



United States Department of Agriculture

United States
Department of
Agriculture

Office of the Chief
Information Officer

1400 Independence
Avenue SW
Washington, DC
20250

September 16, 2019

Delivered via Electronic Mail

Dan McGrath
American Oversight
1030 15th St. NW, Suite B255
Washington, DC 20005
foia@americanoversight.org

**RE: Freedom of Information Act (FOIA) Request 2019-DA-02245-F
Final Response**

Dear Mr. McGrath:

This is the Departmental FOIA Office's (DFO) final response to the above-referenced FOIA request seeking the following:

All records reflecting communications (including email messages, email attachments, calendar invitations, memoranda or background material for meetings, or handwritten or typed notes taken during meetings) between any political appointees at your agency and any employee or representative of Ballard Partners, including, but not limited to, any of the following individuals:

- a) Any individual using an email address ending in ballardfl.com,
- b) Brian Ballard,
- c) Sylvester Lukis,
- d) Susan "Susie" Wiles,
- e) Dan McFaul,
- f) Rebecca Benn,
- g) Justin Sayfie,
- h) James "Jamie" Rubin,
- i) Otto Reich,
- j) Raj Shah,
- k) Pam Bondi,
- l) Robert Wexler,
- m) Jose Felix Diaz,
- n) Katherine San Pedro,
- o) Karl Bowers,
- p) Sara Pennington,
- q) Hannah Walters, or
- r) Sara Nuvy

Please provide all responsive records from January 20, 2017, through the date the search is conducted.

Your request has been processed under the FOIA, 5 U.S.C. § 552.

A search for responsive records was conducted by the Office of the Chief Information Officer's (OCIO) telecommunications provider, the Client Experience Center (CEC). The CEC provides comprehensive, fee-for-service information technology (IT) associated operations, security, and technical support services to USDA end users. The CEC also implements and manages enterprise IT solutions for users Department-wide. The CEC located ninety-seven (97) pages of responsive records.

Following a review of the responsive records, the DFO has determined that certain information contained therein should be withheld pursuant to 5 U.S.C. §552(b)(3), (4), (5), and (6) (FOIA Exemptions 3, 4, 5, and 6). Below is an explanation of the information that has been withheld.

FOIA Exemption 3

FOIA Exemption 3 provides for the withholding of information prohibited from disclosure by another federal statute provided that one of two disjunctive requirements are met: the statute either "(A) requires that the matters be withheld from the public in such a matter as to leave no discretion on the issue; *or* (B) establishes particular criteria for withholding or refers to particular types of matter to be withheld." 5 U.S.C. §(b)(3)(2006) (emphasis added), amended by the OPEN Government Act of 2007, Pub. L.No. 110-175, 121 Stat. 2524.

The information herein withheld is protected by Section 1619 of the 2008 Farm Bill, codified as 7 U.S.C. §8791(b)(2)A), which "prohibits the release of information provided by an agricultural producer or owner of agricultural land concerning the agricultural operation, farming or conservation practices, or the land itself, in order to participate in programs of the Department, and geospatial information otherwise maintained by the Secretary about agricultural land or operations for which the previously described information is provided."

In this instance, the DFO is withholding, under Exemption 3, descriptions of the types of animal feed purchased by farmers and certain farming practices used.

FOIA Exemption 4

FOIA Exemption 4 protects "trade secrets and commercial or financial information obtained from a person [that is] privileged or confidential. 5 U.S.C. §552(b)(4) (2006), *amended by* the OPEN Government Act of 2007, Pub. L. No. 100-175, 121 Stat. 2524.

This exemption is intended to protect the interests of both the government and submitters of information. See, e.g., *Nat'l Parks & Conservation Ass'n v. Morton*, 498 F. 2d 765, 767-70 (D.C. Cir. 1974) (concluding that the legislative history of the FOIA “firmly supports an inference that Exemption (b)(4) is intended for the benefit of persons who supply information as well as the agencies which collect it”).

