, Heather C <heather.gottry@sol.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: RE: Draft Responses to OGE First Round Questions

All of this looks good.
Thanks for your help,
Liz

From: Gottry, Heather C <heather.gottry@sol.doi.gov>
Sent: Friday, February 5, 2021 6:19 PM
To: Klein, Elizabeth A <Elizabeth_Klein@ios.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: Draft Responses to OGE First Round Questions

Liz – Hello! Thank you for taking time to walk through OGE’s first round review questions with us today. As promised, attached for your review please find draft responses to each request for confirmation or question as well as a copy of your updated Nominee OGE Form 278e. Can you please review and let us know if you have any edits or questions? If the attached look good, then we will send to OGE. We are considering how to scope and draft the authorization that we discussed and should have a draft ready to discuss early next week. Please do not hesitate to reach out in the interim if we can be of any assistance. Thank you and hope you have a great weekend.

- Heather

Heather C. Gottry
Director & DAEO
Departmental Ethics Office | Office of the Solicitor
U.S. Department of the Interior | MIB 5308
(O) (202) 208-4472
(C) (202) 740-0417
Email: heather.gottry@sol.doi.gov

Visit us online at: www.doi.gov/ethics

Integrity is our mission.

From: [Gottry, Heather C](#)
To: [Margaret E. Yukins](#)
Cc: [Stephanie Nonluecha](#); [Garcia, Monica L](#)
Subject: RE: [EXTERNAL] Elizabeth Klein Second Round Review Questions - [Message and attachment(s) contain CUI]
Date: Friday, February 12, 2021 12:54:28 PM
Attachments: [DOI Responses - Klein Second Round Review Questions \(2.11.21\).docx](#)

Margaret – Hello! Thank you again for taking the time to speak with us yesterday. Attached please find responses to the Second Round Review Questions. If helpful, we can also provide a copy of her husband's current client list. We are still assessing the 502 recusal and welcome the opportunity to review the samples we discussed. Please do not hesitate to reach out with any questions or if we can be of any assistance. Thanks and hope you have a great weekend!

- Heather

From: Margaret E. Yukins <meyukins@oge.gov>
Sent: Wednesday, February 10, 2021 6:15 PM
To: Gottry, Heather C <heather.gottry@sol.doi.gov>
Cc: Stephanie Nonluecha <snonlue@oge.gov>; Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: RE: [EXTERNAL] Elizabeth Klein Second Round Review Questions - [Message and attachment(s) contain CUI]

Hi Heather,

Both Stephanie and I are free tomorrow any time after 11:00 am and all day Friday. Let us know when works for you.

Thanks,
Margaret

From: Gottry, Heather C [<mailto:heather.gottry@sol.doi.gov>]
Sent: Wednesday, February 10, 2021 2:29 PM
To: Margaret E. Yukins <meyukins@oge.gov>
Cc: Stephanie Nonluecha <snonlue@oge.gov>; Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: RE: [EXTERNAL] Elizabeth Klein Second Round Review Questions - [Message and attachment(s) contain CUI]

Margaret – Hello! We will review and circle back with responses. Would you and Stephanie like to schedule a call to discuss our thinking on a possible 502 authorization? If so, what times work tomorrow and Friday? Many thanks.

- Heather

Heather C. Gottry
Director & DAEO
Departmental Ethics Office | Office of the Solicitor
U.S. Department of the Interior | MIB 5308
(O) (202) 208-4472
(C) (202) 740-0417
Email: heather.gottry@sol.doi.gov



CONTROLLED UNCLASSIFIED INFORMATION (CUI)

Use this space to indicate categories/subcategories, special instructions, points of contact, etc., if needed.

The attached document contains CUI that requires protection and safeguarding in a manner that prevents unauthorized disclosure of CUI. (e.g., locked file cabinet, restricted access to CUI, etc.)

If you need additional information regarding the attached document containing CUI, please contact Margaret Yukins at (202) 482-9222 or at meyukins@oge.gov.

ATTENTION

All individuals handling this information are required to protect it from unauthorized disclosure.

Handling, storage, reproduction, and disposition of the attached document(s) must be in accordance with 32 CFR Part 2002 and applicable agency policy.

Access to and dissemination of CUI shall be allowed as necessary and permissible to any individual(s), organization(s), or grouping(s) of users, provided such access or dissemination is consistent with or in furtherance of a Lawful Government Purpose and in a manner consistent with applicable law, regulations, and Government-wide policies.





CONTROLLED UNCLASSIFIED INFORMATION (CUI)

Use this space to indicate categories/subcategories, special instructions, points of contact, etc., if needed.

The attached document contains CUI that requires protection and safeguarding in a manner that prevents unauthorized disclosure of CUI. (e.g., locked file cabinet, restricted access to CUI, etc.)

If you need additional information regarding the attached document containing CUI, please contact Margaret Yukins at (202) 482-9222 or at meyukins@oge.gov.

ATTENTION

All individuals handling this information are required to protect it from unauthorized disclosure.

Handling, storage, reproduction, and disposition of the attached document(s) must be in accordance with 32 CFR Part 2002 and applicable agency policy.

Access to and dissemination of CUI shall be allowed as necessary and permissible to any individual(s), organization(s), or grouping(s) of users, provided such access or dissemination is consistent with or in furtherance of a Lawful Government Purpose and in a manner consistent with applicable law, regulations, and Government-wide policies.



From: [Elizabeth Klein](#)
To: [Garcia, Monica L](#)
Cc: [Gottry, Heather C](#)
Subject: [EXTERNAL] Re: DOI ethics preliminary review
Date: Saturday, January 16, 2021 10:00:27 AM

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Good morning,
See answers below. Happy to connect to answer any questions. I could do 1pm or 4pm today, if that works?

Do you hold any direct or indirect financial interest in Federal lands or resources administered or controlled by the Department?

Not that I am aware of. (b) (6)

I can send along the list if you want to review.

Do you, your spouse and/or minor children retain any claim, permit, lease, small tract entries, or other rights that are granted by the Department in Federal lands?

No

Do you currently serve as an officer, director, trustee, or general partner of any entity not listed on your resume?

I'm on the board of the George Washington Middle School PTA! But I'm guessing that's probably not what you're worried about. So, no.

Please identify your spouse's current employer(s), if applicable.

[Invariant](#)

Are all of your employers for the preceding two calendar years listed on your resume? If not, please provide the name of any employers not on your resume and identify your position with the employer.

I was an adjunct faculty member at American University's Washington Semester Program for the fall of 2019 (Aug-Dec). I taught a Public Law & Society course.

If you provided other personal services to clients (including through your employer), please list all of your clients for the preceding two calendar years, if not already listed on your resume. Please note that personal services can include legal services, consulting services, lobbying services, pro bono, or other uncompensated volunteer activities, etc.

The [State Energy & Environmental Impact Center](#) has entered into attorney/client agreements with several state attorney general offices. I have provided legal advice to some of those offices pursuant to those agreements.

Did you, your employer, or your clients engage with the Department, including any Bureaus or Offices, on matters pending before the Department in the preceding two calendar years? If so, please describe the matters if not already described in your resume.

State attorneys general have filed litigation against DOI and participated in various rulemakings through the comment processes. The State Impact Center has not been a party in any litigation and has not signed any briefs or other litigation filings or any NEPA comments.

On Fri, Jan 15, 2021 at 5:57 PM Garcia, Monica L <monica.garcia@sol.doi.gov> wrote:

Liz,

Hello and good evening! I am the Acting Deputy Director of the Departmental Ethics Office (DEO) in the Office of the Solicitor, U.S. Department of the Interior. The DEO provides ethics services to all employees of the Department, including senior agency leadership. We are working closely with the Agency Review Team on ethics matters related to the upcoming transition.

Your resume was shared with us by the Agency Review Team so we could complete a preliminary ethics review. As part of our review, we ask that you please respond to the questions below:

1. Do you hold any direct or indirect financial interest in Federal lands or resources administered or controlled by the Department?
 - a. If so, please describe.
 - b. Please also review the attached list which identifies certain financial holdings which are prohibited for certain Department employees to hold by statute or supplemental regulation.
 - c. Please note that if you will be working on matters for U.S. Geological Survey, Office of Surface Mining Reclamation and Enforcement, U.S. Bureau of Land Management, Bureau of Ocean Energy Management, Bureau of Safety and Environmental Enforcement, and the Office of Natural Resources Revenue, there may be additional prohibitions that you will need to comply with after appointment, if appointed.
2. Do you, your spouse and/or minor children retain any claim, permit, lease, small tract entries, or other rights that are granted by the Department in Federal lands?
 - a. If so, please describe.
3. Do you currently serve as an officer, director, trustee, or general partner of any entity not listed on your resume?
 - a. If so, please identify and describe your role and position(s), including whether you plan to continue your position(s) after appointment, if appointed.
4. Please identify your spouse's current employer(s), if applicable.
5. Are all of your employers for the preceding two calendar years listed on your resume?
 - a. If not, please provide the name of any employers not on your resume and identify your position with the employer.
6. If you provided other personal services to clients (including through your employer), please list all of your clients for the preceding two calendar years, if not already listed on your resume.

- a. Please note that personal services can include legal services, consulting services, lobbying services, pro bono, or other uncompensated volunteer activities, *etc.*
7. Did you, your employer, or your clients engage with the Department, including any Bureaus or Offices, on matters pending before the Department in the preceding two calendar years?
 - a. If so, please describe the matters if not already described in your resume.

Your responses to these questions will help us to identify whether you will be potentially required to implement significant recusals or require additional consultation outside of the planned onboarding process, if appointed.

Additionally, once we have reviewed your responses to these questions, we would like to schedule a time to follow up and answer any questions that you might have regarding your ethics obligations should you be appointed to a position at the Department. To that end, please let us know which days and times are most convenient for a call. Heather and I will be online this weekend and available for a quick call if you have some availability.

Please do not hesitate to reach out in the interim if we can be of assistance as you prepare responses to the questions above. We look forward to speaking with you. Thank you.

-Monica

Please note: I will be teleworking until further notice

Monica L. Garcia

Acting Deputy Director for Ethics Law & Policy

and Acting Alternate Designated Agency Ethics Official

Departmental Ethics Office | Office of the Solicitor

U.S. Department of the Interior | MIB 5316

(O): (202) 208-0460

(C): (202) 880-4474

Email: monica.garcia@sol.doi.gov

Visit us online at www.doi.gov/ethics

Integrity is Our Mission.

From: [Gottry, Heather C](#)
To: [Elizabeth Klein](#)
Cc: [Garcia, Monica L](#)
Subject: RE: [EXTERNAL] Re: DOI ethics preliminary review
Date: Saturday, January 16, 2021 11:35:00 AM

Liz – Thank you for the quick responses! I will send an invite for a MS Teams video call at 4:00 pm EST today. We look forward to speaking with you. Thanks.

- Heather

Heather C. Gottry
Director & DAEO
Departmental Ethics Office | Office of the Solicitor
U.S. Department of the Interior | MIB 5308
(O) (202) 208-4472
(C) (202) 740-0417
Email: heather.gottry@sol.doi.gov

Visit us online at: www.doi.gov/ethics

Integrity is our mission.

From: Elizabeth Klein <lizjohnsonklein@gmail.com>
Sent: Saturday, January 16, 2021 10:00 AM
To: Garcia, Monica L <monica.garcia@sol.doi.gov>
Cc: Gottry, Heather C <heather.gottry@sol.doi.gov>
Subject: [EXTERNAL] Re: DOI ethics preliminary review

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Good morning,

See answers below. Happy to connect to answer any questions. I could do 1pm or 4pm today, if that works?

Do you hold any direct or indirect financial interest in Federal lands or resources administered or controlled by the Department?

Not that I am aware of: (b) (6) |
I can send along the list if you want to review.

Do you, your spouse and/or minor children retain any claim, permit, lease, small tract entries, or other rights that are granted by the Department in Federal lands?

No

Do you currently serve as an officer, director, trustee, or general partner of any entity not listed on your resume?

I'm on the board of the George Washington Middle School PTA! But I'm guessing that's probably not what you're worried about. So, no.

Please identify your spouse's current employer(s), if applicable.

[Invariant](#)

Are all of your employers for the preceding two calendar years listed on your resume? If not, please provide the name of any employers not on your resume and identify your position with the employer.

I was an adjunct faculty member at American University's Washington Semester Program for the fall of 2019 (Aug-Dec). I taught a Public Law & Society course.

If you provided other personal services to clients (including through your employer), please list all of your clients for the preceding two calendar years, if not already listed on your resume. Please note that personal services can include legal services, consulting services, lobbying services, pro bono, or other uncompensated volunteer activities, etc.

The [State Energy & Environmental Impact Center](#) has entered into attorney/client agreements with several state attorney general offices. I have provided legal advice to some of those offices pursuant to those agreements.

Did you, your employer, or your clients engage with the Department, including any Bureaus or Offices, on matters pending before the Department in the preceding two calendar years? If so, please describe the matters if not already described in your resume.

State attorneys general have filed litigation against DOI and participated in various rulemakings through the comment processes. The State Impact Center has not been a party in any litigation and has not signed any briefs or other litigation filings or any NEPA comments.

On Fri, Jan 15, 2021 at 5:57 PM Garcia, Monica L <monica.garcia@sol.doi.gov> wrote:

Liz,

Hello and good evening! I am the Acting Deputy Director of the Departmental Ethics Office (DEO) in the Office of the Solicitor, U.S. Department of the Interior. The DEO provides ethics services to all employees of the Department, including senior agency leadership. We are working closely with the Agency Review Team on ethics matters related to the upcoming transition.

Your resume was shared with us by the Agency Review Team so we could complete a preliminary ethics review. As part of our review, we ask that you please respond to the questions below:

1. Do you hold any direct or indirect financial interest in Federal lands or resources administered or controlled by the Department?
 - a. If so, please describe.
 - b. Please also review the attached list which identifies certain financial holdings which are prohibited for certain Department employees to hold by statute or supplemental regulation.

- c. Please note that if you will be working on matters for U.S. Geological Survey, Office of Surface Mining Reclamation and Enforcement, U.S. Bureau of Land Management, Bureau of Ocean Energy Management, Bureau of Safety and Environmental Enforcement, and the Office of Natural Resources Revenue, there may be additional prohibitions that you will need to comply with after appointment, if appointed.
2. Do you, your spouse and/or minor children retain any claim, permit, lease, small tract entries, or other rights that are granted by the Department in Federal lands?
 - a. If so, please describe.
3. Do you currently serve as an officer, director, trustee, or general partner of any entity not listed on your resume?
 - a. If so, please identify and describe your role and position(s), including whether you plan to continue your position(s) after appointment, if appointed.
4. Please identify your spouse's current employer(s), if applicable.
5. Are all of your employers for the preceding two calendar years listed on your resume?
 - a. If not, please provide the name of any employers not on your resume and identify your position with the employer.
6. If you provided other personal services to clients (including through your employer), please list all of your clients for the preceding two calendar years, if not already listed on your resume.
 - a. Please note that personal services can include legal services, consulting services, lobbying services, pro bono, or other uncompensated volunteer activities, *etc.*
7. Did you, your employer, or your clients engage with the Department, including any Bureaus or Offices, on matters pending before the Department in the preceding two calendar years?
 - a. If so, please describe the matters if not already described in your resume.

Your responses to these questions will help us to identify whether you will be potentially required to implement significant recusals or require additional consultation outside of the planned onboarding process, if appointed.

Additionally, once we have reviewed your responses to these questions, we would like to schedule a time to follow up and answer any questions that you might have regarding your ethics obligations should you be appointed to a position at the Department. To that end, please let us know which days and times are most convenient for a call. Heather and I will be online this weekend and available for a quick call if you have some availability.

Please do not hesitate to reach out in the interim if we can be of assistance as you prepare responses to the questions above. We look forward to speaking with you. Thank you.

-Monica

Please note: I will be teleworking until further notice

Monica L. Garcia
Acting Deputy Director for Ethics Law & Policy
and Acting Alternate Designated Agency Ethics Official

Departmental Ethics Office | Office of the Solicitor
U.S. Department of the Interior | MIB 5316
(O): (202) 208-0460
(C): (202) 880-4474
Email: monica.garcia@sol.doi.gov

Visit us online at www.doi.gov/ethics

Integrity is Our Mission.

From: [Gottry, Heather C](#)
To: [Klein, Elizabeth A](#)
Cc: [Garcia, Monica L](#)
Subject: Welcome & Next Ethics Steps
Date: Wednesday, January 20, 2021 3:31:24 PM
Attachments: [Initial Ethics Briefing for Onboarding Political Appointees \(01.19.21\).pdf](#)

Liz - Hello and Welcome! We look forward to working with you. As promised during our briefing, here is a quick summary of the next ethics steps after onboarding:

- **New Executive Order on Ethics:** It is our understanding that a new Executive Order will shortly be issued on ethics. Once that is available, we will be in touch with any action items and guidance on any additional ethics requirements.
- **Financial Disclosure Reporting:** In the next few days, you will receive an email from the *Integrity* system notifying you that you have been assigned a New Entrant OGE Form 278e, Public Financial Disclosure Report. A member of the Departmental Ethics Office will also reach out to schedule a time to complete an initial financial disclosure interview and to make sure that you can access and use the *Integrity* system. Your New Entrant OGE Form 278e is due on or before **February 19, 2021**, 30 days after your date of appointment.
- **Initial Ethics Training:** Early next week, you will be invited to attend a one-hour mandatory initial ethics training session. The ethics training session will cover conflicts of interest, impartiality, gifts, misuse of position, the Department's supplemental ethics regulations, and the requirements of the new Executive Order on ethics.
- **Interim Guidance on Recusals:** As we discussed during our initial ethics call with you, during your first week we will also provide you with draft interim recusal guidance and schedule a time to discuss the guidance so that it can be issued while your New Entrant OGE Form 278e is being completed, reviewed, and certified.
- **Final Guidance on Recusals:** Once your New Entrant OGE Form 278e is completed, reviewed, and certified, we will provide you with cautionary guidance, a recusal memorandum for you to sign, or a recusal and screening arrangement for you to sign and implement.
- **General Ethics Reminders:**
 - **Financial Conflicts of Interest:** Under 18 U.S.C. § 208(a), you may not participate personally and substantially in any particular matter in which you know that you have a financial interest directly and predictably affected by the matter, or in which you know that a person whose interests are imputed to you has a financial interest directly and predictably affected by the matter, unless you 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).

The interests of the following persons are imputed to you: any spouse or minor child; any general partner of a partnership in which you are a limited or general partner; any organization in which you serve as officer, director, trustee, general partner or employee; and any person or organization with which you are negotiating or have an arrangement concerning prospective employment.

- **Impartiality:** As required by 5 C.F.R. § 2635.502(a), if you know that a particular matter involving specific parties is likely to have a direct and predictable effect on the financial interest of a member of your household, or know that a person with whom you have a “covered relationship” is or represents a party to such matter, and where you determine that the circumstances would cause a reasonable person with knowledge of the relevant facts to question your impartiality in the matter, you may not participate in the matter unless you have informed the DEO of the appearance problem and received written authorization from the DEO to participate in the matter.

You have a “covered relationship” with any person for whom you have, within the last year, served as officer, director, trustee, general partner, agent, attorney, consultant, contractor or employee. Additionally, you have a “covered relationship” with members of your household and close friends and family.

Thank you for making time for an ethics briefing on your first day at the Department! For your reference, we have attached a copy of the briefing.

Please do not hesitate to reach out to us with any questions about your ethics obligations, or if we can be of any assistance. Thank you.

- Heather

Heather C. Gottry
Director & DAEO
Departmental Ethics Office | Office of the Solicitor
U.S. Department of the Interior | MIB 5308
(O) (202) 208-4472
(C) (202) 740-0417
Email: heather.gottry@sol.doi.gov

Visit us online at: www.doi.gov/ethics

Integrity is our mission.



INITIAL ETHICS BRIEFING: ONBOARDING POLITICAL APPOINTEES



WHY DO WE NEED ETHICS RULES?

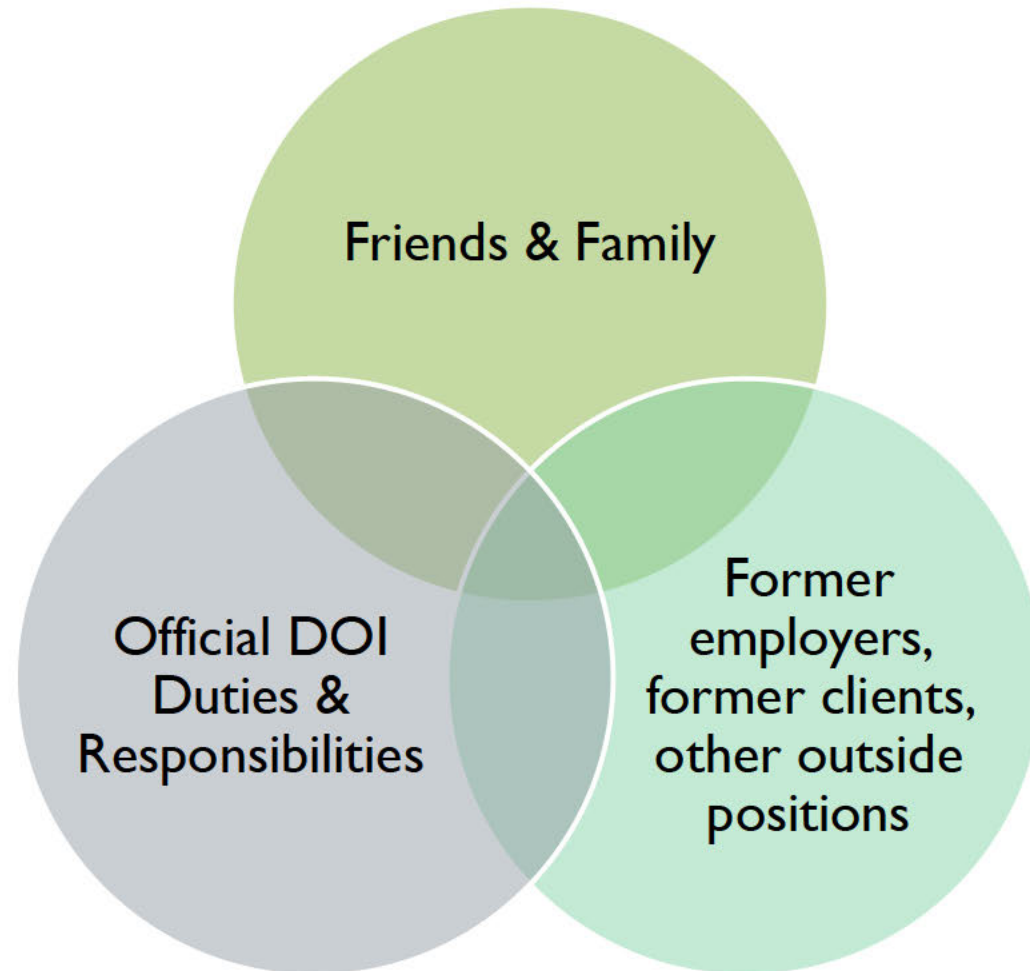
- The rules establish a baseline to assure the public that certain minimal standards will be met by federal employees.
- The rules provide clear guidance on, and resolution of, many ethics questions.

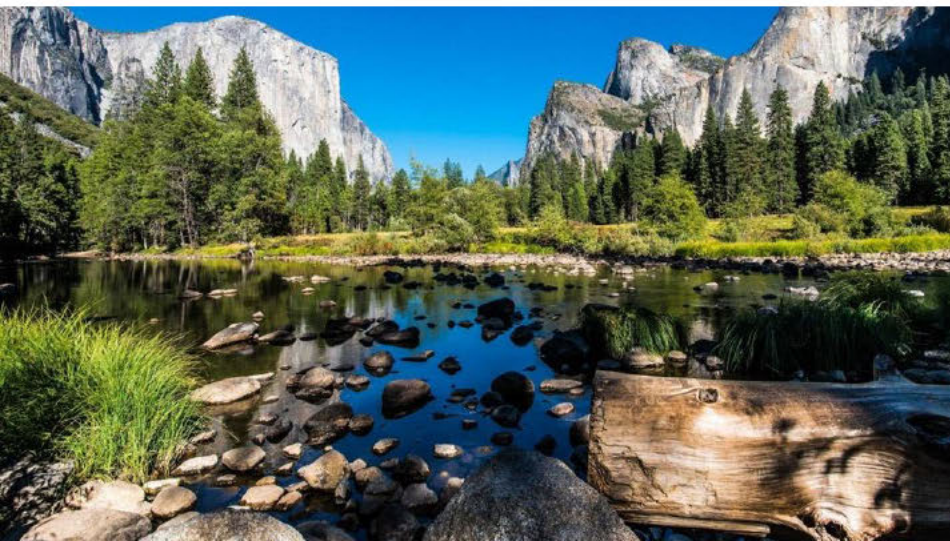
CORE ETHICS CONCEPTS

1. Do not use your public office for private gain;
2. Act impartially and do not give preferential treatment to any private organization or individual; and
3. Seek counsel and strive to avoid any action that would create the appearance that you are violating the law or ethical standards.



OVERLAPS CREATE AREAS OF ETHICS RISK

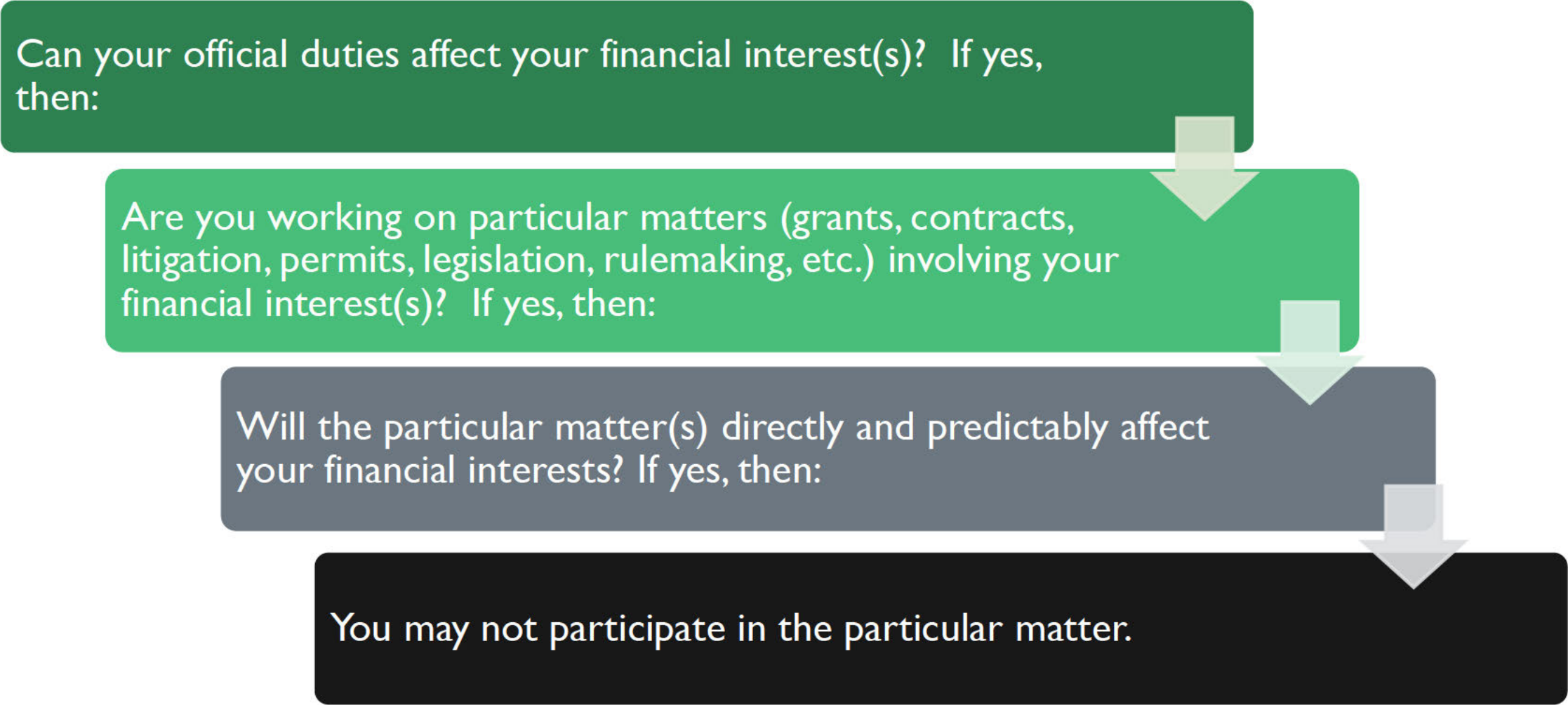




CONFLICTS OF INTEREST

IMPLEMENTING CONFLICT OF INTEREST RECUSALS

Can your official duties affect your financial interest(s)? If yes, then:



```
graph TD; A[Can your official duties affect your financial interest(s)? If yes, then:] --> B[Are you working on particular matters (grants, contracts, litigation, permits, legislation, rulemaking, etc.) involving your financial interest(s)? If yes, then:]; B --> C[Will the particular matter(s) directly and predictably affect your financial interests? If yes, then:]; C --> D[You may not participate in the particular matter.];
```

Are you working on particular matters (grants, contracts, litigation, permits, legislation, rulemaking, etc.) involving your financial interest(s)? If yes, then:

Will the particular matter(s) directly and predictably affect your financial interests? If yes, then:

You may not participate in the particular matter.




IMPARTIALITY

IMPLEMENTING IMPARTIALITY DISQUALIFICATION


Are you being asked to work on a particular matter involving specific parties (e.g., contract, permit, license, grant, litigation, etc.)?



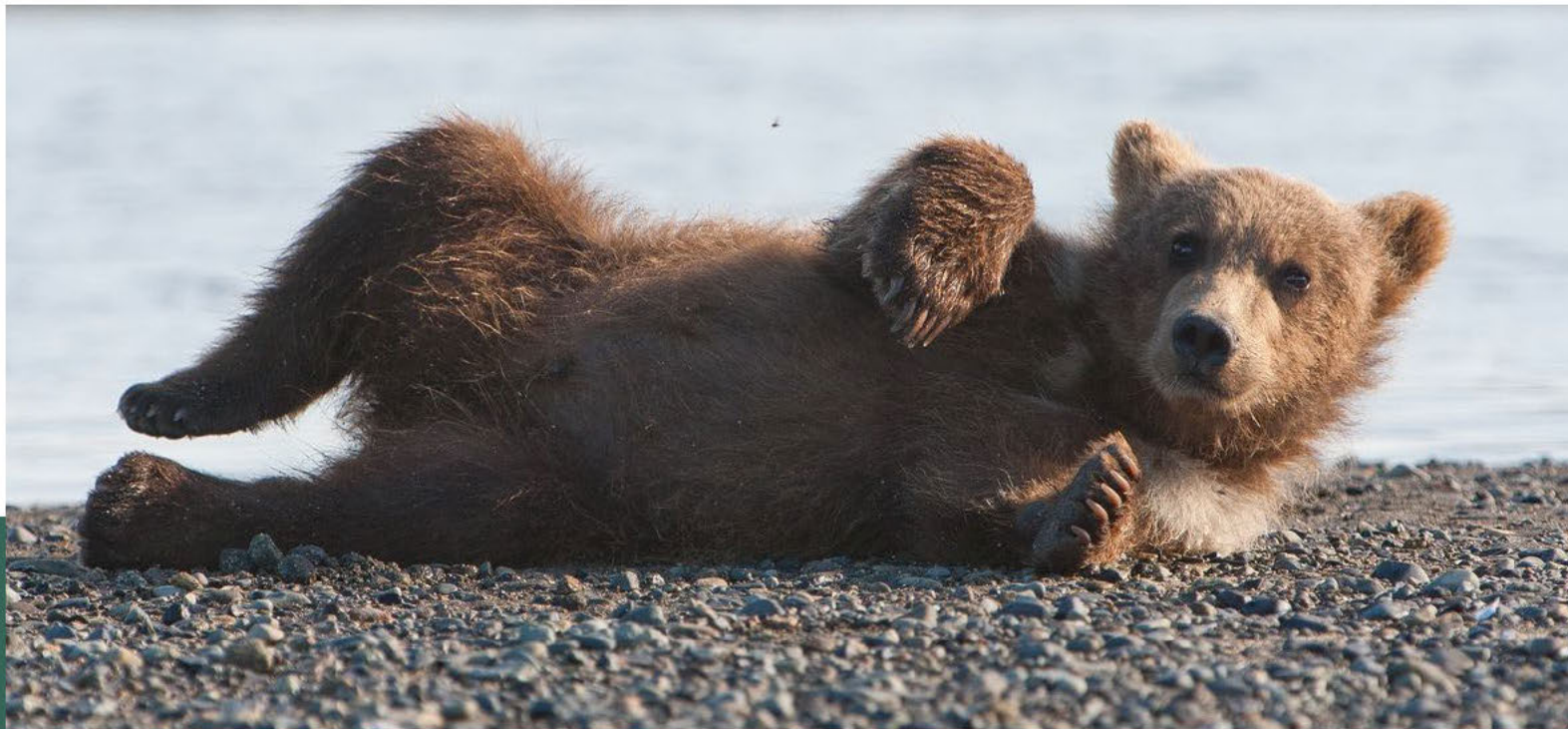
Will it have a direct and predictable effect on your financial interests? A member of your household's interests? A friend's interests? A former employer/clients interests?



Would a reasonable person with knowledge of the relevant facts question your impartiality?



If so, do not participate – first, seek guidance from the DEO.



GIFTS

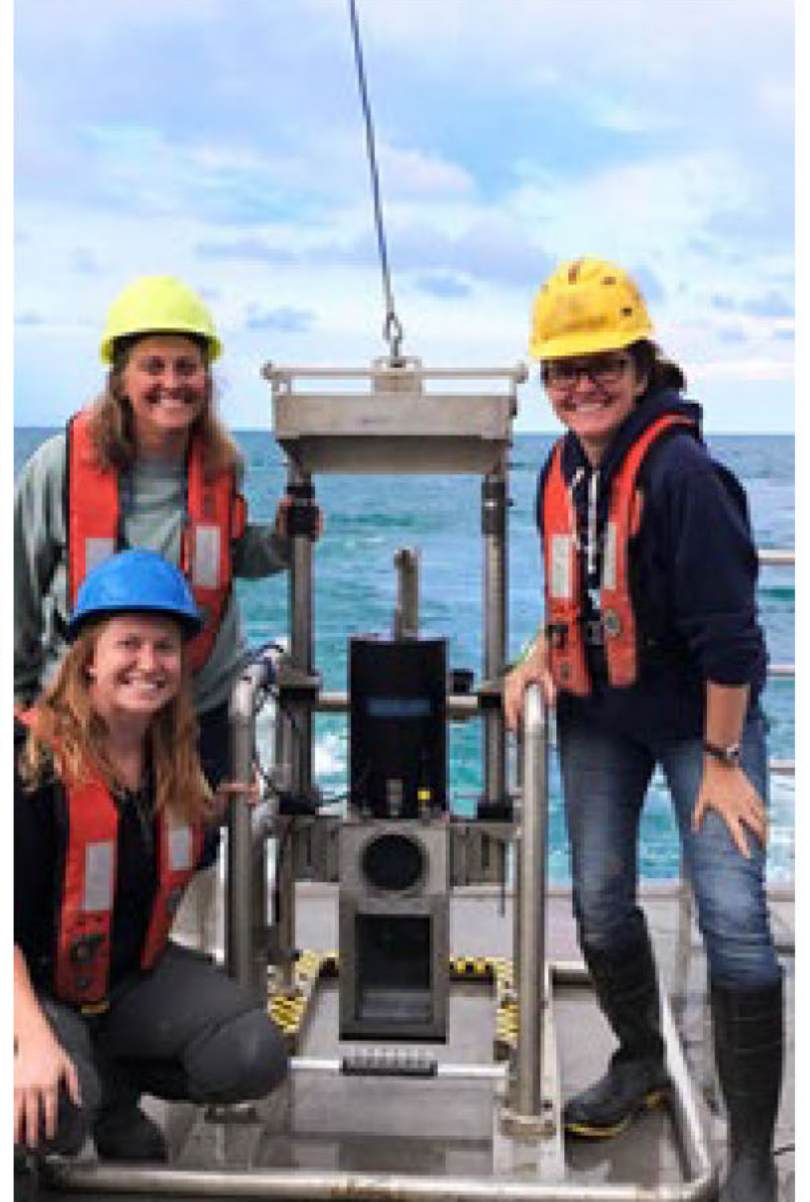
GIFTS FROM OUTSIDE SOURCES

Basic Rule: You may not accept, directly or indirectly:

- a gift from a prohibited source; or
- a gift given because of your official position.

There are a number of exceptions and exclusions to the basic rule.





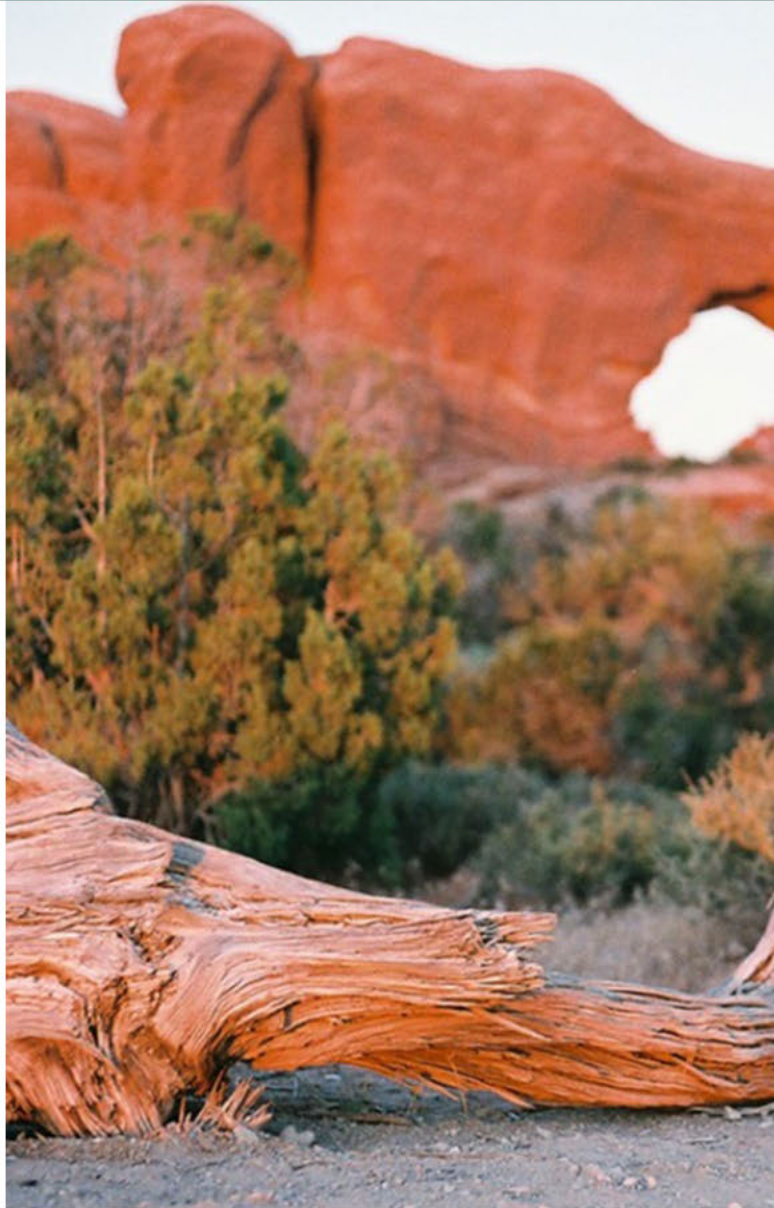
MISUSE OF POSITION

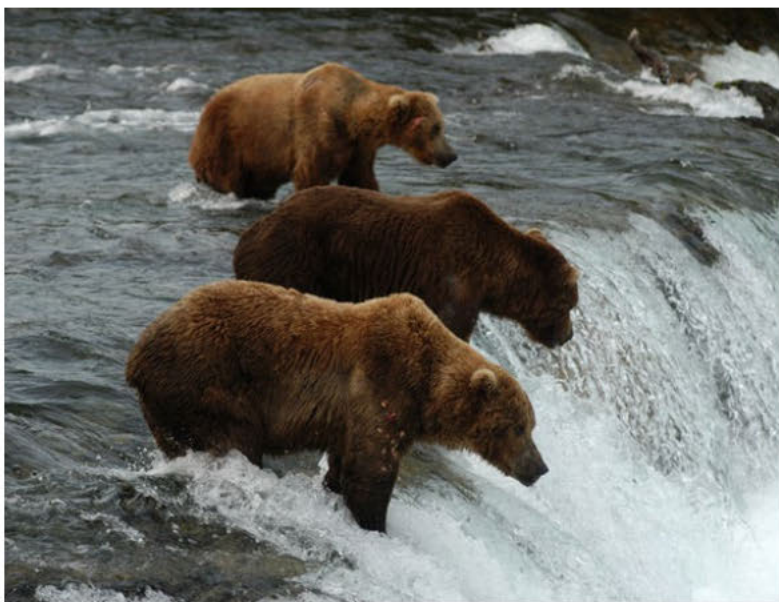


MISUSE OF POSITION

- Use of Public Office for Private Gain
 - Inducement or Coercion of Benefits
 - Appearance of Governmental Sanction
 - Endorsements
- Use of Nonpublic Information
- Use of Government Property
- Use of Official Time

ETHICS NEXT STEPS





- New Ethics Executive Order/Ethics Pledge.
- Assignment of OGE Form 278e.
- New Filer Interview.
- Initial Ethics Training.
- Interim Recusal Guidance (if appropriate).
- Final Recusal Guidance.

- Integrity is our most important value.
- Do the right thing and do it the right way.
- Know and follow the law.
- Reach out to the DEO for guidance:
 - DOI_Ethics@sol.doi.gov
 - Tel: (202) 208-7960



A photograph of ancient cliff dwellings, likely Anasazi, built into a sandstone cliff face. The structures are multi-story with rectangular windows and doorways. Some buildings have circular kivas. The dwellings are situated in a deep canyon with a winding path and some greenery on the right side. The text "INTEGRITY IS OUR MISSION" is overlaid in white, and "WWW.DOI.GOV/ETHICS" is overlaid in yellow below it.

INTEGRITY IS
OUR MISSION

WWW.DOI.GOV/ETHICS

From: [Klein, Elizabeth A](#)
To: [Gottry, Heather C](#)
Cc: [Garcia, Monica L](#)
Subject: RE: Welcome & Next Ethics Steps
Date: Saturday, January 23, 2021 4:10:58 PM

Hi there,

With respect to the OGE Form 278e – I already have a draft completed in the system. I think the guidance from the transition nominations team was to wait until my various paperwork is completed and ready to submit to the Hill before hitting final. Have you received different guidance? Do you all need to review it now? I think that requires making someone from DOI a reviewer in the system, but let me know what next steps you think I should take.

Thanks

Liz

From: Gottry, Heather C <heather.gottry@sol.doi.gov>
Sent: Wednesday, January 20, 2021 3:31 PM
To: Klein, Elizabeth A <Elizabeth_Klein@ios.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: Welcome & Next Ethics Steps

Liz - Hello and Welcome! We look forward to working with you. As promised during our briefing, here is a quick summary of the next ethics steps after onboarding:

- **New Executive Order on Ethics:** It is our understanding that a new Executive Order will shortly be issued on ethics. Once that is available, we will be in touch with any action items and guidance on any additional ethics requirements.
- **Financial Disclosure Reporting:** In the next few days, you will receive an email from the *Integrity* system notifying you that you have been assigned a New Entrant OGE Form 278e, Public Financial Disclosure Report. A member of the Departmental Ethics Office will also reach out to schedule a time to complete an initial financial disclosure interview and to make sure that you can access and use the *Integrity* system. Your New Entrant OGE Form 278e is due on or before **February 19, 2021**, 30 days after your date of appointment.
- **Initial Ethics Training:** Early next week, you will be invited to attend a one-hour mandatory initial ethics training session. The ethics training session will cover conflicts of interest, impartiality, gifts, misuse of position, the Department's supplemental ethics regulations, and the requirements of the new Executive Order on ethics.
- **Interim Guidance on Recusals:** As we discussed during our initial ethics call with you, during your first week we will also provide you with draft interim recusal guidance and schedule a time to discuss the guidance so that it can be issued while your New Entrant OGE Form 278e is being completed, reviewed, and certified.
- **Final Guidance on Recusals:** Once your New Entrant OGE Form 278e is completed, reviewed, and certified, we will provide you with cautionary guidance, a recusal memorandum for you to sign, or a recusal and screening arrangement for you to sign and implement.
- **General Ethics Reminders:**

- **Financial Conflicts of Interest:** Under 18 U.S.C. § 208(a), you may not participate personally and substantially in any particular matter in which you know that you have a financial interest directly and predictably affected by the matter, or in which you know that a person whose interests are imputed to you has a financial interest directly and predictably affected by the matter, unless you 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).

The interests of the following persons are imputed to you: any spouse or minor child; any general partner of a partnership in which you are a limited or general partner; any organization in which you serve as officer, director, trustee, general partner or employee; and any person or organization with which you are negotiating or have an arrangement concerning prospective employment.

- **Impartiality:** As required by 5 C.F.R. § 2635.502(a), if you know that a particular matter involving specific parties is likely to have a direct and predictable effect on the financial interest of a member of your household, or know that a person with whom you have a “covered relationship” is or represents a party to such matter, and where you determine that the circumstances would cause a reasonable person with knowledge of the relevant facts to question your impartiality in the matter, you may not participate in the matter unless you have informed the DEO of the appearance problem and received written authorization from the DEO to participate in the matter.

You have a “covered relationship” with any person for whom you have, within the last year, served as officer, director, trustee, general partner, agent, attorney, consultant, contractor or employee. Additionally, you have a “covered relationship” with members of your household and close friends and family.

Thank you for making time for an ethics briefing on your first day at the Department! For your reference, we have attached a copy of the briefing.

Please do not hesitate to reach out to us with any questions about your ethics obligations, or if we can be of any assistance. Thank you.

- Heather

Heather C. Gottry
Director & DAEO
Departmental Ethics Office | Office of the Solicitor
U.S. Department of the Interior | MIB 5308
(O) (202) 208-4472
(C) (202) 740-0417
Email: heather.gottry@sol.doi.gov

Visit us online at: www.doi.gov/ethics

Integrity is our mission.

From: [Gottry, Heather C](#)
To: [Klein, Elizabeth A](#)
Cc: [Garcia, Monica L](#)
Subject: RE: Welcome & Next Ethics Steps
Date: Saturday, January 23, 2021 4:38:58 PM

Liz – Hello! Based on the information below, your report in *Integrity* now is your draft Nominee OGE Form 278e Report. That report will not be able to be finalized until it has been released to us for review and also precleared by the U.S. Office of Government Ethics (OGE). At that point, you will be asked to review and submit your final signature and we can certify it. After your nomination, it will be sent by OGE along with your ethics agreement to the Senate. There are slightly different reporting requirements for nominees than for other New Entrant OGE Form 278e filers, and I think it would be helpful for us to discuss how to handle your reporting. Is there a convenient time for us to touch base? I am working today and will also be online tomorrow. We can also find a time next week. Please let me know what works best on your end. Many thanks.

- Heather

From: Klein, Elizabeth A <Elizabeth_Klein@ios.doi.gov>
Sent: Saturday, January 23, 2021 4:11 PM
To: Gottry, Heather C <heather.gottry@sol.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: RE: Welcome & Next Ethics Steps

Hi there,

With respect to the OGE Form 278e – I already have a draft completed in the system. I think the guidance from the transition nominations team was to wait until my various paperwork is completed and ready to submit to the Hill before hitting final. Have you received different guidance? Do you all need to review it now? I think that requires making someone from DOI a reviewer in the system, but let me know what next steps you think I should take.

Thanks

Liz

From: Gottry, Heather C <heather.gottry@sol.doi.gov>
Sent: Wednesday, January 20, 2021 3:31 PM
To: Klein, Elizabeth A <Elizabeth_Klein@ios.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: Welcome & Next Ethics Steps

Liz - Hello and Welcome! We look forward to working with you. As promised during our briefing, here is a quick summary of the next ethics steps after onboarding:

- **New Executive Order on Ethics:** It is our understanding that a new Executive Order will shortly be issued on ethics. Once that is available, we will be in touch with any action items and guidance on any additional ethics requirements.

- **Financial Disclosure Reporting:** In the next few days, you will receive an email from the *Integrity* system notifying you that you have been assigned a New Entrant OGE Form 278e, Public Financial Disclosure Report. A member of the Departmental Ethics Office will also reach out to schedule a time to complete an initial financial disclosure interview and to make sure that you can access and use the *Integrity* system. Your New Entrant OGE Form 278e is due on or before **February 19, 2021**, 30 days after your date of appointment.
- **Initial Ethics Training:** Early next week, you will be invited to attend a one-hour mandatory initial ethics training session. The ethics training session will cover conflicts of interest, impartiality, gifts, misuse of position, the Department's supplemental ethics regulations, and the requirements of the new Executive Order on ethics.
- **Interim Guidance on Recusals:** As we discussed during our initial ethics call with you, during your first week we will also provide you with draft interim recusal guidance and schedule a time to discuss the guidance so that it can be issued while your New Entrant OGE Form 278e is being completed, reviewed, and certified.
- **Final Guidance on Recusals:** Once your New Entrant OGE Form 278e is completed, reviewed, and certified, we will provide you with cautionary guidance, a recusal memorandum for you to sign, or a recusal and screening arrangement for you to sign and implement.
- **General Ethics Reminders:**
 - **Financial Conflicts of Interest:** Under 18 U.S.C. § 208(a), you may not participate personally and substantially in any particular matter in which you know that you have a financial interest directly and predictably affected by the matter, or in which you know that a person whose interests are imputed to you has a financial interest directly and predictably affected by the matter, unless you 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).

The interests of the following persons are imputed to you: any spouse or minor child; any general partner of a partnership in which you are a limited or general partner; any organization in which you serve as officer, director, trustee, general partner or employee; and any person or organization with which you are negotiating or have an arrangement concerning prospective employment.

- **Impartiality:** As required by 5 C.F.R. § 2635.502(a), if you know that a particular matter involving specific parties is likely to have a direct and predictable effect on the financial interest of a member of your household, or know that a person with whom you have a "covered relationship" is or represents a party to such matter, and where you determine that the circumstances would cause a reasonable person with knowledge of the relevant facts to question your impartiality in the matter, you may not participate in the matter unless you have informed the DEO of the appearance problem and received written authorization from the DEO to participate in the matter.

You have a "covered relationship" with any person for whom you have, within the last year, served as officer, director, trustee, general partner, agent, attorney, consultant, contractor or employee. Additionally, you have a "covered relationship"

with members of your household and close friends and family.

Thank you for making time for an ethics briefing on your first day at the Department! For your reference, we have attached a copy of the briefing.

Please do not hesitate to reach out to us with any questions about your ethics obligations, or if we can be of any assistance. Thank you.

- Heather

Heather C. Gottry
Director & DAEO
Departmental Ethics Office | Office of the Solicitor
U.S. Department of the Interior | MIB 5308
(O) (202) 208-4472
(C) (202) 740-0417
Email: heather.gottry@sol.doi.gov

Visit us online at: www.doi.gov/ethics

Integrity is our mission.

From: [Klein, Elizabeth A](#)
To: [Gottry, Heather C](#)
Cc: [Garcia, Monica L](#)
Subject: RE: Welcome & Next Ethics Steps
Date: Sunday, January 24, 2021 1:26:26 PM

Let's talk this week – would Tuesday at 9:30am work?

From: Gottry, Heather C <heather.gottry@sol.doi.gov>
Sent: Saturday, January 23, 2021 4:39 PM
To: Klein, Elizabeth A <Elizabeth_Klein@ios.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: RE: Welcome & Next Ethics Steps

Liz – Hello! Based on the information below, your report in *Integrity* now is your draft Nominee OGE Form 278e Report. That report will not be able to be finalized until it has been released to us for review and also precleared by the U.S. Office of Government Ethics (OGE). At that point, you will be asked to review and submit your final signature and we can certify it. After your nomination, it will be sent by OGE along with your ethics agreement to the Senate. There are slightly different reporting requirements for nominees than for other New Entrant OGE Form 278e filers, and I think it would be helpful for us to discuss how to handle your reporting. Is there a convenient time for us to touch base? I am working today and will also be online tomorrow. We can also find a time next week. Please let me know what works best on your end. Many thanks.

- Heather

From: Klein, Elizabeth A <Elizabeth_Klein@ios.doi.gov>
Sent: Saturday, January 23, 2021 4:11 PM
To: Gottry, Heather C <heather.gottry@sol.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: RE: Welcome & Next Ethics Steps

Hi there,

With respect to the OGE Form 278e – I already have a draft completed in the system. I think the guidance from the transition nominations team was to wait until my various paperwork is completed and ready to submit to the Hill before hitting final. Have you received different guidance? Do you all need to review it now? I think that requires making someone from DOI a reviewer in the system, but let me know what next steps you think I should take.

Thanks

Liz

From: Gottry, Heather C <heather.gottry@sol.doi.gov>
Sent: Wednesday, January 20, 2021 3:31 PM

To: Klein, Elizabeth A <Elizabeth_Klein@ios.doi.gov>

Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>

Subject: Welcome & Next Ethics Steps

Liz - Hello and Welcome! We look forward to working with you. As promised during our briefing, here is a quick summary of the next ethics steps after onboarding:

- **New Executive Order on Ethics:** It is our understanding that a new Executive Order will shortly be issued on ethics. Once that is available, we will be in touch with any action items and guidance on any additional ethics requirements.
- **Financial Disclosure Reporting:** In the next few days, you will receive an email from the *Integrity* system notifying you that you have been assigned a New Entrant OGE Form 278e, Public Financial Disclosure Report. A member of the Departmental Ethics Office will also reach out to schedule a time to complete an initial financial disclosure interview and to make sure that you can access and use the *Integrity* system. Your New Entrant OGE Form 278e is due on or before **February 19, 2021**, 30 days after your date of appointment.
- **Initial Ethics Training:** Early next week, you will be invited to attend a one-hour mandatory initial ethics training session. The ethics training session will cover conflicts of interest, impartiality, gifts, misuse of position, the Department's supplemental ethics regulations, and the requirements of the new Executive Order on ethics.
- **Interim Guidance on Recusals:** As we discussed during our initial ethics call with you, during your first week we will also provide you with draft interim recusal guidance and schedule a time to discuss the guidance so that it can be issued while your New Entrant OGE Form 278e is being completed, reviewed, and certified.
- **Final Guidance on Recusals:** Once your New Entrant OGE Form 278e is completed, reviewed, and certified, we will provide you with cautionary guidance, a recusal memorandum for you to sign, or a recusal and screening arrangement for you to sign and implement.
- **General Ethics Reminders:**
 - **Financial Conflicts of Interest:** Under 18 U.S.C. § 208(a), you may not participate personally and substantially in any particular matter in which you know that you have a financial interest directly and predictably affected by the matter, or in which you know that a person whose interests are imputed to you has a financial interest directly and predictably affected by the matter, unless you 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).

The interests of the following persons are imputed to you: any spouse or minor child; any general partner of a partnership in which you are a limited or general partner; any organization in which you serve as officer, director, trustee, general partner or employee; and any person or organization with which you are negotiating or have an arrangement concerning prospective employment.

- **Impartiality:** As required by 5 C.F.R. § 2635.502(a), if you know that a particular matter involving specific parties is likely to have a direct and predictable effect on the financial

interest of a member of your household, or know that a person with whom you have a “covered relationship” is or represents a party to such matter, and where you determine that the circumstances would cause a reasonable person with knowledge of the relevant facts to question your impartiality in the matter, you may not participate in the matter unless you have informed the DEO of the appearance problem and received written authorization from the DEO to participate in the matter.

You have a “covered relationship” with any person for whom you have, within the last year, served as officer, director, trustee, general partner, agent, attorney, consultant, contractor or employee. Additionally, you have a “covered relationship” with members of your household and close friends and family.

Thank you for making time for an ethics briefing on your first day at the Department! For your reference, we have attached a copy of the briefing.

Please do not hesitate to reach out to us with any questions about your ethics obligations, or if we can be of any assistance. Thank you.

- Heather

Heather C. Gottry
Director & DAEO
Departmental Ethics Office | Office of the Solicitor
U.S. Department of the Interior | MIB 5308
(O) (202) 208-4472
(C) (202) 740-0417
Email: heather.gottry@sol.doi.gov

Visit us online at: www.doi.gov/ethics

Integrity is our mission.

From: [Gottry, Heather C](#)
To: [Klein, Elizabeth A](#)
Cc: [Garcia, Monica L](#)
Subject: RE: Welcome & Next Ethics Steps
Date: Sunday, January 24, 2021 1:27:29 PM

Yes, we can make that work. Would you like us to send an invite? Thanks.

From: Klein, Elizabeth A <Elizabeth_Klein@ios.doi.gov>
Sent: Sunday, January 24, 2021 1:26 PM
To: Gottry, Heather C <heather.gottry@sol.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: RE: Welcome & Next Ethics Steps

Let's talk this week – would Tuesday at 9:30am work?

From: Gottry, Heather C <heather.gottry@sol.doi.gov>
Sent: Saturday, January 23, 2021 4:39 PM
To: Klein, Elizabeth A <Elizabeth_Klein@ios.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: RE: Welcome & Next Ethics Steps

Liz – Hello! Based on the information below, your report in *Integrity* now is your draft Nominee OGE Form 278e Report. That report will not be able to be finalized until it has been released to us for review and also precleared by the U.S. Office of Government Ethics (OGE). At that point, you will be asked to review and submit your final signature and we can certify it. After your nomination, it will be sent by OGE along with your ethics agreement to the Senate. There are slightly different reporting requirements for nominees than for other New Entrant OGE Form 278e filers, and I think it would be helpful for us to discuss how to handle your reporting. Is there a convenient time for us to touch base? I am working today and will also be online tomorrow. We can also find a time next week. Please let me know what works best on your end. Many thanks.

- Heather

From: Klein, Elizabeth A <Elizabeth_Klein@ios.doi.gov>
Sent: Saturday, January 23, 2021 4:11 PM
To: Gottry, Heather C <heather.gottry@sol.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: RE: Welcome & Next Ethics Steps

Hi there,

With respect to the OGE Form 278e – I already have a draft completed in the system. I think the guidance from the transition nominations team was to wait until my various paperwork is completed and ready to submit to the Hill before hitting final. Have you received different guidance? Do you all

need to review it now? I think that requires making someone from DOI a reviewer in the system, but let me know what next steps you think I should take.

Thanks

Liz

From: Gottry, Heather C <heather.gottry@sol.doi.gov>

Sent: Wednesday, January 20, 2021 3:31 PM

To: Klein, Elizabeth A <Elizabeth_Klein@ios.doi.gov>

Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>

Subject: Welcome & Next Ethics Steps

Liz - Hello and Welcome! We look forward to working with you. As promised during our briefing, here is a quick summary of the next ethics steps after onboarding:

- **New Executive Order on Ethics:** It is our understanding that a new Executive Order will shortly be issued on ethics. Once that is available, we will be in touch with any action items and guidance on any additional ethics requirements.
- **Financial Disclosure Reporting:** In the next few days, you will receive an email from the *Integrity* system notifying you that you have been assigned a New Entrant OGE Form 278e, Public Financial Disclosure Report. A member of the Departmental Ethics Office will also reach out to schedule a time to complete an initial financial disclosure interview and to make sure that you can access and use the *Integrity* system. Your New Entrant OGE Form 278e is due on or before **February 19, 2021**, 30 days after your date of appointment.
- **Initial Ethics Training:** Early next week, you will be invited to attend a one-hour mandatory initial ethics training session. The ethics training session will cover conflicts of interest, impartiality, gifts, misuse of position, the Department's supplemental ethics regulations, and the requirements of the new Executive Order on ethics.
- **Interim Guidance on Recusals:** As we discussed during our initial ethics call with you, during your first week we will also provide you with draft interim recusal guidance and schedule a time to discuss the guidance so that it can be issued while your New Entrant OGE Form 278e is being completed, reviewed, and certified.
- **Final Guidance on Recusals:** Once your New Entrant OGE Form 278e is completed, reviewed, and certified, we will provide you with cautionary guidance, a recusal memorandum for you to sign, or a recusal and screening arrangement for you to sign and implement.
- **General Ethics Reminders:**
 - **Financial Conflicts of Interest:** Under 18 U.S.C. § 208(a), you may not participate personally and substantially in any particular matter in which you know that you have a financial interest directly and predictably affected by the matter, or in which you know that a person whose interests are imputed to you has a financial interest directly and predictably affected by the matter, unless you 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).

The interests of the following persons are imputed to you: any spouse or minor child; any general partner of a partnership in which you are a limited or general partner; any organization in which you serve as officer, director, trustee, general partner or employee; and any person or organization with which you are negotiating or have an arrangement concerning prospective employment.

- **Impartiality:** As required by 5 C.F.R. § 2635.502(a), if you know that a particular matter involving specific parties is likely to have a direct and predictable effect on the financial interest of a member of your household, or know that a person with whom you have a “covered relationship” is or represents a party to such matter, and where you determine that the circumstances would cause a reasonable person with knowledge of the relevant facts to question your impartiality in the matter, you may not participate in the matter unless you have informed the DEO of the appearance problem and received written authorization from the DEO to participate in the matter.

You have a “covered relationship” with any person for whom you have, within the last year, served as officer, director, trustee, general partner, agent, attorney, consultant, contractor or employee. Additionally, you have a “covered relationship” with members of your household and close friends and family.

Thank you for making time for an ethics briefing on your first day at the Department! For your reference, we have attached a copy of the briefing.

Please do not hesitate to reach out to us with any questions about your ethics obligations, or if we can be of any assistance. Thank you.

- Heather

Heather C. Gottry
Director & DAEO
Departmental Ethics Office | Office of the Solicitor
U.S. Department of the Interior | MIB 5308
(O) (202) 208-4472
(C) (202) 740-0417
Email: heather.gottry@sol.doi.gov

Visit us online at: www.doi.gov/ethics

Integrity is our mission.

From: [Klein, Elizabeth A](#)
To: [Gottry, Heather C](#)
Cc: [Garcia, Monica L](#)
Subject: RE: Welcome & Next Ethics Steps
Date: Sunday, January 24, 2021 1:29:56 PM

Yes, that would be great – figuring out the invite function in Teams is still on the pending to-do list.
Thanks

From: Gottry, Heather C <heather.gottry@sol.doi.gov>
Sent: Sunday, January 24, 2021 1:27 PM
To: Klein, Elizabeth A <Elizabeth_Klein@ios.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: RE: Welcome & Next Ethics Steps

Yes, we can make that work. Would you like us to send an invite? Thanks.

From: Klein, Elizabeth A <Elizabeth_Klein@ios.doi.gov>
Sent: Sunday, January 24, 2021 1:26 PM
To: Gottry, Heather C <heather.gottry@sol.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: RE: Welcome & Next Ethics Steps

Let's talk this week – would Tuesday at 9:30am work?

From: Gottry, Heather C <heather.gottry@sol.doi.gov>
Sent: Saturday, January 23, 2021 4:39 PM
To: Klein, Elizabeth A <Elizabeth_Klein@ios.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: RE: Welcome & Next Ethics Steps

Liz – Hello! Based on the information below, your report in *Integrity* now is your draft Nominee OGE Form 278e Report. That report will not be able to be finalized until it has been released to us for review and also precleared by the U.S. Office of Government Ethics (OGE). At that point, you will be asked to review and submit your final signature and we can certify it. After your nomination, it will be sent by OGE along with your ethics agreement to the Senate. There are slightly different reporting requirements for nominees than for other New Entrant OGE Form 278e filers, and I think it would be helpful for us to discuss how to handle your reporting. Is there a convenient time for us to touch base? I am working today and will also be online tomorrow. We can also find a time next week. Please let me know what works best on your end. Many thanks.

- Heather

From: Klein, Elizabeth A <Elizabeth_Klein@ios.doi.gov>
Sent: Saturday, January 23, 2021 4:11 PM
To: Gottry, Heather C <heather.gottry@sol.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: RE: Welcome & Next Ethics Steps

Hi there,

With respect to the OGE Form 278e – I already have a draft completed in the system. I think the guidance from the transition nominations team was to wait until my various paperwork is completed and ready to submit to the Hill before hitting final. Have you received different guidance? Do you all need to review it now? I think that requires making someone from DOI a reviewer in the system, but let me know what next steps you think I should take.

Thanks

Liz

From: Gottry, Heather C <heather.gottry@sol.doi.gov>
Sent: Wednesday, January 20, 2021 3:31 PM
To: Klein, Elizabeth A <Elizabeth_Klein@ios.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: Welcome & Next Ethics Steps

Liz - Hello and Welcome! We look forward to working with you. As promised during our briefing, here is a quick summary of the next ethics steps after onboarding:

- **New Executive Order on Ethics:** It is our understanding that a new Executive Order will shortly be issued on ethics. Once that is available, we will be in touch with any action items and guidance on any additional ethics requirements.
- **Financial Disclosure Reporting:** In the next few days, you will receive an email from the *Integrity* system notifying you that you have been assigned a New Entrant OGE Form 278e, Public Financial Disclosure Report. A member of the Departmental Ethics Office will also reach out to schedule a time to complete an initial financial disclosure interview and to make sure that you can access and use the *Integrity* system. Your New Entrant OGE Form 278e is due on or before **February 19, 2021**, 30 days after your date of appointment.
- **Initial Ethics Training:** Early next week, you will be invited to attend a one-hour mandatory initial ethics training session. The ethics training session will cover conflicts of interest, impartiality, gifts, misuse of position, the Department's supplemental ethics regulations, and the requirements of the new Executive Order on ethics.
- **Interim Guidance on Recusals:** As we discussed during our initial ethics call with you, during your first week we will also provide you with draft interim recusal guidance and schedule a time to discuss the guidance so that it can be issued while your New Entrant OGE Form 278e is being completed, reviewed, and certified.
- **Final Guidance on Recusals:** Once your New Entrant OGE Form 278e is completed, reviewed, and certified, we will provide you with cautionary guidance, a recusal memorandum for you to sign, or a recusal and screening arrangement for you to sign and implement.

General Ethics Reminders:

- **Financial Conflicts of Interest:** Under 18 U.S.C. § 208(a), you may not participate personally and substantially in any particular matter in which you know that you have a financial interest directly and predictably affected by the matter, or in which you know that a person whose interests are imputed to you has a financial interest directly and predictably affected by the matter, unless you 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).

The interests of the following persons are imputed to you: any spouse or minor child; any general partner of a partnership in which you are a limited or general partner; any organization in which you serve as officer, director, trustee, general partner or employee; and any person or organization with which you are negotiating or have an arrangement concerning prospective employment.

- **Impartiality:** As required by 5 C.F.R. § 2635.502(a), if you know that a particular matter involving specific parties is likely to have a direct and predictable effect on the financial interest of a member of your household, or know that a person with whom you have a “covered relationship” is or represents a party to such matter, and where you determine that the circumstances would cause a reasonable person with knowledge of the relevant facts to question your impartiality in the matter, you may not participate in the matter unless you have informed the DEO of the appearance problem and received written authorization from the DEO to participate in the matter.

You have a “covered relationship” with any person for whom you have, within the last year, served as officer, director, trustee, general partner, agent, attorney, consultant, contractor or employee. Additionally, you have a “covered relationship” with members of your household and close friends and family.

Thank you for making time for an ethics briefing on your first day at the Department! For your reference, we have attached a copy of the briefing.

Please do not hesitate to reach out to us with any questions about your ethics obligations, or if we can be of any assistance. Thank you.

- Heather

Heather C. Gottry
Director & DAEO
Departmental Ethics Office | Office of the Solicitor
U.S. Department of the Interior | MIB 5308
(O) (202) 208-4472
(C) (202) 740-0417
Email: heather.gottry@sol.doi.gov

Visit us online at: www.doi.gov/ethics

Integrity is our mission.

From: [Gottry, Heather C](#)
To: [Klein, Elizabeth A](#)
Cc: [Garcia, Monica L](#)
Subject: Draft Interim Ethics Guidance Memorandum
Date: Monday, January 25, 2021 2:46:25 PM
Attachments: [Interim Ethics Recusal Memo - Klein \(Draft for Review 01.25.21\).docx](#)
[Attachment A to Interim Ethics Guidance Memorandum.docx](#)
[Attachment B to Interim Ethics Guidance Memorandum.docx](#)

Liz – Hello! As promised during our discussion before you onboarded, we have drafted a memorandum for your consideration that provides interim ethics guidance on your recusals.

The draft memorandum was developed using information included on your resume, your responses to our preliminary questions, and our notes from our discussion before you onboarded. As a result, we recognize that it may need to be updated further before it is finalized.

At your convenience, can you please review the draft memorandum? Once you have reviewed, we would like to schedule some time to walk through the recusals discussed in the attached memorandum. You are in the best position to know and identify your personal and imputed financial interests, your “covered relationships,” and your former employers and clients as defined in the Ethics Pledge, and we want to make sure that we have captured all relevant information.

Please let us know how best to find a convenient time on your schedule for us to discuss. Time permitting, we can also discuss during our meeting on financial disclosure tomorrow morning. We greatly appreciate your time and attention and hope that the draft memorandum provides helpful guidance on your recusals. Thank you.

- Heather

Heather C. Gottry
Director & DAEO
Departmental Ethics Office | Office of the Solicitor
U.S. Department of the Interior | MIB 5308
(O) (202) 208-4472
(C) (202) 740-0417
Email: heather.gottry@sol.doi.gov

Visit us online at: www.doi.gov/ethics

Integrity is our mission.

From: [Klein, Elizabeth A](#)
To: [Garcia, Monica L](#); [Gottry, Heather C](#)
Subject: FW: [EXTERNAL] Ben Klein client list
Date: Tuesday, January 26, 2021 12:03:14 PM
Attachments: [Elizabeth Klein ben klein client list.docx](#)

Hi again. As promised: attached is my husband's current client list. For the other questions in the draft recusal memo – last day at the State Impact Center was 1/15/21; state AG offices w/agreements were MA, WA, MN, NY, and MD; I taught one semester at AU – not really sure what my last official day was, so seems you could put 12/31/19. Let me know if you need anything else on this, will turn to the financial disclosure form next.

Thanks

Liz

From: Elizabeth Klein <lizjohnsonklein@gmail.com>
Sent: Tuesday, January 26, 2021 11:54 AM
To: Klein, Elizabeth A <Elizabeth_Klein@ios.doi.gov>
Subject: [EXTERNAL] Ben Klein client list

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

From: [Garcia, Monica L](#)
To: [Klein, Elizabeth A](#); [Gottry, Heather C](#)
Subject: RE: Financial disclosure form
Date: Wednesday, January 27, 2021 7:14:00 AM

Liz,

Thanks very much! I'll work on getting the data entry complete for your New Entrant OGE Form 278 and get back in touch when ready for your review and any further discussion.

-Monica

From: Klein, Elizabeth A <Elizabeth_Klein@ios.doi.gov>
Sent: Tuesday, January 26, 2021 12:42 PM
To: Gottry, Heather C <heather.gottry@sol.doi.gov>; Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: Financial disclosure form

Attached is the draft of my financial disclosure form. As I mentioned, I finished this up with the vetting team about 2 weeks ago so not much has changed other than last day of employment at the State Impact Center (1/15/21).

Thanks

Liz

From: [Klein, Elizabeth A](#)
To: [Garcia, Monica L](#); [Gottry, Heather C](#)
Subject: Recusal question
Date: Thursday, January 28, 2021 3:17:04 PM

Hi there,

Before landing here, a professor from NYU School of Law – who now happens to be the new Executive Director of my former Center – asked me to be a guest lecturer at one of her classes in March. How do we feel about that?

Thanks!

Liz

From: [Gottry, Heather C](#)
To: [Margaret E. Yukins](#)
Cc: [Garcia, Monica L](#)
Subject: RE: [EXTERNAL] Elizabeth Klein 278 Report Review - [Message contains CUI]
Date: Tuesday, February 2, 2021 2:04:12 PM

Margaret – Hello! Please send the questions to me and to Monica Garcia, copied above. We look forward to working with you. Many thanks!

- Heather

Heather C. Gottry
Director & DAEO
Departmental Ethics Office | Office of the Solicitor
U.S. Department of the Interior | MIB 5308
(O) (202) 208-4472
(C) (202) 740-0417
Email: heather.gottry@sol.doi.gov

Visit us online at: www.doi.gov/ethics

Integrity is our mission.

From: Margaret E. Yukins <meyukins@oge.gov>
Sent: Tuesday, February 2, 2021 1:08 PM
To: Gottry, Heather C <heather.gottry@sol.doi.gov>
Subject: [EXTERNAL] Elizabeth Klein 278 Report Review - [Message contains CUI]

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

CONTROLLED

Good afternoon Heather,

I am the OGE reviewer assigned to the Elizabeth Klein 278 report. We are almost finished putting together our first round review questions for the report. Who should we deliver the questions to once ready?

Thank you,

Margaret

Margaret Dylus-Yukins

Assistant Counsel
Ethics Law & Policy Branch
International Assistance & Outreach Program
U.S. Office of Government Ethics
(202) 482-9222 phone
meyukins@oge.gov <<mailto:meyukins@oge.gov>>
Pronouns: she/her

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: [Klein, Elizabeth A](#)
To: [Garcia, Monica L](#); [Gottry, Heather C](#)
Subject: RE: Recusal question
Date: Thursday, February 4, 2021 4:42:43 PM

Hi there,
Checking in on this question. Any thoughts?

From: Klein, Elizabeth A
Sent: Thursday, January 28, 2021 3:17 PM
To: Garcia, Monica L <monica.garcia@sol.doi.gov>; Gottry, Heather C <heather.gottry@sol.doi.gov>
Subject: Recusal question

Hi there,
Before landing here, a professor from NYU School of Law – who now happens to be the new Executive Director of my former Center – asked me to be a guest lecturer at one of her classes in March. How do we feel about that?
Thanks!
Liz

From: [Klein, Elizabeth A](#)
To: [Garcia, Monica L](#); [Gottry, Heather C](#)
Subject: RE: Recusal question
Date: Thursday, February 4, 2021 4:42:43 PM

Hi there,
Checking in on this question. Any thoughts?

From: Klein, Elizabeth A
Sent: Thursday, January 28, 2021 3:17 PM
To: Garcia, Monica L <monica.garcia@sol.doi.gov>; Gottry, Heather C <heather.gottry@sol.doi.gov>
Subject: Recusal question

Hi there,
Before landing here, a professor from NYU School of Law – who now happens to be the new Executive Director of my former Center – asked me to be a guest lecturer at one of her classes in March. How do we feel about that?
Thanks!
Liz

From: [Klein, Elizabeth A](#)
To: [Gottry, Heather C](#)
Cc: [Garcia, Monica L](#)
Subject: RE: Nominee Financial Disclosure Report
Date: Thursday, February 4, 2021 7:05:57 PM

Great – thanks for forwarding. May this “first” round be the last round. Can you talk at 11am tomorrow? I think most of these are easily answered, might need to rummage through paperwork for some.

Thanks

From: Gottry, Heather C <heather.gottry@sol.doi.gov>
Sent: Thursday, February 4, 2021 7:00 PM
To: Klein, Elizabeth A <Elizabeth_Klein@ios.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: Nominee Financial Disclosure Report

Liz – Congratulations! We just received notice from the U.S. Office of Government Ethics (OGE) that your Nominee OGE Form 278e, Public Financial Disclosure Report, is ready for our review and we can start the nominee ethics review process.

As part of the process, OGE provided us with a number of first round review questions in the attached document that we would like to discuss once you have had a chance to review. OGE requires that written responses be provided to each request for confirmation or question and we are happy to draft the responses after we touch base.

To that end, we are available when convenient for you to discuss the first round review questions, your Nominee OGE Form 278e, and the nominee ethics review process generally. Please do not hesitate to reach out in the interim if we can be of any assistance. Thank you.

- Heather

Heather C. Gottry
Director & DAEO
Departmental Ethics Office | Office of the Solicitor
U.S. Department of the Interior | MIB 5308
(O) (202) 208-4472
(C) (202) 740-0417
Email: heather.gottry@sol.doi.gov

Visit us online at: www.doi.gov/ethics

Integrity is our mission.

From: [Gottry, Heather C](#)
To: [Klein, Elizabeth A](#)
Cc: [Garcia, Monica L](#)
Subject: RE: Nominee Financial Disclosure Report
Date: Thursday, February 4, 2021 7:10:21 PM

Liz – Yes, we can make tomorrow at 11:00 work and I will send an invite shortly. We should absolutely keep our fingers crossed that the first round is the last round of questions (but if the past is any predictor of the future then OGE will generally make us go through several more rounds before they are willing to sign off)! We will do everything we can to move your report through as quickly as possible. Thanks.

- Heather

From: Klein, Elizabeth A <Elizabeth_Klein@ios.doi.gov>
Sent: Thursday, February 4, 2021 7:06 PM
To: Gottry, Heather C <heather.gottry@sol.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: RE: Nominee Financial Disclosure Report

Great – thanks for forwarding. May this “first” round be the last round. Can you talk at 11am tomorrow? I think most of these are easily answered, might need to rummage through paperwork for some.

Thanks

From: Gottry, Heather C <heather.gottry@sol.doi.gov>
Sent: Thursday, February 4, 2021 7:00 PM
To: Klein, Elizabeth A <Elizabeth_Klein@ios.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: Nominee Financial Disclosure Report

Liz – Congratulations! We just received notice from the U.S. Office of Government Ethics (OGE) that your Nominee OGE Form 278e, Public Financial Disclosure Report, is ready for our review and we can start the nominee ethics review process.

As part of the process, OGE provided us with a number of first round review questions in the attached document that we would like to discuss once you have had a chance to review. OGE requires that written responses be provided to each request for confirmation or question and we are happy to draft the responses after we touch base.

To that end, we are available when convenient for you to discuss the first round review questions, your Nominee OGE Form 278e, and the nominee ethics review process generally. Please do not hesitate to reach out in the interim if we can be of any assistance. Thank you.

- Heather

Heather C. Gottry
Director & DAEO
Departmental Ethics Office | Office of the Solicitor
U.S. Department of the Interior | MIB 5308
(O) (202) 208-4472
(C) (202) 740-0417
Email: heather.gottry@sol.doi.gov

Visit us online at: www.doi.gov/ethics

Integrity is our mission.

From: [Garcia, Monica L](#)
To: [Klein, Elizabeth A](#); [Gottry, Heather C](#)
Subject: RE: Recusal question
Date: Thursday, February 4, 2021 7:33:00 PM

Hi Liz – Please accept my apologies for the delay. We’ve analyzed this question under both official and personal capacity and would like to connect with you on this before finalizing our review.

If you don’t mind, I’d like to briefly discuss this during our meeting tomorrow at 11:00 to make sure we have the facts for our write up.

Thank you and I’m looking forward to seeing you again.

-Monica

From: Klein, Elizabeth A <Elizabeth_Klein@ios.doi.gov>
Sent: Thursday, February 4, 2021 4:43 PM
To: Garcia, Monica L <monica.garcia@sol.doi.gov>; Gottry, Heather C <heather.gottry@sol.doi.gov>
Subject: RE: Recusal question

Hi there,
Checking in on this question. Any thoughts?

From: Klein, Elizabeth A
Sent: Thursday, January 28, 2021 3:17 PM
To: Garcia, Monica L <monica.garcia@sol.doi.gov>; Gottry, Heather C <heather.gottry@sol.doi.gov>
Subject: Recusal question

Hi there,
Before landing here, a professor from NYU School of Law – who now happens to be the new Executive Director of my former Center – asked me to be a guest lecturer at one of her classes in March. How do we feel about that?
Thanks!
Liz

From: [Klein, Elizabeth A](#)
To: [Gottry, Heather C](#)
Cc: [Garcia, Monica L](#)
Subject: RE: Draft Responses to OGE First Round Questions
Date: Friday, February 5, 2021 6:46:28 PM

All of this looks good.
Thanks for your help,
Liz

From: Gottry, Heather C <heather.gottry@sol.doi.gov>
Sent: Friday, February 5, 2021 6:19 PM
To: Klein, Elizabeth A <Elizabeth_Klein@ios.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: Draft Responses to OGE First Round Questions

Liz – Hello! Thank you for taking time to walk through OGE’s first round review questions with us today. As promised, attached for your review please find draft responses to each request for confirmation or question as well as a copy of your updated Nominee OGE Form 278e. Can you please review and let us know if you have any edits or questions? If the attached look good, then we will send to OGE. We are considering how to scope and draft the authorization that we discussed and should have a draft ready to discuss early next week. Please do not hesitate to reach out in the interim if we can be of any assistance. Thank you and hope you have a great weekend.

- Heather

Heather C. Gottry
Director & DAEO
Departmental Ethics Office | Office of the Solicitor
U.S. Department of the Interior | MIB 5308
(O) (202) 208-4472
(C) (202) 740-0417
Email: heather.gottry@sol.doi.gov

Visit us online at: www.doi.gov/ethics

Integrity is our mission.

From: [Gottry, Heather C](#)
To: [Klein, Elizabeth A](#)
Cc: [Garcia, Monica L](#)
Subject: RE: Draft Responses to OGE First Round Questions
Date: Friday, February 5, 2021 6:59:58 PM

Great! I will send to OGE tonight. Thank you for the quick review.

From: Klein, Elizabeth A <Elizabeth_Klein@ios.doi.gov>
Sent: Friday, February 5, 2021 6:46 PM
To: Gottry, Heather C <heather.gottry@sol.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: RE: Draft Responses to OGE First Round Questions

All of this looks good.
Thanks for your help,
Liz

From: Gottry, Heather C <heather.gottry@sol.doi.gov>
Sent: Friday, February 5, 2021 6:19 PM
To: Klein, Elizabeth A <Elizabeth_Klein@ios.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: Draft Responses to OGE First Round Questions

Liz – Hello! Thank you for taking time to walk through OGE’s first round review questions with us today. As promised, attached for your review please find draft responses to each request for confirmation or question as well as a copy of your updated Nominee OGE Form 278e. Can you please review and let us know if you have any edits or questions? If the attached look good, then we will send to OGE. We are considering how to scope and draft the authorization that we discussed and should have a draft ready to discuss early next week. Please do not hesitate to reach out in the interim if we can be of any assistance. Thank you and hope you have a great weekend.