The information withheld under Exemption 4 consists of the names of certain farms and employees associated with those farms. Release of this information, in correlation with the financial data and other information that is being released in satisfaction of this FOIA request, may reveal protected commercial or financial information of these farms. Thus, this information is properly withheld under Exemption 4.

FOIA Exemption 5

FOIA Exemption 5 protects from disclosure those “inter-agency or intra-agency memorandums or letters which would not be available by law to a party other than an agency in litigation with the agency.” FOIA Exemption 5 protects from disclosure privileged information under the deliberative process privilege.

To fall within FOIA’s deliberative process privilege, the records must be both pre-decisional and deliberative; the records must precede the adoption of an agency policy and include the opinions, recommendations, or deliberations on a legal or policy matter. In this instance, the DFO is withholding, under the deliberative process privilege, pre-decisional discussions contained in email communications between USDA employees.

FOIA Exemption 6

Exemption 6 generally is referred to as the “personal privacy” exemption. It provides that the disclosure requirements of FOIA do not apply to “personnel and medical files and similar files the disclosure of which would constitute a clearly unwarranted invasion of personal privacy.” Application of the exemption involves balancing the public’s interest in disclosure against individuals’ privacy interests.

The information withheld under Exemption 6 consists of cellular phone numbers, direct office numbers, email addresses not available to the public, conference call access codes, information about personal leave, and information contained in company invoices. This information qualifies as “similar files” because it is information in which individuals have a privacy interest. Moreover, releasing the cell phone numbers, direct office lines, and email addresses could subject the individuals to unwarranted or unsolicited communications. As for the conference call access codes, participants have a privacy interest in ensuring no uninvited individual is listening in on the call. With regard to the other items, all are purely personal in nature and do not advance one’s understanding of the government’s operations. Because there is a viable privacy interest that would be threatened by disclosure, Exemption 6 authorizes this office to withhold the information.

Accordingly, we have determined that the public interest in the information's release does not outweigh the overriding privacy interests in keeping it confidential.

Please note that the responsive records include information that originated with or pertains to USDA's Risk Management Agency (RMA). The DFO consulted RMA regarding its equities. The withheld information is redacted with overlay text indicating the agency to which it pertains, and the exemptions asserted.

You may appeal this response by email at USDAFOIA@ocio.usda.gov, or by mail to the Assistant Secretary for Administration at 1400 Independence Avenue, S.W., Whitten Building, Room 209-A, Washington, D.C. 20250-0103. Your appeal must be in writing, and it must be received no later than 90 calendar days from the date of this letter. The DFO will not consider appeals received after the 90 calendar-day limit. Appeals received after 5:00 p.m. EST will be considered received the next business day. The appeal letter should include the FOIA tracking number listed above, a copy of the original request, the DFO's response to your original request, and a statement explaining the basis of your appeal. For quickest possible handling, the subject line of your email, the appeal letter, and its envelope, if applicable, should be marked "Freedom of Information Act Appeal."

You may appeal any withholdings applied by another agency directly to that agency, within 90 calendar days from receipt of this letter, to the contact information below.

For RMA: FOIA Officer
1400 Independence Ave., SW
Room 6603-S
Washington, DC 20250
Tel. 202-690-3041
Fax 202-720-1162
Email: FOIA@rma.usda.gov

You may seek dispute resolution services from the DFO's FOIA Public Liaison, Ms. Ravoyne Payton at USDAFOIA@ocio.usda.gov.

Additionally, you may contact the Office of Government Information Services (OGIS) at the National Archives and Records Administration to inquire about its FOIA mediation services. The contact information for OGIS is as follows: Office of Government Information Services, National Archives and Records Administration, Room 2510, 8601 Adelphi Road, College Park, Maryland 20740-6001; email at ogis@nara.gov; telephone at 202-741-5770; toll-free at 1-877-684-6448; or facsimile at 202-741-5769.

If you have any questions regarding this letter, please contact 202-694-5982 or USDAFOIA@ocio.usda.gov.