- Heather

Heather C. Gottry
Director & DAEO
Departmental Ethics Office | Office of the Solicitor
U.S. Department of the Interior | MIB 5308
(O) (202) 208-4472
(C) (202) 740-0417
Email: heather.gottry@sol.doi.gov

Visit us online at: www.doi.gov/ethics

Integrity is our mission.

Stephanie Nonluecha (CC'd) will be assisting me in the review of this report.

Best regards,

Margaret

Margaret Dylus-Yukins
Assistant Counsel
Ethics Law & Policy Branch
International Assistance & Outreach Program
U.S. Office of Government Ethics
(202) 482-9222 phone
meYukins@oge.gov <<mailto:meYukins@oge.gov>>
Pronouns: she/her

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: [Margaret E. Yukins](#)
To: [Gottry, Heather C](#)
Cc: [Stephanie Nonluecha](#); [Garcia, Monica L](#)
Subject: RE: [EXTERNAL] Elizabeth Klein 278 First Round Review Questions - [Message and attachment(s) contain CUI]
Date: Monday, February 8, 2021 8:30:39 AM

Thank you Heather, received! I will review and then get back to you about setting up a time to discuss Ms. Klein's .502 recusals.

Best,
Margaret

From: Gottry, Heather C [mailto:heather.gottry@sol.doi.gov]
Sent: Friday, February 5, 2021 7:06 PM
To: Margaret E. Yukins <meyukins@oge.gov>
Cc: Stephanie Nonluecha <snonlue@oge.gov>; Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: RE: [EXTERNAL] Elizabeth Klein 278 First Round Review Questions - [Message and attachment(s) contain CUI]

Margaret – Hello! Attached please find responses to OGE's First Round Review Questions. We have updated Ms. Klein's Nominee OGE Form 278e as noted in the responses. We are also considering whether it may be appropriate to grant Ms. Klein an authorization for her 502 client recusals. Please let us know if it would be helpful to set up a time to discuss further. Thank you and hope you both have a great weekend!

- Heather

Heather C. Gottry
Director & DAEO
Departmental Ethics Office | Office of the Solicitor
U.S. Department of the Interior | MIB 5308
(O) (202) 208-4472
(C) (202) 740-0417
Email: heather.gottry@sol.doi.gov

Visit us online at: www.doi.gov/ethics

Integrity is our mission.

From: Margaret E. Yukins <meyukins@oge.gov>
Sent: Tuesday, February 2, 2021 2:33 PM
To: Gottry, Heather C <heather.gottry@sol.doi.gov>; Garcia, Monica L <monica.garcia@sol.doi.gov>
Cc: Stephanie Nonluecha <snonlue@oge.gov>
Subject: [EXTERNAL] Elizabeth Klein 278 First Round Review Questions - [Message and attachment(s) contain CUI]



This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

CONTROLLED

Email and attachment(s) contain CUI.

Hi Heather and Monica,

Attached are the first round review questions for Elizabeth Klein's 278 report. Please feel free to reach out should you have any questions or concerns.

Stephanie Nonluecha (CC'd) will be assisting me in the review of this report.

Best regards,

Margaret

Margaret Dylus-Yukins
Assistant Counsel
Ethics Law & Policy Branch
International Assistance & Outreach Program
U.S. Office of Government Ethics
(202) 482-9222 phone
meyukins@oge.gov <<mailto:meyukins@oge.gov>>
Pronouns: she/her

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: [Garcia, Monica L](#)
To: [Klein, Elizabeth A](#); [Gottry, Heather C](#)
Subject: RE: Recusal question
Date: Monday, February 8, 2021 12:40:00 PM

Liz – Hello again! Thank you for your patience while we worked on this question. After review, we determined that there is currently no legal objection under the ethics statutes and regulations, or the Administration’s Ethics Pledge (Pledge) to you serving as a one-time guest lecturer to a class of law students and New York University (NYU) School of Law.

The invitation was extended to you by a former colleague at the NYU School of Law State Energy & Environmental Impact Center before you were appointed to your position at the Department of the Interior or served on the Biden-Harris transition team. You will deliver the lecture in your personal capacity and will not receive compensation for the guest lecture.

Based on this information, we determined that the invitation to be a guest lecturer was extended to you primarily due to your professional expertise and not your official government position.

As an initial matter, NYU Law is your former employer for the purposes of the impartiality regulations at 5 C.F.R. § 2635.502 and the Ethics Pledge. As such, you are limited from participating in certain issues, actions, and decisions in your official capacity where NYU School of Law is a party or represents a party. However, because you plan to deliver this guest lecture in your personal capacity, the restriction will not apply.

We have analyzed your request as a personal capacity outside activity under the applicable regulations governing teaching, speaking, and writing. Under 5 C.F.R. § 2635.807(a), you may not receive compensation from any source other than the U.S. Government for teaching, speaking, or writing that “relates” to your official duties, subject to limited exceptions. Based upon the information provided, you will not be compensated for your guest lecture. Please note that delivering a guest lecture would not require prior approval under the Department’s supplemental ethics regulations, found at 5 C.F.R. 3501.105(b)(1)(i).

Because you plan to deliver a guest lecture at NYU School of Law in your personal capacity, and without compensation, you may do so subject to the following restrictions:

Reference to Official Position: Generally, you may not use or permit the use of your official title or position to identify you in connection with your outside activity. 5 C.F.R. § 2635.807(b). However, as you will be engaged in teaching/speaking as an outside activity, you may include or permit the inclusion of your title or position as one of several biographical details when such information is given no more prominence than other significant biographical details. 5 C.F.R. § 2635.807(b).

No Endorsement: You may not permit the use of your Government position or title or any authority associated with your public office to endorse any product, service, or enterprise, including your teaching/speaking engagement. 5 C.F.R. § 2635.702(c).

No Use of Official Time or Government Property: While engaging in outside activities, Federal

employees are not permitted to use official time or Government property. 5 C.F.R. § 2635.101(b) (9), 704, and 705.

-

No Use of Public Office for Private Gain: Pursuant to 5 C.F.R. § 2635.702, you may not use your public office (authority or title) for your own private gain or the private gain of others, to include NYU School of Law.

-

Nonpublic Information: You may not use or improperly disclose nonpublic information or otherwise protected information acquired as part of your official duties which is not generally available to the public. 18 U.S.C. § 1905; 5 C.F.R. § 2635.703; 41 U.S.C. § 2102.

Please let us know if we can be of further assistance with this or any other question.

-Monica

From: Garcia, Monica L

Sent: Thursday, February 4, 2021 7:34 PM

To: Klein, Elizabeth A <Elizabeth_Klein@ios.doi.gov>; Gottry, Heather C <heather.gottry@sol.doi.gov>

Subject: RE: Recusal question

Hi Liz – Please accept my apologies for the delay. We’ve analyzed this question under both official and personal capacity and would like to connect with you on this before finalizing our review.

If you don’t mind, I’d like to briefly discuss this during our meeting tomorrow at 11:00 to make sure we have the facts for our write up.

Thank you and I’m looking forward to seeing you again.

-Monica

From: Klein, Elizabeth A <Elizabeth_Klein@ios.doi.gov>

Sent: Thursday, February 4, 2021 4:43 PM

To: Garcia, Monica L <monica.garcia@sol.doi.gov>; Gottry, Heather C <heather.gottry@sol.doi.gov>

Subject: RE: Recusal question

Hi there,

Checking in on this question. Any thoughts?

From: Klein, Elizabeth A

Sent: Thursday, January 28, 2021 3:17 PM

To: Garcia, Monica L <monica.garcia@sol.doi.gov>; Gottry, Heather C <heather.gottry@sol.doi.gov>

Subject: Recusal question

Hi there,

Before landing here, a professor from NYU School of Law – who now happens to be the new Executive Director of my former Center – asked me to be a guest lecturer at one of her classes in March. How do we feel about that?

Thanks!

Liz

From: [Gottry, Heather C](#)
To: [Wallace, Andrew G](#)
Cc: [Salotti, Christopher](#); [Garcia, Monica L](#)
Subject: Klein - Nominee Ethics Review Process
Date: Monday, February 8, 2021 7:02:39 PM

Drew – Hello again! I wanted to send a quick heads up that we have started the nominee ethics review process for Liz Klein. Please let us know if it would be helpful to touch base or to discuss further. Many thanks!

- Heather

Heather C. Gottry
Director & DAEO
Departmental Ethics Office | Office of the Solicitor
U.S. Department of the Interior | MIB 5308
(O) (202) 208-4472
(C) (202) 740-0417
Email: heather.gottry@sol.doi.gov

Visit us online at: www.doi.gov/ethics

Integrity is our mission.

From: [Wallace, Andrew G](#)
To: [Gottry, Heather C](#)
Cc: [Salotti, Christopher](#); [Garcia, Monica L](#)
Subject: Re: Klein - Nominee Ethics Review Process
Date: Monday, February 8, 2021 7:11:05 PM

Chris I defer to you but I think just updating us on when it's ready to go and any issues is the key thing.

Get [Outlook for iOS](#)

From: Gottry, Heather C <heather.gottry@sol.doi.gov>
Sent: Monday, February 8, 2021 7:02:36 PM
To: Wallace, Andrew G <andrew_wallace@ios.doi.gov>
Cc: Salotti, Christopher <Chris_Salotti@ios.doi.gov>; Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: Klein - Nominee Ethics Review Process

Drew – Hello again! I wanted to send a quick heads up that we have started the nominee ethics review process for Liz Klein. Please let us know if it would be helpful to touch base or to discuss further. Many thanks!

- Heather

Heather C. Gottry
Director & DAEO
Departmental Ethics Office | Office of the Solicitor
U.S. Department of the Interior | MIB 5308
(O) (202) 208-4472
(C) (202) 740-0417
Email: heather.gottry@sol.doi.gov

Visit us online at: www.doi.gov/ethics

Integrity is our mission.

From: [Klein, Elizabeth A](#)
To: [Gottry, Heather C](#)
Cc: [Garcia, Monica L](#)
Subject: RE: Draft Responses to OGE First Round Questions
Date: Tuesday, February 9, 2021 11:45:45 AM

Hi there!

Just checking in on the status of the draft authorization that we discussed.

Thanks,

Liz

From: Gottry, Heather C <heather.gottry@sol.doi.gov>
Sent: Friday, February 5, 2021 7:00 PM
To: Klein, Elizabeth A <Elizabeth_Klein@ios.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: RE: Draft Responses to OGE First Round Questions

Great! I will send to OGE tonight. Thank you for the quick review.

From: Klein, Elizabeth A <Elizabeth_Klein@ios.doi.gov>
Sent: Friday, February 5, 2021 6:46 PM
To: Gottry, Heather C <heather.gottry@sol.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: RE: Draft Responses to OGE First Round Questions

All of this looks good.

Thanks for your help,

Liz

From: Gottry, Heather C <heather.gottry@sol.doi.gov>
Sent: Friday, February 5, 2021 6:19 PM
To: Klein, Elizabeth A <Elizabeth_Klein@ios.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: Draft Responses to OGE First Round Questions

Liz – Hello! Thank you for taking time to walk through OGE’s first round review questions with us today. As promised, attached for your review please find draft responses to each request for confirmation or question as well as a copy of your updated Nominee OGE Form 278e. Can you please review and let us know if you have any edits or questions? If the attached look good, then we will send to OGE. We are considering how to scope and draft the authorization that we discussed and should have a draft ready to discuss early next week. Please do not hesitate to reach out in the interim if we can be of any assistance. Thank you and hope you have a great weekend.

- Heather

Heather C. Gottry
Director & DAEO
Departmental Ethics Office | Office of the Solicitor
U.S. Department of the Interior | MIB 5308
(O) (202) 208-4472
(C) (202) 740-0417
Email: heather.gottry@sol.doi.gov

Visit us online at: www.doi.gov/ethics

Integrity is our mission.

From: [Gottry, Heather C](#)
To: [Margaret E. Yukins](#)
Cc: [Stephanie Nonluecha](#); [Garcia, Monica L](#)
Subject: RE: [EXTERNAL] Elizabeth Klein Second Round Review Questions - [Message and attachment(s) contain CUI]
Date: Wednesday, February 10, 2021 2:28:53 PM

Margaret – Hello! We will review and circle back with responses. Would you and Stephanie like to schedule a call to discuss our thinking on a possible 502 authorization? If so, what times work tomorrow and Friday? Many thanks.

- Heather

Heather C. Gottry
Director & DAEO
Departmental Ethics Office | Office of the Solicitor
U.S. Department of the Interior | MIB 5308
(O) (202) 208-4472
(C) (202) 740-0417
Email: heather.gottry@sol.doi.gov

Visit us online at: www.doi.gov/ethics

Integrity is our mission.

From: Margaret E. Yukins <meyukins@oge.gov>
Sent: Wednesday, February 10, 2021 12:47 PM
To: Gottry, Heather C <heather.gottry@sol.doi.gov>; Garcia, Monica L <monica.garcia@sol.doi.gov>
Cc: Stephanie Nonluecha <snonlue@oge.gov>
Subject: [EXTERNAL] Elizabeth Klein Second Round Review Questions - [Message and attachment(s) contain CUI]

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

CONTROLLED

Email and attachment(s) contain CUI.

Hi Heather and Monica,

Attached are the second round review questions for Elizabeth Klein's 278 report. Please do not hesitate to reach out should you have any questions or concerns.

Best regards,

Margaret

Margaret Dylus-Yukins
Assistant Counsel
Ethics Law & Policy Branch
International Assistance & Outreach Program
U.S. Office of Government Ethics
(202) 482-9222
meyukins@oge.gov <<mailto:meyukins@oge.gov>>
Pronouns: she/her

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: [Gottry, Heather C](#)
To: [Garcia, Monica L](#)
Subject: FW: Quick 502 Authorization Question
Date: Wednesday, February 10, 2021 3:33:57 PM

FYSA. I will keep you in the loop and hope he will be able to touch base.

From: Gottry, Heather C
Sent: Wednesday, February 10, 2021 3:33 PM
To: Hall, Randall (HHS/OGC) <randall.hall@hhs.gov>
Subject: Quick 502 Authorization Question

Randy – Hello! I hope you are having a good week. I was talking with OGE about the scope of a 502 recusal from several states for a potential nominee and they mentioned that they had recently worked with you on a similar issue for Becerra. Would you be willing to chat sometime today or tomorrow about the scope of the authorization referenced in his ethics agreement? If so, please let me know what times work best for you. Many, many thanks in advance.

- Heather

Heather C. Gottry
Director & DAEO
Departmental Ethics Office | Office of the Solicitor
U.S. Department of the Interior | MIB 5308
(O) (202) 208-4472
(C) (202) 740-0417
Email: heather.gottry@sol.doi.gov

Visit us online at: www.doi.gov/ethics

Integrity is our mission.

From: [Margaret E. Yukins](#)
To: [Gottry, Heather C](#)
Cc: [Stephanie Nonluecha](#); [Garcia, Monica L](#)
Subject: RE: [EXTERNAL] Elizabeth Klein Second Round Review Questions - [Message and attachment(s) contain CUI]
Date: Wednesday, February 10, 2021 6:16:15 PM

Hi Heather,

Both Stephanie and I are free tomorrow any time after 11:00 am and all day Friday. Let us know when works for you.

Thanks,
Margaret

From: Gottry, Heather C [mailto:heather.gottry@sol.doi.gov]
Sent: Wednesday, February 10, 2021 2:29 PM
To: Margaret E. Yukins <meyukins@oge.gov>
Cc: Stephanie Nonluecha <snonlue@oge.gov>; Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: RE: [EXTERNAL] Elizabeth Klein Second Round Review Questions - [Message and attachment(s) contain CUI]

Margaret – Hello! We will review and circle back with responses. Would you and Stephanie like to schedule a call to discuss our thinking on a possible 502 authorization? If so, what times work tomorrow and Friday? Many thanks.

- Heather

Heather C. Gottry
Director & DAEO
Departmental Ethics Office | Office of the Solicitor
U.S. Department of the Interior | MIB 5308
(O) (202) 208-4472
(C) (202) 740-0417
Email: heather.gottry@sol.doi.gov

Visit us online at: www.doi.gov/ethics

Integrity is our mission.

From: Margaret E. Yukins <meyukins@oge.gov>
Sent: Wednesday, February 10, 2021 12:47 PM
To: Gottry, Heather C <heather.gottry@sol.doi.gov>; Garcia, Monica L <monica.garcia@sol.doi.gov>
Cc: Stephanie Nonluecha <snonlue@oge.gov>
Subject: [EXTERNAL] Elizabeth Klein Second Round Review Questions - [Message and attachment(s) contain CUI]



This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

CONTROLLED

Email and attachment(s) contain CUI.

Hi Heather and Monica,

Attached are the second round review questions for Elizabeth Klein's 278 report. Please do not hesitate to reach out should you have any questions or concerns.

Best regards,

Margaret

Margaret Dylus-Yukins
Assistant Counsel
Ethics Law & Policy Branch
International Assistance & Outreach Program
U.S. Office of Government Ethics
(202) 482-9222
meyukins@oge.gov <<mailto:meyukins@oge.gov>>
Pronouns: she/her

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: [Gottry, Heather C](#)
To: [Margaret E. Yukins](#)
Cc: [Stephanie Nonluecha](#); [Garcia, Monica L](#)
Subject: RE: [EXTERNAL] Elizabeth Klein Second Round Review Questions - [Message and attachment(s) contain CUI]
Date: Wednesday, February 10, 2021 7:12:04 PM

Margaret – Thanks! I just sent an invite for a call at 4:30 tomorrow. If that does not work for you or Stephanie, please let me know and I will look for a time on Friday. Have a good evening!

- Heather

From: Margaret E. Yukins <meyukins@oge.gov>
Sent: Wednesday, February 10, 2021 6:15 PM
To: Gottry, Heather C <heather.gottry@sol.doi.gov>
Cc: Stephanie Nonluecha <snonlue@oge.gov>; Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: RE: [EXTERNAL] Elizabeth Klein Second Round Review Questions - [Message and attachment(s) contain CUI]

Hi Heather,

Both Stephanie and I are free tomorrow any time after 11:00 am and all day Friday. Let us know when works for you.

Thanks,
Margaret

From: Gottry, Heather C [<mailto:heather.gottry@sol.doi.gov>]
Sent: Wednesday, February 10, 2021 2:29 PM
To: Margaret E. Yukins <meyukins@oge.gov>
Cc: Stephanie Nonluecha <snonlue@oge.gov>; Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: RE: [EXTERNAL] Elizabeth Klein Second Round Review Questions - [Message and attachment(s) contain CUI]

Margaret – Hello! We will review and circle back with responses. Would you and Stephanie like to schedule a call to discuss our thinking on a possible 502 authorization? If so, what times work tomorrow and Friday? Many thanks.

- Heather

Heather C. Gottry
Director & DAEO
Departmental Ethics Office | Office of the Solicitor
U.S. Department of the Interior | MIB 5308
(O) (202) 208-4472
(C) (202) 740-0417
Email: heather.gottry@sol.doi.gov

Visit us online at: www.doi.gov/ethics

Integrity is our mission.

From: Margaret E. Yukins <meyukins@oge.gov>

Sent: Wednesday, February 10, 2021 12:47 PM

To: Gottry, Heather C <heather.gottry@sol.doi.gov>; Garcia, Monica L <monica.garcia@sol.doi.gov>

Cc: Stephanie Nonluecha <snonlue@oge.gov>

Subject: [EXTERNAL] Elizabeth Klein Second Round Review Questions - [Message and attachment(s) contain CUI]

<p>This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.</p>
--

CONTROLLED

Email and attachment(s) contain CUI.

Hi Heather and Monica,

Attached are the second round review questions for Elizabeth Klein's 278 report. Please do not hesitate to reach out should you have any questions or concerns.

Best regards,

Margaret

Margaret Dylus-Yukins
Assistant Counsel
Ethics Law & Policy Branch
International Assistance & Outreach Program
U.S. Office of Government Ethics
(202) 482-9222
meyukins@oge.gov <<mailto:meyukins@oge.gov>>
Pronouns: she/her

OGC 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: Gottry, Heather C <heather.gottry@sol.doi.gov>
Sent: Friday, February 5, 2021 7:00 PM
To: Klein, Elizabeth A <Elizabeth_Klein@ios.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: RE: Draft Responses to OGE First Round Questions

Great! I will send to OGE tonight. Thank you for the quick review.

From: Klein, Elizabeth A <Elizabeth_Klein@ios.doi.gov>
Sent: Friday, February 5, 2021 6:46 PM
To: Gottry, Heather C <heather.gottry@sol.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: RE: Draft Responses to OGE First Round Questions

All of this looks good.
Thanks for your help,
Liz

From: Gottry, Heather C <heather.gottry@sol.doi.gov>
Sent: Friday, February 5, 2021 6:19 PM
To: Klein, Elizabeth A <Elizabeth_Klein@ios.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: Draft Responses to OGE First Round Questions

Liz – Hello! Thank you for taking time to walk through OGE’s first round review questions with us today. As promised, attached for your review please find draft responses to each request for confirmation or question as well as a copy of your updated Nominee OGE Form 278e. Can you please review and let us know if you have any edits or questions? If the attached look good, then we will send to OGE. We are considering how to scope and draft the authorization that we discussed and should have a draft ready to discuss early next week. Please do not hesitate to reach out in the interim if we can be of any assistance. Thank you and hope you have a great weekend.

- Heather

Heather C. Gottry
Director & DAEO
Departmental Ethics Office | Office of the Solicitor
U.S. Department of the Interior | MIB 5308
(O) (202) 208-4472
(C) (202) 740-0417
Email: heather.gottry@sol.doi.gov

Visit us online at: www.doi.gov/ethics

Integrity is our mission.

From: [Margaret E. Yukins](#)
To: [Gottry, Heather C](#)
Cc: [Stephanie Nonluecha](#); [Garcia, Monica L](#)
Subject: RE: [EXTERNAL] Elizabeth Klein Second Round Review Questions - [Message and attachment(s) contain CUI]
Date: Friday, February 12, 2021 1:01:02 PM

Thank you Heather! Stephanie and I are still putting together a samples list, but plan to get that over to you soon.

From: Gottry, Heather C [mailto:heather.gottry@sol.doi.gov]
Sent: Friday, February 12, 2021 12:54 PM
To: Margaret E. Yukins <meyukins@oge.gov>
Cc: Stephanie Nonluecha <snonlue@oge.gov>; Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: RE: [EXTERNAL] Elizabeth Klein Second Round Review Questions - [Message and attachment(s) contain CUI]

Margaret – Hello! Thank you again for taking the time to speak with us yesterday. Attached please find responses to the Second Round Review Questions. If helpful, we can also provide a copy of her husband's current client list. We are still assessing the 502 recusal and welcome the opportunity to review the samples we discussed. Please do not hesitate to reach out with any questions or if we can be of any assistance. Thanks and hope you have a great weekend!

- Heather

From: Margaret E. Yukins <meyukins@oge.gov>
Sent: Wednesday, February 10, 2021 6:15 PM
To: Gottry, Heather C <heather.gottry@sol.doi.gov>
Cc: Stephanie Nonluecha <snonlue@oge.gov>; Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: RE: [EXTERNAL] Elizabeth Klein Second Round Review Questions - [Message and attachment(s) contain CUI]

Hi Heather,

Both Stephanie and I are free tomorrow any time after 11:00 am and all day Friday. Let us know when works for you.

Thanks,
Margaret

From: Gottry, Heather C [mailto:heather.gottry@sol.doi.gov]
Sent: Wednesday, February 10, 2021 2:29 PM
To: Margaret E. Yukins <meyukins@oge.gov>
Cc: Stephanie Nonluecha <snonlue@oge.gov>; Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: RE: [EXTERNAL] Elizabeth Klein Second Round Review Questions - [Message and attachment(s) contain CUI]

Margaret – Hello! We will review and circle back with responses. Would you and Stephanie like to schedule a call to discuss our thinking on a possible 502 authorization? If so, what times work

tomorrow and Friday? Many thanks.

- Heather

Heather C. Gottry
Director & DAEO
Departmental Ethics Office | Office of the Solicitor
U.S. Department of the Interior | MIB 5308
(O) (202) 208-4472
(C) (202) 740-0417
Email: heather.gottry@sol.doi.gov

Visit us online at: www.doi.gov/ethics

Integrity is our mission.

From: Margaret E. Yukins <meyukins@oge.gov>
Sent: Wednesday, February 10, 2021 12:47 PM
To: Gottry, Heather C <heather.gottry@sol.doi.gov>; Garcia, Monica L <monica.garcia@sol.doi.gov>
Cc: Stephanie Nonluecha <snonlue@oge.gov>
Subject: [EXTERNAL] Elizabeth Klein Second Round Review Questions - [Message and attachment(s) contain CUI]

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

CONTROLLED
Email and attachment(s) contain CUI.

Hi Heather and Monica,

Attached are the second round review questions for Elizabeth Klein's 278 report. Please do not hesitate to reach out should you have any questions or concerns.

Best regards,

Margaret

Margaret Dylus-Yukins
Assistant Counsel
Ethics Law & Policy Branch
International Assistance & Outreach Program
U.S. Office of Government Ethics

(202) 482-9222

meyukins@oge.gov <<mailto:meyukins@oge.gov>>

Pronouns: she/her

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: [Gottry, Heather C](#)
To: [Garcia, Monica L](#)
Subject: Draft Klein EA
Date: Friday, February 12, 2021 4:20:46 PM
Attachments: [Klein - Draft EA \(02.12.21\).docx](#)

For review and discussion. Thanks!

Heather C. Gottry
Director & DAEO
Departmental Ethics Office | Office of the Solicitor
U.S. Department of the Interior | MIB 5308
(O) (202) 208-4472
(C) (202) 740-0417
Email: heather.gottry@sol.doi.gov

Visit us online at: www.doi.gov/ethics

Integrity is our mission.

From: [Gottry, Heather C](#)
To: [Margaret E. Yukins](#)
Cc: [Stephanie Nonluecha](#); [Garcia, Monica L](#)
Subject: RE: [EXTERNAL] Elizabeth Klein Second Round Review Questions - [Message and attachment(s) contain CUI]
Date: Friday, February 12, 2021 5:50:24 PM
Attachments: [Klein - Draft EA for Review \(02.12.21\).docx](#)

Margaret – Hello! As promised, attached please find our first draft of an EA for Klein. We modeled Section 2 on the Becerra EA and are happy to discuss any feedback. In drafting, we realized that Liz had not included her position with the transition team on her OGE 278 and will add that in once we have the needed information from Liz. Many thanks and hope you have a good weekend!

- Heather

From: Margaret E. Yukins <meyukins@oge.gov>
Sent: Friday, February 12, 2021 1:01 PM
To: Gottry, Heather C <heather.gottry@sol.doi.gov>
Cc: Stephanie Nonluecha <snonlue@oge.gov>; Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: RE: [EXTERNAL] Elizabeth Klein Second Round Review Questions - [Message and attachment(s) contain CUI]

Thank you Heather! Stephanie and I are still putting together a samples list, but plan to get that over to you soon.

From: Gottry, Heather C [<mailto:heather.gottry@sol.doi.gov>]
Sent: Friday, February 12, 2021 12:54 PM
To: Margaret E. Yukins <meyukins@oge.gov>
Cc: Stephanie Nonluecha <snonlue@oge.gov>; Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: RE: [EXTERNAL] Elizabeth Klein Second Round Review Questions - [Message and attachment(s) contain CUI]

Margaret – Hello! Thank you again for taking the time to speak with us yesterday. Attached please find responses to the Second Round Review Questions. If helpful, we can also provide a copy of her husband's current client list. We are still assessing the 502 recusal and welcome the opportunity to review the samples we discussed. Please do not hesitate to reach out with any questions or if we can be of any assistance. Thanks and hope you have a great weekend!

- Heather

From: Margaret E. Yukins <meyukins@oge.gov>
Sent: Wednesday, February 10, 2021 6:15 PM
To: Gottry, Heather C <heather.gottry@sol.doi.gov>
Cc: Stephanie Nonluecha <snonlue@oge.gov>; Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: RE: [EXTERNAL] Elizabeth Klein Second Round Review Questions - [Message and attachment(s) contain CUI]

Hi Heather,

Both Stephanie and I are free tomorrow any time after 11:00 am and all day Friday. Let us know when works for you.

Thanks,
Margaret

From: Gottry, Heather C [<mailto:heather.gottry@sol.doi.gov>]
Sent: Wednesday, February 10, 2021 2:29 PM
To: Margaret E. Yukins <meyukins@oge.gov>
Cc: Stephanie Nonluecha <snonlue@oge.gov>; Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: RE: [EXTERNAL] Elizabeth Klein Second Round Review Questions - [Message and attachment(s) contain CUI]

Margaret – Hello! We will review and circle back with responses. Would you and Stephanie like to schedule a call to discuss our thinking on a possible 502 authorization? If so, what times work tomorrow and Friday? Many thanks.

- Heather

Heather C. Gottry
Director & DAEO
Departmental Ethics Office | Office of the Solicitor
U.S. Department of the Interior | MIB 5308
(O) (202) 208-4472
(C) (202) 740-0417
Email: heather.gottry@sol.doi.gov

Visit us online at: www.doi.gov/ethics

Integrity is our mission.

From: Margaret E. Yukins <meyukins@oge.gov>
Sent: Wednesday, February 10, 2021 12:47 PM
To: Gottry, Heather C <heather.gottry@sol.doi.gov>; Garcia, Monica L <monica.garcia@sol.doi.gov>
Cc: Stephanie Nonluecha <snonlue@oge.gov>
Subject: [EXTERNAL] Elizabeth Klein Second Round Review Questions - [Message and attachment(s) contain CUI]

<p>This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.</p>
--

CONTROLLED

Email and attachment(s) contain CUI.

Hi Heather and Monica,

Attached are the second round review questions for Elizabeth Klein's 278 report. Please do not hesitate to reach out should you have any questions or concerns.

Best regards,

Margaret

Margaret Dylus-Yukins
Assistant Counsel
Ethics Law & Policy Branch
International Assistance & Outreach Program
U.S. Office of Government Ethics
(202) 482-9222
me yukins@oge.gov <<mailto:me yukins@oge.gov>>
Pronouns: she/her

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: [Gottry, Heather C](#)
To: [Klein, Elizabeth A](#)
Cc: [Garcia, Monica L](#)
Subject: RE: Draft Responses to OGE First Round Questions
Date: Friday, February 12, 2021 6:02:44 PM
Attachments: [Klein - Draft EA for Review \(02.12.21\).docx](#)

Liz – Hello! Attached please find the first draft of your ethics agreement that we shared with OGE for their review. The draft includes required language from OGE’s 2020 Ethics agreement guide we will likely not be able to request edits to their standard language. Additionally, OGE generally requests that agencies not share draft ethics agreements with potential nominees until they have signed off on a draft, but we would like your input on the non-standard language in Section 2 discussing potential authorizations. It is modeled after the language in the Becerra ethics agreement and modified to reflect that the covered relationship is with former clients as well as a former employer. As drafted, we would be signaling that you could receive authorizations for: (1) new particular matters involving specific parties in which your former clients are or represent a party; and (2) existing particular matters involving specific parties in which your former clients are or represent a party and which you did not participate personally and substantially in while serving as the Deputy Director of the State Impact Center. I anticipate that OGE will have edits to this draft, but we welcome your input and are available to discuss when convenient. Thank you and hope you have a great weekend!

- Heather

From: Klein, Elizabeth A <Elizabeth_Klein@ios.doi.gov>
Sent: Friday, February 12, 2021 3:01 PM
To: Gottry, Heather C <heather.gottry@sol.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: Re: Draft Responses to OGE First Round Questions

Great. I’ll look forward to seeing the draft agreement.
Thanks

Get [Outlook for iOS](#)

From: Gottry, Heather C <heather.gottry@sol.doi.gov>
Sent: Friday, February 12, 2021 2:34:35 PM
To: Klein, Elizabeth A <Elizabeth_Klein@ios.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: RE: Draft Responses to OGE First Round Questions

Liz – Hello! Please accept my apologies for the delay in responding and thank you for getting your responses back to us so quickly. We slightly reformatted the responses you provided and sent the attached back to OGE. We also had a long discussion with your OGE reviewers last evening and they would like us to consider the approach reflected in Becerra Ethics Agreement to a 502 authorization, which I have attached for your reference. We are drafting an ethics agreement today that OGE will need to review and provide input on. They also will be sending us sample 502 authorizations that they recommend we use as a model when an authorization is needed. Please let us know if it would be helpful to touch base. Thank you.

- Heather

Heather C. Gottry
Director & DAEO
Departmental Ethics Office | Office of the Solicitor
U.S. Department of the Interior | MIB 5308
(O) (202) 208-4472
(C) (202) 740-0417
Email: heather.gottry@sol.doi.gov

Visit us online at: www.doi.gov/ethics

Integrity is our mission.

From: Klein, Elizabeth A <Elizabeth_Klein@ios.doi.gov>
Sent: Friday, February 12, 2021 1:38 PM
To: Gottry, Heather C <heather.gottry@sol.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: RE: Draft Responses to OGE First Round Questions

Hi there,
Just checking in on this again – I think there's eagerness to move things along!
Thanks
Liz

From: Klein, Elizabeth A
Sent: Thursday, February 11, 2021 8:05 AM
To: Gottry, Heather C <heather.gottry@sol.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: RE: Draft Responses to OGE First Round Questions

I've included answers to all the questions that seem directed at me in the attached. Lawyer speak: I hereby grant you permission to make all the other technical corrections they have requested.

Available to discuss at 9:30am, b/w 11am-2pm, or b/w 3-4pm today if needed.

Thanks
Liz

From: Gottry, Heather C <heather.gottry@sol.doi.gov>
Sent: Wednesday, February 10, 2021 7:20 PM
To: Klein, Elizabeth A <Elizabeth_Klein@ios.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: RE: Draft Responses to OGE First Round Questions

Liz - Hello! Please accept my apologies for the delay in getting back to you. I have actually attempted to send two responses to your message, but discovered that there is a problem with my Outlook permanently deleting rather than sending a number of my email messages. I am hoping that the Help Desk can quickly resolve this issue, and that, once they do, you do not receive repeated messages from me.

We are still working on drafting and scoping the authorization we discussed. OGE has requested that we coordinate with them on the authorization as well as any limitations established by the authorization. We are scheduled to meet with them tomorrow afternoon and I hope to have a more comprehensive update after that call.

Additionally, we received the attached Second Round Review Questions from OGE this afternoon. Once you have had a chance to review, we are available when convenient discuss drafting the responses back to OGE. Please do not hesitate to reach out in the interim if we can be of any assistance. Thank you.

- Heather

Heather C. Gottry
Director & DAEO
Departmental Ethics Office | Office of the Solicitor
U.S. Department of the Interior | MIB 5308
(O) (202) 208-4472
(C) (202) 740-0417
Email: heather.gottry@sol.doi.gov

Visit us online at: www.doi.gov/ethics

Integrity is our mission.

From: Klein, Elizabeth A <Elizabeth_Klein@ios.doi.gov>
Sent: Tuesday, February 9, 2021 11:46 AM
To: Gottry, Heather C <heather.gottry@sol.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: RE: Draft Responses to OGE First Round Questions

Hi there!
Just checking in on the status of the draft authorization that we discussed.
Thanks,
Liz

From: Gottry, Heather C <heather.gottry@sol.doi.gov>
Sent: Friday, February 5, 2021 7:00 PM
To: Klein, Elizabeth A <Elizabeth_Klein@ios.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: RE: Draft Responses to OGE First Round Questions

Great! I will send to OGE tonight. Thank you for the quick review.

From: Klein, Elizabeth A <Elizabeth_Klein@ios.doi.gov>
Sent: Friday, February 5, 2021 6:46 PM
To: Gottry, Heather C <heather.gottry@sol.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: RE: Draft Responses to OGE First Round Questions

All of this looks good.
Thanks for your help,
Liz

From: Gottry, Heather C <heather.gottry@sol.doi.gov>
Sent: Friday, February 5, 2021 6:19 PM
To: Klein, Elizabeth A <Elizabeth_Klein@ios.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: Draft Responses to OGE First Round Questions

Liz – Hello! Thank you for taking time to walk through OGE’s first round review questions with us today. As promised, attached for your review please find draft responses to each request for confirmation or question as well as a copy of your updated Nominee OGE Form 278e. Can you please review and let us know if you have any edits or questions? If the attached look good, then we will send to OGE. We are considering how to scope and draft the authorization that we discussed and should have a draft ready to discuss early next week. Please do not hesitate to reach out in the interim if we can be of any assistance. Thank you and hope you have a great weekend.

- Heather

Heather C. Gottry
Director & DAEO
Departmental Ethics Office | Office of the Solicitor
U.S. Department of the Interior | MIB 5308
(O) (202) 208-4472
(C) (202) 740-0417
Email: heather.gottry@sol.doi.gov

Visit us online at: www.doi.gov/ethics

Integrity is our mission.

From: [Margaret E. Yukins](#)
To: [Gottry, Heather C](#)
Cc: [Stephanie Nonluecha](#); [Garcia, Monica L](#)
Subject: RE: [EXTERNAL] Elizabeth Klein Second Round Review Questions - [Message and attachment(s) contain CUI]
Date: Friday, February 12, 2021 6:03:26 PM

Thank you very much Heather! We're still collecting possible recusal language, and we will send you a revised EA as soon as possible.

Have a good weekend,
Margaret

From: Gottry, Heather C [mailto:heather.gottry@sol.doi.gov]
Sent: Friday, February 12, 2021 5:50 PM
To: Margaret E. Yukins <meyukins@oge.gov>
Cc: Stephanie Nonluecha <snonlue@oge.gov>; Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: RE: [EXTERNAL] Elizabeth Klein Second Round Review Questions - [Message and attachment(s) contain CUI]

Margaret – Hello! As promised, attached please find our first draft of an EA for Klein. We modeled Section 2 on the Becerra EA and are happy to discuss any feedback. In drafting, we realized that Liz had not included her position with the transition team on her OGE 278 and will add that in once we have the needed information from Liz. Many thanks and hope you have a good weekend!

- Heather

From: Margaret E. Yukins <meyukins@oge.gov>
Sent: Friday, February 12, 2021 1:01 PM
To: Gottry, Heather C <heather.gottry@sol.doi.gov>
Cc: Stephanie Nonluecha <snonlue@oge.gov>; Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: RE: [EXTERNAL] Elizabeth Klein Second Round Review Questions - [Message and attachment(s) contain CUI]

Thank you Heather! Stephanie and I are still putting together a samples list, but plan to get that over to you soon.

From: Gottry, Heather C [mailto:heather.gottry@sol.doi.gov]
Sent: Friday, February 12, 2021 12:54 PM
To: Margaret E. Yukins <meyukins@oge.gov>
Cc: Stephanie Nonluecha <snonlue@oge.gov>; Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: RE: [EXTERNAL] Elizabeth Klein Second Round Review Questions - [Message and attachment(s) contain CUI]

Margaret – Hello! Thank you again for taking the time to speak with us yesterday. Attached please find responses to the Second Round Review Questions. If helpful, we can also provide a copy of her husband's current client list. We are still assessing the 502 recusal and welcome the opportunity to review the samples we discussed. Please do not hesitate to reach out with any questions or if we

can be of any assistance. Thanks and hope you have a great weekend!

- Heather

From: Margaret E. Yukins <meyukins@oge.gov>
Sent: Wednesday, February 10, 2021 6:15 PM
To: Gottry, Heather C <heather.gottry@sol.doi.gov>
Cc: Stephanie Nonluecha <snonlue@oge.gov>; Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: RE: [EXTERNAL] Elizabeth Klein Second Round Review Questions - [Message and attachment(s) contain CUI]

Hi Heather,

Both Stephanie and I are free tomorrow any time after 11:00 am and all day Friday. Let us know when works for you.

Thanks,
Margaret

From: Gottry, Heather C [<mailto:heather.gottry@sol.doi.gov>]
Sent: Wednesday, February 10, 2021 2:29 PM
To: Margaret E. Yukins <meyukins@oge.gov>
Cc: Stephanie Nonluecha <snonlue@oge.gov>; Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: RE: [EXTERNAL] Elizabeth Klein Second Round Review Questions - [Message and attachment(s) contain CUI]

Margaret – Hello! We will review and circle back with responses. Would you and Stephanie like to schedule a call to discuss our thinking on a possible 502 authorization? If so, what times work tomorrow and Friday? Many thanks.

- Heather

Heather C. Gottry
Director & DAEO
Departmental Ethics Office | Office of the Solicitor
U.S. Department of the Interior | MIB 5308
(O) (202) 208-4472
(C) (202) 740-0417
Email: heather.gottry@sol.doi.gov

Visit us online at: www.doi.gov/ethics

Integrity is our mission.

From: Margaret E. Yukins <meyukins@oge.gov>
Sent: Wednesday, February 10, 2021 12:47 PM
To: Gottry, Heather C <heather.gottry@sol.doi.gov>; Garcia, Monica L <monica.garcia@sol.doi.gov>
Cc: Stephanie Nonluecha <snonlue@oge.gov>

Subject: [EXTERNAL] Elizabeth Klein Second Round Review Questions - [Message and attachment(s) contain CUI]

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

CONTROLLED

Email and attachment(s) contain CUI.

Hi Heather and Monica,

Attached are the second round review questions for Elizabeth Klein's 278 report. Please do not hesitate to reach out should you have any questions or concerns.

Best regards,

Margaret

Margaret Dylus-Yukins
Assistant Counsel
Ethics Law & Policy Branch
International Assistance & Outreach Program
U.S. Office of Government Ethics
(202) 482-9222
meyukins@oge.gov <<mailto:meyukins@oge.gov>>
Pronouns: she/her

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: [Gottry, Heather C](#)
To: [Klein, Elizabeth A](#)
Cc: [Garcia, Monica L](#)
Subject: Proposed Edit to Your Nominee OGE Form 788e
Date: Wednesday, February 17, 2021 5:24:04 AM

Liz – Good morning! In reviewing your Nominee OGE Form 278e, Public Financial Disclosure Report, we realized that your position with the Presidential Transition team was not previously disclosed on your report. With your permission, we would like to add your position with the Presidential Transition Team to Part 1. It is our understanding that the position was unpaid so there is no further required reporting outside of Part 1. Below please find an example of how we propose to report the position:

Organization Name	City/State	Organization Type	Position Held	From	To
PT Fund, Inc. (Presidential Transition Team)	Washington, DC	Non-profit	Volunteer Advisor	<u> </u> /2020	1/2021

Can you please let us know when your position with the Presidential Transition Team started? Or if you have any further edits to the proposed reporting of this position?

As a quick update, I have reached out to the WH to confirm their policy on your position as a Girl Scout Troop Leader and with the George Washington Middle School PTA, and we are waiting to hear back from them. We will also be reaching out to OGE on the draft ethics agreement today and I hope to have further updates later in the day. Many thanks.

- Heather

Heather C. Gottry
Director & DAEO
Departmental Ethics Office | Office of the Solicitor
U.S. Department of the Interior | MIB 5308
(O) (202) 208-4472
(C) (202) 740-0417
Email: heather.gottry@sol.doi.gov

Visit us online at: www.doi.gov/ethics

Integrity is our mission.

From: [Klein, Elizabeth A](#)
To: [Gottry, Heather C](#)
Cc: [Garcia, Monica L](#)
Subject: RE: Proposed Edit to Your Nominee OGE Form 788e
Date: Wednesday, February 17, 2021 7:43:04 AM

Good morning,

The start date for transition was 11/2020. If OGE asks, you can confirm that I took annual leave and then an unpaid leave of absence from the State Impact Center during the time of the transition.

Thanks,

Liz

From: Gottry, Heather C <heather.gottry@sol.doi.gov>
Sent: Wednesday, February 17, 2021 5:24 AM
To: Klein, Elizabeth A <Elizabeth_Klein@ios.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: Proposed Edit to Your Nominee OGE Form 788e

Liz – Good morning! In reviewing your Nominee OGE Form 278e, Public Financial Disclosure Report, we realized that your position with the Presidential Transition team was not previously disclosed on your report. With your permission, we would like to add your position with the Presidential Transition Team to Part 1. It is our understanding that the position was unpaid so there is no further required reporting outside of Part 1. Below please find an example of how we propose to report the position:

Organization Name	City/State	Organization Type	Position Held	From	To
PT Fund, Inc. (Presidential Transition Team)	Washington, DC	Non-profit	Volunteer Advisor	/2020	1/2021

Can you please let us know when your position with the Presidential Transition Team started? Or if you have any further edits to the proposed reporting of this position?

As a quick update, I have reached out to the WH to confirm their policy on your position as a Girl Scout Troop Leader and with the George Washington Middle School PTA, and we are waiting to hear back from them. We will also be reaching out to OGE on the draft ethics agreement today and I hope to have further updates later in the day. Many thanks.

- Heather

Heather C. Gottry
Director & DAEO
Departmental Ethics Office | Office of the Solicitor
U.S. Department of the Interior | MIB 5308
(O) (202) 208-4472
(C) (202) 740-0417
Email: heather.gottry@sol.doi.gov

Visit us online at: www.doi.gov/ethics

Integrity is our mission.

From: [Klein, Elizabeth A](#)
To: [Gottry, Heather C](#)
Cc: [Garcia, Monica L](#)
Subject: RE: Proposed Edit to Your Nominee OGE Form 788e
Date: Wednesday, February 17, 2021 1:18:18 PM

Hi again,

I have an edit to my spouse's client list – (b) (5) They're still a client of his firm, but I'm still operating under the assumption that its his client list and not the whole firm's. Am told nothing else has changed.

Thanks

Liz

From: Gottry, Heather C <heather.gottry@sol.doi.gov>
Sent: Wednesday, February 17, 2021 8:04 AM
To: Klein, Elizabeth A <Elizabeth_Klein@ios.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: RE: Proposed Edit to Your Nominee OGE Form 788e

Perfect – thank you! We will make the edit to your report and hope to have further updates later in the day.

From: Klein, Elizabeth A <Elizabeth_Klein@ios.doi.gov>
Sent: Wednesday, February 17, 2021 7:43 AM
To: Gottry, Heather C <heather.gottry@sol.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: RE: Proposed Edit to Your Nominee OGE Form 788e

Good morning,

The start date for transition was 11/2020. If OGE asks, you can confirm that I took annual leave and then an unpaid leave of absence from the State Impact Center during the time of the transition.

Thanks,

Liz

From: Gottry, Heather C <heather.gottry@sol.doi.gov>
Sent: Wednesday, February 17, 2021 5:24 AM
To: Klein, Elizabeth A <Elizabeth_Klein@ios.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: Proposed Edit to Your Nominee OGE Form 788e

Liz – Good morning! In reviewing your Nominee OGE Form 278e, Public Financial Disclosure Report, we realized that your position with the Presidential Transition team was not previously disclosed on your report. With your permission, we would like to add your position with the Presidential Transition Team to Part 1. It is our understanding that the position was unpaid so there is no further required reporting outside of Part 1. Below please find an example of how we propose to report the position:

--	--	--	--	--	--

Organization Name	City/State	Organization Type	Position Held	From	To
PT Fund, Inc. (Presidential Transition Team)	Washington, DC	Non-profit	Volunteer Advisor	1/2020	1/2021

Can you please let us know when your position with the Presidential Transition Team started? Or if you have any further edits to the proposed reporting of this position?

As a quick update, I have reached out to the WH to confirm their policy on your position as a Girl Scout Troop Leader and with the George Washington Middle School PTA, and we are waiting to hear back from them. We will also be reaching out to OGE on the draft ethics agreement today and I hope to have further updates later in the day. Many thanks.

- Heather

Heather C. Gottry
 Director & DAEO
 Departmental Ethics Office | Office of the Solicitor
 U.S. Department of the Interior | MIB 5308
 (O) (202) 208-4472
 (C) (202) 740-0417
 Email: heather.gottry@sol.doi.gov

Visit us online at: www.doi.gov/ethics

Integrity is our mission.

From: [Gottry, Heather C](#)
To: [Margaret E. Yukins](#)
Cc: [Stephanie Nonluecha](#); [Garcia, Monica L](#)
Subject: RE: [EXTERNAL] Elizabeth Klein Draft EA - [Message and attachment(s) contain CUI] - [Message and attachment(s) contain CUI]
Date: Wednesday, February 17, 2021 9:53:45 PM
Attachments: [Klein - Redline Draft EA for Review \(02.17.21\).docx](#)
[Klein - Clean Copy Draft EA for Review \(02.17.21\).docx](#)

Margaret – Thank you. We have reviewed and have attached both a redline and a clean copy the EA for your further comment and review. We have added the Presidential Transition Team to Part 1 of the 278 and are waiting to hear back from the WH on the Girls Scouts and PTA position. Please let us know if you have further edits or if it would be helpful to discuss the 502 authorization language further. Many thanks!

- Heather

From: Margaret E. Yukins <meyukins@oge.gov>
Sent: Tuesday, February 16, 2021 1:52 PM
To: Gottry, Heather C <heather.gottry@sol.doi.gov>
Cc: Stephanie Nonluecha <snonlue@oge.gov>; Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: RE: [EXTERNAL] Elizabeth Klein Draft EA - [Message and attachment(s) contain CUI] - [Message and attachment(s) contain CUI]

CONTROLLED

Email and attachment(s) contain CUI.

Hi Heather, thank you so much for sending Elizabeth Klein's draft Ethics Agreement over for our review. I've attached OGE's comments on the draft EA. Additionally, I have included the sample EA language that we thought was most applicable to this particular case.

While reviewing Elizabeth Klein's file, we realized that her position with the Presidential Transition team was not previously disclosed on her 278e form. Please add Ms. Klein's position with the PT Fund, Inc. to Part 1. Below is an example of how to report the position.

Organization Name	City/State	Organization Type	Position Held	From	To
PT Fund, Inc. (Presidential Transition Team)	Washington, DC	Non-profit	Volunteer Advisor	9/2020	1/2021

Margaret

From: Gottry, Heather C [<mailto:heather.gottry@sol.doi.gov>]
Sent: Friday, February 12, 2021 5:50 PM
To: Margaret E. Yukins <meyukins@oge.gov>
Cc: Stephanie Nonluecha <snonlue@oge.gov>; Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: RE: [EXTERNAL] Elizabeth Klein Second Round Review Questions - [Message and

attachment(s) contain CUI]

Margaret – Hello! As promised, attached please find our first draft of an EA for Klein. We modeled Section 2 on the Becerra EA and are happy to discuss any feedback. In drafting, we realized that Liz had not included her position with the transition team on her OGE 278 and will add that in once we have the needed information from Liz. Many thanks and hope you have a good weekend!

- Heather

From: Margaret E. Yukins <meyukins@oge.gov <<mailto:meyukins@oge.gov>> >
Sent: Friday, February 12, 2021 1:01 PM
To: Gottry, Heather C <heather.gottry@sol.doi.gov <<mailto:heather.gottry@sol.doi.gov>> >
Cc: Stephanie Nonluecha <snonlue@oge.gov <<mailto:snonlue@oge.gov>> >; Garcia, Monica L <monica.garcia@sol.doi.gov <<mailto:monica.garcia@sol.doi.gov>> >
Subject: RE: [EXTERNAL] Elizabeth Klein Second Round Review Questions - [Message and attachment(s) contain CUI]

Thank you Heather! Stephanie and I are still putting together a samples list, but plan to get that over to you soon.

From: Gottry, Heather C [<mailto:heather.gottry@sol.doi.gov> <<mailto:heather.gottry@sol.doi.gov>> >
]
Sent: Friday, February 12, 2021 12:54 PM
To: Margaret E. Yukins <meyukins@oge.gov <<mailto:meyukins@oge.gov>> >
Cc: Stephanie Nonluecha <snonlue@oge.gov <<mailto:snonlue@oge.gov>> >; Garcia, Monica L <monica.garcia@sol.doi.gov <<mailto:monica.garcia@sol.doi.gov>> >
Subject: RE: [EXTERNAL] Elizabeth Klein Second Round Review Questions - [Message and attachment(s) contain CUI]

Margaret – Hello! Thank you again for taking the time to speak with us yesterday. Attached please find responses to the Second Round Review Questions. If helpful, we can also provide a copy of her husband's current client list. We are still assessing the 502 recusal and welcome the opportunity to review the samples we discussed. Please do not hesitate to reach out with any questions or if we can be of any assistance. Thanks and hope you have a great weekend!

- Heather

From: Margaret E. Yukins <meyukins@oge.gov <<mailto:meyukins@oge.gov>> >
Sent: Wednesday, February 10, 2021 6:15 PM

To: Gottry, Heather C <heather.gottry@sol.doi.gov <<mailto:heather.gottry@sol.doi.gov>> >
Cc: Stephanie Nonluecha <snonlue@oge.gov <<mailto:snonlue@oge.gov>> >; Garcia, Monica L <monica.garcia@sol.doi.gov <<mailto:monica.garcia@sol.doi.gov>> >

Subject: RE: [EXTERNAL] Elizabeth Klein Second Round Review Questions - [Message and attachment(s) contain CUI]

Hi Heather,

Both Stephanie and I are free tomorrow any time after 11:00 am and all day Friday. Let us know when works for you.

Thanks,
Margaret

From: Gottry, Heather C [<mailto:heather.gottry@sol.doi.gov> <<mailto:heather.gottry@sol.doi.gov>>]

Sent: Wednesday, February 10, 2021 2:29 PM

To: Margaret E. Yukins <meyukins@oge.gov <<mailto:meyukins@oge.gov>> >

Cc: Stephanie Nonluecha <snonlue@oge.gov <<mailto:snonlue@oge.gov>> >; Garcia, Monica L <monica.garcia@sol.doi.gov <<mailto:monica.garcia@sol.doi.gov>> >

Subject: RE: [EXTERNAL] Elizabeth Klein Second Round Review Questions - [Message and attachment(s) contain CUI]

Margaret – Hello! We will review and circle back with responses. Would you and Stephanie like to schedule a call to discuss our thinking on a possible 502 authorization? If so, what times work tomorrow and Friday? Many thanks.

- Heather

Heather C. Gottry
Director & DAEO
Departmental Ethics Office | Office of the Solicitor
U.S. Department of the Interior | MIB 5308
(O) (202) 208-4472
(C) (202) 740-0417
Email: heather.gottry@sol.doi.gov <<mailto:heather.gottry@sol.doi.gov>>

Visit us online at: www.doi.gov/ethics <<http://www.doi.gov/ethics>>

Integrity is our mission.

From: Margaret E. Yukins <meyukins@oge.gov <<mailto:meyukins@oge.gov>> >
Sent: Wednesday, February 10, 2021 12:47 PM
To: Gottry, Heather C <heather.gottry@sol.doi.gov <<mailto:heather.gottry@sol.doi.gov>> >; Garcia, Monica L <monica.garcia@sol.doi.gov <<mailto:monica.garcia@sol.doi.gov>> >
Cc: Stephanie Nonluecha <snonlue@oge.gov <<mailto:snonlue@oge.gov>> >
Subject: [EXTERNAL] Elizabeth Klein Second Round Review Questions - [Message and attachment(s) contain CUI]

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

CONTROLLED
Email and attachment(s) contain CUI.

Hi Heather and Monica,
Attached are the second round review questions for Elizabeth Klein's 278 report. Please do not hesitate to reach out should you have any questions or concerns.

Best regards,
Margaret

Margaret Dylus-Yukins
Assistant Counsel
Ethics Law & Policy Branch
International Assistance & Outreach Program
U.S. Office of Government Ethics
(202) 482-9222
meyukins@oge.gov <<mailto:meyukins@oge.gov>> <<mailto:meyukins@oge.gov>>
<<mailto:meyukins@oge.gov>> >
Pronouns: she/her

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: [Gottry, Heather C](#)
To: [Margaret E. Yukins](#)
Cc: [Stephanie Nonluecha](#); [Garcia, Monica L](#)
Subject: RE: [EXTERNAL] Elizabeth Klein Draft EA - [Message and attachment(s) contain CUI] - [Message and attachment(s) contain CUI]
Date: Wednesday, February 17, 2021 9:57:56 PM

Thanks! We welcome feedback on the updated 502 language and pulled from the examples you kindly provided. Our schedules are a little crazy tomorrow but we can find time if it would be helpful to touch base. Have a good evening.

From: Margaret E. Yukins <meyukins@oge.gov>
Sent: Wednesday, February 17, 2021 9:55 PM
To: Gottry, Heather C <heather.gottry@sol.doi.gov>
Cc: Stephanie Nonluecha <snonlue@oge.gov>; Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: RE: [EXTERNAL] Elizabeth Klein Draft EA - [Message and attachment(s) contain CUI] - [Message and attachment(s) contain CUI]

Thank you Heather! Received.

From: Gottry, Heather C [<mailto:heather.gottry@sol.doi.gov>]
Sent: Wednesday, February 17, 2021 9:54 PM
To: Margaret E. Yukins <meyukins@oge.gov>
Cc: Stephanie Nonluecha <snonlue@oge.gov>; Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: RE: [EXTERNAL] Elizabeth Klein Draft EA - [Message and attachment(s) contain CUI] - [Message and attachment(s) contain CUI]

Margaret – Thank you. We have reviewed and have attached both a redline and a clean copy the EA for your further comment and review. We have added the Presidential Transition Team to Part 1 of the 278 and are waiting to hear back from the WH on the Girls Scouts and PTA position. Please let us know if you have further edits or if it would be helpful to discuss the 502 authorization language further. Many thanks!

- Heather

From: Margaret E. Yukins <meyukins@oge.gov>
Sent: Tuesday, February 16, 2021 1:52 PM
To: Gottry, Heather C <heather.gottry@sol.doi.gov>
Cc: Stephanie Nonluecha <snonlue@oge.gov>; Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: RE: [EXTERNAL] Elizabeth Klein Draft EA - [Message and attachment(s) contain CUI] - [Message and attachment(s) contain CUI]

CONTROLLED

Email and attachment(s) contain CUI.

Hi Heather, thank you so much for sending Elizabeth Klein's draft Ethics Agreement over for our review. I've attached OGE's comments on the draft EA. Additionally, I have included the sample

EA language that we thought was most applicable to this particular case.

While reviewing Elizabeth Klein's file, we realized that her position with the Presidential Transition team was not previously disclosed on her 278e form. Please add Ms. Klein's position with the PT Fund, Inc. to Part 1. Below is an example of how to report the position.

Organization Name	City/State	Organization Type	Position Held	From	To
PT Fund, Inc. (Presidential Transition Team)	Washington, DC	Non-profit	Volunteer Advisor	9/2020	1/2021

Margaret

From: Gottry, Heather C [<mailto:heather.gottry@sol.doi.gov>]
Sent: Friday, February 12, 2021 5:50 PM
To: Margaret E. Yukins <meyukins@oge.gov>
Cc: Stephanie Nonluecha <snonlue@oge.gov>; Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: RE: [EXTERNAL] Elizabeth Klein Second Round Review Questions - [Message and attachment(s) contain CUI]

Margaret – Hello! As promised, attached please find our first draft of an EA for Klein. We modeled Section 2 on the Becerra EA and are happy to discuss any feedback. In drafting, we realized that Liz had not included her position with the transition team on her OGE 278 and will add that in once we have the needed information from Liz. Many thanks and hope you have a good weekend!

- Heather

From: Margaret E. Yukins <meyukins@oge.gov <<mailto:meyukins@oge.gov>> >
Sent: Friday, February 12, 2021 1:01 PM
To: Gottry, Heather C <heather.gottry@sol.doi.gov <<mailto:heather.gottry@sol.doi.gov>> >
Cc: Stephanie Nonluecha <snonlue@oge.gov <<mailto:snonlue@oge.gov>> >; Garcia, Monica L <monica.garcia@sol.doi.gov <<mailto:monica.garcia@sol.doi.gov>> >

Subject: RE: [EXTERNAL] Elizabeth Klein Second Round Review Questions - [Message and attachment(s) contain CUI]

Thank you Heather! Stephanie and I are still putting together a samples list, but plan to get that over to you soon.

From: Gottry, Heather C [<mailto:heather.gottry@sol.doi.gov> <<mailto:heather.gottry@sol.doi.gov>>]

Sent: Friday, February 12, 2021 12:54 PM

To: Margaret E. Yukins <meyukins@oge.gov <<mailto:meyukins@oge.gov>> >

Cc: Stephanie Nonluecha <snonlue@oge.gov <<mailto:snonlue@oge.gov>> >; Garcia, Monica L <monica.garcia@sol.doi.gov <<mailto:monica.garcia@sol.doi.gov>> >

Subject: RE: [EXTERNAL] Elizabeth Klein Second Round Review Questions - [Message and attachment(s) contain CUI]

Margaret – Hello! Thank you again for taking the time to speak with us yesterday. Attached please find responses to the Second Round Review Questions. If helpful, we can also provide a copy of her husband's current client list. (b) (5)

Please do not hesitate to reach out with any questions or if we can be of any assistance. Thanks and hope you have a great weekend!

- Heather

From: Margaret E. Yukins <meyukins@oge.gov <<mailto:meyukins@oge.gov>> >

Sent: Wednesday, February 10, 2021 6:15 PM

To: Gottry, Heather C <heather.gottry@sol.doi.gov <<mailto:heather.gottry@sol.doi.gov>> >

Cc: Stephanie Nonluecha <snonlue@oge.gov <<mailto:snonlue@oge.gov>> >; Garcia, Monica L <monica.garcia@sol.doi.gov <<mailto:monica.garcia@sol.doi.gov>> >

Subject: RE: [EXTERNAL] Elizabeth Klein Second Round Review Questions - [Message and attachment(s) contain CUI]

Hi Heather,

Both Stephanie and I are free tomorrow any time after 11:00 am and all day Friday. Let us know when works for you.

Thanks,
Margaret

From: Gottry, Heather C [<mailto:heather.gottry@sol.doi.gov> <<mailto:heather.gottry@sol.doi.gov>>]

Sent: Wednesday, February 10, 2021 2:29 PM

To: Margaret E. Yukins <meyukins@oge.gov <<mailto:meyukins@oge.gov>> >

Cc: Stephanie Nonluecha <snonlue@oge.gov <<mailto:snonlue@oge.gov>> >; Garcia, Monica L <monica.garcia@sol.doi.gov <<mailto:monica.garcia@sol.doi.gov>> >

Subject: RE: [EXTERNAL] Elizabeth Klein Second Round Review Questions - [Message and attachment(s) contain CUI]

Margaret – Hello! We will review and circle back with responses. Would you and Stephanie like to schedule a call to discuss our thinking on a possible 502 authorization? If so, what times work tomorrow and Friday? Many thanks.

- Heather

Heather C. Gottry
Director & DAEO
Departmental Ethics Office | Office of the Solicitor
U.S. Department of the Interior | MIB 5308
(O) (202) 208-4472
(C) (202) 740-0417
Email: heather.gottry@sol.doi.gov <<mailto:heather.gottry@sol.doi.gov>>

Visit us online at: www.doi.gov/ethics <<http://www.doi.gov/ethics>>

Integrity is our mission.

From: Margaret E. Yukins <meyukins@oge.gov <<mailto:meyukins@oge.gov>> >
Sent: Wednesday, February 10, 2021 12:47 PM
To: Gottry, Heather C <heather.gottry@sol.doi.gov <<mailto:heather.gottry@sol.doi.gov>> >; Garcia, Monica L <monica.garcia@sol.doi.gov <<mailto:monica.garcia@sol.doi.gov>> >
Cc: Stephanie Nonluecha <snonlue@oge.gov <<mailto:snonlue@oge.gov>> >
Subject: [EXTERNAL] Elizabeth Klein Second Round Review Questions - [Message and attachment(s) contain CUI]

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

CONTROLLED
Email and attachment(s) contain CUI.

Hi Heather and Monica,
Attached are the second round review questions for Elizabeth Klein's 278 report. Please do not hesitate to reach out should you have any questions or concerns.

Best regards,
Margaret

Margaret Dylus-Yukins
Assistant Counsel
Ethics Law & Policy Branch
International Assistance & Outreach Program
U.S. Office of Government Ethics
(202) 482-9222
meyukins@oge.gov <<mailto:meyukins@oge.gov>> <<mailto:meyukins@oge.gov>
<<mailto:meyukins@oge.gov>> >
Pronouns: she/her

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: [Gottry, Heather C](#)
To: [Klein, Elizabeth A](#)
Cc: [Garcia, Monica L](#)
Subject: Update on Nominee Ethics Review
Date: Wednesday, February 17, 2021 10:08:22 PM

Liz – Hello! As promised, I wanted to send a quick update on where matters stand as of tonight. We have exchanged comments with OGE on your draft ethics agreement and are waiting to hear whether they have any further proposed edits. We also updated your Nominee OGE Form 278e with information about the Presidential Transition Team and are waiting for confirmation that there are no additional edits needed to your OGE Form 278e. We have not yet heard back from the WH on your positions as a Girl Scout Troop Leader and with the George Washington Middle School PTA and will follow up with them tomorrow. I will keep you updated on any further developments, but please do not hesitate to let us know if it would be helpful to touch base in the interim. Many thanks for your patience with the review process.

- Heather

Heather C. Gottry
Director & DAEO
Departmental Ethics Office | Office of the Solicitor
U.S. Department of the Interior | MIB 5308
(O) (202) 208-4472
(C) (202) 740-0417
Email: heather.gottry@sol.doi.gov

Visit us online at: www.doi.gov/ethics

Integrity is our mission.

From: [Gottry, Heather C](#)
To: [Klein, Elizabeth A](#)
Cc: [Garcia, Monica L](#)
Subject: RE: Proposed Edit to Your Nominee OGE Form 788e
Date: Wednesday, February 17, 2021 11:09:29 PM

Liz – Thank you for this update. You are correct that under 5 C.F.R. § 2635.502 your recusal for your husband’s clients only extends to his current clients and does not extend to either his former clients or all of Invariant’s clients. If your spouse was an equity partner, held shares, or some other ownership interest in Invariant, then your recusal would be broader and under certain circumstances could extend to all clients of Invariant. We will make sure to remove (b) (5) in your interim ethics guidance memorandum and are holding on circulating an updated draft pending OGE’s edits on your ethics agreement. Many thanks.

- Heather

From: Klein, Elizabeth A <Elizabeth_Klein@ios.doi.gov>
Sent: Wednesday, February 17, 2021 1:18 PM
To: Gottry, Heather C <heather.gottry@sol.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: RE: Proposed Edit to Your Nominee OGE Form 788e

Hi again,
I have an edit to my spouse’s client list – (b) (5) They’re still a client of his firm, but I’m still operating under the assumption that its his client list and not the whole firm’s. Am told nothing else has changed.
Thanks
Liz

From: Gottry, Heather C <heather.gottry@sol.doi.gov>
Sent: Wednesday, February 17, 2021 8:04 AM
To: Klein, Elizabeth A <Elizabeth_Klein@ios.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: RE: Proposed Edit to Your Nominee OGE Form 788e

Perfect – thank you! We will make the edit to your report and hope to have further updates later in the day.

From: Klein, Elizabeth A <Elizabeth_Klein@ios.doi.gov>
Sent: Wednesday, February 17, 2021 7:43 AM
To: Gottry, Heather C <heather.gottry@sol.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: RE: Proposed Edit to Your Nominee OGE Form 788e

Good morning,
The start date for transition was 11/2020. If OGE asks, you can confirm that I took annual leave and then

an unpaid leave of absence from the State Impact Center during the time of the transition.

Thanks,

Liz

From: Gottry, Heather C <heather.gottry@sol.doi.gov>

Sent: Wednesday, February 17, 2021 5:24 AM

To: Klein, Elizabeth A <Elizabeth_Klein@ios.doi.gov>

Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>

Subject: Proposed Edit to Your Nominee OGE Form 788e

Liz – Good morning! In reviewing your Nominee OGE Form 278e, Public Financial Disclosure Report, we realized that your position with the Presidential Transition team was not previously disclosed on your report. With your permission, we would like to add your position with the Presidential Transition Team to Part 1. It is our understanding that the position was unpaid so there is no further required reporting outside of Part 1. Below please find an example of how we propose to report the position:

Organization Name	City/State	Organization Type	Position Held	From	To
PT Fund, Inc. (Presidential Transition Team)	Washington, DC	Non-profit	Volunteer Advisor	/2020	1/2021

Can you please let us know when your position with the Presidential Transition Team started? Or if you have any further edits to the proposed reporting of this position?

As a quick update, I have reached out to the WH to confirm their policy on your position as a Girl Scout Troop Leader and with the George Washington Middle School PTA, and we are waiting to hear back from them. We will also be reaching out to OGE on the draft ethics agreement today and I hope to have further updates later in the day. Many thanks.

- Heather

Heather C. Gottry
Director & DAEO
Departmental Ethics Office | Office of the Solicitor
U.S. Department of the Interior | MIB 5308
(O) (202) 208-4472
(C) (202) 740-0417
Email: heather.gottry@sol.doi.gov

Visit us online at: www.doi.gov/ethics

Integrity is our mission.

From: [Margaret E. Yukins](#)
To: [Heather A. Jones](#); [Garcia, Monica L](#)
Cc: [Stephanie Nonluecha](#)
Subject: [EXTERNAL] Elizabeth Klein Draft EA - Updated - [Message and attachment(s) contain CUI]
Date: Thursday, February 18, 2021 12:47:43 PM
Attachments: [Klein - Draft EA for Review \(02.18.21\).\(OGE edits\).docx](#)
[CUI Coversheet.pdf](#)

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

CONTROLLED

Email and attachment(s) contain CUI.

Hi Heather and Monica,

Attached is an updated draft of the Ethics Agreement for Elizabeth Klein. Please note that this updated draft of the EA has not been reviewed by Deb or Heather yet; we are reluctant to forward the draft EA for review until we know that Ms. Klein is fully onboard. Once Ms. Klein has approved the EA language, I will send the confirmatory email and forward her package for preclearance.

Thank you,

Margaret

Margaret Dylus-Yukins
Assistant Counsel
Ethics Law & Policy Branch
International Assistance & Outreach Program
U.S. Office of Government Ethics
(202) 482-9222
meyukins@oge.gov <<mailto:meyukins@oge.gov>>
Pronouns: she/her

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: [Garcia, Monica L](#)
To: [Heather Gottry](#)
Subject: FW: [EXTERNAL] Elizabeth Klein Draft EA - Updated - [Message and attachment(s) contain CUI]
Date: Thursday, February 18, 2021 12:57:00 PM
Attachments: [Klein - Draft EA for Review \(02.18.21\).\(OGE edits\).docx](#)
[CUI Coversheet.pdf](#)
[Klein - Draft EA for Review \(02.18.21\).\(OGE edits\) DOI redline.docx](#)

Please see the attached with conforming edits to reflect that Liz signed the pledge upon appointment. (I used the standard EA language).

Monica

From: Margaret E. Yukins <meyukins@oge.gov>
Sent: Thursday, February 18, 2021 12:45 PM
To: Heather A. Jones <hajones@oge.gov>; Garcia, Monica L <monica.garcia@sol.doi.gov>
Cc: Stephanie Nonluecha <snonlue@oge.gov>
Subject: [EXTERNAL] Elizabeth Klein Draft EA - Updated - [Message and attachment(s) contain CUI]

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

CONTROLLED

Email and attachment(s) contain CUI.

Hi Heather and Monica,

Attached is an updated draft of the Ethics Agreement for Elizabeth Klein. Please note that this updated draft of the EA has not been reviewed by Deb or Heather yet; we are reluctant to forward the draft EA for review until we know that Ms. Klein is fully onboard. Once Ms. Klein has approved the EA language, I will send the confirmatory email and forward her package for preclearance.

Thank you,

Margaret

Margaret Dylus-Yukins
Assistant Counsel
Ethics Law & Policy Branch
International Assistance & Outreach Program

U.S. Office of Government Ethics
(202) 482-9222
meyukins@oge.gov <<mailto:meyukins@oge.gov>>
Pronouns: she/her

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: [Margaret E. Yukins](#)
To: [Gottry, Heather C](#)
Cc: [Garcia, Monica L](#); [Stephanie Nonluecha](#)
Subject: RE: [EXTERNAL] Elizabeth Klein Draft EA - Updated - [Message and attachment(s) contain CUI] - [Message contains CUI]
Date: Thursday, February 18, 2021 4:55:49 PM

CONTROLLED

Hi Heather,

I realize we're still waiting to hear from the White House regarding the Girl Scout Troop leader and PTA position. However, I just received word from Heather Jones that the PTA position actually *is* reportable, as the Filer (1) holds an officer position, and (2) she holds a fiduciary duty in her role as VP of Fundraising. More information may be found here: [FAQs: Positions Outside of Government](#).

Could you add the VP of Fundraising for the George Washington Middle School PTA to the 278? (I'm sorry to have incorrectly told you that the 278 was in good shape!) This position will also have to be included in the EA, regardless of the White House decision.

Additionally, could you confirm that the Filer's spouse does not hold any equity in the Invariant lobbying practice?

Thank you very much,
Margaret

From: Gottry, Heather C [<mailto:heather.gottry@sol.doi.gov>]
Sent: Thursday, February 18, 2021 3:41 PM
To: Margaret E. Yukins <meyukins@oge.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>; Stephanie Nonluecha <snonlue@oge.gov>
Subject: RE: [EXTERNAL] Elizabeth Klein Draft EA - Updated - [Message and attachment(s) contain CUI]

Margaret - Thank you for sending us this updated draft. As a quick reminder, we have not yet heard back from the WH on whether Liz can continue to serve as a Girl Scout Troop Leader and a board member of the George Washington Middle School PTA, where she serves on the fundraising committee. We need this resolved in order to determine whether the resignations need to be added to her EA. I have sent to messages to Funmi and will give a call today. Hopefully we will hear back and can then circle back on the EA. Based on your message below, is it fair to assume that her OGE Form 278e looks good to go? Many thanks.

- Heather

From: Garcia, Monica L <monica.garcia@sol.doi.gov <<mailto:monica.garcia@sol.doi.gov>> >

Sent: Thursday, February 18, 2021 12:57 PM

To: Gottry, Heather C <heather.gottry@sol.doi.gov <<mailto:heather.gottry@sol.doi.gov>> >

Subject: FW: [EXTERNAL] Elizabeth Klein Draft EA - Updated - [Message and attachment(s) contain CUI]

From: Margaret E. Yukins <meyukins@oge.gov <<mailto:meyukins@oge.gov>> >

Sent: Thursday, February 18, 2021 12:45 PM

To: Heather A. Jones <hajones@oge.gov <<mailto:hajones@oge.gov>> >; Garcia, Monica L <monica.garcia@sol.doi.gov <<mailto:monica.garcia@sol.doi.gov>> >

Cc: Stephanie Nonluecha <snonlue@oge.gov <<mailto:snonlue@oge.gov>> >

Subject: [EXTERNAL] Elizabeth Klein Draft EA - Updated - [Message and attachment(s) contain CUI]

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

CONTROLLED

Email and attachment(s) contain CUI.

Hi Heather and Monica,

Attached is an updated draft of the Ethics Agreement for Elizabeth Klein. Please note that this updated draft of the EA has not been reviewed by Deb or Heather yet; we are reluctant to forward the draft EA for review until we know that Ms. Klein is fully onboard. Once Ms. Klein has approved the EA language, I will send the confirmatory email and forward her package for preclearance.

Thank you,
Margaret

Margaret Dylus-Yukins

Assistant Counsel

Ethics Law & Policy Branch

International Assistance & Outreach Program

U.S. Office of Government Ethics

(202) 482-9222

meyukins@oge.gov <<mailto:meyukins@oge.gov>> <<mailto:meyukins@oge.gov>>

[<mailto:meyukins@oge.gov>](mailto:meyukins@oge.gov) >

Pronouns: she/her

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: [Gottry, Heather C](#)
To: [Klein, Elizabeth A](#)
Cc: [Garcia, Monica L](#)
Subject: RE: Updated Draft EA for Review
Date: Thursday, February 18, 2021 5:45:33 PM

Liz – Hello again! We just heard from both OGE and the WH.

The WH confirmed that your positions with the Girl Scouts and the PTA are considered “local activities” which fall under the exception to the WH Policy provided that we sign off and are comfortable with your participation and provides you with ethics counsel regarding the participation. Therefore, because we have no legal objection to your participation in either position and will provide you with ethics guidance on your participation, you will not need to resign from either position.

OGE also circled back and have determined that your PTA position actually *is* reportable on your Nominee OGE Form 278e, because you are a member of the board and are the vice president of fundraising. They have asked that we add it to your Nominee OGE Form 278e. Below please find an example of how we propose to report the position:

Organization Name	City/State	Organization Type	Position Held	From	To
George Washington Middle School Parent Teacher Organization	Alexandria, VA	Non-profit	Board member	<u>/20_</u>	Current

They also informed us that we will need to add the position into the ethics agreement, regardless of the White House’s determination.

Finally, OGE asked that we confirm that your spouse does not hold any equity in the Invariant lobbying practice.

We are close to final in the process and available to touch base and discuss further at your convenience. Many thanks!

- Heather

From: Gottry, Heather C
Sent: Thursday, February 18, 2021 4:50 PM
To: Klein, Elizabeth A <Elizabeth_Klein@ios.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: Updated Draft EA for Review

Liz – Hello! OGE just requested that we share the attached draft ethics agreement with you for review. Please note that the ethics agreement does not discuss your position as Girl Scout Troop Leader or as a board member of the George Washington Middle School PTA. We are still waiting on confirmation from the WH that you can continue to serve in these positions consistent with their policy. Presuming they confirm this understanding, then the ethics agreement will not to be further updated to address these two positions. I have already emailed and called the WH today and hope to hear back from them soon.

OGE has confirmed that your Nominee OGE Form 278e looks good to go and we have made conforming

updates to your New Entrant OGE Form 278 in *Integrity*. At this point, you can now log into *Integrity* and review your New Entrant OGE Form 278 so that if it looks good to you it can be submitted before the deadline of COB tomorrow. Please let us know if you have any problems logging in or accessing your New Entrant OGE Form 278.

Please let us know if it would be helpful to find a time to walk through OGE's edits to the ethics agreement and discuss any questions. We can be available at your convenience. Thank you.

- Heather

Heather C. Gottry
Director & DAEO
Departmental Ethics Office | Office of the Solicitor
U.S. Department of the Interior | MIB 5308
(O) (202) 208-4472
(C) (202) 740-0417
Email: heather.gottry@sol.doi.gov

Visit us online at: www.doi.gov/ethics

Integrity is our mission.

From: [Klein, Elizabeth A](#)
To: [Gottry, Heather C](#)
Cc: [Garcia, Monica L](#)
Subject: RE: Updated Draft EA for Review
Date: Thursday, February 18, 2021 8:01:00 PM

Hi there,

The agreement looks fine to me.

I can confirm that my husband does not hold any equity in Invariant.

The GWMS PTA entry looks fine. Start date for that position is Sept 2020.

I think I need help finding where my new entrant report is. When I just went into integrity using my DOI email address, there was no report listed. I think my nominee report is associated with my personal email address. So, just need confirmation about where to go to find it!

Thanks

From: Gottry, Heather C <heather.gottry@sol.doi.gov>
Sent: Thursday, February 18, 2021 5:46 PM
To: Klein, Elizabeth A <Elizabeth_Klein@ios.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: RE: Updated Draft EA for Review

Liz – Hello again! We just heard from both OGE and the WH.

The WH confirmed that your positions with the Girl Scouts and the PTA are considered “local activities” which fall under the exception to the WH Policy provided that we sign off and are comfortable with your participation and provides you with ethics counsel regarding the participation. Therefore, because we have no legal objection to your participation in either position and will provide you with ethics guidance on your participation, you will not need to resign from either position.

OGE also circled back and have determined that your PTA position actually *is* reportable on your Nominee OGE Form 278e, because you are a member of the board and are the vice president of fundraising. They have asked that we add it to your Nominee OGE Form 278e. Below please find an example of how we propose to report the position:

Organization Name	City/State	Organization Type	Position Held	From	To
George Washington Middle School Parent Teacher Organization	Alexandria, VA	Non-profit	Board member	/20_	Current

They also informed us that we will need to add the position into the ethics agreement, regardless of the White House’s determination.

Finally, OGE asked that we confirm that your spouse does not hold any equity in the Invariant lobbying practice.

We are close to final in the process and available to touch base and discuss further at your convenience.
Many thanks!

- Heather

From: Gottry, Heather C
Sent: Thursday, February 18, 2021 4:50 PM
To: Klein, Elizabeth A <Elizabeth_Klein@ios.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: Updated Draft EA for Review

Liz – Hello! OGE just requested that we share the attached draft ethics agreement with you for review. Please note that the ethics agreement does not discuss your position as Girl Scout Troop Leader or as a board member of the George Washington Middle School PTA. We are still waiting on confirmation from the WH that you can continue to serve in these positions consistent with their policy. Presuming they confirm this understanding, then the ethics agreement will not to be further updated to address these two positions. I have already emailed and called the WH today and hope to hear back from them soon.

OGE has confirmed that your Nominee OGE Form 278e looks good to go and we have made conforming updates to your New Entrant OGE Form 278 in *Integrity*. At this point, you can now log into *Integrity* and review your New Entrant OGE Form 278 so that if it looks good to you it can be submitted before the deadline of COB tomorrow. Please let us know if you have any problems logging in or accessing your New Entrant OGE Form 278.

Please let us know if it would be helpful to find a time to walk through OGE's edits to the ethics agreement and discuss any questions. We can be available at your convenience. Thank you.

- Heather

Heather C. Gottry
Director & DAEO
Departmental Ethics Office | Office of the Solicitor
U.S. Department of the Interior | MIB 5308
(O) (202) 208-4472
(C) (202) 740-0417
Email: heather.gottry@sol.doi.gov

Visit us online at: www.doi.gov/ethics

Integrity is our mission.

From: [Gottry, Heather C](#)
To: [Klein, Elizabeth A](#)
Cc: [Garcia, Monica L](#)
Subject: RE: Updated Draft EA for Review
Date: Thursday, February 18, 2021 8:34:33 PM

Liz – Thank you for reviewing so quickly. I have added the PTA position to both your New Entrant and Nominee OGE Form 278e reports. Are you available for a quick call? Monica and I can help you troubleshoot any issues with Integrity. Thanks.

- Heather

From: Klein, Elizabeth A <Elizabeth_Klein@ios.doi.gov>
Sent: Thursday, February 18, 2021 8:01 PM
To: Gottry, Heather C <heather.gottry@sol.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: RE: Updated Draft EA for Review

Hi there,

The agreement looks fine to me.