Sincerely,

Alexis R. Graves
Departmental FOIA Officer
Office of the Chief Information Officer

Enclosure: Responsive Records (97 pages)

From: [Bachmann, Peter - OCR, Washington, DC](#)
To: [Flournoy, Richard - RMA](#)
Subject: Call on PRF Changes with Ballard Partners (Brian Ballard, Susie Wiles, Dan McFaul)

From: [Bachmann, Peter - OCR, Washington, DC](#)
To: [Susie Wiles](#)
Subject: RE: 9 a.m. on Monday
Date: Monday, July 30, 2018 8:28:27 AM

Thanks, Susie. Apologies for not getting back in touch sooner than Sunday on this. I am fine with in-person, however, while I'm the policy expert in the Secretary's Office, I cannot dig very deep on this specific issue. Our folks are aware of concerns out there (we've heard from at least one other firm in town) and nothing is moving so fast that we cannot take some comments. The reason I've asked for phone is that we've got most of our experts on this at our Kansas City RMA Office and I'd like for them to be able to participate on equal footing, if some of us are in the room and some on the phone, it makes things a bit more difficult.

Hope that makes sense!

Call in: 1-888-844-9904; Passcode: (b) (6)

Peter

From: Susie Wiles (b) (6) @ballardfl.com>
Sent: Monday, July 30, 2018 6:35 AM
To: Bachmann, Peter - OCR, Washington, DC <Peter.Bachmann@osec.usda.gov>
Subject: Re: 9 a.m. on Monday

Okay. Our Friday emails said pick a time, so I did. I think they'd really like to discuss in person but if you prefer a call, of course we can do that.

Let me know — and we will make 11 work. If we'd doing a call, what's the best#?

Thanks so much,

Susie Wiles

Sent from my iPhone
Please excuse typos

On Jul 29, 2018, at 10:27 PM, Bachmann, Peter - OCR, Washington, DC
<Peter.Bachmann@osec.usda.gov> wrote:

Susie,

9 am tomorrow is not good for me, can we try to get on the phone later in the morning? 11 works great. No need for an in-person for this check-in, I'd like to include my colleagues in Kansas City with RMA.

Peter

On Jul 29, 2018, at 8:59 PM, Susie Wiles (b) (6)@ballardfl.com> wrote:

Peter,

Taking the liberty of arriving to see you at 9 tomorrow a.m. The meeting will be with my partners, Brian Ballard and Dan McFaul. It turns out I'm not in DC until Wednesday because I'm a Floridian and participating with the President in Tampa on Tuesday. I can be reached at (b) (6) and you can reach Dan at (b) (6).

They'll see you at 9. Please let Dan or me know where, exactly, to go when we get to the building entrance.

Many thanks,
Susie

Susan Summerall Wiles
Partner, Ballard Partners
601 13th Street, NW
Washington, DC 20005
(202)800-5620

From: "Bachmann, Peter - OCR, Washington, DC"

<Peter.Bachmann@osec.usda.gov>

Date: Friday, July 27, 2018 at 5:46 PM

To: Susie Wiles (b) (6)@ballardfl.com>

Subject: RE: PRF insurance

Hi Susie,

Just getting finished digging out of emails from this week. I'm pretty flexible on Monday morning before 12:30, what's a good time for you?

Peter

From: Susie Wiles (b) (6)@ballardfl.com>

Sent: Friday, July 27, 2018 6:47 AM

To: Starling, Raymond - OSEC, Washington, DC

<Raymond.Starling@osec.usda.gov>

Cc: Bachmann, Peter - OCR, Washington, DC

<Peter.Bachmann@osec.usda.gov>

Subject: Re: PRF insurance

Thank you so much - really appreciate the connect. Peter, might you have 20 minutes, or so, any time on Monday to meet with Brian Ballard? I won't be in DC but he knows the issue and can quickly walk you through the concern. Hoping this can work.