I can confirm that my husband does not hold any equity in Invariant.

The GWMS PTA entry looks fine. Start date for that position is Sept 2020.

I think I need help finding where my new entrant report is. When I just went into integrity using my DOI email address, there was no report listed. I think my nominee report is associated with my personal email address. So, just need confirmation about where to go to find it!

Thanks

From: Gottry, Heather C <heather.gottry@sol.doi.gov>
Sent: Thursday, February 18, 2021 5:46 PM
To: Klein, Elizabeth A <Elizabeth_Klein@ios.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: RE: Updated Draft EA for Review

Liz – Hello again! We just heard from both OGE and the WH.

The WH confirmed that your positions with the Girl Scouts and the PTA are considered “local activities” which fall under the exception to the WH Policy provided that we sign off and are comfortable with your participation and provides you with ethics counsel regarding the participation. Therefore, because we have no legal objection to your participation in either position and will provide you with ethics guidance on your participation, you will not need to resign from either position.

OGE also circled back and have determined that your PTA position actually *is* reportable on your Nominee OGE Form 278e, because you are a member of the board and are the vice president of fundraising. They have asked that we add it to your Nominee OGE Form 278e. Below please find

an example of how we propose to report the position:

Organization Name	City/State	Organization Type	Position Held	From	To
George Washington Middle School Parent Teacher Organization	Alexandria, VA	Non-profit	Board member	/20	Current

They also informed us that we will need to add the position into the ethics agreement, regardless of the White House's determination.

Finally, OGE asked that we confirm that your spouse does not hold any equity in the Invariant lobbying practice.

We are close to final in the process and available to touch base and discuss further at your convenience. Many thanks!

- Heather

From: Gottry, Heather C
Sent: Thursday, February 18, 2021 4:50 PM
To: Klein, Elizabeth A <Elizabeth_Klein@ios.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: Updated Draft EA for Review

Liz – Hello! OGE just requested that we share the attached draft ethics agreement with you for review. Please note that the ethics agreement does not discuss your position as Girl Scout Troop Leader or as a board member of the George Washington Middle School PTA. We are still waiting on confirmation from the WH that you can continue to serve in these positions consistent with their policy. Presuming they confirm this understanding, then the ethics agreement will not to be further updated to address these two positions. I have already emailed and called the WH today and hope to hear back from them soon.

OGE has confirmed that your Nominee OGE Form 278e looks good to go and we have made conforming updates to your New Entrant OGE Form 278 in *Integrity*. At this point, you can now log into *Integrity* and review your New Entrant OGE Form 278 so that if it looks good to you it can be submitted before the deadline of COB tomorrow. Please let us know if you have any problems logging in or accessing your New Entrant OGE Form 278.

Please let us know if it would be helpful to find a time to walk through OGE's edits to the ethics agreement and discuss any questions. We can be available at your convenience. Thank you.

- Heather

Heather C. Gottry
Director & DAEO
Departmental Ethics Office | Office of the Solicitor
U.S. Department of the Interior | MIB 5308
(O) (202) 208-4472
(C) (202) 740-0417

Email: heather.gottry@sol.doi.gov

Visit us online at: www.doi.gov/ethics

Integrity is our mission.

From: [Gottry, Heather C](#)
To: [Margaret E. Yukins](#)
Cc: [Garcia, Monica L](#); [Stephanie Nonluecha](#)
Subject: RE: [EXTERNAL] Elizabeth Klein Draft EA - Updated - [Message and attachment(s) contain CUI] - [Message contains CUI]
Date: Thursday, February 18, 2021 9:01:56 PM
Attachments: [Klein - Draft EA for Review \(02.18.21\).\(OGE edits\) DOI redline.docx](#)
[Klein - Draft EA for Review \(02.18.21\) \(Clean Copy\).docx](#)

Margaret – Hello! We heard from the WH tonight and they confirmed that her positions with the Girl Scouts and the PTA are considered “local activities” which fall under the exception to the WH Policy provided that we sign off and are comfortable with her participation and provide her with ethics counsel regarding the participation. Therefore, because we have no legal objection to her participation in either position and will provide her with ethics guidance on your participation, she will not need to resign from either position.

As requested, we have added her board position with the PTA to Part 1 of her OGE Form 278e and have included proposed draft language in the EA for your review. She also reviewed and was comfortable with an earlier version the draft ethics agreement that I sent to her before we received the request to add the PTA language. However, we do not expect that she will object to the inclusion of the PTA language. Can you please confirm whether the proposed PTA language in the ethics agreement is good to go? If so, we will share with Liz ASAP.

Finally, Liz confirmed that her husband does not have an equity position with Invariant.

Please let us know if it would be helpful to touch base or if we can be of any additional assistance. Thanks and hope you have a good evening!

- Heather

From: Margaret E. Yukins <meyukins@oge.gov>
Sent: Thursday, February 18, 2021 4:55 PM
To: Gottry, Heather C <heather.gottry@sol.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>; Stephanie Nonluecha <snonlue@oge.gov>
Subject: RE: [EXTERNAL] Elizabeth Klein Draft EA - Updated - [Message and attachment(s) contain CUI] - [Message contains CUI]

CONTROLLED

Hi Heather,

I realize we’re still waiting to hear from the White House regarding the Girl Scout Troop leader and PTA position. However, I just received word from Heather Jones that the PTA position actually *is* reportable, as the Filer (1) holds an officer position, and (2) she holds a fiduciary duty in her role as VP of Fundraising. More information may be found here: [FAQs: Positions Outside of Government](#).

Could you add the VP of Fundraising for the George Washington Middle School PTA to the 278? (I’m sorry to have incorrectly told you that the 278 was in good shape!) This position will also have to be included in the EA, regardless of the White House decision.

Additionally, could you confirm that the Filer’s spouse does not hold any equity in the Invariant lobbying practice?

Thank you very much,
Margaret

From: Gottry, Heather C [<mailto:heather.gottry@sol.doi.gov>]
Sent: Thursday, February 18, 2021 3:41 PM
To: Margaret E. Yukins <meyukins@oge.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>; Stephanie Nonluecha <snonlue@oge.gov>
Subject: RE: [EXTERNAL] Elizabeth Klein Draft EA - Updated - [Message and attachment(s) contain CUI]

Margaret - Thank you for sending us this updated draft. As a quick reminder, (b) (5) [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED] We need this resolved in order to determine whether the resignations need to be added to her EA. I have sent to messages to Funmi and will give a call today. Hopefully we will hear back and can then circle back on the EA. Based on your message below, is it fair to assume that her OGE Form 278e looks good to go? Many thanks.

- Heather

From: Garcia, Monica L <monica.garcia@sol.doi.gov <<mailto:monica.garcia@sol.doi.gov>> >
Sent: Thursday, February 18, 2021 12:57 PM
To: Gottry, Heather C <heather.gottry@sol.doi.gov <<mailto:heather.gottry@sol.doi.gov>> >
Subject: FW: [EXTERNAL] Elizabeth Klein Draft EA - Updated - [Message and attachment(s) contain CUI]

From: Margaret E. Yukins <meyukins@oge.gov <<mailto:meyukins@oge.gov>> >
Sent: Thursday, February 18, 2021 12:45 PM
To: Heather A. Jones <hajones@oge.gov <<mailto:hajones@oge.gov>> >; Garcia, Monica L <monica.garcia@sol.doi.gov <<mailto:monica.garcia@sol.doi.gov>> >
Cc: Stephanie Nonluecha <snonlue@oge.gov <<mailto:snonlue@oge.gov>> >
Subject: [EXTERNAL] Elizabeth Klein Draft EA - Updated - [Message and attachment(s) contain CUI]

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

CONTROLLED

Email and attachment(s) contain CUI.

Hi Heather and Monica,
Attached is an updated draft of the Ethics Agreement for Elizabeth Klein. Please note that this updated draft of the EA has not been reviewed by Deb or Heather yet; we are reluctant to forward the draft EA for review until we know that Ms. Klein is fully onboard. Once Ms. Klein has approved the EA language, I will send the confirmatory email and forward her package for preclearance.

Thank you,
Margaret

Margaret Dylus-Yukins
Assistant Counsel
Ethics Law & Policy Branch
International Assistance & Outreach Program
U.S. Office of Government Ethics
(202) 482-9222
meyukins@oge.gov <<mailto:meyukins@oge.gov>> <<mailto:meyukins@oge.gov>>
<<mailto:meyukins@oge.gov>> >
Pronouns: she/her

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: [Klein, Elizabeth A](#)
To: [Gottry, Heather C](#)
Cc: [Garcia, Monica L](#)
Subject: RE: Updated Draft EA for Review
Date: Thursday, February 18, 2021 9:04:48 PM

How about 9am tmrw morning?

From: Gottry, Heather C <heather.gottry@sol.doi.gov>
Sent: Thursday, February 18, 2021 8:35 PM
To: Klein, Elizabeth A <Elizabeth_Klein@ios.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: RE: Updated Draft EA for Review

Liz – Thank you for reviewing so quickly. I have added the PTA position to both your New Entrant and Nominee OGE Form 278e reports. Are you available for a quick call? Monica and I can help you troubleshoot any issues with Integrity. Thanks.

- Heather

From: Klein, Elizabeth A <Elizabeth_Klein@ios.doi.gov>
Sent: Thursday, February 18, 2021 8:01 PM
To: Gottry, Heather C <heather.gottry@sol.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: RE: Updated Draft EA for Review

Hi there,

The agreement looks fine to me.

I can confirm that my husband does not hold any equity in Invariant.

The GWMS PTA entry looks fine. Start date for that position is Sept 2020.

I think I need help finding where my new entrant report is. When I just went into integrity using my DOI email address, there was no report listed. I think my nominee report is associated with my personal email address. So, just need confirmation about where to go to find it!

Thanks

From: Gottry, Heather C <heather.gottry@sol.doi.gov>
Sent: Thursday, February 18, 2021 5:46 PM
To: Klein, Elizabeth A <Elizabeth_Klein@ios.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: RE: Updated Draft EA for Review

Liz – Hello again! We just heard from both OGE and the WH.

The WH confirmed that your positions with the Girl Scouts and the PTA are considered “local activities” which fall under the exception to the WH Policy provided that we sign off and are comfortable with your participation and provides you with ethics counsel regarding the participation. Therefore, because we have no legal objection to your participation in either position and will provide you with ethics guidance on your participation, you will not need to resign from either position.

OGE also circled back and have determined that your PTA position actually *is* reportable on your Nominee OGE Form 278e, because you are a member of the board and are the vice president of fundraising. They have asked that we add it to your Nominee OGE Form 278e. Below please find an example of how we propose to report the position:

Organization Name	City/State	Organization Type	Position Held	From	To
George Washington Middle School Parent Teacher Organization	Alexandria, VA	Non-profit	Board member	<u>/20</u>	Current

They also informed us that we will need to add the position into the ethics agreement, regardless of the White House’s determination.

Finally, OGE asked that we confirm that your spouse does not hold any equity in the Invariant lobbying practice.

We are close to final in the process and available to touch base and discuss further at your convenience. Many thanks!

- Heather

From: Gottry, Heather C
Sent: Thursday, February 18, 2021 4:50 PM
To: Klein, Elizabeth A <Elizabeth_Klein@ios.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: Updated Draft EA for Review

Liz – Hello! OGE just requested that we share the attached draft ethics agreement with you for review. Please note that the ethics agreement does not discuss your position as Girl Scout Troop Leader or as a board member of the George Washington Middle School PTA. We are still waiting on confirmation from the WH that you can continue to serve in these positions consistent with their policy. Presuming they confirm this understanding, then the ethics agreement will not to be further updated to address these two positions. I have already emailed and called the WH today and hope to hear back from them soon.

OGE has confirmed that your Nominee OGE Form 278e looks good to go and we have made conforming updates to your New Entrant OGE Form 278 in *Integrity*. At this point, you can now log into *Integrity* and review your New Entrant OGE Form 278 so that if it looks good to you it can be submitted before the deadline of COB tomorrow. Please let us know if you have any problems logging in or accessing your New Entrant OGE Form 278.

Please let us know if it would be helpful to find a time to walk through OGE’s edits to the ethics agreement and discuss any questions. We can be available at your convenience. Thank you.

- Heather

Heather C. Gottry
Director & DAEO
Departmental Ethics Office | Office of the Solicitor
U.S. Department of the Interior | MIB 5308
(O) (202) 208-4472
(C) (202) 740-0417
Email: heather.gottry@sol.doi.gov

Visit us online at: www.doi.gov/ethics

Integrity is our mission.

From: [Gottry, Heather C](#)
To: [Klein, Elizabeth A](#)
Cc: [Garcia, Monica L](#)
Subject: RE: Updated Draft EA for Review
Date: Thursday, February 18, 2021 9:06:03 PM
Attachments: [Klein - Draft EA for Review \(02.18.21\) \(Clean Copy\).docx](#)

Liz – Hello again! I am sorry that we did not connect tonight, but please let us know if there is a convenient time tomorrow and we will help you get into *Integrity* to file your New Entrant OGE Form 278e.

As I mentioned in my earlier message, we updated your Nominee OGE Form 278e and sent the attached updated version of your ethics agreement to OGE for review. The only change in the attached draft is the inclusion of a paragraph on your PTA position that OGE requested.

If OGE is comfortable with the attached draft and we can confirm that you are comfortable with it as well, then we believe that your Nominee OGE Form 278e and ethics agreement will move forward into preclearance review at OGE tomorrow.

Thanks and hope you have a good evening!

- Heather

From: Gottry, Heather C
Sent: Thursday, February 18, 2021 8:35 PM
To: Klein, Elizabeth A <Elizabeth_Klein@ios.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: RE: Updated Draft EA for Review

Liz – Thank you for reviewing so quickly. I have added the PTA position to both your New Entrant and Nominee OGE Form 278e reports. Are you available for a quick call? Monica and I can help you troubleshoot any issues with Integrity. Thanks.

- Heather

From: Klein, Elizabeth A <Elizabeth_Klein@ios.doi.gov>
Sent: Thursday, February 18, 2021 8:01 PM
To: Gottry, Heather C <heather.gottry@sol.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: RE: Updated Draft EA for Review

Hi there,

The agreement looks fine to me.

I can confirm that my husband does not hold any equity in Invariant.

The GWMS PTA entry looks fine. Start date for that position is Sept 2020.

I think I need help finding where my new entrant report is. When I just went into integrity using my DOI email address, there was no report listed. I think my nominee report is associated with my personal email address. So, just need confirmation about where to go to find it!

Thanks

From: Gottry, Heather C <heather.gottry@sol.doi.gov>
Sent: Thursday, February 18, 2021 5:46 PM
To: Klein, Elizabeth A <Elizabeth_Klein@ios.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: RE: Updated Draft EA for Review

Liz – Hello again! We just heard from both OGE and the WH.

The WH confirmed that your positions with the Girl Scouts and the PTA are considered “local activities” which fall under the exception to the WH Policy provided that we sign off and are comfortable with your participation and provides you with ethics counsel regarding the participation. Therefore, because we have no legal objection to your participation in either position and will provide you with ethics guidance on your participation, you will not need to resign from either position.

OGE also circled back and have determined that your PTA position actually *is* reportable on your Nominee OGE Form 278e, because you are a member of the board and are the vice president of fundraising. They have asked that we add it to your Nominee OGE Form 278e. Below please find an example of how we propose to report the position:

Organization Name	City/State	Organization Type	Position Held	From	To
George Washington Middle School Parent Teacher Organization	Alexandria, VA	Non-profit	Board member	/20	Current

They also informed us that we will need to add the position into the ethics agreement, regardless of the White House’s determination.

Finally, OGE asked that we confirm that your spouse does not hold any equity in the Invariant lobbying practice.

We are close to final in the process and available to touch base and discuss further at your convenience. Many thanks!

- Heather

From: Gottry, Heather C
Sent: Thursday, February 18, 2021 4:50 PM
To: Klein, Elizabeth A <Elizabeth_Klein@ios.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: Updated Draft EA for Review

Liz – Hello! OGE just requested that we share the attached draft ethics agreement with you for review. Please note that the ethics agreement does not discuss your position as Girl Scout Troop Leader or as a board member of the George Washington Middle School PTA. We are still waiting on confirmation from the WH that you can continue to serve in these positions consistent with their policy. Presuming they confirm this understanding, then the ethics agreement will not to be further updated to address these two positions. I have already emailed and called the WH today and hope to hear back from them soon.

OGE has confirmed that your Nominee OGE Form 278e looks good to go and we have made conforming updates to your New Entrant OGE Form 278 in *Integrity*. At this point, you can now log into *Integrity* and review your New Entrant OGE Form 278 so that if it looks good to you it can be submitted before the deadline of COB tomorrow. Please let us know if you have any problems logging in or accessing your New Entrant OGE Form 278.

Please let us know if it would be helpful to find a time to walk through OGE's edits to the ethics agreement and discuss any questions. We can be available at your convenience. Thank you.

- Heather

Heather C. Gottry
Director & DAEO
Departmental Ethics Office | Office of the Solicitor
U.S. Department of the Interior | MIB 5308
(O) (202) 208-4472
(C) (202) 740-0417
Email: heather.gottry@sol.doi.gov

Visit us online at: www.doi.gov/ethics

Integrity is our mission.

From: [Gottry, Heather C](#)
To: [Klein, Elizabeth A](#)
Cc: [Garcia, Monica L](#)
Subject: RE: Updated Draft EA for Review
Date: Thursday, February 18, 2021 9:06:31 PM

Perfect – I will send an invite now. Thanks!

From: Klein, Elizabeth A <Elizabeth_Klein@ios.doi.gov>
Sent: Thursday, February 18, 2021 9:05 PM
To: Gottry, Heather C <heather.gottry@sol.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: RE: Updated Draft EA for Review

How about 9am tmrw morning?

From: Gottry, Heather C <heather.gottry@sol.doi.gov>
Sent: Thursday, February 18, 2021 8:35 PM
To: Klein, Elizabeth A <Elizabeth_Klein@ios.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: RE: Updated Draft EA for Review

Liz – Thank you for reviewing so quickly. I have added the PTA position to both your New Entrant and Nominee OGE Form 278e reports. Are you available for a quick call? Monica and I can help you troubleshoot any issues with Integrity. Thanks.

- Heather

From: Klein, Elizabeth A <Elizabeth_Klein@ios.doi.gov>
Sent: Thursday, February 18, 2021 8:01 PM
To: Gottry, Heather C <heather.gottry@sol.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: RE: Updated Draft EA for Review

Hi there,

The agreement looks fine to me.

I can confirm that my husband does not hold any equity in Invariant.

The GWMS PTA entry looks fine. Start date for that position is Sept 2020.

I think I need help finding where my new entrant report is. When I just went into integrity using my DOI email address, there was no report listed. I think my nominee report is associated with my personal email address. So, just need confirmation about where to go to find it!

Thanks

From: Gottry, Heather C <heather.gottry@sol.doi.gov>

Sent: Thursday, February 18, 2021 5:46 PM

To: Klein, Elizabeth A <Elizabeth_Klein@ios.doi.gov>

Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>

Subject: RE: Updated Draft EA for Review

Liz – Hello again! We just heard from both OGE and the WH.

The WH confirmed that your positions with the Girl Scouts and the PTA are considered “local activities” which fall under the exception to the WH Policy provided that we sign off and are comfortable with your participation and provides you with ethics counsel regarding the participation. Therefore, because we have no legal objection to your participation in either position and will provide you with ethics guidance on your participation, you will not need to resign from either position.

OGE also circled back and have determined that your PTA position actually *is* reportable on your Nominee OGE Form 278e, because you are a member of the board and are the vice president of fundraising. They have asked that we add it to your Nominee OGE Form 278e. Below please find an example of how we propose to report the position:

Organization Name	City/State	Organization Type	Position Held	From	To
George Washington Middle School Parent Teacher Organization	Alexandria, VA	Non-profit	Board member	/20	Current

They also informed us that we will need to add the position into the ethics agreement, regardless of the White House’s determination.

Finally, OGE asked that we confirm that your spouse does not hold any equity in the Invariant lobbying practice.

We are close to final in the process and available to touch base and discuss further at your convenience. Many thanks!

- Heather

From: Gottry, Heather C

Sent: Thursday, February 18, 2021 4:50 PM

To: Klein, Elizabeth A <Elizabeth_Klein@ios.doi.gov>

Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>

Subject: Updated Draft EA for Review

Liz – Hello! OGE just requested that we share the attached draft ethics agreement with you for review. Please note that the ethics agreement does not discuss your position as Girl Scout Troop Leader or as a board member of the George Washington Middle School PTA. We are still waiting on confirmation from the WH that you can continue to serve in these positions consistent with their policy. Presuming they confirm this understanding, then the ethics agreement will not to be further updated to address these two positions. I have already emailed and called the WH today and hope to hear back from them soon.

OGE has confirmed that your Nominee OGE Form 278e looks good to go and we have made conforming updates to your New Entrant OGE Form 278 in *Integrity*. At this point, you can now log into *Integrity* and review your New Entrant OGE Form 278 so that if it looks good to you it can be submitted before the deadline of COB tomorrow. Please let us know if you have any problems logging in or accessing your New Entrant OGE Form 278.

Please let us know if it would be helpful to find a time to walk through OGE's edits to the ethics agreement and discuss any questions. We can be available at your convenience. Thank you.

- Heather

Heather C. Gottry
Director & DAEO
Departmental Ethics Office | Office of the Solicitor
U.S. Department of the Interior | MIB 5308
(O) (202) 208-4472
(C) (202) 740-0417
Email: heather.gottry@sol.doi.gov

Visit us online at: www.doi.gov/ethics

Integrity is our mission.

From: [Margaret E. Yukins](#)
To: [Gottry, Heather C](#)
Cc: [Garcia, Monica L](#); [Stephanie Nonluecha](#)
Subject: RE: [EXTERNAL] Elizabeth Klein Draft EA - Updated - [Message and attachment(s) contain CUI] - [Message contains CUI]
Date: Friday, February 19, 2021 8:48:35 AM

Thanks Heather! We will review and get back to you shortly.

Best,
Margaret

From: Gottry, Heather C [mailto:heather.gottry@sol.doi.gov]
Sent: Thursday, February 18, 2021 9:02 PM
To: Margaret E. Yukins <meyukins@oge.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>; Stephanie Nonluecha <snonlue@oge.gov>
Subject: RE: [EXTERNAL] Elizabeth Klein Draft EA - Updated - [Message and attachment(s) contain CUI] - [Message contains CUI]

Margaret – Hello! We heard from the WH tonight and they confirmed that her positions with the Girl Scouts and the PTA are considered “local activities” which fall under the exception to the WH Policy provided that we sign off and are comfortable with her participation and provide her with ethics counsel regarding the participation. Therefore, because we have no legal objection to her participation in either position and will provide her with ethics guidance on your participation, she will not need to resign from either position.

As requested, we have added her board position with the PTA to Part 1 of her OGE Form 278e and have included proposed draft language in the EA for your review. She also reviewed and was comfortable with an earlier version the draft ethics agreement that I sent to her before we received the request to add the PTA language. However, we do not expect that she will object to the inclusion of the PTA language. Can you please confirm whether the proposed PTA language in the ethics agreement is good to go? If so, we will share with Liz ASAP.

Finally, Liz confirmed that her husband does not have an equity position with Invariant.

Please let us know if it would be helpful to touch base or if we can be of any additional assistance. Thanks and hope you have a good evening!

- Heather

From: Margaret E. Yukins <meyukins@oge.gov>
Sent: Thursday, February 18, 2021 4:55 PM
To: Gottry, Heather C <heather.gottry@sol.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>; Stephanie Nonluecha <snonlue@oge.gov>
Subject: RE: [EXTERNAL] Elizabeth Klein Draft EA - Updated - [Message and attachment(s) contain CUI] - [Message contains CUI]

CONTROLLED

Hi Heather,

I realize we're still waiting to hear from the White House regarding the Girl Scout Troop leader and PTA position. However, I just received word from Heather Jones that the PTA position actually *is* reportable, as the Filer (1) holds an officer position, and (2) she holds a fiduciary duty in her role as VP of Fundraising. More information may be found here: [FAQs: Positions Outside of Government](#).

Could you add the VP of Fundraising for the George Washington Middle School PTA to the 278? (I'm sorry to have incorrectly told you that the 278 was in good shape!) This position will also have to be included in the EA, regardless of the White House decision.

Additionally, could you confirm that the Filer's spouse does not hold any equity in the Invariant lobbying practice?

Thank you very much,
Margaret

From: Gottry, Heather C [<mailto:heather.gottry@sol.doi.gov>]
Sent: Thursday, February 18, 2021 3:41 PM
To: Margaret E. Yukins <meyukins@oge.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>; Stephanie Nonluecha <snonlue@oge.gov>
Subject: RE: [EXTERNAL] Elizabeth Klein Draft EA - Updated - [Message and attachment(s) contain CUI]

Margaret - Thank you for sending us this updated draft. As a quick reminder, we have not yet heard back from the WH on whether Liz can continue to serve as a Girl Scout Troop Leader and a board member of the George Washington Middle School PTA, where she serves on the fundraising committee. We need this resolved in order to determine whether the resignations need to be added to her EA. I have sent to messages to Funmi and will give a call today. Hopefully we will hear back and can then circle back on the EA. Based on your message below, is it fair to assume that her OGE Form 278e looks good to go? Many thanks.

- Heather

From: Garcia, Monica L <monica.garcia@sol.doi.gov <<mailto:monica.garcia@sol.doi.gov>> >
Sent: Thursday, February 18, 2021 12:57 PM
To: Gottry, Heather C <heather.gottry@sol.doi.gov <<mailto:heather.gottry@sol.doi.gov>> >
Subject: FW: [EXTERNAL] Elizabeth Klein Draft EA - Updated - [Message and attachment(s) contain CUI]

From: Margaret E. Yukins <meyukins@oge.gov <<mailto:meyukins@oge.gov>> >
Sent: Thursday, February 18, 2021 12:45 PM
To: Heather A. Jones <hajones@oge.gov <<mailto:hajones@oge.gov>> >; Garcia, Monica L

<monica.garcia@sol.doi.gov <<mailto:monica.garcia@sol.doi.gov>> >

Cc: Stephanie Nonluecha <snonlue@oge.gov> <<mailto:snonlue@oge.gov>> >

Subject: [EXTERNAL] Elizabeth Klein Draft EA - Updated - [Message and attachment(s) contain CUI]

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

CONTROLLED

Email and attachment(s) contain CUI.

Hi Heather and Monica,
Attached is an updated draft of the Ethics Agreement for Elizabeth Klein. Please note that this updated draft of the EA has not been reviewed by Deb or Heather yet; we are reluctant to forward the draft EA for review until we know that Ms. Klein is fully onboard. Once Ms. Klein has approved the EA language, I will send the confirmatory email and forward her package for preclearance.

Thank you,
Margaret

Margaret Dylus-Yukins
Assistant Counsel
Ethics Law & Policy Branch
International Assistance & Outreach Program
U.S. Office of Government Ethics
(202) 482-9222
meyukins@oge.gov <<mailto:meyukins@oge.gov>> <<mailto:meyukins@oge.gov>>
<<mailto:meyukins@oge.gov>> >
Pronouns: she/her

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: [Margaret E. Yukins](#)
To: [Gottry, Heather C](#); [Garcia, Monica L](#)
Cc: [Stephanie Nonluecha](#)
Subject: [EXTERNAL] Elizabeth Klein Confirmatory Email - [Message contains CUI]
Date: Friday, February 19, 2021 11:14:46 AM

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

CONTROLLED

Good morning,

The U.S. Office of Government Ethics (OGE) will be reviewing Elizabeth Klein's report for "preclearance." Please be sure to instruct Elizabeth Klein to personally review the report carefully once more, given that she 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 Elizabeth Klein's material representations on which we are relying. Please forward this message to Elizabeth Klein and instruct her to notify you immediately if any item in this list is incorrect.

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

- Elizabeth Klein has personally reviewed all entries in the current version of the financial disclosure report and has affirmed that they are correct.
- Elizabeth Klein has already signed the Executive Order 13989 Ethics Pledge.
- For Part 1 and Part 4, Elizabeth Klein has provided information covering the entire reporting period of January 1, 2019, to date of signing.
- For Part 2, Part 5, Part 6, and Part 8, Elizabeth Klein has provided information covering the entire reporting period of January 1, 2020, to date of signing.
- Elizabeth Klein is not a trustee of any trust.
- Elizabeth Klein, her spouse, and her dependent children do not have any beneficial interests in trusts, including discretionary trusts.
- Elizabeth Klein's spouse holds no equity in his employer, Invariant LLC.
- The ethics agreement correctly describes all items addressed in the agreement. Further, Elizabeth Klein understands the commitments that she is making to the Senate and will be able to fulfill these commitments within the stated timeframes.

Thank you,

Margaret

Margaret Dylus-Yukins
Assistant Counsel
Ethics Law & Policy Branch
International Assistance & Outreach Program
U.S. Office of Government Ethics
(202) 482-9222
meyukins@oge.gov <<mailto:meyukins@oge.gov>>
Pronouns: she/her

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.

[illegible]

From: [Gottry, Heather C](#)
To: [Klein, Elizabeth A](#)
Cc: [Garcia, Monica L](#)
Subject: FW: [EXTERNAL] Elizabeth Klein Confirmatory Email - [Message contains CUI]
Date: Friday, February 19, 2021 12:13:53 PM
Attachments: [Klein - Draft EA for Review \(02.19.21\).\(OGE edits\).docx](#)

Liz – Good news! OGE has no further follow up questions related to your Nominee OGE Form 278e and is ready to review both it and your ethics agreement for preclearance. I have attached the minor modifications that they are proposing to your EA in redline above for your review.

OGE has also asked that we send the message below on to you for review and that you please confirm that:

- You have personally reviewed all entries in the current version of the financial disclosure report and affirm that they are correct.
- You have signed the Executive Order 13989 Ethics Pledge.
- For Part 1 and Part 4, you have provided information covering the entire reporting period of January 1, 2019, to date of signing.
- For Part 2, Part 5, Part 6, and Part 8, you have provided information covering the entire reporting period of January 1, 2020, to date of signing.
- You are not a trustee of any trust.
- You, your spouse, and your dependent children do not have any beneficial interests in trusts, including discretionary trusts.
- Your spouse holds no equity in his employer, Invariant LLC.
- The attached ethics agreement correctly describes all items addressed in the agreement.
- You understand the commitments that you will be making to the Senate and will be able to fulfill these commitments within the stated timeframes.

Please let me know at your earliest convenience if any of the above list is incorrect or if you have questions that would be helpful to discuss. Thank you.

- Heather

From: Margaret E. Yukins <meyukins@oge.gov>
Sent: Friday, February 19, 2021 11:14 AM
To: Gottry, Heather C <heather.gottry@sol.doi.gov>; Garcia, Monica L <monica.garcia@sol.doi.gov>
Cc: Stephanie Nonluecha <snonlue@oge.gov>
Subject: [EXTERNAL] Elizabeth Klein Confirmatory Email - [Message contains CUI]

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

CONTROLLED

Good morning,

The U.S. Office of Government Ethics (OGE) will be reviewing Elizabeth Klein's report for "preclearance." Please be sure to instruct Elizabeth Klein to personally review the report carefully once more, given that she 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 Elizabeth Klein's material representations on which we are relying. Please forward this message to Elizabeth Klein and instruct her to notify you immediately if any item in this list is incorrect.

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

- Elizabeth Klein has personally reviewed all entries in the current version of the financial disclosure report and has affirmed that they are correct.
- Elizabeth Klein has already signed the Executive Order 13989 Ethics Pledge.
- For Part 1 and Part 4, Elizabeth Klein has provided information covering the entire reporting period of January 1, 2019, to date of signing.
- For Part 2, Part 5, Part 6, and Part 8, Elizabeth Klein has provided information covering the entire reporting period of January 1, 2020, to date of signing.
- Elizabeth Klein is not a trustee of any trust.
- Elizabeth Klein, her spouse, and her dependent children do not have any beneficial interests in trusts, including discretionary trusts.
- Elizabeth Klein's spouse holds no equity in his employer, Invariant LLC.
- The ethics agreement correctly describes all items addressed in the agreement. Further, Elizabeth Klein understands the commitments that she is making to the Senate and will be able to fulfill these commitments within the stated timeframes.

Thank you,

Margaret

Margaret Dylus-Yukins
Assistant Counsel
Ethics Law & Policy Branch
International Assistance & Outreach Program
U.S. Office of Government Ethics
(202) 482-9222
me yukins@oge.gov <<mailto:me yukins@oge.gov>>

Pronouns: she/her

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: [Gottry, Heather C](#)
To: [Margaret E. Yukins](#); [Garcia, Monica L](#)
Cc: [Stephanie Nonluecha](#)
Subject: RE: [EXTERNAL] Elizabeth Klein Confirmatory Email - [Message contains CUI]
Date: Friday, February 19, 2021 12:14:39 PM

Margaret – Thank you. We have send the message onto Liz and are waiting on her responses now. We will update you as soon as we hear back from her.

- Heather

From: Margaret E. Yukins <meyukins@oge.gov>
Sent: Friday, February 19, 2021 11:14 AM
To: Gottry, Heather C <heather.gottry@sol.doi.gov>; Garcia, Monica L <monica.garcia@sol.doi.gov>
Cc: Stephanie Nonluecha <snonlue@oge.gov>
Subject: [EXTERNAL] Elizabeth Klein Confirmatory Email - [Message contains CUI]

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

CONTROLLED

Good morning,

The U.S. Office of Government Ethics (OGE) will be reviewing Elizabeth Klein’s report for “preclearance.” Please be sure to instruct Elizabeth Klein to personally review the report carefully once more, given that she 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 Elizabeth Klein’s material representations on which we are relying. Please forward this message to Elizabeth Klein and instruct her to notify you immediately if any item in this list is incorrect.

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

- Elizabeth Klein has personally reviewed all entries in the current version of the financial disclosure report and has affirmed that they are correct.
- Elizabeth Klein has already signed the Executive Order 13989 Ethics Pledge.
- For Part 1 and Part 4, Elizabeth Klein has provided information covering the entire reporting period of January 1, 2019, to date of signing.
- For Part 2, Part 5, Part 6, and Part 8, Elizabeth Klein has provided information covering the entire reporting period of January 1, 2020, to date of signing.

- Elizabeth Klein is not a trustee of any trust.
- Elizabeth Klein, her spouse, and her dependent children do not have any beneficial interests in trusts, including discretionary trusts.
- Elizabeth Klein's spouse holds no equity in his employer, Invariant LLC.
- The ethics agreement correctly describes all items addressed in the agreement. Further, Elizabeth Klein understands the commitments that she is making to the Senate and will be able to fulfill these commitments within the stated timeframes.

Thank you,

Margaret

Margaret Dylus-Yukins
Assistant Counsel
Ethics Law & Policy Branch
International Assistance & Outreach Program
U.S. Office of Government Ethics
(202) 482-9222
meiyukins@oge.gov <<mailto:meiyukins@oge.gov>>
Pronouns: she/her

OGC 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.

11
 12
 13
 14
 15
 16
 17
 18
 19
 20
 21
 22
 23
 24
 25
 26
 27
 28
 29
 30
 31
 32
 33
 34
 35
 36
 37
 38
 39
 40
 41
 42
 43
 44
 45
 46
 47
 48
 49
 50
 51
 52
 53
 54
 55
 56
 57
 58
 59
 60
 61
 62
 63
 64
 65
 66
 67
 68
 69
 70
 71
 72
 73
 74
 75
 76
 77
 78
 79
 80
 81
 82
 83
 84
 85
 86
 87
 88
 89
 90
 91
 92
 93
 94
 95
 96
 97
 98
 99
 100
 101
 102
 103
 104
 105
 106
 107
 108
 109
 110
 111
 112
 113
 114
 115
 116
 117
 118
 119
 120
 121
 122
 123
 124
 125
 126
 127
 128
 129
 130
 131
 132
 133
 134
 135
 136
 137
 138
 139
 140
 141
 142
 143
 144
 145
 146
 147
 148
 149
 150
 151
 152
 153
 154
 155
 156
 157
 158
 159
 160
 161
 162
 163
 164
 165
 166
 167
 168
 169
 170
 171
 172
 173
 174
 175
 176
 177
 178
 179
 180
 181
 182
 183
 184
 185
 186
 187
 188
 189
 190
 191
 192
 193
 194
 195
 196
 197
 198
 199
 200
 201
 202
 203
 204
 205
 206
 207
 208
 209
 210
 211
 212
 213
 214
 215
 216
 217
 218
 219
 220
 221
 222
 223
 224
 225
 226
 227
 228
 229
 230
 231
 232
 233
 234
 235
 236
 237
 238
 239
 240
 241
 242
 243
 244
 245
 246
 247
 248
 249
 250
 251
 252
 253
 254
 255
 256
 257
 258
 259
 260
 261
 262
 263
 264
 265
 266
 267
 268
 269
 270
 271
 272
 273
 274
 275
 276
 277
 278
 279
 280
 281
 282
 283
 284
 285
 286
 287
 288
 289
 290
 291
 292
 293
 294
 295
 296
 297
 298
 299
 300
 301
 302
 303
 304
 305
 306
 307
 308
 309
 310
 311
 312
 313
 314
 315
 316
 317
 318
 319
 320
 321
 322
 323
 324
 325
 326
 327
 328
 329
 330
 331
 332
 333
 334
 335
 336
 337
 338
 339
 340
 341
 342
 343
 344
 345
 346
 347
 348
 349
 350
 351
 352
 353
 354
 355
 356
 357
 358
 359
 360
 361
 362
 363
 364
 365
 366
 367
 368
 369
 370
 371
 372
 373
 374
 375
 376
 377
 378
 379
 380
 381
 382
 383
 384
 385
 386
 387
 388
 389
 390
 391
 392
 393
 394
 395
 396
 397
 398
 399
 400
 401
 402
 403
 404
 405
 406
 407
 408
 409
 410
 411
 412
 413
 414
 415
 416
 417
 418
 419
 420
 421
 422
 423
 424
 425
 426
 427
 428
 429
 430
 431
 432
 433
 434
 435
 436
 437
 438
 439
 440
 441
 442
 443
 444
 445
 446
 447
 448
 449
 450
 451
 452
 453
 454
 455
 456
 457
 458
 459
 460
 461
 462
 463
 464
 465
 466
 467
 468
 469
 470
 471
 472
 473
 474
 475
 476
 477
 478
 479
 480
 481
 482
 483
 484
 485
 486
 487
 488
 489
 490
 491
 492
 493
 494
 495
 496
 497
 498
 499
 500
 501
 502
 503
 504
 505
 506
 507
 508
 509
 510
 511
 512
 513
 514
 515
 516
 517
 518
 519
 520
 521
 522
 523
 524
 525
 526
 527
 528
 529
 530
 531
 532
 533
 534
 535
 536
 537
 538
 539
 540
 541
 542
 543
 544
 545
 546
 547
 548
 549
 550
 551
 552
 553
 554
 555
 556
 557
 558
 559
 560
 561
 562
 563
 564
 565
 566
 567
 568
 569
 570
 571
 572
 573
 574
 575
 576
 577
 578
 579
 580
 581
 582
 583
 584
 585
 586
 587
 588
 589
 590
 591
 592
 593
 594
 595
 596
 597
 598
 599
 600
 601
 602
 603
 604
 605
 606
 607
 608
 609
 610
 611
 612
 613
 614
 615
 616
 617
 618
 619
 620
 621
 622
 623
 624
 625
 626
 627
 628
 629
 630
 631
 632
 633
 634
 635
 636
 637
 638
 639
 640
 641
 642
 643
 644
 645
 646
 647
 648
 649
 650
 651
 652
 653
 654
 655
 656
 657
 658
 659
 660
 661
 662
 663
 664
 665
 666
 667
 668
 669
 670
 671
 672
 673
 674
 675
 676
 677
 678
 679
 680
 681
 682
 683
 684
 685
 686
 687
 688
 689
 690
 691
 692
 693
 694
 695
 696
 697
 698
 699
 700
 701
 702
 703
 704
 705
 706
 707
 708
 709
 710
 711
 712
 713
 714
 715
 716
 717
 718
 719
 720
 721
 722
 723
 724
 725
 726
 727
 728
 729
 730
 731
 732
 733
 734
 735
 736
 737
 738
 739
 740
 741
 742
 743
 744
 745
 746
 747
 748
 749
 750
 751
 752
 753
 754
 755
 756
 757
 758
 759
 760
 761
 762
 763
 764
 765
 766
 767
 768
 769
 770
 771
 772
 773
 774
 775
 776
 777
 778
 779
 780
 781
 782
 783
 784
 785
 786
 787
 788
 789
 790
 791
 792
 793
 794
 795
 796
 797
 798
 799
 800
 801
 802
 803
 804
 805
 806
 807
 808
 809
 810
 811
 812
 813
 814
 815
 816
 817
 818
 819
 820
 821
 822
 823
 824
 825
 826
 827
 828
 829
 830
 831
 832
 833
 834
 835
 836
 837
 838
 839
 840
 841
 842
 843
 844
 845
 846
 847
 848
 849
 850
 851
 852
 853
 854
 855
 856
 857
 858
 859
 860
 861
 862
 863
 864
 865
 866
 867
 868
 869
 870
 871
 872
 873
 874
 875
 876
 877
 878
 879
 880
 881
 882
 883
 884
 885
 886
 887
 888
 889
 890
 891
 892
 893
 894
 895
 896
 897
 898
 899
 900
 901
 902
 903
 904
 905
 906
 907
 908
 909
 910
 911
 912
 913
 914
 915
 916
 917
 918
 919
 920
 921
 922
 923
 924
 925
 926
 927
 928
 929
 930
 931
 932
 933
 934
 935
 936
 937
 938
 939
 940
 941
 942
 943
 944
 945
 946
 947
 948
 949
 950
 951
 952
 953
 954
 955
 956
 957
 958
 959
 960
 961
 962
 963
 964
 965
 966
 967
 968
 969
 970
 971
 972
 973
 974
 975
 976
 977
 978
 979
 980
 981
 982
 983
 984
 985
 986
 987
 988
 989
 990
 991
 992
 993
 994
 995
 996
 997
 998
 999
 1000

From: [Klein, Elizabeth A](#)
To: [Gottry, Heather C](#)
Cc: [Garcia, Monica L](#)
Subject: RE: [EXTERNAL] Elizabeth Klein Confirmatory Email - [Message contains CUI]
Date: Friday, February 19, 2021 12:54:58 PM

The edits look fine, though a little confusing since now there are two paragraphs covering the PTA. I assume they are suggesting replacing the existing one with the one they've added. Either way, good here. GWMS PTA has no business in front of the DOI.

I affirm everything below.

Thanks

From: Gottry, Heather C <heather.gottry@sol.doi.gov>
Sent: Friday, February 19, 2021 12:14 PM
To: Klein, Elizabeth A <Elizabeth_Klein@ios.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: FW: [EXTERNAL] Elizabeth Klein Confirmatory Email - [Message contains CUI]

Liz – Good news! OGE has no further follow up questions related to your Nominee OGE Form 278e and is ready to review both it and your ethics agreement for preclearance. I have attached the minor modifications that they are proposing to your EA in redline above for your review.

OGE has also asked that we send the message below on to you for review and that you please confirm that:

- You have personally reviewed all entries in the current version of the financial disclosure report and affirm that they are correct.
- You have signed the Executive Order 13989 Ethics Pledge.
- For Part 1 and Part 4, you have provided information covering the entire reporting period of January 1, 2019, to date of signing.
- For Part 2, Part 5, Part 6, and Part 8, you have provided information covering the entire reporting period of January 1, 2020, to date of signing.
- You are not a trustee of any trust.
- You, your spouse, and your dependent children do not have any beneficial interests in trusts, including discretionary trusts.
- Your spouse holds no equity in his employer, Invariant LLC.
- The attached ethics agreement correctly describes all items addressed in the agreement.
- You understand the commitments that you will be making to the Senate and will be able to fulfill these commitments within the stated timeframes.

Please let me know at your earliest convenience if any of the above list is incorrect or if you have

questions that would be helpful to discuss. Thank you.

- Heather

From: Margaret E. Yukins <meyukins@oge.gov>

Sent: Friday, February 19, 2021 11:14 AM

To: Gottry, Heather C <heather.gottry@sol.doi.gov>; Garcia, Monica L <monica.garcia@sol.doi.gov>

Cc: Stephanie Nonluecha <snonlue@oge.gov>

Subject: [EXTERNAL] Elizabeth Klein Confirmatory Email - [Message contains CUI]

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

CONTROLLED

Good morning,

The U.S. Office of Government Ethics (OGE) will be reviewing Elizabeth Klein's report for "preclearance." Please be sure to instruct Elizabeth Klein to personally review the report carefully once more, given that she 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 Elizabeth Klein's material representations on which we are relying. Please forward this message to Elizabeth Klein and instruct her to notify you immediately if any item in this list is incorrect.

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

- Elizabeth Klein has personally reviewed all entries in the current version of the financial disclosure report and has affirmed that they are correct.
- Elizabeth Klein has already signed the Executive Order 13989 Ethics Pledge.
- For Part 1 and Part 4, Elizabeth Klein has provided information covering the entire reporting period of January 1, 2019, to date of signing.
- For Part 2, Part 5, Part 6, and Part 8, Elizabeth Klein has provided information covering the entire reporting period of January 1, 2020, to date of signing.
- Elizabeth Klein is not a trustee of any trust.
- Elizabeth Klein, her spouse, and her dependent children do not have any beneficial interests in trusts, including discretionary trusts.

- Elizabeth Klein's spouse holds no equity in his employer, Invariant LLC.
- The ethics agreement correctly describes all items addressed in the agreement. Further, Elizabeth Klein understands the commitments that she is making to the Senate and will be able to fulfill these commitments within the stated timeframes.

Thank you,

Margaret

Margaret Dylus-Yukins
Assistant Counsel
Ethics Law & Policy Branch
International Assistance & Outreach Program
U.S. Office of Government Ethics
(202) 482-9222
meyukins@oge.gov <<mailto:meyukins@oge.gov>>
Pronouns: she/her

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: [Gottry, Heather C](#)
To: [Klein, Elizabeth A](#)
Cc: [Garcia, Monica L](#)
Subject: RE: [EXTERNAL] Elizabeth Klein Confirmatory Email - [Message contains CUI]
Date: Friday, February 19, 2021 12:56:19 PM

I will circle back with them to clarify and appreciate your quick review and confirmation. Thanks.

From: Klein, Elizabeth A <Elizabeth_Klein@ios.doi.gov>
Sent: Friday, February 19, 2021 12:55 PM
To: Gottry, Heather C <heather.gottry@sol.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: RE: [EXTERNAL] Elizabeth Klein Confirmatory Email - [Message contains CUI]

The edits look fine, though a little confusing since now there are two paragraphs covering the PTA. I assume they are suggesting replacing the existing one with the one they've added. Either way, good here. GWMS PTA has no business in front of the DOI.

I affirm everything below.

Thanks

From: Gottry, Heather C <heather.gottry@sol.doi.gov>
Sent: Friday, February 19, 2021 12:14 PM
To: Klein, Elizabeth A <Elizabeth_Klein@ios.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: FW: [EXTERNAL] Elizabeth Klein Confirmatory Email - [Message contains CUI]

Liz – Good news! OGE has no further follow up questions related to your Nominee OGE Form 278e and is ready to review both it and your ethics agreement for preclearance. I have attached the minor modifications that they are proposing to your EA in redline above for your review.

OGE has also asked that we send the message below on to you for review and that you please confirm that:

- You have personally reviewed all entries in the current version of the financial disclosure report and affirm that they are correct.
- You have signed the Executive Order 13989 Ethics Pledge.
- For Part 1 and Part 4, you have provided information covering the entire reporting period of January 1, 2019, to date of signing.
- For Part 2, Part 5, Part 6, and Part 8, you have provided information covering the entire reporting period of January 1, 2020, to date of signing.
- You are not a trustee of any trust.
- You, your spouse, and your dependent children do not have any beneficial interests in trusts, including discretionary trusts.

- Your spouse holds no equity in his employer, Invariant LLC.
- The attached ethics agreement correctly describes all items addressed in the agreement.
- You understand the commitments that you will be making to the Senate and will be able to fulfill these commitments within the stated timeframes.

Please let me know at your earliest convenience if any of the above list is incorrect or if you have questions that would be helpful to discuss. Thank you.

- Heather

From: Margaret E. Yukins <meyukins@oge.gov>

Sent: Friday, February 19, 2021 11:14 AM

To: Gottry, Heather C <heather.gottry@sol.doi.gov>; Garcia, Monica L <monica.garcia@sol.doi.gov>

Cc: Stephanie Nonluecha <snonlue@oge.gov>

Subject: [EXTERNAL] Elizabeth Klein Confirmatory Email - [Message contains CUI]

<p>This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.</p>
--

CONTROLLED

Good morning,

The U.S. Office of Government Ethics (OGE) will be reviewing Elizabeth Klein's report for "preclearance." Please be sure to instruct Elizabeth Klein to personally review the report carefully once more, given that she 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 Elizabeth Klein's material representations on which we are relying. Please forward this message to Elizabeth Klein and instruct her to notify you immediately if any item in this list is incorrect.

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

- Elizabeth Klein has personally reviewed all entries in the current version of the financial disclosure report and has affirmed that they are correct.
- Elizabeth Klein has already signed the Executive Order 13989 Ethics Pledge.
- For Part 1 and Part 4, Elizabeth Klein has provided information covering the entire reporting period of January 1, 2019, to date of signing.

- For Part 2, Part 5, Part 6, and Part 8, Elizabeth Klein has provided information covering the entire reporting period of January 1, 2020, to date of signing.
- Elizabeth Klein is not a trustee of any trust.
- Elizabeth Klein, her spouse, and her dependent children do not have any beneficial interests in trusts, including discretionary trusts.
- Elizabeth Klein's spouse holds no equity in his employer, Invariant LLC.
- The ethics agreement correctly describes all items addressed in the agreement. Further, Elizabeth Klein understands the commitments that she is making to the Senate and will be able to fulfill these commitments within the stated timeframes.

Thank you,

Margaret

Margaret Dylus-Yukins
Assistant Counsel
Ethics Law & Policy Branch
International Assistance & Outreach Program
U.S. Office of Government Ethics
(202) 482-9222
meyukins@oge.gov <<mailto:meyukins@oge.gov>>
Pronouns: she/her

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: [Gottry, Heather C](#)
To: [Margaret E. Yukins](#)
Cc: [Stephanie Nonluecha](#); [Garcia, Monica L](#)
Subject: RE: [EXTERNAL] Elizabeth Klein Confirmatory Email - [Message contains CUI]
Date: Friday, February 19, 2021 1:00:27 PM
Attachments: [Klein - Draft EA for Review \(02.19.21\).\(OGE edits\) \(DOI edits\).docx](#)

Margaret – Hello again! Liz just provided us with confirmation on all points requested in your message below. Also, in the EA, is it correct that the 208 language will replace the 502 language with respect to the PTA? Please let me know if you need anything else from us or if we can be of any additional assistance. Thanks.

- Heather

From: Gottry, Heather C
Sent: Friday, February 19, 2021 12:15 PM
To: Margaret E. Yukins <meyukins@oge.gov>; Garcia, Monica L <monica.garcia@sol.doi.gov>
Cc: Stephanie Nonluecha <snonlue@oge.gov>
Subject: RE: [EXTERNAL] Elizabeth Klein Confirmatory Email - [Message contains CUI]

Margaret – Thank you. We have sent the message onto Liz and are waiting on her responses now. We will update you as soon as we hear back from her.

- Heather

From: Margaret E. Yukins <meyukins@oge.gov>
Sent: Friday, February 19, 2021 11:14 AM
To: Gottry, Heather C <heather.gottry@sol.doi.gov>; Garcia, Monica L <monica.garcia@sol.doi.gov>
Cc: Stephanie Nonluecha <snonlue@oge.gov>
Subject: [EXTERNAL] Elizabeth Klein Confirmatory Email - [Message contains CUI]

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

CONTROLLED

Good morning,

The U.S. Office of Government Ethics (OGE) will be reviewing Elizabeth Klein's report for "preclearance." Please be sure to instruct Elizabeth Klein to personally review the report carefully once more, given that she 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 Elizabeth

Klein's material representations on which we are relying. Please forward this message to Elizabeth Klein and instruct her to notify you immediately if any item in this list is incorrect.

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

- Elizabeth Klein has personally reviewed all entries in the current version of the financial disclosure report and has affirmed that they are correct.
- Elizabeth Klein has already signed the Executive Order 13989 Ethics Pledge.
- For Part 1 and Part 4, Elizabeth Klein has provided information covering the entire reporting period of January 1, 2019, to date of signing.
- For Part 2, Part 5, Part 6, and Part 8, Elizabeth Klein has provided information covering the entire reporting period of January 1, 2020, to date of signing.
- Elizabeth Klein is not a trustee of any trust.
- Elizabeth Klein, her spouse, and her dependent children do not have any beneficial interests in trusts, including discretionary trusts.
- Elizabeth Klein's spouse holds no equity in his employer, Invariant LLC.
- The ethics agreement correctly describes all items addressed in the agreement. Further, Elizabeth Klein understands the commitments that she is making to the Senate and will be able to fulfill these commitments within the stated timeframes.

Thank you,

Margaret

Margaret Dylus-Yukins
Assistant Counsel
Ethics Law & Policy Branch
International Assistance & Outreach Program
U.S. Office of Government Ethics
(202) 482-9222
meyukins@oge.gov <<mailto:meyukins@oge.gov>>
Pronouns: she/her

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: [Margaret E. Yukins](#)
To: [Gottry, Heather C](#)
Cc: [Stephanie Nonluecha](#); [Garcia, Monica L](#)
Subject: RE: [EXTERNAL] Elizabeth Klein Confirmatory Email - [Message contains CUI] - [Message contains CUI]
Date: Friday, February 19, 2021 1:07:49 PM

CONTROLLED

Thank you Heather! Yes, you're correct, the PTA 208 language will replace the 502 language. If you agree with these edits, I can produce a clean copy for you.

From: Gottry, Heather C [<mailto:heather.gottry@sol.doi.gov>]
Sent: Friday, February 19, 2021 1:00 PM
To: Margaret E. Yukins <meyukins@oge.gov>
Cc: Stephanie Nonluecha <snonlue@oge.gov>; Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: RE: [EXTERNAL] Elizabeth Klein Confirmatory Email - [Message contains CUI]

Margaret – Hello again! Liz just provided us with confirmation on all points requested in your message below. Also, in the EA, is it correct that the 208 language will replace the 502 language with respect to the PTA? Please let me know if you need anything else from us or if we can be of any additional assistance. Thanks.

- Heather

From: Gottry, Heather C
Sent: Friday, February 19, 2021 12:15 PM
To: Margaret E. Yukins <meyukins@oge.gov <<mailto:meyukins@oge.gov>> >; Garcia, Monica L <monica.garcia@sol.doi.gov <<mailto:monica.garcia@sol.doi.gov>> >
Cc: Stephanie Nonluecha <snonlue@oge.gov <<mailto:snonlue@oge.gov>> >
Subject: RE: [EXTERNAL] Elizabeth Klein Confirmatory Email - [Message contains CUI]

Margaret – Thank you. We have sent the message onto Liz and are waiting on her responses now. We will update you as soon as we hear back from her.

- Heather

From: Margaret E. Yukins <meyukins@oge.gov <<mailto:meyukins@oge.gov>> >
Sent: Friday, February 19, 2021 11:14 AM
To: Gottry, Heather C <heather.gottry@sol.doi.gov <<mailto:heather.gottry@sol.doi.gov>> >; Garcia, Monica L <monica.garcia@sol.doi.gov <<mailto:monica.garcia@sol.doi.gov>> >

Cc: Stephanie Nonluecha <snonlue@oge.gov <<mailto:snonlue@oge.gov>> >
Subject: [EXTERNAL] Elizabeth Klein Confirmatory Email - [Message contains CUI]

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

CONTROLLED

Good morning,

The U.S. Office of Government Ethics (OGE) will be reviewing Elizabeth Klein's report for "preclearance." Please be sure to instruct Elizabeth Klein to personally review the report carefully once more, given that she 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 Elizabeth Klein's material representations on which we are relying. Please forward this message to Elizabeth Klein and instruct her to notify you immediately if any item in this list is incorrect.

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

- Elizabeth Klein has personally reviewed all entries in the current version of the financial disclosure report and has affirmed that they are correct.
 - Elizabeth Klein has already signed the Executive Order 13989 Ethics Pledge.
 - For Part 1 and Part 4, Elizabeth Klein has provided information covering the entire reporting period of January 1, 2019, to date of signing.
 - For Part 2, Part 5, Part 6, and Part 8, Elizabeth Klein has provided information covering the entire reporting period of January 1, 2020, to date of signing.
 - Elizabeth Klein is not a trustee of any trust.
 - Elizabeth Klein, her spouse, and her dependent children do not have any beneficial interests in trusts, including discretionary trusts.
 - Elizabeth Klein's spouse holds no equity in his employer, Invariant LLC.
 - The ethics agreement correctly describes all items addressed in the agreement.
- Further, Elizabeth Klein understands the commitments that she is making to the Senate and will be able to fulfill these commitments within the stated timeframes.

Thank you,
Margaret

Margaret Dylus-Yukins

Assistant Counsel
Ethics Law & Policy Branch
International Assistance & Outreach Program
U.S. Office of Government Ethics
(202) 482-9222
meyukins@oge.gov <<mailto:meyukins@oge.gov>> <<mailto:meyukins@oge.gov>
<<mailto:meyukins@oge.gov>> >
Pronouns: she/her

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: [Gottry, Heather C](#)
To: [Margaret E. Yukins](#)
Cc: [Stephanie Nonluecha](#); [Garcia, Monica L](#)
Subject: RE: [EXTERNAL] Elizabeth Klein Confirmatory Email - [Message contains CUI] - [Message contains CUI]
Date: Friday, February 19, 2021 1:20:13 PM

Margaret – Yes, we are comfortable with the edits and would appreciate a clean version. Thanks!

- Heather

From: Margaret E. Yukins <meyukins@oge.gov>
Sent: Friday, February 19, 2021 1:07 PM
To: Gottry, Heather C <heather.gottry@sol.doi.gov>
Cc: Stephanie Nonluecha <snonlue@oge.gov>; Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: RE: [EXTERNAL] Elizabeth Klein Confirmatory Email - [Message contains CUI] - [Message contains CUI]

CONTROLLED

Thank you Heather! Yes, you're correct, the PTA 208 language will replace the 502 language. If you agree with these edits, I can produce a clean copy for you.

From: Gottry, Heather C [<mailto:heather.gottry@sol.doi.gov>]
Sent: Friday, February 19, 2021 1:00 PM
To: Margaret E. Yukins <meyukins@oge.gov>
Cc: Stephanie Nonluecha <snonlue@oge.gov>; Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: RE: [EXTERNAL] Elizabeth Klein Confirmatory Email - [Message contains CUI]

Margaret – Hello again! Liz just provided us with confirmation on all points requested in your message below. Also, in the EA, is it correct that the 208 language will replace the 502 language with respect to the PTA? Please let me know if you need anything else from us or if we can be of any additional assistance. Thanks.

- Heather

From: Gottry, Heather C
Sent: Friday, February 19, 2021 12:15 PM
To: Margaret E. Yukins <meyukins@oge.gov <<mailto:meyukins@oge.gov>> >; Garcia, Monica L <monica.garcia@sol.doi.gov <<mailto:monica.garcia@sol.doi.gov>> >
Cc: Stephanie Nonluecha <snonlue@oge.gov <<mailto:snonlue@oge.gov>> >
Subject: RE: [EXTERNAL] Elizabeth Klein Confirmatory Email - [Message contains CUI]

Margaret – Thank you. We have sent the message onto Liz and are waiting on her responses now. We will update you as soon as we hear back from her.

- Heather

From: Margaret E. Yukins <meyukins@oge.gov <<mailto:meyukins@oge.gov>> >
Sent: Friday, February 19, 2021 11:14 AM
To: Gottry, Heather C <heather.gottry@sol.doi.gov <<mailto:heather.gottry@sol.doi.gov>> >; Garcia, Monica L <monica.garcia@sol.doi.gov <<mailto:monica.garcia@sol.doi.gov>> >
Cc: Stephanie Nonluecha <snonlue@oge.gov <<mailto:snonlue@oge.gov>> >
Subject: [EXTERNAL] Elizabeth Klein Confirmatory Email - [Message contains CUI]

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

CONTROLLED

Good morning,

The U.S. Office of Government Ethics (OGE) will be reviewing Elizabeth Klein's report for "preclearance." Please be sure to instruct Elizabeth Klein to personally review the report carefully once more, given that she 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 Elizabeth Klein's material representations on which we are relying. Please forward this message to Elizabeth Klein and instruct her to notify you immediately if any item in this list is incorrect.

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

- Elizabeth Klein has personally reviewed all entries in the current version of the financial disclosure report and has affirmed that they are correct.
- Elizabeth Klein has already signed the Executive Order 13989 Ethics Pledge.
- For Part 1 and Part 4, Elizabeth Klein has provided information covering the entire reporting period of January 1, 2019, to date of signing.
- For Part 2, Part 5, Part 6, and Part 8, Elizabeth Klein has provided information covering the entire reporting period of January 1, 2020, to date of signing.
- Elizabeth Klein is not a trustee of any trust.
- Elizabeth Klein, her spouse, and her dependent children do not have any beneficial interests in trusts, including discretionary trusts.

- Elizabeth Klein's spouse holds no equity in his employer, Invariant LLC.
 - The ethics agreement correctly describes all items addressed in the agreement.
- Further, Elizabeth Klein understands the commitments that she is making to the Senate and will be able to fulfill these commitments within the stated timeframes.

Thank you,
Margaret

Margaret Dylus-Yukins
Assistant Counsel
Ethics Law & Policy Branch
International Assistance & Outreach Program
U.S. Office of Government Ethics
(202) 482-9222
meyukins@oge.gov <<mailto:meyukins@oge.gov>> <<mailto:meyukins@oge.gov>>
<<mailto:meyukins@oge.gov>> >
Pronouns: she/her

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: [Gottry, Heather C](#)
To: [Klein, Elizabeth A](#)
Cc: [Garcia, Monica L](#)
Subject: RE: [EXTERNAL] Elizabeth Klein Confirmatory Email - [Message contains CUI]
Date: Friday, February 19, 2021 1:48:38 PM
Attachments: [Klein - Draft EA for Review \(02.19.21\) Clean.docx](#)

Liz – Hello again! OGE just confirmed that your ethics agreement will only include one paragraph on the PTA and sent us the attached revised draft. This is the version of your ethics agreement that is being reviewed during OGE’s preclearance review. I hope to hear shortly whether there are any further questions as a result of that review. Thank you again for your quick review and responses as we work through this process.

- Heather

From: Gottry, Heather C
Sent: Friday, February 19, 2021 12:56 PM
To: Klein, Elizabeth A <Elizabeth_Klein@ios.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: RE: [EXTERNAL] Elizabeth Klein Confirmatory Email - [Message contains CUI]

I will circle back with them to clarify and appreciate your quick review and confirmation. Thanks.

From: Klein, Elizabeth A <Elizabeth_Klein@ios.doi.gov>
Sent: Friday, February 19, 2021 12:55 PM
To: Gottry, Heather C <heather.gottry@sol.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: RE: [EXTERNAL] Elizabeth Klein Confirmatory Email - [Message contains CUI]

The edits look fine, though a little confusing since now there are two paragraphs covering the PTA. I assume they are suggesting replacing the existing one with the one they’ve added. Either way, good here. GWMS PTA has no business in front of the DOI.

I affirm everything below.

Thanks

From: Gottry, Heather C <heather.gottry@sol.doi.gov>
Sent: Friday, February 19, 2021 12:14 PM
To: Klein, Elizabeth A <Elizabeth_Klein@ios.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: FW: [EXTERNAL] Elizabeth Klein Confirmatory Email - [Message contains CUI]

Liz – Good news! OGE has no further follow up questions related to your Nominee OGE Form 278e and is ready to review both it and your ethics agreement for preclearance. I have attached the minor modifications that they are proposing to your EA in redline above for your review.

OGE has also asked that we send the message below on to you for review and that you please confirm that:

- You have personally reviewed all entries in the current version of the financial disclosure report and affirm that they are correct.
- You have signed the Executive Order 13989 Ethics Pledge.
- For Part 1 and Part 4, you have provided information covering the entire reporting period of January 1, 2019, to date of signing.
- For Part 2, Part 5, Part 6, and Part 8, you have provided information covering the entire reporting period of January 1, 2020, to date of signing.
- You are not a trustee of any trust.
- You, your spouse, and your dependent children do not have any beneficial interests in trusts, including discretionary trusts.
- Your spouse holds no equity in his employer, Invariant LLC.
- The attached ethics agreement correctly describes all items addressed in the agreement.
- You understand the commitments that you will be making to the Senate and will be able to fulfill these commitments within the stated timeframes.

Please let me know at your earliest convenience if any of the above list is incorrect or if you have questions that would be helpful to discuss. Thank you.

- Heather

From: Margaret E. Yukins <meyukins@oge.gov>

Sent: Friday, February 19, 2021 11:14 AM

To: Gottry, Heather C <heather.gottry@sol.doi.gov>; Garcia, Monica L <monica.garcia@sol.doi.gov>

Cc: Stephanie Nonluecha <snonlue@oge.gov>

Subject: [EXTERNAL] Elizabeth Klein Confirmatory Email - [Message contains CUI]

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

CONTROLLED

Good morning,

The U.S. Office of Government Ethics (OGE) will be reviewing Elizabeth Klein's report for "preclearance." Please be sure to instruct Elizabeth Klein to personally review the report carefully once more, given that she 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 Elizabeth Klein's material representations on which we are relying. Please forward this message to Elizabeth Klein and instruct her to notify you immediately if any item in this list is incorrect.

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

- Elizabeth Klein has personally reviewed all entries in the current version of the financial disclosure report and has affirmed that they are correct.
- Elizabeth Klein has already signed the Executive Order 13989 Ethics Pledge.
- For Part 1 and Part 4, Elizabeth Klein has provided information covering the entire reporting period of January 1, 2019, to date of signing.
- For Part 2, Part 5, Part 6, and Part 8, Elizabeth Klein has provided information covering the entire reporting period of January 1, 2020, to date of signing.
- Elizabeth Klein is not a trustee of any trust.
- Elizabeth Klein, her spouse, and her dependent children do not have any beneficial interests in trusts, including discretionary trusts.
- Elizabeth Klein's spouse holds no equity in his employer, Invariant LLC.
- The ethics agreement correctly describes all items addressed in the agreement. Further, Elizabeth Klein understands the commitments that she is making to the Senate and will be able to fulfill these commitments within the stated timeframes.

Thank you,

Margaret

Margaret Dylus-Yukins
Assistant Counsel
Ethics Law & Policy Branch
International Assistance & Outreach Program
U.S. Office of Government Ethics
(202) 482-9222
me yukins@oge.gov <<mailto:me yukins@oge.gov>>
Pronouns: she/her

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: [Gottry, Heather C](#)
To: [Salotti, Christopher](#)
Cc: [Garcia, Monica L](#); [Gray, Morgan](#)
Subject: RE: Liz Klein's paperwork ...
Date: Friday, February 19, 2021 2:52:41 PM

Chris – Hello! OGE did move Liz's Nominee OGE Form 278e and ethics agreement into preclearance review and it is possible that her package will be precleared today. However, it has not precleared at this point. Thank you for sending her draft questionnaire. I will review as soon as I get a break in meetings. Please let me know if it would be helpful to touch base in the interim. Thanks.

- Heather

From: Salotti, Christopher <Chris_Salotti@ios.doi.gov>
Sent: Friday, February 19, 2021 2:17 PM
To: Gottry, Heather C <heather.gottry@sol.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>; Gray, Morgan <Leslie_Morgan_Gray@ios.doi.gov>
Subject: Liz Klein's paperwork ...

Hi Heather and Monica -

Liz mentioned that there was the possibility that OGE would preclear her ethics paperwork today - what are you hearing about that?

Also, I'm attaching a draft copy of her committee questionnaire that we've been working on with her. There is nothing out of the ordinary on this form, but I wanted to make sure you saw it for a brief check against your documents!

Thanks, and let me know your thoughts.

Chris

From: [Margaret E. Yukins](#)
To: [Gottry, Heather C](#)
Cc: [Garcia, Monica L](#); [Stephanie Nonluecha](#)
Subject: [EXTERNAL] Elizabeth Klein PTA Position + Solicitation Rules - [Message contains CUI]
Date: Friday, February 19, 2021 3:07:20 PM

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

CONTROLLED

Hi Heather,

I've forwarded Elizabeth Klein's report for preclearance. Because the White House has approved Elizabeth Klein to maintain her PTA fundraising position, we ask that you also counsel Ms. Klein on the solicitation rules.

Thank you,

Margaret

Margaret Dylus-Yukins
Assistant Counsel
Ethics Law & Policy Branch
International Assistance & Outreach Program
U.S. Office of Government Ethics
(202) 482-9222
meyukins@oge.gov <<mailto:meyukins@oge.gov>>
Pronouns: she/her

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: [Gottry, Heather C](#)
To: [Margaret E. Yukins](#)
Cc: [Garcia, Monica L](#); [Stephanie Nonluecha](#)
Subject: RE: [EXTERNAL] Elizabeth Klein PTA Position + Solicitation Rules - [Message contains CUI]
Date: Friday, February 19, 2021 3:35:32 PM

Margaret – Yes, we are adding in guidance about that point in her interim recusal memo and will also discuss it with her. Many thanks.

- Heather

From: Margaret E. Yukins <meyukins@oge.gov>
Sent: Friday, February 19, 2021 3:06 PM
To: Gottry, Heather C <heather.gottry@sol.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>; Stephanie Nonluecha <snonlue@oge.gov>
Subject: [EXTERNAL] Elizabeth Klein PTA Position + Solicitation Rules - [Message contains CUI]

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

CONTROLLED

Hi Heather,

I've forwarded Elizabeth Klein's report for preclearance. Because the White House has approved Elizabeth Klein to maintain her PTA fundraising position, we ask that you also counsel Ms. Klein on the solicitation rules.

Thank you,

Margaret

Margaret Dylus-Yukins
Assistant Counsel
Ethics Law & Policy Branch
International Assistance & Outreach Program
U.S. Office of Government Ethics
(202) 482-9222
meyukins@oge.gov <<mailto:meyukins@oge.gov>>
Pronouns: she/her

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.

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: [Gottry, Heather C](#)
To: [Margaret E. Yukins](#); [Stephanie Nonluecha](#)
Cc: [Garcia, Monica L](#)
Subject: RE: [EXTERNAL] Precleared: Elizabeth Klein - (Contains CUI) - [Message and attachment(s) contain CUI]
Date: Friday, February 19, 2021 3:41:34 PM

Margaret and Stephanie – It was a pleasure working with you on this nominee review! Thank you for all of your assistance. Hope you have a great weekend!

- Heather

From: Margaret E. Yukins <meyukins@oge.gov>
Sent: Friday, February 19, 2021 3:35 PM
To: Heather A. Jones <hajones@oge.gov>; Phillips, Anjali W. EOP/WHO <Anjali.W.Phillips@who.eop.gov>; Raviv, Adam M. EOP/WHO <Adam.M.Raviv@who.eop.gov>; Duross, Jeanne M. EOP/WHO <Jeanne.M.Duross@who.eop.gov>; Olorunnipa, Funmi B. EOP/WHO <Oluwafunmilayo.B.Olorunnipa@who.eop.gov>
Cc: Gottry, Heather C <heather.gottry@sol.doi.gov>; David J. Apol <djapol@oge.gov>; Deborah J. Bortot <djborot@oge.gov>; Keith Labedz <klabedz@oge.gov>; Teresa L. Williamson <tlwillia@oge.gov>
Subject: [EXTERNAL] Precleared: Elizabeth Klein - (Contains CUI) - [Message and attachment(s) contain CUI]

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

CONTROLLED
Email and attachment(s) contain CUI.

Thank you. Please find Elizabeth Klein's Ethics Agreement attached.

Best regards,

Margaret

Margaret Dylus-Yukins
Assistant Counsel
Ethics Law & Policy Branch
International Assistance & Outreach Program
U.S. Office of Government Ethics
(202) 482-9222
meyukins@oge.gov
Pronouns: she/her

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: [Gottry, Heather C](#)
To: [Salotti, Christopher](#)
Cc: [Garcia, Monica L](#); [Gray, Morgan](#)
Subject: RE: Liz Klein's paperwork ...
Date: Friday, February 19, 2021 3:46:17 PM

Chris – Hello! Liz's ethics package was just precleared by OGE and they have let the WH know. Please let me know if it would be helpful to touch base today. Many thanks.

- Heather

From: Gottry, Heather C
Sent: Friday, February 19, 2021 2:53 PM
To: Salotti, Christopher <Chris_Salotti@ios.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>; Gray, Morgan <Leslie_Morgan_Gray@ios.doi.gov>
Subject: RE: Liz Klein's paperwork ...

Chris – Hello! OGE did move Liz's Nominee OGE Form 278e and ethics agreement into preclearance review and it is possible that her package will be precleared today. However, it has not precleared at this point. Thank you for sending her draft questionnaire. I will review as soon as I get a break in meetings. Please let me know if it would be helpful to touch base in the interim. Thanks.

- Heather

From: Salotti, Christopher <Chris_Salotti@ios.doi.gov>
Sent: Friday, February 19, 2021 2:17 PM
To: Gottry, Heather C <heather.gottry@sol.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>; Gray, Morgan <Leslie_Morgan_Gray@ios.doi.gov>
Subject: Liz Klein's paperwork ...

Hi Heather and Monica -

Liz mentioned that there was the possibility that OGE would preclear her ethics paperwork today - what are you hearing about that?

Also, I'm attaching a draft copy of her committee questionnaire that we've been working on with her. There is nothing out of the ordinary on this form, but I wanted to make sure you saw it for a brief check against your documents!

Thanks, and let me know your thoughts.

Chris

<<mailto:Oluwafunmilayo.B.Olorunnipa@who.eop.gov>> >

Cc: Margaret E. Yukins <meyukins@oge.gov <<mailto:meyukins@oge.gov>> >;
'heather.gottry@sol.doi.gov' <heather.gottry@sol.doi.gov
<<mailto:heather.gottry@sol.doi.gov>> >; David J. Apol <djapol@oge.gov
<<mailto:djapol@oge.gov>> >; Deborah J. Bortot <djborot@oge.gov
<<mailto:djbortot@oge.gov>> >; Heather A. Jones <hajones@oge.gov
<<mailto:hajones@oge.gov>> >; Keith Labedz <klabedz@oge.gov <<mailto:klabedz@oge.gov>> >;
Teresa L. Williamson <tlwillia@oge.gov <<mailto:tlwillia@oge.gov>> >

Subject: Precleared: Elizabeth Klein - (Contains CUI)

CONTROLLED

All-

Elizabeth Klein is precleared. Margaret, please send the ethics agreement to the White House.

Thanks,
Heather

Heather Jones
Senior Counsel
(202) 482-9316
U.S. Office of Government Ethics

Visit OGE's website: www.oge.gov <<http://www.oge.gov>> <<http://www.oge.gov/>> >

Follow OGE on Twitter: @OfficeGovEthics

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: [Margaret E. Yukins](#)
To: [Stephanie Nonluecha](#); [Gottry, Heather C](#)
Cc: [Garcia, Monica L](#)
Subject: RE: [EXTERNAL] Precleared: Elizabeth Klein - (Contains CUI) - [Message and attachment(s) contain CUI] - [Message contains CUI] - [Message contains CUI]
Date: Friday, February 19, 2021 4:07:05 PM

CONTROLLED

Yes, thank you all! What a relief to be done!

From: Stephanie Nonluecha
Sent: Friday, February 19, 2021 4:04 PM
To: 'Gottry, Heather C' <heather.gottry@sol.doi.gov>; Margaret E. Yukins <meyukins@oge.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: RE: [EXTERNAL] Precleared: Elizabeth Klein - (Contains CUI) - [Message and attachment(s) contain CUI] - [Message contains CUI]

CONTROLLED

Same here! And thanks to you and Monica for your patience with the process!

Best,
Stephanie Nonluecha
Program Analyst
Presidential Nominations Branch
U.S. Office of Government Ethics
(202) 482-9243
snonlue@oge.gov <<mailto:snonlue@oge.gov>> <<mailto:snonlue@oge.gov>>
<<mailto:snonlue@oge.gov>> >

From: Gottry, Heather C [<mailto:heather.gottry@sol.doi.gov>
<<mailto:heather.gottry@sol.doi.gov>>]
Sent: Friday, February 19, 2021 3:42 PM
To: Margaret E. Yukins <meyukins@oge.gov> <<mailto:meyukins@oge.gov>> >; Stephanie Nonluecha <snonlue@oge.gov> <<mailto:snonlue@oge.gov>> >

Cc: Garcia, Monica L <monica.garcia@sol.doi.gov> <<mailto:monica.garcia@sol.doi.gov>> >
Subject: RE: [EXTERNAL] Precleared: Elizabeth Klein - (Contains CUI) - [Message and

Thanks,
Heather

Heather Jones
Senior Counsel
(202) 482-9316
U.S. Office of Government Ethics

Visit OGE's website: www.oge.gov <<http://www.oge.gov>> <<http://www.oge.gov>> >
<<http://www.oge.gov/>> > >

Follow OGE on Twitter: @OfficeGovEthics

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: [Salotti, Christopher](#)
To: [Gottry, Heather C](#)
Cc: [Garcia, Monica L](#); [Gray, Morgan](#)
Subject: Re: Liz Klein's paperwork ...
Date: Monday, February 22, 2021 3:31:48 PM

I'm crashing today - can we talk tomorrow afternoon?

From: Gottry, Heather C <heather.gottry@sol.doi.gov>
Sent: Monday, February 22, 2021 2:36 PM
To: Salotti, Christopher <Chris_Salotti@ios.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>; Gray, Morgan <Leslie_Morgan_Gray@ios.doi.gov>
Subject: RE: Liz Klein's paperwork ...

Chris – Thank you for sharing. I just had a chance to review and thought it might be helpful for us to touch base quickly. I am attaching Liz's precleared ethics agreement for your reference as well. I am free before 3:00 and after 5:00 today if convenient on your end. Many thanks.

- Heather

From: Salotti, Christopher <Chris_Salotti@ios.doi.gov>
Sent: Friday, February 19, 2021 2:17 PM
To: Gottry, Heather C <heather.gottry@sol.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>; Gray, Morgan <Leslie_Morgan_Gray@ios.doi.gov>
Subject: Liz Klein's paperwork ...

Hi Heather and Monica -

Liz mentioned that there was the possibility that OGE would preclear her ethics paperwork today - what are you hearing about that?

Also, I'm attaching a draft copy of her committee questionnaire that we've been working on with her. There is nothing out of the ordinary on this form, but I wanted to make sure you saw it for a brief check against your documents!

Thanks, and let me know your thoughts.

Chris

From: [Gottry, Heather C](#)
To: [Salotti, Christopher](#)
Cc: [Garcia, Monica L](#); [Gray, Morgan](#)
Subject: RE: Liz Klein's paperwork ...
Date: Monday, February 22, 2021 4:13:07 PM

Of course! I will check schedules and look for an open time.

From: Salotti, Christopher <Chris_Salotti@ios.doi.gov>
Sent: Monday, February 22, 2021 3:32 PM
To: Gottry, Heather C <heather.gottry@sol.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>; Gray, Morgan <Leslie_Morgan_Gray@ios.doi.gov>
Subject: Re: Liz Klein's paperwork ...

I'm crashing today - can we talk tomorrow afternoon?

From: Gottry, Heather C <heather.gottry@sol.doi.gov>
Sent: Monday, February 22, 2021 2:36 PM
To: Salotti, Christopher <Chris_Salotti@ios.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>; Gray, Morgan <Leslie_Morgan_Gray@ios.doi.gov>
Subject: RE: Liz Klein's paperwork ...

Chris – Thank you for sharing. I just had a chance to review and thought it might be helpful for us to touch base quickly. I am attaching Liz's precleared ethics agreement for your reference as well. I am free before 3:00 and after 5:00 today if convenient on your end. Many thanks.

- Heather

From: Salotti, Christopher <Chris_Salotti@ios.doi.gov>
Sent: Friday, February 19, 2021 2:17 PM
To: Gottry, Heather C <heather.gottry@sol.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>; Gray, Morgan <Leslie_Morgan_Gray@ios.doi.gov>
Subject: Liz Klein's paperwork ...

Hi Heather and Monica -

Liz mentioned that there was the possibility that OGE would preclear her ethics paperwork today - what are you hearing about that?

Also, I'm attaching a draft copy of her committee questionnaire that we've been working on with her. There is nothing out of the ordinary on this form, but I wanted to make sure you

saw it for a brief check against your documents!

Thanks, and let me know your thoughts.

Chris

From: [Gottry, Heather C](#)
To: [Garcia, Monica L](#)
Subject: FW: Liz Klein's paperwork ...
Date: Wednesday, February 24, 2021 5:48:41 AM
Attachments: [Klein draft senr questionnaire ver 2.18.21 review.docx](#)
[Ethics Responses - Klein Questionnaire \(Draft for Consideration\).docx](#)

Monica – Hello! As requested by Chris and Morgan, attached please find potential responses to the ethics questions on Klein's Questionnaire for review and further discussion. Thanks.

- Heather

From: Salotti, Christopher <Chris_Salotti@ios.doi.gov>
Sent: Friday, February 19, 2021 2:17 PM
To: Gottry, Heather C <heather.gottry@sol.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>; Gray, Morgan <Leslie_Morgan_Gray@ios.doi.gov>
Subject: Liz Klein's paperwork ...

Hi Heather and Monica -

Liz mentioned that there was the possibility that OGE would preclear her ethics paperwork today - what are you hearing about that?

Also, I'm attaching a draft copy of her committee questionnaire that we've been working on with her. There is nothing out of the ordinary on this form, but I wanted to make sure you saw it for a brief check against your documents!

Thanks, and let me know your thoughts.