Much appreciated,
Susie Wiles

Susie Wiles
Sent from my iPhone so please excuse typos

From: Starling, Raymond - OSEC, Washington, DC
<Raymond.Starling@osec.usda.gov>
Sent: Thursday, July 26, 2018 10:31:08 PM
To: Susie Wiles
Cc: Bachmann, Peter - OCR, Washington, DC
Subject: RE: PRF insurance

Susie,

Please meet Peter Bachmann, with whom I hope you can connect early next week. Please be assured that I would not meet with you on any crop insurance related issue without Peter in the room.

Cordially,
-Ray

From: Susie Wiles [[mailto:\(b\) \(6\)@ballardfl.com](mailto:(b) (6)@ballardfl.com)]
Sent: Thursday, July 26, 2018 10:23 PM
To: Starling, Raymond - OSEC, Washington, DC
<Raymond.Starling@osec.usda.gov>
Subject: Re: PRF insurance

That would be most helpful, I think., and hopefully on Monday. Or if you have a deputy - or both. You certainly know best. We will be there when you say to meet with whomever you say.

Thanks,
Susie Wiles

Sent from my iPhone
Please excuse typos

On Jul 26, 2018, at 10:11 PM, Starling, Raymond - OSEC, Washington,

DC <Raymond.Starling@osec.usda.gov> wrote:

Hi Susie,

**I'm out of the office tomorrow through August 6th.
Would it be helpful to schedule time with the Senior
Advisor to the Secretary for crop insurance issues?**

**Thanks,
-Ray**

From: Susie Wiles [[mailto:\(b\) \(6\)@ballardfl.com](mailto:(b) (6)@ballardfl.com)]
Sent: Thursday, July 26, 2018 5:46 PM
To: Starling, Raymond - OSEC, Washington, DC
<Raymond.Starling@osec.usda.gov>
Subject: PRF insurance

Ray,
I understand you are out of the office –I hope you getting a nice break from the business of DC.

In your absence, would it be possible to schedule a meeting with my partners Brian Ballard and Dan McFaul – hopefully on Monday or Tuesday of next week regarding the matter of PRF Insurance and the Risk Management Agency at Department of Agriculture?

We will make ourselves available whenever the person you designate might be able to see us for 30 minutes, or so.

I can be reached at (b) (6) or at this email address.

Thanking you in advance,
Susie Wiles

Susan Summerall Wiles
Partner, Ballard Partners
601 13th Street, NW
Washington, DC 20005
(202)800-5620

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From: [Lyons, Maggie - OSEC, Washington, DC](#)
To: [Clovis, Sam - OSEC, Washington, DC](#)
Subject: RE: Thank you
Date: Monday, September 18, 2017 5:41:59 PM
Attachments: [image002.png](#)
[image003.png](#)

Thanks Dr. Clovis. (b)(5) pre-decisional deliberative
[REDACTED]

Maggie

From: Clovis, Sam - OSEC, Washington, DC
Sent: Monday, September 18, 2017 5:39 PM
To: Lyons, Maggie - OSEC, Washington, DC <Maggie.Lyons@osec.usda.gov>
Subject: FW: Thank you

Maggie,

(b)(5) pre-decisional deliberative
[REDACTED]

Thanks.

Sam



Samuel H. Clovis, Jr., MBA, DPA

Senior White House Advisor - Office of the Secretary

United States Department of Agriculture

Office: (b) (6)

Cell: (b) (6)

From: Rebecca Benn

[mailto:(b) (6)@ballardfl.com]

Sent: Monday, September 18, 2017 4:33 PM
To: Clovis, Sam - OSEC, Washington, DC <Sam.Clovis@osec.usda.gov>
Subject: FW: Thank you

Dr. Clovis – Thank you again for taking the time to talk about the disaster supplemental nutrition assistance program (D-SNAP) this afternoon. As I mentioned, I represent the City of Jacksonville, FL and the City of Jacksonville is interested in utilizing D-SNAP to help its residents recover after Hurricane Irma. I appreciate any advice or help you can offer.