Chris

From: [Parsons, Matthew W](#)
To: [Rees, Gareth C](#)
Cc: [Genter, Constance G](#); [Klein, Elizabeth A](#); [Garcia, Monica L](#); [Gottry, Heather C](#)
Subject: Fw: [EXTERNAL] Meeting Request
Date: Wednesday, April 7, 2021 7:46:38 AM
Attachments: [ASPMB-MEETINGREQUEST FORM 2021 AWL.pdf](#)

Garreth,

After reviewing the information provided to the Departmental Ethics Office (DEO) and supporting materials, and subject to the limitations discussed below (see Conflicts of Interest/Impartiality Review section), we have identified no legal objection under the ethics statutes and regulations, or the Administration's Ethics Pledge (Ethics Pledge), to Elizabeth Klein, Senior Advisor to the Chief of Staff, participating in a virtual meeting to be held on April 13, 2021, with the following individuals:

1. Leah Donahey, Legislative Director, Alaska Wilderness League (AWL);
2. Kristen Miller, Conservation Director, AWL; and
3. Stephenne Harding, Great Northern Strategies (GNS).

The AWL is a nonprofit organization that works to protect Alaska's most significant wild lands from oil and gas drilling and from other industrial threats. Founded in 1993, the AWL has its main office in Washington, D.C. Per the House lobbying database, the AWL is currently identified as registered lobbying organization. In addition, per the same database, Ms. Donahey and Ms. Miller are currently identified as registered lobbyists.

GNS is a strategy and policy consulting firm working in the environment, climate, agriculture, conservation and natural resources arena.

Official Meeting and Nexus to DOI Mission – It is our understanding that the purpose of the meeting is to discuss the Arctic National Wildlife Refuge (ANWR) leasing program as it relates to the budget. The nexus between the DOI mission and these subjects allows this to be categorized as an official meeting for Ms. Klein. We note that Shantha Alonso, Director, Intergovernmental & External Affairs; Shannon Estenoz, Principal Deputy Assistant Secretary - Fish, Wildlife and Parks; Laura Daniel-Davis, Principal Deputy Assistant Secretary - Land and Minerals Management; and Rachael Taylor, Principal Deputy Assistant Secretary - Policy, Management, and Budget are anticipated to participate in the meeting as well and that a separate ethics review will be prepared for each individually.

Conflicts of Interest/Impartiality Review – Ms. Klein's appointment date at DOI was January 20, 2021. Although Ms. Klein's New Entrant Public Financial Disclosure Report (OGE Form 278e) has been reviewed and certified on March 28, 2021, a recusal list has not been finalized. As such, DEO cannot make a complete assessment of any potential conflicts of interests that may prevent or limit her participation in this meeting under 18 U.S.C. § 208 or 5 C.F.R. § 2635.502. We conducted our review based on the available information at this time. Our available information includes Ms. Klein's OGE Form 278e, information provided on Ms. Klein's resume, her responses to preliminary questions, and ethics officials' notes from discussions. To date, we identified current recusals with the following entities:

- American University;
- George Washington Middle School PTA;
- Invarient LLC;
- PT Fund, Inc. (Presidential Transition Team);
- State Energy & Environmental Impact Center, NYU School of Law;

- State of Massachusetts; and
- State of Washington.

*Please note that Ms. Klein is in the best position to know and identify her personal and imputed financial interests, her “covered relationships,” and her former employers and clients as defined in the Pledge, so please let us know if the list above is not complete.

We remind Ms. Klein to be cautious in the event any particular matter involving specific parties to which any of the aforementioned entities is or represents a party is raised for discussion during the meeting. Specifically, it is our understanding that four lawsuits were filed following issuance of the National Environmental Policy Act Record of Decision challenging its legal sufficiency related to leasing in ANWR:

- *National Audubon Society et al. v. Bernhardt et al.*, Case No. 1:20-cv-00205-JWS;
- *Gwich'in Steering Committee v. Bernhardt*, Case No. 3:20-cv-00204-JWS;
- *Native Village of Venetie Tribal Government v. Bernhardt*, Case No. 3:20-cv-00223-JMK; and
- *State of Washington v. Bernhardt*, Case No. 3:20-cv-00224-JMK.

We note that the states of Massachusetts and Washington are parties to the *State of Washington v. Bernhardt*, Case No. 3:20-cv-00224-JMK. In the event Ms. Klein attends the meeting and this case is raised for discussion, and before engaging in any discussion of the case, she must determine whether she believes a reasonable person with knowledge of the relevant facts would question her impartiality in performing her official duties participating in the discussion. If she personally determines that the circumstances would not cause a reasonable person with knowledge of the relevant facts to question her impartiality in the matter, then she may participate in the discussion of the case as part of her official duties.

Ethics Pledge – Ms. Klein is covered by the revolving door ban in the Pledge stating that she will not, for a period of two years from the date of her appointment, participate in any particular matter involving specific parties that is directly and substantially related to her former employer or former clients, including regulations and contracts. Executive Order 13989. Based on the information currently before the DEO, this meeting about budget issues should not implicate any restriction under the Pledge.

General Ethics Guidance on Meetings

We remind Ms. Klein of the following standard guidance for participating in meetings:

1. **Other External Attendees** – If any additional parties external to the Department are added to the list of expected meeting attendees, please let the Departmental Ethics Office know sufficiently in advance so that we can review and make a determination with respect to the new expected attendee(s).
2. **Non-Public Information and Party Matters** – Department officials must refrain from disclosing non-public information at meetings with external parties (5 C.F.R. § 2635.703) and should, to the extent possible, refrain from discussing and making any commitments about any particular matters involving specific parties, such as litigation, contracts, leases, permits, etc.
3. **No Endorsement** – Department officials may not use their official position or title, or any authority associated with their public office, to endorse any product, service, or enterprise. This includes nonprofit and charitable organizations. 5 C.F.R. § 2635.702(c).
4. **No Preferential Treatment** – Department officials must act impartially and not give preferential treatment to any private organization or individual and must avoid creating even

the appearance that they are violating this requirement. 5 C.F.R. § 2635.101(b)(8) and 5 C.F.R. § 2635.101(b)(14).

5. **Gifts** – Outside parties to the meeting are prohibited sources under the rules on gifts from outside sources. Under those rules a gift from a prohibited source may not normally be accepted. Consequently, we advise that no gifts be accepted in conjunction with this meeting.
6. **No Partisan Political Activity** – While Department officials may discuss the Administration's policy priorities and ideological approach to proposed laws and regulations at this meeting, they must strictly avoid partisan political activity in order to remain in compliance with the Hatch Act. Partisan political activity is any activity directed toward the success or failure of a political party, candidate for a partisan political office, or partisan political group and can include verbal remarks and speech.

Please let us know if you have any questions or concerns. Matt

Matthew W. Parsons
Attorney Advisor
Departmental Ethics Office Office of the Solicitor
U.S. Department of the Interior
Atlanta, GA
Office: (404) 331-5610
matthew.parsons@sol.doi.gov

Visit us online at: www.doi.gov/ethics

Public Service is a Public Trust

From: White, Katherine M <katherine_white@ios.doi.gov>
Sent: Thursday, April 1, 2021 12:58 PM
To: Schasberger, Paula I <paula.schasberger@sol.doi.gov>; Parsons, Matthew W <matthew.parsons@sol.doi.gov>
Cc: Myers, Casey A <casey_myers@ios.doi.gov>; Robbins, Tasha L <tasha_l_robbins@ios.doi.gov>; Rees, Gareth C <Gareth_Rees@ios.doi.gov>; Lassiter, Tracie L <Tracie_Lassiter@ios.doi.gov>
Subject: RE: [EXTERNAL] Meeting Request

Hello,

I've attached a Meeting Request Form from Alaska Wilderness League for the upcoming meeting. Shantha Alonso arranged this meeting with Leah Donahey, Legislative Director of Alaska Wilderness League. Shantha asked that Rachael, Liz Klein, Shannon Estenoz, and Laura Daniel-Davis join the meeting.

Please let me know if you need any more information. Thank you.

Best,

-Katie

Katie White

Executive Assistant

Office of the Assistant Secretary for Policy, Management, and Budget

1849 C Street NW, Room 5113

Washington, D.C. 20240

Phone - 202-208-6411

Katherine.white@ios.doi.gov

From: Schasberger, Paula I <paula.schasberger@sol.doi.gov>

Sent: Wednesday, March 31, 2021 3:58 PM

To: White, Katherine M <katherine.white@ios.doi.gov>; Parsons, Matthew W <matthew.parsons@sol.doi.gov>

Cc: Myers, Casey A <casey_myers@ios.doi.gov>

Subject: RE: [EXTERNAL] Meeting Request

I cleared Shantha verbally but I don't think we got a request for others and their recusals are different.

Paula I. Schasberger

Supervisory Attorney, Ethics Advice and Counsel

Departmental Ethics Office

U.S. Department of the Interior

(o) (202) 208 -6514

(c) (202) 923-0253

Email: paula.schasberger@sol.doi.gov

Integrity is our mission.

From: White, Katherine M <katherine.white@ios.doi.gov>

Sent: Wednesday, March 31, 2021 3:56 PM

To: Parsons, Matthew W <matthew.parsons@sol.doi.gov>; Schasberger, Paula I <paula.schasberger@sol.doi.gov>

Cc: Myers, Casey A <casey_myers@ios.doi.gov>

Subject: FW: [EXTERNAL] Meeting Request

Hello,

Rachael Taylor has been asked to join this meeting with Leah Donahey, Legislative Director of Alaska Wilderness League and Affiliate Alaska Wilderness League Action. Shantha Alonso arranged the meeting and asked that Rachael, Liz Klein, Shannon Estenoz, and Laura Daniel-Davis join the meeting. Valerie Smith from Shantha's office says that this has already been reviewed by Ethics – can

you confirm that Rachael's attendance has been reviewed?

Thanks,

-Katie

Katie White

Executive Assistant

Office of the Assistant Secretary for Policy, Management, and Budget

1849 C Street NW, Room 5113

Washington, D.C. 20240

Phone - 202-208-6411

Katherine_white@ios.doi.gov

From: Smith, Valerie V <Valerie_V_Smith@ios.doi.gov>

Sent: Wednesday, March 31, 2021 2:26 PM

To: Robbins, Tasha L <tasha_l_robbins@ios.doi.gov>; Rees, Gareth C <Gareth_Rees@ios.doi.gov>; White, Katherine M <katherine_white@ios.doi.gov>; Lassiter, Tracie L <Tracie_Lassiter@ios.doi.gov>

Subject: RE: [EXTERNAL] Meeting Request

Hi Tasha,

Shantha has informed me that this request has been reviewed by Ethic's and there are no action needed from there office. I will send out the meeting request invite.

Thanks

From: Robbins, Tasha L <tasha_l_robbins@ios.doi.gov>

Sent: Wednesday, March 31, 2021 10:08 AM

To: Smith, Valerie V <Valerie_V_Smith@ios.doi.gov>; Rees, Gareth C <Gareth_Rees@ios.doi.gov>; White, Katherine M <katherine_white@ios.doi.gov>; Lassiter, Tracie L <Tracie_Lassiter@ios.doi.gov>

Subject: Re: [EXTERNAL] Meeting Request

Thanks,

I will await your response. I will definitely need to clear Shannon. Did you have the requesting office fill out a meeting request form for ethics clearance?

Thanks again,

Tasha

From: Smith, Valerie V <Valerie_V_Smith@ios.doi.gov>

Sent: Wednesday, March 31, 2021 9:55 AM

To: Robbins, Tasha L <tasha_l_robbins@ios.doi.gov>; Rees, Gareth C <Gareth_Rees@ios.doi.gov>;

White, Katherine M <katherine_white@ios.doi.gov>; Lassiter, Tracie L <Tracie_Lassiter@ios.doi.gov>

Subject: RE: [EXTERNAL] Meeting Request

Hi Tasha,

Shantha Ready Alonso informed me that she has been approved to take this meeting, I will check with her to see if it has been approved by Ethics.

Thanks

From: Robbins, Tasha L <tasha_l_robbins@ios.doi.gov>

Sent: Wednesday, March 31, 2021 9:50 AM

To: Rees, Gareth C <Gareth_Rees@ios.doi.gov>; Smith, Valerie V <Valerie_V_Smith@ios.doi.gov>;

White, Katherine M <katherine_white@ios.doi.gov>; Lassiter, Tracie L <Tracie_Lassiter@ios.doi.gov>

Subject: Re: [EXTERNAL] Meeting Request

Hi Valerie,

We received a request earlier this month from this group but different discussion topics. We are looking to schedule it with our FWS office. We certainly can accommodate this request but did it clear ethics?

Thanks,

Tasha

From: Rees, Gareth C <Gareth_Rees@ios.doi.gov>

Sent: Wednesday, March 31, 2021 9:38 AM

To: Smith, Valerie V <Valerie_V_Smith@ios.doi.gov>; Robbins, Tasha L

<tasha_l_robbins@ios.doi.gov>; White, Katherine M <katherine_white@ios.doi.gov>; Lassiter, Tracie L <Tracie_Lassiter@ios.doi.gov>

Subject: Re: [EXTERNAL] Meeting Request

Hi,

I can make either time work for Liz

Thanks

Gareth C. Rees
Office to the Deputy Secretary
U.S. Department of the Interior
Tel: 202-227-9181

From: Smith, Valerie V <Valerie_V_Smith@ios.doi.gov>

Sent: Wednesday, March 31, 2021 9:01 AM

To: Robbins, Tasha L <tasha_l_robbins@ios.doi.gov>; White, Katherine M <katherine_white@ios.doi.gov>; Rees, Gareth C <Gareth_Rees@ios.doi.gov>; Lassiter, Tracie L <Tracie_Lassiter@ios.doi.gov>

Subject: FW: [EXTERNAL] Meeting Request

Good Morning All,

Shantha Ready Alonso is meeting with Lean Donahey with Alaska Wilderness League and Affiliate to discuss National Wildlife Refuge leasing program.

She would like to have Rachael Taylor, Elizabeth Klein Shannon Estenoz and Laura Daniel – Davis to attend the Teams meeting.

Please advise on their availability for April 13th from 1:30pm – 3pm (est) or April 14 at 4pm (est)

Thanks

From: Alonso, Shantha R <shantha_alonso@ios.doi.gov>

Sent: Wednesday, March 24, 2021 3:52 PM

To: Smith, Valerie V <Valerie_V_Smith@ios.doi.gov>; OS, OIEA <OIEA@ios.doi.gov>

Subject: Fw: [EXTERNAL] Meeting Request

Hi Valerie,

Please add this to the meeting request spreadsheet.

Thank you!

Shantha

From: Leah Donahey <Leah@alaskawild.org>

Sent: Wednesday, March 24, 2021 2:02 PM

To: Taylor, Rachael S <rachael_taylor@ios.doi.gov>

Cc: Kristen Miller <Kristen@alaskawild.org>

Subject: [EXTERNAL] Meeting Request

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Rachael – I am writing to request a meeting to discuss Arctic National Wildlife Refuge leasing program as it relates to the budget. I know this is an incredibly busy time for you, so please let me know if there are times during the next few weeks that work for you.

Best,
Leah

**ALASKA
WILDERNESS**

LEAGUE
AND AFFILIATE

**ALASKA
WILDERNESS
LEAGUE|ACTION**

LEAH DONAHEY
SHE/HER/HERS
Legislative Director

122 C St NW, Ste 240
Washington, DC 20001
Tel: 202-266-0421
Cell: 415-309-0455
www.AlaskaWild.org
www.AlaskaWildAction.org

U.S. Department of the Interior – Office of the Assistant Secretary for Policy, Management, and Budget

Meeting Information Request Form

To ensure that the appropriate individual within the Department of the Interior is meeting with you on a given matter and because the Office of the Assistant Secretary for Policy, Management, and Budget is committed to maintaining the highest ethical standards, we need the information requested below before we can agree to schedule a meeting¹.

Please respond to the questions below and send your response to *Casey_Myers@ios.doi.gov* and *Katherine_White@ios.doi.gov*. If you have any questions you may contact the Office of the Assistant Secretary for Policy, Management, and Budget at 202-579-0792 or 202-208-6411.

Requesting individual/organization: (Please identify the person(s) (name and affiliation) requesting the meeting, including any background information on the affiliated organization(s).)	Alaska Wilderness League Leah Donahey, Legislative Director
Contact information (Name, Email, Phone):	Leah Donahey, leah@alaskawild.org, 415-309-0455
Please describe the action sought from the Office of the Assistant Secretary for Policy, Management, and Budget:	To discuss Arctic National Wildlife Refuge leasing program as it relates to the budget
Meeting date (if date is flexible please indicate the range): Please explain any time sensitivity that impacts the date of the meeting, such as court-ordered or statutory deadline:	April 13
Proposed meeting location (City, State):	Virtual
Expected meeting participants (name, title, and organizational affiliation):	Kristen Miller, Conservation Director, Alaska Wilderness League Stephene Harding, Great Northern Strategies
Are any expected meeting participants registered lobbyists or lobbying organizations, and/or registered under the Foreign Agents Registration Act? (If yes, please identify.)	Yes, Leah Donahey and Kristen Miller are registered lobbyists.
Are any expected meeting participants a partisan political candidate, a representative of a political party or a	No

¹Per the Administration Ethics Pledge, the Assistant Secretary for Policy, Management, and Budget agreed that she will not for a period of two years from the date of her appointment participate in any particular matter involving specific parties in which a former employer or client is or represents a party, if she served that former employer or client during the two years prior to her appointment, absent a waiver under Section 3 of Executive Order No. 13770. This includes recusal from any meeting or other communication with such a former employer or client unless (1) there are five or more different stakeholders present and (2) no particular matters involving specific parties are discussed.

registered political action committee (PAC)? (If yes, please identify.)	
Do any expected meeting participants seek or currently have any business interests with the Department such as permits, contracts, litigation, grants, etc.? (If yes, please identify.)	Yes, Alaska Wilderness League is a client in litigation on the Arctic Refuge leasing program.
Describe the proposed meeting topic/ agenda, provide available briefing materials, and identify desired outcome(s):	To discuss Arctic National Wildlife Refuge leasing program as it relates to the budget
Will the meeting involve legislation, broad policy options, or other general matters that involve a large and diverse range of persons and interests? (If yes, please describe.)	No
Will the meeting involve regulations, rules, or other matters that impact a specific industry, sector of the economy, or group of persons? (If yes, please describe.)	No
Will the meeting involve a litigation matter, a permit, a grant, a contract, or any other matter that involves specific parties? <ul style="list-style-type: none"> If yes, please identify the matter and list the specific parties. 	No
With which Bureau or Agency does your proposed meeting agenda most align? Please list all, if more than one.	Policy, Management, and Budget
If the Assistant Secretary is unable to meet, is a surrogate desired? If yes, who specifically?	N/A
Any additional notes or information?	No

From: [Klein, Elizabeth A](#)
To: [Parsons, Matthew W](#); [Rees, Gareth C](#)
Cc: [Genter, Constance G](#); [Garcia, Monica L](#); [Gottry, Heather C](#)
Subject: RE: [EXTERNAL] Meeting Request
Date: Wednesday, April 7, 2021 7:53:28 AM

Good morning all,

Thanks for the analysis. Wanted to follow up on the note below that you don't have sufficient information to determine the scope of my recusals. I think I've provided all of that information (and more!), so am interested in finalizing whatever you all would like for me to finalize.

Thanks very much,

Liz

From: Parsons, Matthew W <matthew.parsons@sol.doi.gov>
Sent: Wednesday, April 7, 2021 7:47 AM
To: Rees, Gareth C <Gareth_Rees@ios.doi.gov>
Cc: Genter, Constance G <constance.genter@sol.doi.gov>; Klein, Elizabeth A <Elizabeth_Klein@ios.doi.gov>; Garcia, Monica L <monica.garcia@sol.doi.gov>; Gottry, Heather C <heather.gottry@sol.doi.gov>
Subject: Fw: [EXTERNAL] Meeting Request

Garreth,

After reviewing the information provided to the Departmental Ethics Office (DEO) and supporting materials, and subject to the limitations discussed below (see Conflicts of Interest/Impartiality Review section), we have identified no legal objection under the ethics statutes and regulations, or the Administration's Ethics Pledge (Ethics Pledge), to Elizabeth Klein, Senior Advisor to the Chief of Staff, participating in a virtual meeting to be held on April 13, 2021, with the following individuals:

1. Leah Donahey, Legislative Director, Alaska Wilderness League (AWL);
2. Kristen Miller, Conservation Director, AWL; and
3. Stephenne Harding, Great Northern Strategies (GNS).

The AWL is a nonprofit organization that works to protect Alaska's most significant wild lands from oil and gas drilling and from other industrial threats. Founded in 1993, the AWL has its main office in Washington, D.C. Per the House lobbying database, the AWL is currently identified as registered lobbying organization. In addition, per the same database, Ms. Donahey and Ms. Miller are currently identified as registered lobbyists.

GNS is a strategy and policy consulting firm working in the environment, climate, agriculture, conservation and natural resources arena.

Official Meeting and Nexus to DOI Mission – It is our understanding that the purpose of the meeting is to discuss the Arctic National Wildlife Refuge (ANWR) leasing program as it relates to the budget. The nexus between the DOI mission and these subjects allows this to be categorized as an official meeting for Ms. Klein. We note that Shantha Alonso, Director, Intergovernmental & External Affairs; Shannon Estenoz, Principal Deputy Assistant Secretary - Fish, Wildlife and Parks; Laura Daniel-Davis, Principal Deputy Assistant Secretary - Land and Minerals Management; and Rachael Taylor, Principal Deputy Assistant Secretary - Policy, Management, and Budget are anticipated to participate in the meeting as well and that a separate ethics review will be prepared for each individually.

Conflicts of Interest/Impartiality Review – Ms. Klein's appointment date at DOI was January 20,

2021. Although Ms. Klein's New Entrant Public Financial Disclosure Report (OGE Form 278e) has been reviewed and certified on March 28, 2021, a recusal list has not been finalized. As such, DEO cannot make a complete assessment of any potential conflicts of interests that may prevent or limit her participation in this meeting under 18 U.S.C. § 208 or 5 C.F.R. § 2635.502. We conducted our review based on the available information at this time. Our available information includes Ms. Klein's OGE Form 278e, information provided on Ms. Klein's resume, her responses to preliminary questions, and ethics officials' notes from discussions. To date, we identified current recusals with the following entities:

- American University;
- George Washington Middle School PTA;
- Invariant LLC;
- PT Fund, Inc. (Presidential Transition Team);
- State Energy & Environmental Impact Center, NYU School of Law;
- State of Massachusetts; and
- State of Washington.

*Please note that Ms. Klein is in the best position to know and identify her personal and imputed financial interests, her "covered relationships," and her former employers and clients as defined in the Pledge, so please let us know if the list above is not complete.

We remind Ms. Klein to be cautious in the event any particular matter involving specific parties to which any of the aforementioned entities is or represents a party is raised for discussion during the meeting. Specifically, it is our understanding that four lawsuits were filed following issuance of the National Environmental Policy Act Record of Decision challenging its legal sufficiency related to leasing in ANWR:

- *National Audubon Society et al. v. Bernhardt et al.*, Case No. 1:20-cv-00205-JWS;
- *Gwich'in Steering Committee v. Bernhardt*, Case No. 3:20-cv-00204-JWS;
- *Native Village of Venetie Tribal Government v. Bernhardt*, Case No. 3:20-cv-00223-JMK; and
- *State of Washington v. Bernhardt*, Case No. 3:20-cv-00224-JMK.

We note that the states of Massachusetts and Washington are parties to the *State of Washington v. Bernhardt*, Case No. 3:20-cv-00224-JMK. In the event Ms. Klein attends the meeting and this case is raised for discussion, and before engaging in any discussion of the case, she must determine whether she believes a reasonable person with knowledge of the relevant facts would question her impartiality in performing her official duties participating in the discussion. If she personally determines that the circumstances would not cause a reasonable person with knowledge of the relevant facts to question her impartiality in the matter, then she may participate in the discussion of the case as part of her official duties.

Ethics Pledge – Ms. Klein is covered by the revolving door ban in the Pledge stating that she will not, for a period of two years from the date of her appointment, participate in any particular matter involving specific parties that is directly and substantially related to her former employer or former clients, including regulations and contracts. Executive Order 13989. Based on the information currently before the DEO, this meeting about budget issues should not implicate any restriction under the Pledge.

General Ethics Guidance on Meetings

We remind Ms. Klein of the following standard guidance for participating in meetings:

1. **Other External Attendees** – If any additional parties external to the Department are added to the list of expected meeting attendees, please let the Departmental Ethics Office know sufficiently in advance so that we can review and make a determination with respect to the new expected attendee(s).

2. **Non-Public Information and Party Matters** – Department officials must refrain from disclosing non-public information at meetings with external parties (5 C.F.R. § 2635.703) and should, to the extent possible, refrain from discussing and making any commitments about any particular matters involving specific parties, such as litigation, contracts, leases, permits, etc.
3. **No Endorsement** – Department officials may not use their official position or title, or any authority associated with their public office, to endorse any product, service, or enterprise. This includes nonprofit and charitable organizations. 5 C.F.R. § 2635.702(c).
4. **No Preferential Treatment** – Department officials must act impartially and not give preferential treatment to any private organization or individual and must avoid creating even the appearance that they are violating this requirement. 5 C.F.R. § 2635.101(b)(8) and 5 C.F.R. § 2635.101(b)(14).
5. **Gifts** – Outside parties to the meeting are prohibited sources under the rules on gifts from outside sources. Under those rules a gift from a prohibited source may not normally be accepted. Consequently, we advise that no gifts be accepted in conjunction with this meeting.
6. **No Partisan Political Activity** – While Department officials may discuss the Administration's policy priorities and ideological approach to proposed laws and regulations at this meeting, they must strictly avoid partisan political activity in order to remain in compliance with the Hatch Act. Partisan political activity is any activity directed toward the success or failure of a political party, candidate for a partisan political office, or partisan political group and can include verbal remarks and speech.

Please let us know if you have any questions or concerns. Matt

Matthew W. Parsons
Attorney Advisor
Departmental Ethics Office Office of the Solicitor
U.S. Department of the Interior
Atlanta, GA
Office: (404) 331-5610
matthew.parsons@sol.doi.gov

Visit us online at: www.doi.gov/ethics

Public Service is a Public Trust

From: White, Katherine M <katherine_white@ios.doi.gov>

Sent: Thursday, April 1, 2021 12:58 PM

To: Schasberger, Paula I <paula.schasberger@sol.doi.gov>; Parsons, Matthew W <matthew.parsons@sol.doi.gov>

Cc: Myers, Casey A <casey_myers@ios.doi.gov>; Robbins, Tasha L <tasha_l_robbins@ios.doi.gov>; Rees, Gareth C <Gareth_Rees@ios.doi.gov>; Lassiter, Tracie L <Tracie_Lassiter@ios.doi.gov>

Subject: RE: [EXTERNAL] Meeting Request

Hello,

I've attached a Meeting Request Form from Alaska Wilderness League for the upcoming meeting. Shantha Alonso arranged this meeting with Leah Donahey, Legislative Director of Alaska Wilderness League. Shantha asked that Rachael, Liz Klein, Shannon Estenoz, and Laura Daniel-Davis join the meeting.

Please let me know if you need any more information. Thank you.

Best,

-Katie

Katie White

Executive Assistant

Office of the Assistant Secretary for Policy, Management, and Budget

1849 C Street NW, Room 5113

Washington, D.C. 20240

Phone - 202-208-6411

Katherine_white@ios.doi.gov

From: Schasberger, Paula I <paula.schasberger@sol.doi.gov>

Sent: Wednesday, March 31, 2021 3:58 PM

To: White, Katherine M <katherine_white@ios.doi.gov>; Parsons, Matthew W <matthew.parsons@sol.doi.gov>

Cc: Myers, Casey A <casey_myers@ios.doi.gov>

Subject: RE: [EXTERNAL] Meeting Request

I cleared Shantha verbally but I don't think we got a request for others and their recusals are different.

Paula I. Schasberger

Supervisory Attorney, Ethics Advice and Counsel

Departmental Ethics Office

U.S. Department of the Interior

(o) (202) 208 -6514

(c) (202) 923-0253

Email: paula.schasberger@sol.doi.gov

Integrity is our mission.

From: White, Katherine M <katherine_white@ios.doi.gov>

Sent: Wednesday, March 31, 2021 3:56 PM

To: Parsons, Matthew W <matthew.parsons@sol.doi.gov>; Schasberger, Paula I <paula.schasberger@sol.doi.gov>

Cc: Myers, Casey A <casey_myers@ios.doi.gov>

Subject: FW: [EXTERNAL] Meeting Request

Hello,

Rachael Taylor has been asked to join this meeting with Leah Donahey, Legislative Director of Alaska Wilderness League and Affiliate Alaska Wilderness League Action. Shantha Alonso arranged the meeting and asked that Rachael, Liz Klein, Shannon Estenoz, and Laura Daniel-Davis join the meeting. Valerie Smith from Shantha's office says that this has already been reviewed by Ethics – can you confirm that Rachael's attendance has been reviewed?

Thanks,

-Katie

Katie White

Executive Assistant

Office of the Assistant Secretary for Policy, Management, and Budget

1849 C Street NW, Room 5113

Washington, D.C. 20240

Phone - 202-208-6411

Katherine_white@ios.doi.gov

From: Smith, Valerie V <Valerie_V_Smith@ios.doi.gov>

Sent: Wednesday, March 31, 2021 2:26 PM

To: Robbins, Tasha L <tasha_l_robbins@ios.doi.gov>; Rees, Gareth C <Gareth_Rees@ios.doi.gov>;

White, Katherine M <katherine_white@ios.doi.gov>; Lassiter, Tracie L <Tracie_Lassiter@ios.doi.gov>

Subject: RE: [EXTERNAL] Meeting Request

Hi Tasha,

Shantha has informed me that this request has been reviewed by Ethics and there are no action needed from their office. I will send out the meeting request invite.

Thanks

From: Robbins, Tasha L <tasha_l_robbins@ios.doi.gov>

Sent: Wednesday, March 31, 2021 10:08 AM

To: Smith, Valerie V <Valerie_V_Smith@ios.doi.gov>; Rees, Gareth C <Gareth_Rees@ios.doi.gov>;

White, Katherine M <katherine_white@ios.doi.gov>; Lassiter, Tracie L <Tracie_Lassiter@ios.doi.gov>

Subject: Re: [EXTERNAL] Meeting Request

Thanks,

I will await your response. I will definitely need to clear Shannon. Did you have the requesting

office fill out a meeting request form for ethics clearance?

Thanks again,

Tasha

From: Smith, Valerie V <Valerie_V_Smith@ios.doi.gov>
Sent: Wednesday, March 31, 2021 9:55 AM
To: Robbins, Tasha L <tasha_l_robbins@ios.doi.gov>; Rees, Gareth C <Gareth_Rees@ios.doi.gov>; White, Katherine M <katherine_white@ios.doi.gov>; Lassiter, Tracie L <Tracie_Lassiter@ios.doi.gov>
Subject: RE: [EXTERNAL] Meeting Request

Hi Tasha,

Shantha Ready Alonso informed me that she has been approved to take this meeting, I will check with her to see if it has been approved by Ethics.

Thanks

From: Robbins, Tasha L <tasha_l_robbins@ios.doi.gov>
Sent: Wednesday, March 31, 2021 9:50 AM
To: Rees, Gareth C <Gareth_Rees@ios.doi.gov>; Smith, Valerie V <Valerie_V_Smith@ios.doi.gov>; White, Katherine M <katherine_white@ios.doi.gov>; Lassiter, Tracie L <Tracie_Lassiter@ios.doi.gov>
Subject: Re: [EXTERNAL] Meeting Request

Hi Valerie,

We received a request earlier this month from this group but different discussion topics. We are looking to schedule it with our FWS office. We certainly can accommodate this request but did it clear ethics?

Thanks,

Tasha

From: Rees, Gareth C <Gareth_Rees@ios.doi.gov>
Sent: Wednesday, March 31, 2021 9:38 AM
To: Smith, Valerie V <Valerie_V_Smith@ios.doi.gov>; Robbins, Tasha L <tasha_l_robbins@ios.doi.gov>; White, Katherine M <katherine_white@ios.doi.gov>; Lassiter, Tracie L <Tracie_Lassiter@ios.doi.gov>
Subject: Re: [EXTERNAL] Meeting Request

Hi,

I can make either time work for Liz

Thanks

Gareth C. Rees

Office to the Deputy Secretary

U.S. Department of the Interior

Tel: 202-227-9181

From: Smith, Valerie V <Valerie_V_Smith@ios.doi.gov>
Sent: Wednesday, March 31, 2021 9:01 AM
To: Robbins, Tasha L <tasha_l_robbins@ios.doi.gov>; White, Katherine M <katherine_white@ios.doi.gov>; Rees, Gareth C <Gareth_Rees@ios.doi.gov>; Lassiter, Tracie L <Tracie_Lassiter@ios.doi.gov>
Subject: FW: [EXTERNAL] Meeting Request

Good Morning All,

Shantha Ready Alonso is meeting with Lean Donahey with Alaska Wilderness League and Affiliate to discuss National Wildlife Refuge leasing program.

She would like to have Rachael Taylor, Elizabeth Klein Shannon Estenoz and Laura Daniel – Davis to attend the Teams meeting.

Please advise on their availability for April 13th from 1:30pm – 3pm (est) or April 14 at 4pm (est)

Thanks

From: Alonso, Shantha R <shantha_alonso@ios.doi.gov>
Sent: Wednesday, March 24, 2021 3:52 PM
To: Smith, Valerie V <Valerie_V_Smith@ios.doi.gov>; OS, OIEA <OIEA@ios.doi.gov>
Subject: Fw: [EXTERNAL] Meeting Request

Hi Valerie,
Please add this to the meeting request spreadsheet.
Thank you!
Shantha

From: Leah Donahey <Leah@alaskawild.org>
Sent: Wednesday, March 24, 2021 2:02 PM
To: Taylor, Rachael S <rachael_taylor@ios.doi.gov>

Cc: Kristen Miller <Kristen@alaskawild.org>

Subject: [EXTERNAL] Meeting Request

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Rachael – I am writing to request a meeting to discuss Arctic National Wildlife Refuge leasing program as it relates to the budget. I know this is an incredibly busy time for you, so please let me know if there are times during the next few weeks that work for you.

Best,
Leah

**ALASKA
WILDERNESS
LEAGUE
AND AFFILIATE
ALASKA
WILDERNESS
LEAGUE|ACTION**

LEAH DONAHEY
SHE/HER/HERS
Legislative Director

122 C St NW, Ste 240
Washington, DC 20001
Tel: 202-266-0421
Cell: 415-309-0455
www.AlaskaWild.org
www.AlaskaWildAction.org

From: [Gottry, Heather C](#)
To: [Klein, Elizabeth A](#)
Cc: [Genter, Constance G](#); [Garcia, Monica L](#); [Parsons, Matthew W](#); [Rees, Gareth C](#)
Subject: RE: [EXTERNAL] Meeting Request
Date: Thursday, April 8, 2021 10:25:50 AM

Liz - Hello! I hope all is well with you. Please accept my apologies. There was an internal gap in communication in the DEO and we do have all information needed on your recusals. We will be sending you final ethics materials shortly and will make sure that the reviewers of any meetings or events for you have the needed information. Please let me know if it would be helpful to touch base. Thank you.

- Heather

From: Klein, Elizabeth A <Elizabeth_Klein@ios.doi.gov>
Sent: Wednesday, April 7, 2021 7:53 AM
To: Parsons, Matthew W <matthew.parsons@sol.doi.gov>; Rees, Gareth C <Gareth_Rees@ios.doi.gov>
Cc: Genter, Constance G <constance.genter@sol.doi.gov>; Garcia, Monica L <monica.garcia@sol.doi.gov>; Gottry, Heather C <heather.gottry@sol.doi.gov>
Subject: RE: [EXTERNAL] Meeting Request

Good morning all,
Thanks for the analysis. Wanted to follow up on the note below that you don't have sufficient information to determine the scope of my recusals. I think I've provided all of that information (and more!), so am interested in finalizing whatever you all would like for me to finalize.
Thanks very much,
Liz

From: Parsons, Matthew W <matthew.parsons@sol.doi.gov>
Sent: Wednesday, April 7, 2021 7:47 AM
To: Rees, Gareth C <Gareth_Rees@ios.doi.gov>
Cc: Genter, Constance G <constance.genter@sol.doi.gov>; Klein, Elizabeth A <Elizabeth_Klein@ios.doi.gov>; Garcia, Monica L <monica.garcia@sol.doi.gov>; Gottry, Heather C <heather.gottry@sol.doi.gov>
Subject: Fw: [EXTERNAL] Meeting Request

Garreth,

After reviewing the information provided to the Departmental Ethics Office (DEO) and supporting materials, and subject to the limitations discussed below (see Conflicts of Interest/Impartiality Review section), we have identified no legal objection under the ethics statutes and regulations, or the Administration's Ethics Pledge (Ethics Pledge), to Elizabeth Klein, Senior Advisor to the Chief of Staff, participating in a virtual meeting to be held on April 13, 2021, with the following individuals:

1. Leah Donahey, Legislative Director, Alaska Wilderness League (AWL);
2. Kristen Miller, Conservation Director, AWL; and

3. Stephenne Harding, Great Northern Strategies (GNS).

The AWL is a nonprofit organization that works to protect Alaska's most significant wild lands from oil and gas drilling and from other industrial threats. Founded in 1993, the AWL has its main office in Washington, D.C. Per the House lobbying database, the AWL is currently identified as registered lobbying organization. In addition, per the same database, Ms. Donahey and Ms. Miller are currently identified as registered lobbyists.

GNS is a strategy and policy consulting firm working in the environment, climate, agriculture, conservation and natural resources arena.

Official Meeting and Nexus to DOI Mission – It is our understanding that the purpose of the meeting is to discuss the Arctic National Wildlife Refuge (ANWR) leasing program as it relates to the budget. The nexus between the DOI mission and these subjects allows this to be categorized as an official meeting for Ms. Klein. We note that Shantha Alonso, Director, Intergovernmental & External Affairs; Shannon Estenoz, Principal Deputy Assistant Secretary - Fish, Wildlife and Parks; Laura Daniel-Davis, Principal Deputy Assistant Secretary - Land and Minerals Management; and Rachael Taylor, Principal Deputy Assistant Secretary - Policy, Management, and Budget are anticipated to participate in the meeting as well and that a separate ethics review will be prepared for each individually.

Conflicts of Interest/Impartiality Review – Ms. Klein's appointment date at DOI was January 20, 2021. Although Ms. Klein's New Entrant Public Financial Disclosure Report (OGE Form 278e) has been reviewed and certified on March 28, 2021, a recusal list has not been finalized. As such, DEO cannot make a complete assessment of any potential conflicts of interests that may prevent or limit her participation in this meeting under 18 U.S.C. § 208 or 5 C.F.R. § 2635.502. We conducted our review based on the available information at this time. Our available information includes Ms. Klein's OGE Form 278e, information provided on Ms. Klein's resume, her responses to preliminary questions, and ethics officials' notes from discussions. To date, we identified current recusals with the following entities:

- American University;
- George Washington Middle School PTA;
- Invariant LLC;
- PT Fund, Inc. (Presidential Transition Team);
- State Energy & Environmental Impact Center, NYU School of Law;
- State of Massachusetts; and
- State of Washington.

*Please note that Ms. Klein is in the best position to know and identify her personal and imputed financial interests, her "covered relationships," and her former employers and clients as defined in the Pledge, so please let us know if the list above is not complete.

We remind Ms. Klein to be cautious in the event any particular matter involving specific parties to which any of the aforementioned entities is or represents a party is raised for discussion during the meeting. Specifically, it is our understanding that four lawsuits were filed following issuance of the National Environmental Policy Act Record of Decision challenging its legal sufficiency related to leasing in ANWR:

- *National Audubon Society et al. v. Bernhardt et al.*, Case No. 1:20-cv-00205-JWS;
- *Gwich'in Steering Committee v. Bernhardt*, Case No. 3:20-cv-00204-JWS;
- *Native Village of Venetie Tribal Government v. Bernhardt*, Case No. 3:20-cv-00223-JMK; and
- *State of Washington v. Bernhardt*, Case No. 3:20-cv-00224-JMK.

We note that the states of Massachusetts and Washington are parties to the *State of Washington*

v. Bernhardt, Case No. 3:20-cv-00224-JMK. In the event Ms. Klein attends the meeting and this case is raised for discussion, and before engaging in any discussion of the case, she must determine whether she believes a reasonable person with knowledge of the relevant facts would question her impartiality in performing her official duties participating in the discussion. If she personally determines that the circumstances would not cause a reasonable person with knowledge of the relevant facts to question her impartiality in the matter, then she may participate in the discussion of the case as part of her official duties.

Ethics Pledge – Ms. Klein is covered by the revolving door ban in the Pledge stating that she will not, for a period of two years from the date of her appointment, participate in any particular matter involving specific parties that is directly and substantially related to her former employer or former clients, including regulations and contracts. Executive Order 13989. Based on the information currently before the DEO, this meeting about budget issues should not implicate any restriction under the Pledge.