Best,
Rebecca

Rebecca Benn

BALLARD | PARTNERS

Ballard Partners
601 Thirteenth St, NW, Suite #200 N
Washington, DC 20005
P: 202.800.5620
F: 202.800.5623
(b) (6) @ballardfl.com

From: [Dan McFaul](#)
To: [Bachmann, Peter - OCR, Washington, DC](#)
Subject: Re: Feed info
Date: Monday, August 27, 2018 7:02:21 PM

No need for a call. Thank you

Sent from my iPhone

On Aug 27, 2018, at 6:23 PM, Bachmann, Peter - OCR, Washington, DC
<Peter.Bachmann@osec.usda.gov> wrote:

Dan,

I can talk briefly this evening but wanted to send this over, first. And see attached!

Key Points:

- RMA is not adjusting the productivity factor or eliminating any intervals for 2019.
- However, grazing county base values will be reduced in areas of Arizona. These values are based on the NASS rental rate, grazing fee, and hay price data adjusted using the NRCS productivity model. Reductions will also occur in the surrounding states as well as throughout the country.
- These values are updated yearly and are part of normal maintenance of the policy.

10:30 AM ET

Call-in: 1 (888) 844-9904; (b) (6)

Peter

From: Dan McFaul [\(b\) \(6\)@ballardfl.com](mailto:(b) (6)@ballardfl.com)>
Sent: Monday, August 27, 2018 10:18 AM
To: Bachmann, Peter - OCR, Washington, DC <Peter.Bachmann@osec.usda.gov>
Subject: Re: Feed info

Peter

Do you have a few moments for a quick call today? Just trying to get some color on tomorrow's conf call. I don't want to have my ranchers walk into a buzzsaw without some preparation.

Thanks

Dan

On Aug 24, 2018, at 7:49 PM, Bachmann, Peter - OCR, Washington, DC
<Peter.Bachmann@osec.usda.gov> wrote:

Perfect. Please hold it and we'll get y'all a call-in number on Monday.

From: Dan McFaul (b) (6) <[\[REDACTED\]@ballardfl.com](mailto:[REDACTED]@ballardfl.com)>
Sent: Friday, August 24, 2018 11:59 AM
To: Bachmann, Peter - OCR, Washington, DC
<Peter.Bachmann@osec.usda.gov>
Subject: Re: Feed info

Yes. I think we can make that work.

Sent from my iPhone

On Aug 24, 2018, at 11:49 AM, Bachmann, Peter - OCR, Washington, DC
<Peter.Bachmann@osec.usda.gov> wrote:

Dan,

Does 10:30 work for a call on Tuesday? I don't have any additional information to share but our Kansas City staff will provide you and whoever you invite on, an update.

From: Dan McFaul (b) (6) <[\[REDACTED\]@ballardfl.com](mailto:[REDACTED]@ballardfl.com)>
Sent: Friday, August 24, 2018 10:55 AM
To: Bachmann, Peter - OCR, Washington, DC
<Peter.Bachmann@osec.usda.gov>
Subject: Feed info

Peter,

Two more data points for you. (b)(3) in conjunction with 7 USC 8791 (b)(2)(A), (b)(4), and (b)(6)

[REDACTED].

Thanks

Dan

From: (b)(3) in conjunction with 7 USC 8791 (b)(2)(A), (b)(4), and (b)(6)

(b)(3) in conjunction with 7 USC 8791 (b)(2)(A), (b)(4), and (b)(6)

[REDACTED]

(b)(3) in conjunction with 7 USC 8791 (b)(2)(A), (b)(4), and (b)(6)

<image001.jpg>

(b)(3) in conjunction with 7 USC 8791 (b)(2)(A), (b)(4), and (b)(6)

Have a great day - may it be filled with rain!