General Ethics Guidance on Meetings

We remind Ms. Klein of the following standard guidance for participating in meetings:

1. **Other External Attendees** – If any additional parties external to the Department are added to the list of expected meeting attendees, please let the Departmental Ethics Office know sufficiently in advance so that we can review and make a determination with respect to the new expected attendee(s).
2. **Non-Public Information and Party Matters** – Department officials must refrain from disclosing non-public information at meetings with external parties (5 C.F.R. § 2635.703) and should, to the extent possible, refrain from discussing and making any commitments about any particular matters involving specific parties, such as litigation, contracts, leases, permits, etc.
3. **No Endorsement** – Department officials may not use their official position or title, or any authority associated with their public office, to endorse any product, service, or enterprise. This includes nonprofit and charitable organizations. 5 C.F.R. § 2635.702(c).
4. **No Preferential Treatment** – Department officials must act impartially and not give preferential treatment to any private organization or individual and must avoid creating even the appearance that they are violating this requirement. 5 C.F.R. § 2635.101(b)(8) and 5 C.F.R. § 2635.101(b)(14).
5. **Gifts** – Outside parties to the meeting are prohibited sources under the rules on gifts from outside sources. Under those rules a gift from a prohibited source may not normally be accepted. Consequently, we advise that no gifts be accepted in conjunction with this meeting.
6. **No Partisan Political Activity** – While Department officials may discuss the Administration's policy priorities and ideological approach to proposed laws and regulations at this meeting, they must strictly avoid partisan political activity in order to remain in compliance with the Hatch Act. Partisan political activity is any activity directed toward the success or failure of a political party, candidate for a partisan political office, or partisan political group and can include verbal remarks and speech.

Please let us know if you have any questions or concerns. Matt

Matthew W. Parsons
Attorney Advisor
Departmental Ethics Office Office of the Solicitor
U.S. Department of the Interior

Atlanta, GA
Office: (404) 331-5610
matthew.parsons@sol.doi.gov

Visit us online at: www.doi.gov/ethics

Public Service is a Public Trust

From: White, Katherine M <katherine_white@ios.doi.gov>
Sent: Thursday, April 1, 2021 12:58 PM
To: Schasberger, Paula I <paula.schasberger@sol.doi.gov>; Parsons, Matthew W <matthew.parsons@sol.doi.gov>
Cc: Myers, Casey A <casey_myers@ios.doi.gov>; Robbins, Tasha L <tasha_l_robbins@ios.doi.gov>; Rees, Gareth C <Gareth_Rees@ios.doi.gov>; Lassiter, Tracie L <Tracie_Lassiter@ios.doi.gov>
Subject: RE: [EXTERNAL] Meeting Request

Hello,

I've attached a Meeting Request Form from Alaska Wilderness League for the upcoming meeting. Shantha Alonso arranged this meeting with Leah Donahey, Legislative Director of Alaska Wilderness League. Shantha asked that Rachael, Liz Klein, Shannon Estenoz, and Laura Daniel-Davis join the meeting.

Please let me know if you need any more information. Thank you.

Best,

-Katie

Katie White

Executive Assistant
Office of the Assistant Secretary for Policy, Management, and Budget
1849 C Street NW, Room 5113
Washington, D.C. 20240
Phone - 202-208-6411
Katherine_white@ios.doi.gov

From: Schasberger, Paula I <paula.schasberger@sol.doi.gov>
Sent: Wednesday, March 31, 2021 3:58 PM
To: White, Katherine M <katherine_white@ios.doi.gov>; Parsons, Matthew W <matthew.parsons@sol.doi.gov>
Cc: Myers, Casey A <casey_myers@ios.doi.gov>
Subject: RE: [EXTERNAL] Meeting Request

I cleared Shantha verbally but I don't think we got a request for others and their recusals are

different.

Paula I. Schasberger
Supervisory Attorney, Ethics Advice and Counsel
Departmental Ethics Office
U.S. Department of the Interior
(o) (202) 208 -6514
(c) (202) 923-0253
Email: paula.schasberger@sol.doi.gov

Integrity is our mission.

From: White, Katherine M <katherine_white@ios.doi.gov>
Sent: Wednesday, March 31, 2021 3:56 PM
To: Parsons, Matthew W <matthew.parsons@sol.doi.gov>; Schasberger, Paula I <paula.schasberger@sol.doi.gov>
Cc: Myers, Casey A <casey_myers@ios.doi.gov>
Subject: FW: [EXTERNAL] Meeting Request

Hello,

Rachael Taylor has been asked to join this meeting with Leah Donahey, Legislative Director of Alaska Wilderness League and Affiliate Alaska Wilderness League Action. Shantha Alonso arranged the meeting and asked that Rachael, Liz Klein, Shannon Estenoz, and Laura Daniel-Davis join the meeting. Valerie Smith from Shantha's office says that this has already been reviewed by Ethics – can you confirm that Rachael's attendance has been reviewed?

Thanks,

-Katie

Katie White
Executive Assistant
Office of the Assistant Secretary for Policy, Management, and Budget
1849 C Street NW, Room 5113
Washington, D.C. 20240
Phone - 202-208-6411
Katherine_white@ios.doi.gov

From: Smith, Valerie V <Valerie_V_Smith@ios.doi.gov>
Sent: Wednesday, March 31, 2021 2:26 PM
To: Robbins, Tasha L <tasha_l_robbins@ios.doi.gov>; Rees, Gareth C <Gareth_Rees@ios.doi.gov>; White, Katherine M <katherine_white@ios.doi.gov>; Lassiter, Tracie L <Tracie_Lassiter@ios.doi.gov>
Subject: RE: [EXTERNAL] Meeting Request

Hi Tasha,

Shantha has informed me that this request has been reviewed by Ethic's and there are no action needed from there office. I will send out the meeting request invite.

Thanks

From: Robbins, Tasha L <tasha_l_robbins@ios.doi.gov>

Sent: Wednesday, March 31, 2021 10:08 AM

To: Smith, Valerie V <Valerie_V_Smith@ios.doi.gov>; Rees, Gareth C <Gareth_Rees@ios.doi.gov>;

White, Katherine M <katherine_white@ios.doi.gov>; Lassiter, Tracie L <Tracie_Lassiter@ios.doi.gov>

Subject: Re: [EXTERNAL] Meeting Request

Thanks,

I will await your response. I will definitely need to clear Shannon. Did you have the requesting office fill out a meeting request form for ethics clearance?

Thanks again,

Tasha

From: Smith, Valerie V <Valerie_V_Smith@ios.doi.gov>

Sent: Wednesday, March 31, 2021 9:55 AM

To: Robbins, Tasha L <tasha_l_robbins@ios.doi.gov>; Rees, Gareth C <Gareth_Rees@ios.doi.gov>;

White, Katherine M <katherine_white@ios.doi.gov>; Lassiter, Tracie L <Tracie_Lassiter@ios.doi.gov>

Subject: RE: [EXTERNAL] Meeting Request

Hi Tasha,

Shantha Ready Alonso informed me that she has been approved to take this meeting, I will check with her to see if it has been approved by Ethics.

Thanks

From: Robbins, Tasha L <tasha_l_robbins@ios.doi.gov>

Sent: Wednesday, March 31, 2021 9:50 AM

To: Rees, Gareth C <Gareth_Rees@ios.doi.gov>; Smith, Valerie V <Valerie_V_Smith@ios.doi.gov>;

White, Katherine M <katherine_white@ios.doi.gov>; Lassiter, Tracie L <Tracie_Lassiter@ios.doi.gov>

Subject: Re: [EXTERNAL] Meeting Request

Hi Valerie,

We received a request earlier this month from this group but different discussion topics. We

are looking to schedule it with our FWS office. We certainly can accommodate this request but did it clear ethics?

Thanks,

Tasha

From: Rees, Gareth C <Gareth_Rees@ios.doi.gov>
Sent: Wednesday, March 31, 2021 9:38 AM
To: Smith, Valerie V <Valerie_V_Smith@ios.doi.gov>; Robbins, Tasha L <tasha_l_robbins@ios.doi.gov>; White, Katherine M <katherine_white@ios.doi.gov>; Lassiter, Tracie L <Tracie_Lassiter@ios.doi.gov>
Subject: Re: [EXTERNAL] Meeting Request

Hi,

I can make either time work for Liz

Thanks

Gareth C. Rees

Office to the Deputy Secretary

U.S. Department of the Interior

Tel: 202-227-9181

From: Smith, Valerie V <Valerie_V_Smith@ios.doi.gov>
Sent: Wednesday, March 31, 2021 9:01 AM
To: Robbins, Tasha L <tasha_l_robbins@ios.doi.gov>; White, Katherine M <katherine_white@ios.doi.gov>; Rees, Gareth C <Gareth_Rees@ios.doi.gov>; Lassiter, Tracie L <Tracie_Lassiter@ios.doi.gov>
Subject: FW: [EXTERNAL] Meeting Request

Good Morning All,

Shantha Ready Alonso is meeting with Lean Donahey with Alaska Wilderness League and Affiliate to discuss National Wildlife Refuge leasing program.

She would like to have Rachael Taylor, Elizabeth Klein Shannon Estenoz and Laura Daniel – Davis to attend the Teams meeting.

Please advise on their availability for April 13th from 1:30pm – 3pm (est) or April 14 at 4pm (est)

Thanks

From: Alonso, Shantha R <shantha_alonso@ios.doi.gov>
Sent: Wednesday, March 24, 2021 3:52 PM
To: Smith, Valerie V <Valerie_V_Smith@ios.doi.gov>; OS, OIEA <OIEA@ios.doi.gov>
Subject: Fw: [EXTERNAL] Meeting Request

Hi Valerie,
Please add this to the meeting request spreadsheet.
Thank you!
Shantha

From: Leah Donahey <Leah@alaskawild.org>
Sent: Wednesday, March 24, 2021 2:02 PM
To: Taylor, Rachael S <rachael_taylor@ios.doi.gov>
Cc: Kristen Miller <Kristen@alaskawild.org>
Subject: [EXTERNAL] Meeting Request

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Rachael – I am writing to request a meeting to discuss Arctic National Wildlife Refuge leasing program as it relates to the budget. I know this is an incredibly busy time for you, so please let me know if there are times during the next few weeks that work for you.

Best,
Leah

**ALASKA
WILDERNESS
LEAGUE**
AND AFFILIATE
**ALASKA
WILDERNESS
LEAGUE|ACTION**

LEAH DONAHEY
SHE/HER/HERS
Legislative Director

122 C St NW, Ste 240
Washington, DC 20001
Tel: 202-266-0421

Cell: 415-309-0455
www.AlaskaWild.org
www.AlaskaWildAction.org

From: [Klein, Elizabeth A](#)
To: [Gottry, Heather C](#)
Cc: [Genter, Constance G](#); [Garcia, Monica L](#); [Parsons, Matthew W](#); [Rees, Gareth C](#)
Subject: RE: [EXTERNAL] Meeting Request
Date: Thursday, April 8, 2021 10:27:39 AM

No problem. As you finalize the materials, my position will now be Senior Counselor to the Secretary.
Thanks very much,
Liz

From: Gottry, Heather C <heather.gottry@sol.doi.gov>
Sent: Thursday, April 8, 2021 10:26 AM
To: Klein, Elizabeth A <Elizabeth_Klein@ios.doi.gov>
Cc: Genter, Constance G <constance.genter@sol.doi.gov>; Garcia, Monica L <monica.garcia@sol.doi.gov>; Parsons, Matthew W <matthew.parsons@sol.doi.gov>; Rees, Gareth C <Gareth_Rees@ios.doi.gov>
Subject: RE: [EXTERNAL] Meeting Request

Liz - Hello! I hope all is well with you. Please accept my apologies. There was an internal gap in communication in the DEO and we do have all information needed on your recusals. We will be sending you final ethics materials shortly and will make sure that the reviewers of any meetings or events for you have the needed information. Please let me know if it would be helpful to touch base. Thank you.

- Heather

From: Klein, Elizabeth A <Elizabeth_Klein@ios.doi.gov>
Sent: Wednesday, April 7, 2021 7:53 AM
To: Parsons, Matthew W <matthew.parsons@sol.doi.gov>; Rees, Gareth C <Gareth_Rees@ios.doi.gov>
Cc: Genter, Constance G <constance.genter@sol.doi.gov>; Garcia, Monica L <monica.garcia@sol.doi.gov>; Gottry, Heather C <heather.gottry@sol.doi.gov>
Subject: RE: [EXTERNAL] Meeting Request

Good morning all,
Thanks for the analysis. Wanted to follow up on the note below that you don't have sufficient information to determine the scope of my recusals. I think I've provided all of that information (and more!), so am interested in finalizing whatever you all would like for me to finalize.
Thanks very much,
Liz

From: Parsons, Matthew W <matthew.parsons@sol.doi.gov>
Sent: Wednesday, April 7, 2021 7:47 AM
To: Rees, Gareth C <Gareth_Rees@ios.doi.gov>
Cc: Genter, Constance G <constance.genter@sol.doi.gov>; Klein, Elizabeth A

<Elizabeth_Klein@ios.doi.gov>; Garcia, Monica L <monica.garcia@sol.doi.gov>; Gottry, Heather C <heather.gottry@sol.doi.gov>

Subject: Fw: [EXTERNAL] Meeting Request

Garreth,

After reviewing the information provided to the Departmental Ethics Office (DEO) and supporting materials, and subject to the limitations discussed below (see Conflicts of Interest/Impartiality Review section), we have identified no legal objection under the ethics statutes and regulations, or the Administration's Ethics Pledge (Ethics Pledge), to Elizabeth Klein, Senior Advisor to the Chief of Staff, participating in a virtual meeting to be held on April 13, 2021, with the following individuals:

1. Leah Donahey, Legislative Director, Alaska Wilderness League (AWL);
2. Kristen Miller, Conservation Director, AWL; and
3. Stephenne Harding, Great Northern Strategies (GNS).

The AWL is a nonprofit organization that works to protect Alaska's most significant wild lands from oil and gas drilling and from other industrial threats. Founded in 1993, the AWL has its main office in Washington, D.C. Per the House lobbying database, the AWL is currently identified as registered lobbying organization. In addition, per the same database, Ms. Donahey and Ms. Miller are currently identified as registered lobbyists.

GNS is a strategy and policy consulting firm working in the environment, climate, agriculture, conservation and natural resources arena.

Official Meeting and Nexus to DOI Mission – It is our understanding that the purpose of the meeting is to discuss the Arctic National Wildlife Refuge (ANWR) leasing program as it relates to the budget. The nexus between the DOI mission and these subjects allows this to be categorized as an official meeting for Ms. Klein. We note that Shantha Alonso, Director, Intergovernmental & External Affairs; Shannon Estenoz, Principal Deputy Assistant Secretary - Fish, Wildlife and Parks; Laura Daniel-Davis, Principal Deputy Assistant Secretary - Land and Minerals Management; and Rachael Taylor, Principal Deputy Assistant Secretary - Policy, Management, and Budget are anticipated to participate in the meeting as well and that a separate ethics review will be prepared for each individually.

Conflicts of Interest/Impartiality Review – Ms. Klein's appointment date at DOI was January 20, 2021. Although Ms. Klein's New Entrant Public Financial Disclosure Report (OGE Form 278e) has been reviewed and certified on March 28, 2021, a recusal list has not been finalized. As such, DEO cannot make a complete assessment of any potential conflicts of interests that may prevent or limit her participation in this meeting under 18 U.S.C. § 208 or 5 C.F.R. § 2635.502. We conducted our review based on the available information at this time. Our available information includes Ms. Klein's OGE Form 278e, information provided on Ms. Klein's resume, her responses to preliminary questions, and ethics officials' notes from discussions. To date, we identified current recusals with the following entities:

- American University;
- George Washington Middle School PTA;
- Invarient LLC;
- PT Fund, Inc. (Presidential Transition Team);
- State Energy & Environmental Impact Center, NYU School of Law;
- State of Massachusetts; and
- State of Washington.

*Please note that Ms. Klein is in the best position to know and identify her personal and imputed

financial interests, her “covered relationships,” and her former employers and clients as defined in the Pledge, so please let us know if the list above is not complete.

We remind Ms. Klein to be cautious in the event any particular matter involving specific parties to which any of the aforementioned entities is or represents a party is raised for discussion during the meeting. Specifically, it is our understanding that four lawsuits were filed following issuance of the National Environmental Policy Act Record of Decision challenging its legal sufficiency related to leasing in ANWR:

- ***National Audubon Society et al. v. Bernhardt et al.*, Case No. 1:20-cv-00205-JWS;**
- ***Gwich'in Steering Committee v. Bernhardt*, Case No. 3:20-cv-00204-JWS;**
- ***Native Village of Venetie Tribal Government v. Bernhardt*, Case No. 3:20-cv-00223-JMK;**
and
- ***State of Washington v. Bernhardt*, Case No. 3:20-cv-00224-JMK.**

We note that the states of Massachusetts and Washington are parties to the *State of Washington v. Bernhardt*, Case No. 3:20-cv-00224-JMK. In the event Ms. Klein attends the meeting and this case is raised for discussion, and before engaging in any discussion of the case, she must determine whether she believes a reasonable person with knowledge of the relevant facts would question her impartiality in performing her official duties participating in the discussion. If she personally determines that the circumstances would not cause a reasonable person with knowledge of the relevant facts to question her impartiality in the matter, then she may participate in the discussion of the case as part of her official duties.

Ethics Pledge – Ms. Klein is covered by the revolving door ban in the Pledge stating that she will not, for a period of two years from the date of her appointment, participate in any particular matter involving specific parties that is directly and substantially related to her former employer or former clients, including regulations and contracts. Executive Order 13989. Based on the information currently before the DEO, this meeting about budget issues should not implicate any restriction under the Pledge.

General Ethics Guidance on Meetings

We remind Ms. Klein of the following standard guidance for participating in meetings:

1. **Other External Attendees** – If any additional parties external to the Department are added to the list of expected meeting attendees, please let the Departmental Ethics Office know sufficiently in advance so that we can review and make a determination with respect to the new expected attendee(s).
2. **Non-Public Information and Party Matters** – Department officials must refrain from disclosing non-public information at meetings with external parties (5 C.F.R. § 2635.703) and should, to the extent possible, refrain from discussing and making any commitments about any particular matters involving specific parties, such as litigation, contracts, leases, permits, etc.
3. **No Endorsement** – Department officials may not use their official position or title, or any authority associated with their public office, to endorse any product, service, or enterprise. This includes nonprofit and charitable organizations. 5 C.F.R. § 2635.702(c).
4. **No Preferential Treatment** – Department officials must act impartially and not give preferential treatment to any private organization or individual and must avoid creating even the appearance that they are violating this requirement. 5 C.F.R. § 2635.101(b)(8) and 5 C.F.R. § 2635.101(b)(14).
5. **Gifts** – Outside parties to the meeting are prohibited sources under the rules on gifts from outside sources. Under those rules a gift from a prohibited source may not normally be accepted. Consequently, we advise that no gifts be accepted in conjunction with this meeting.

6. **No Partisan Political Activity** – While Department officials may discuss the Administration's policy priorities and ideological approach to proposed laws and regulations at this meeting, they must strictly avoid partisan political activity in order to remain in compliance with the Hatch Act. Partisan political activity is any activity directed toward the success or failure of a political party, candidate for a partisan political office, or partisan political group and can include verbal remarks and speech.

Please let us know if you have any questions or concerns. Matt

Matthew W. Parsons
Attorney Advisor
Departmental Ethics Office Office of the Solicitor
U.S. Department of the Interior
Atlanta, GA
Office: (404) 331-5610
matthew.parsons@sol.doi.gov

Visit us online at: www.doi.gov/ethics

Public Service is a Public Trust

From: White, Katherine M <katherine_white@ios.doi.gov>
Sent: Thursday, April 1, 2021 12:58 PM
To: Schasberger, Paula I <paula.schasberger@sol.doi.gov>; Parsons, Matthew W <matthew.parsons@sol.doi.gov>
Cc: Myers, Casey A <casey_myers@ios.doi.gov>; Robbins, Tasha L <tasha_l_robbins@ios.doi.gov>; Rees, Gareth C <Gareth_Rees@ios.doi.gov>; Lassiter, Tracie L <Tracie_Lassiter@ios.doi.gov>
Subject: RE: [EXTERNAL] Meeting Request

Hello,

I've attached a Meeting Request Form from Alaska Wilderness League for the upcoming meeting. Shantha Alonso arranged this meeting with Leah Donahey, Legislative Director of Alaska Wilderness League. Shantha asked that Rachael, Liz Klein, Shannon Estenoz, and Laura Daniel-Davis join the meeting.

Please let me know if you need any more information. Thank you.

Best,

-Katie

Katie White
Executive Assistant
Office of the Assistant Secretary for Policy, Management, and Budget

1849 C Street NW, Room 5113
Washington, D.C. 20240
Phone - 202-208-6411
Katherine_white@ios.doi.gov

From: Schasberger, Paula I <paula.schasberger@sol.doi.gov>
Sent: Wednesday, March 31, 2021 3:58 PM
To: White, Katherine M <katherine_white@ios.doi.gov>; Parsons, Matthew W <matthew.parsons@sol.doi.gov>
Cc: Myers, Casey A <casey_myers@ios.doi.gov>
Subject: RE: [EXTERNAL] Meeting Request

I cleared Shantha verbally but I don't think we got a request for others and their recusals are different.

Paula I. Schasberger
Supervisory Attorney, Ethics Advice and Counsel
Departmental Ethics Office
U.S. Department of the Interior
(o) (202) 208 -6514
(c) (202) 923-0253
Email: paula.schasberger@sol.doi.gov

Integrity is our mission.

From: White, Katherine M <katherine_white@ios.doi.gov>
Sent: Wednesday, March 31, 2021 3:56 PM
To: Parsons, Matthew W <matthew.parsons@sol.doi.gov>; Schasberger, Paula I <paula.schasberger@sol.doi.gov>
Cc: Myers, Casey A <casey_myers@ios.doi.gov>
Subject: FW: [EXTERNAL] Meeting Request

Hello,

Rachael Taylor has been asked to join this meeting with Leah Donahey, Legislative Director of Alaska Wilderness League and Affiliate Alaska Wilderness League Action. Shantha Alonso arranged the meeting and asked that Rachael, Liz Klein, Shannon Estenoz, and Laura Daniel-Davis join the meeting. Valerie Smith from Shantha's office says that this has already been reviewed by Ethics – can you confirm that Rachael's attendance has been reviewed?

Thanks,

-Katie

Katie White

Executive Assistant
Office of the Assistant Secretary for Policy, Management, and Budget
1849 C Street NW, Room 5113
Washington, D.C. 20240
Phone - 202-208-6411
Katherine_white@ios.doi.gov

From: Smith, Valerie V <Valerie_V_Smith@ios.doi.gov>
Sent: Wednesday, March 31, 2021 2:26 PM
To: Robbins, Tasha L <tasha_l_robbins@ios.doi.gov>; Rees, Gareth C <Gareth_Rees@ios.doi.gov>; White, Katherine M <katherine_white@ios.doi.gov>; Lassiter, Tracie L <Tracie_Lassiter@ios.doi.gov>
Subject: RE: [EXTERNAL] Meeting Request

Hi Tasha,

Shantha has informed me that this request has been reviewed by Ethic's and there are no action needed from there office. I will send out the meeting request invite.

Thanks

From: Robbins, Tasha L <tasha_l_robbins@ios.doi.gov>
Sent: Wednesday, March 31, 2021 10:08 AM
To: Smith, Valerie V <Valerie_V_Smith@ios.doi.gov>; Rees, Gareth C <Gareth_Rees@ios.doi.gov>; White, Katherine M <katherine_white@ios.doi.gov>; Lassiter, Tracie L <Tracie_Lassiter@ios.doi.gov>
Subject: Re: [EXTERNAL] Meeting Request

Thanks,

I will await your response. I will definitely need to clear Shannon. Did you have the requesting office fill out a meeting request form for ethics clearance?

Thanks again,

Tasha

From: Smith, Valerie V <Valerie_V_Smith@ios.doi.gov>
Sent: Wednesday, March 31, 2021 9:55 AM
To: Robbins, Tasha L <tasha_l_robbins@ios.doi.gov>; Rees, Gareth C <Gareth_Rees@ios.doi.gov>; White, Katherine M <katherine_white@ios.doi.gov>; Lassiter, Tracie L <Tracie_Lassiter@ios.doi.gov>
Subject: RE: [EXTERNAL] Meeting Request

Hi Tasha,

Shantha Ready Alonso informed me that she has been approved to take this meeting, I will check with her to see if it has been approved by Ethics.

Thanks

From: Robbins, Tasha L <tasha_l_robbins@ios.doi.gov>
Sent: Wednesday, March 31, 2021 9:50 AM
To: Rees, Gareth C <Gareth_Rees@ios.doi.gov>; Smith, Valerie V <Valerie_V_Smith@ios.doi.gov>; White, Katherine M <katherine_white@ios.doi.gov>; Lassiter, Tracie L <Tracie_Lassiter@ios.doi.gov>
Subject: Re: [EXTERNAL] Meeting Request

Hi Valerie,

We received a request earlier this month from this group but different discussion topics. We are looking to schedule it with our FWS office. We certainly can accommodate this request but did it clear ethics?

Thanks,

Tasha

From: Rees, Gareth C <Gareth_Rees@ios.doi.gov>
Sent: Wednesday, March 31, 2021 9:38 AM
To: Smith, Valerie V <Valerie_V_Smith@ios.doi.gov>; Robbins, Tasha L <tasha_l_robbins@ios.doi.gov>; White, Katherine M <katherine_white@ios.doi.gov>; Lassiter, Tracie L <Tracie_Lassiter@ios.doi.gov>
Subject: Re: [EXTERNAL] Meeting Request

Hi,

I can make either time work for Liz

Thanks

Gareth C. Rees

Office to the Deputy Secretary

U.S. Department of the Interior

Tel: 202-227-9181

From: Smith, Valerie V <Valerie_V_Smith@ios.doi.gov>
Sent: Wednesday, March 31, 2021 9:01 AM
To: Robbins, Tasha L <tasha_l_robbins@ios.doi.gov>; White, Katherine M

<katherine_white@ios.doi.gov>; Rees, Gareth C <Gareth_Rees@ios.doi.gov>; Lassiter, Tracie L <Tracie_Lassiter@ios.doi.gov>

Subject: FW: [EXTERNAL] Meeting Request

Good Morning All,

Shantha Ready Alonso is meeting with Lean Donahey with Alaska Wilderness League and Affiliate to discuss National Wildlife Refuge leasing program.

She would like to have Rachael Taylor, Elizabeth Klein Shannon Estenoz and Laura Daniel – Davis to attend the Teams meeting.

Please advise on their availability for April 13th from 1:30pm – 3pm (est) or April 14 at 4pm (est)

Thanks

From: Alonso, Shantha R <shantha_alonso@ios.doi.gov>

Sent: Wednesday, March 24, 2021 3:52 PM

To: Smith, Valerie V <Valerie_V_Smith@ios.doi.gov>; OS, OIEA <OIEA@ios.doi.gov>

Subject: Fw: [EXTERNAL] Meeting Request

Hi Valerie,

Please add this to the meeting request spreadsheet.

Thank you!

Shantha

From: Leah Donahey <Leah@alaskawild.org>

Sent: Wednesday, March 24, 2021 2:02 PM

To: Taylor, Rachael S <rachael_taylor@ios.doi.gov>

Cc: Kristen Miller <Kristen@alaskawild.org>

Subject: [EXTERNAL] Meeting Request

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Rachael – I am writing to request a meeting to discuss Arctic National Wildlife Refuge leasing program as it relates to the budget. I know this is an incredibly busy time for you, so please let me know if there are times during the next few weeks that work for you.

Best,

Leah

**ALASKA
WILDERNESS
LEAGUE
AND AFFILIATE
ALASKA
WILDERNESS
LEAGUE|ACTION**

LEAH DONAHEY
SHE/HER/HERS
Legislative Director

122 C St NW, Ste 240
Washington, DC 20001
Tel: 202-266-0421
Cell: 415-309-0455
www.AlaskaWild.org
www.AlaskaWildAction.org

From: [Garcia, Monica L](#)
To: [Alonso, Shantha R](#); [Gottry, Heather C](#); [Genter, Constance G](#)
Subject: RE: [EXTERNAL] Join NPCA for Our Salute to the Parks Event (Virtual) on April 14th
Date: Monday, April 12, 2021 7:00:00 AM
Attachments: [image001.png](#)

Dear Shantha,

We have reviewed the information provided to the Departmental Ethics Office (DEO) and determined that you **cannot** accept free attendance at the National Parks Conservation Association's (NPCA) Salute to the Parks event (Parks Event) to be held virtually at 7:30 p.m. on April 14, 2021, as the waived entry fee is neither excluded from the definition of a gift nor meets any relevant gift exception under the circumstances presented as discussed below. However, you may attend the Parks Event so long as you pay NPCA the per person cost of \$25.00 to attend. If you elect to attend this event, it is our understanding that you would do so in your personal capacity and therefore would be subject to the standard guidelines noted below.

For your awareness, the guidance set forth in this email also applies to the following Departmental employees included in NPCA's original invitation of March 3, 2021, sent by Pamela Kemper, Senior Coordinator for Government Affairs at NPCA:

- Robert Anderson, Principal Deputy Solicitor;
- Travis Annatoyn, Deputy Solicitor for Energy and Mineral Resources;
- Ann Marie Bledsoe Downes, Deputy Solicitor for Indian Affairs;
- Tyler Cherry, Press Secretary;
- Laura Daniel-Davis, Principal Deputy Assistant Secretary - Land & Minerals Management;
- Shannon Estenoz, Principal Deputy Assistant Secretary – Fish and Wildlife and Parks;
- Morgan Gray, Deputy Director of Congressional Affairs – Senate;
- Ruchi Jain, Deputy Solicitor for General Law;
- Kate Kelly, Deputy Chief of Staff – Policy;
- Marissa Knodel, Advisor, Bureau of Ocean Energy Management;
- Paniz Rezaeerood, Deputy Director, Congressional Affairs;
- Melissa Schwartz, Communications Director;
- Janea Scott, Counselor to the Secretary;
- Rachel Taylor, Principal Deputy Assistant Secretary – Policy, Management and Budget;
- Maggie Thompson, White House Liaison;
- Maria (Camille) Touton, Deputy Commissioner, Bureau of Reclamation Affairs;
- Tanya Trujillo, Principal Deputy Assistant Secretary – Water and Science;
- Jennifer Van der Heide Escobar, Chief of Staff;
- Andrew Wallace, Director of Congressional Affairs; and
- Martha Williams, Principal Deputy Director, Fish and Wildlife Service.

The guidance set forth in this email also applies to the following additional Departmental employees we understand were also invited to attend the Parks Event by separate invitation, however, we do not have details as to who extended their invitation:

- Eve Barnett, NPS;

- Maria Castro, Special Assistant, National Park Service;
- Alexx Diera, Special Assistant, BLM;
- Emmie Horadam, Special Assistant;
- Judy Fong, Special Assistant (FWP);
- Liz Klein, Senior Advisor to the Chief of Staff;
- Natalie Landreth, Senior Counselor to the Secretary;
- Amanda Lefton, Senior Advisor to the Secretary; BOEM Director;
- Felicia Salazar, Speechwriter;
- Alex Sanchez, Special Assistant, Office of Assistant Secretary - Land and Minerals; and
- Caroline Welles, Special Assistant, Fish and Wildlife Service.

*Please note that the guidance concerning the lobbyist gift ban applies only to Departmental employees that currently are political appointees subject to the Biden Administration's Ethics Pledge (Ethics Pledge).

Factual Background

NPCA is a 501(c)(3) nonprofit organization devoted exclusively to advocacy on behalf of the National Parks System. From the information provided to our office, we understand that NPCA hosts the Parks Event annually, intended to celebrate the national parks. Although traditionally held in person, the Parks Event will be held virtually for the first time this year, and will consist of a livestream program in which the President & CEO of NPCA, Theresa Pierno, will be a live speaker and all other appearances are prerecorded. The virtual Parks Event also includes a silent auction and a virtual photo booth. As confirmed by an NPCA representative, although past live events included a dinner and offered opportunities for attendees to exchange ideas and views, this year's virtual event is prerecorded and will not include any open chat room or similar other opportunities for attendees to do so.

NPCA is charging all attendees an entry fee of \$25.00, which includes a one-year membership to NPCA and a ticket to the Parks Event gala show and silent auction. NPCA, however, is waiving the entry fee (and not providing the one-year membership) for certain government employees, specifically, senior employees of the National Park Service (NPS) and the Department of the Interior (DOI).

-

Lobbyist Gift Ban

As an initial matter, as a political appointee, you are covered by the lobbyist gift ban in the Ethics Pledge stating that, for the duration of your appointment, you will not accept gifts from registered lobbyists or lobbyist organizations. Executive Order 13989, Sec. 1(1). Additionally, as reflected in the Office of Government Ethics (OGE) Legal Advisory DO-09-007 (Feb. 11, 2009), which applies to Executive Order 13989 pursuant to OGE Legal Advisory LA-21-05, only a limited number of the gift exceptions set forth in 5 C.F.R. § 2635.204 are available to you if the donor of the gift is a registered lobbyist or lobbying organization.

Per the Senate database, NPCA currently is identified as a registered lobbying organization. Further, NPCA also is a 501(c)(3) nonprofit organization. Accordingly, and consistent with the guidance set forth in OGE Legal Advisory DO-09-007, the lobbying gift ban will not apply to a gift from NPCA because of its status as a 501(c)(3) organization, **so long as** the gift otherwise may be accepted under

the gift regulations, **and** the NPCA employee who extended you and any other political appointee of the Department the offer is not a registered lobbyist him- or herself.

Per the House and Senate databases, Pamela Kemper, Senior Coordinator for Government Affairs at NPCA, who extended you and the first set of Departmental employees listed above an email invitation to the Parks Event on March 3, 2021, is not a registered lobbyist. We note that you also received an additional invitation to the Parks Event from Kristen Brengel, Senior Vice President of Government Affairs of NPCA, via email on March 17, 2021. Per the Senate database, Ms. Brengel currently is identified as a registered lobbyist, lobbying on behalf of NPCA. Nonetheless, the lobbyist gift ban does not apply to you (or any of the first set of Departmental employees listed above who may also have received a separate invitation from Ms. Brengel) in this case as one of the two NPCA employees who extended you the email invitation to the Parks Event of March 3, 2021 is not a registered lobbyist. Accordingly, all gift exceptions set forth in 5 C.F.R. § 2635.204 are available to you and the first set of Departmental employees listed above in this case.

To the extent any of the second set of Departmental employee listed above received an invitation to the Parks Event from Ms. Kemper, all gift exceptions set forth in 5 C.F.R. § 2635.204 are available to them in this case. However, if any of them received an invitation to the Parks Event from Ms. Brengel only, then only certain gift exceptions set forth in 5 C.F.R. § 2635.204 are available to them in this case, none of which permit the waived entry fee under the facts presented.

Relevant Gift Exclusions and Gift Exceptions

Pursuant to 5 C.F.R. § 2635.202(b), a federal employee may not accept a gift from a prohibited source or given because of their official position, as these terms are defined in 5 C.F.R. § 2635.203(d) and (e), respectively, unless the item is excluded from the definition of a gift or falls within a relevant gift exception. NPCA is a prohibited source and has offered you and other Department employees free attendance because of your official position with the Department. Based on the information available to the DEO, the waived entry fee in this instance is not excluded from the definition of a gift and does not meet any relevant gift exception.

First, NPCA is not offering free attendance to the public or all government employees, but is limiting this benefit to certain NPS and DOI employees. As such, the waived entry fee does not meet the gift exclusion at 5 C.F.R. § 2635.203(b)(4) (opportunities and benefits available to the public or all Government employees). Additionally, you are not assigned to present information on behalf of the Department at the Parks Event. In fact, there are no speakers at this event other than the President and CEO of NPCA as the remainder of the program is prerecorded. Therefore, the waived entry fee also does not meet the gift exclusion at 5 C.F.R. § 2635.203(b)(8), (g) (free attendance to an event offered by the sponsor to an employee assigned to present information on behalf of the agency at the event on any day when the employee is presenting). No other gift exclusion is relevant based on the facts presented.

As for relevant gift exceptions, the market value of the waived entry fee exceeds the threshold of the \$20 or less gift exception at 5 C.F.R. § 2635.204(a). Also, the waived entry fee cannot be accepted under the discounts and benefits gift exception at 5 C.F.R. § 2635.204(c) as this opportunity is not offered to members of a group or class in which membership is only related to professional

qualifications (e.g., discount for Government attorneys). Rather, the free attendance is offered to members of a group or class in which membership is related to Government employment (i.e., NPS or DOI employees), which is not permissible under this particular gift exception. *See also* DO-99-001. And finally, despite NPCA's statements, there is no "charitable event exception." Finally, the Parks Event does not meet the third prong of the "widely attended gathering" (WAG) gift exception at 5 C.F.R. § 2635.204(g) because unlike prior years, this year's Parks Event is virtual and will not allow any opportunity for virtual attendees to exchange ideas and views among themselves. For this reason, this year's event does not meet the WAG gift exception. No other gift exception is relevant based on the facts presented.

We recognize this event is held annually, and that the COVID pandemic has resulted in changes to the way this event is held this year by making it a virtual event. If you are ever invited to attend a Parks Event and offered free attendance on a future occasion, please be sure to request our review as it may be permissible for you to accept free attendance under a gift exclusion or gift exception depending on the facts and circumstances presented.

Guidance for Personal Capacity Attendance

In closing, we have concluded that there is not an applicable gift exclusion or gift exception that will enable you to accept free attendance to the Parks Event. If, however, you choose to attend the event, you may do so in your personal capacity so long as you pay the entry fee. In the event you decide to proceed with this course of action, we suggest that you make the payment by personal check or other documented method and retain a copy of relevant paperwork substantiating that the payment was made (e.g., a photo copy of the check, carbon copy of the check, copy of bank statement reflecting the deduction of \$25.00).

If you attend this event in your personal capacity, we remind you that you are subject to the following guidelines:

1. Official Title – Use of official title is not permitted as you will be participating in a personal capacity. 5 C.F.R. § 2635.702.

2. Endorsement – You may not use your official Government position or title, or any authority associated with your public office, to endorse any product, service, or enterprise, including non-profit and charitable organizations that may have some affiliation with DOI. 5 C.F.R. § 2635.702(c).

3. Nonpublic Information – You may not discuss at this event any nonpublic information you have gained by reason of your Federal position. 5 C.F.R. § 2635.703.

4. Fundraising – If you chose to attend in a personal capacity, please be advised that there is a silent auction component. When the President begins the program, her talking points will include directing the attendees to review the silent auction items and bid on them, and when she closes the program, she will remind attendees to participate in the silent auction. You are prohibited from the use your title, position or authority associated with your office to further the fundraising efforts of the NPCA. 5

C.F.R. § 2635.808(c)

Please do not hesitate to contact me if you have any questions or concerns. Thank you.

Regards,

Monica

From: Alonso, Shantha R <shantha_alonso@ios.doi.gov>
Sent: Wednesday, March 24, 2021 11:00 AM
To: Gottry, Heather C <heather.gottry@sol.doi.gov>; Schasberger, Paula I <paula.schasberger@sol.doi.gov>; Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: Fw: [EXTERNAL] Join NPCA for Our Salute to the Parks Event (Virtual) on April 14th

Hello,
Here is another virtual event coming up!
All the best,
Shantha Ready Alonso (*she/her*)
Director of the Office of Intergovernmental and External Affairs (OIEA)
Office of the Secretary, U.S. Department of the Interior

1849 C Street, NW Washington, DC 20240

shantha_alonso@ios.doi.gov
oiea@ios.doi.gov (OIEA email address for meeting requests)

NOTE: Every e-mail I send or receive is subject to release under the Freedom of Information Act.

From: Kristen Brengel <kbrengel@npca.org>
Sent: Wednesday, March 17, 2021 11:14 AM
To: Kristen Brengel <kbrengel@npca.org>
Subject: [EXTERNAL] Join NPCA for Our Salute to the Parks Event (Virtual) on April 14th

<p>This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.</p>
--

We hope you will join National Parks Conservation Association on **April 14, 2021 at 7:30 ET for our first ever virtual Salute to the Parks**. Be a part of this annual event alongside park lovers across the country from the comfort of your home. Tune in for a livestream program with our President & CEO, Theresa Pierno, honorees and many more to celebrate our national parks. Save the date is attached.

HONORING

QT LUONG, renowned photographer of America's national parks

FRAN ULMER, Senior Fellow, Harvard Belfer Center, Past Chair of the U.S. Arctic Research Commission and former Lt. Governor of Alaska

Tickets are available online now at npca.org/sttp. The \$25 entry fee will be waived by using the code **GovNPCA** for one free entry. If you have more than one person attending from the office, please fill out the forms separately. **Please let us know if you plan to attend, so we can acknowledge your participation.**

This is a widely attended event and is acceptable under the charitable event exception. The fair market value for a \$25 ticket is \$6.

If you have any questions, please reach out to Pam Kemper, pkemper@npca.org or Rachel Holmes, Director of Special Events at rholmes@npca.org or 202-853-4472.

We hope to see you there!



Kristen Brengel

Senior Vice President of Government Affairs | National Parks Conservation Association

P: 202-320-2913 | kbrengel@npca.org | npca.org

Your parks. Your turn.



100 YEARS

Kristen Brengel

Senior Vice President of Government Affairs | National Parks Conservation Association

P: 202-320-2913 | kbrengel@npca.org | npca.org

Your parks. Your turn.