(b)(3) in conjunction with

Sent from my iPhone

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<PRF 2019 Summary_AZ (002).docx>

From: [Bachmann, Peter - OCR, Washington, DC](#)
To: [Flournoy, Richard - RMA](#); [Tolle, Francie - RMA](#); [Ibarra, Robert - RMA](#); [Aulbur, Chris - RMA](#)
Subject: Fwd: Drought Data -- (b)(3) in conjunction with 7 USC 8792
Date: Monday, August 13, 2018 2:52:57 PM
Attachments: [image001.png](#)
[ATT00001.htm](#)
[Scan180813132034-0001.pdf](#)
[ATT00002.htm](#)

Here is more PRF data for consideration.

Begin forwarded message:

From: Dan McFaul (b) (6) <dan.mcfaul@ballardfl.com>
Date: August 13, 2018 at 2:44:16 PM EDT
To: "peter.bachmann@osec.usda.gov" <peter.bachmann@osec.usda.gov>
Subject: Drought Data -- (b)(3) in conjunction with 7 USC 8792 (b)(2)(A), (b)(4), and (b)(6)

Peter,

Thank you again for accepting this data related to RMA's potential changes to PRF insurance.

Please see the attached data from the (b)(3) in conjunction with 7 USC 8792 (b)(2)(A), (b)(4), and (b)(6). This shows their feed costs, which are significantly different from the county estimates. Clearly the PRF insurance has been working. We have more of these examples and data on the way.

Please let me know what else we can provide to help on this issue.

Thank you.

Dan

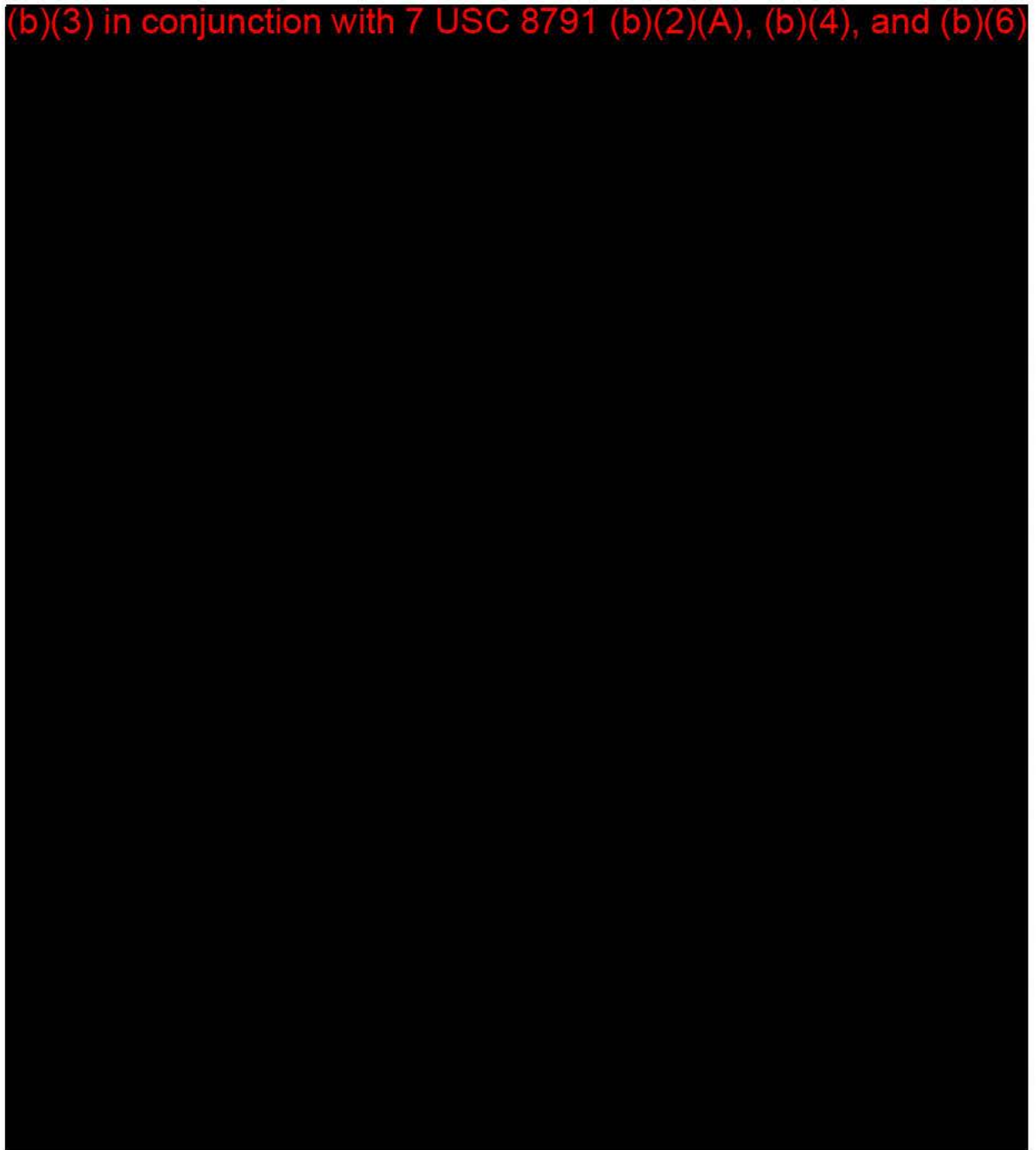
Dan McFaul

(b)(3) in conjunction with 7 USC 8791 (b)(2)(A), (b)(4), and (b)(6)

A small rectangular area of the document is completely redacted with a solid black box.

August 10, 2018

(b)(3) in conjunction with 7 USC 8791 (b)(2)(A), (b)(4), and (b)(6)

A large rectangular area of the document is completely redacted with a solid black box, covering the majority of the page content.

INVOICE

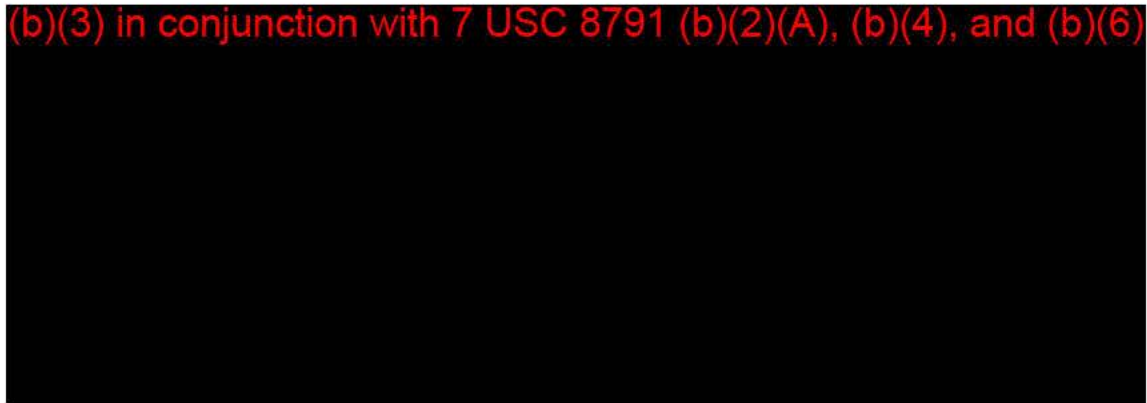
(b)(3) in conjunction with 7 USC 8791 (b)(2)(A), (b)(4), and (b)(6)



(b)(3) in conjunction with 7 USC 8791 (b)(2)(A), (b)(4), and (b)(6)



(b)(3) in conjunction with 7 USC 8791 (b)(2)(A), (b)(4), and (b)(6)



(b)(3) in conjunction with 7 USC 8791 (b)(2)(A), (b)(4), and (b)(6)



THANK YOU FOR YOUR BUSINESS!

INVOICE

(b)(3) in conjunction with 7 USC 8791 (b)(2)(A), (b)(4), and (b)(6)

(b)(3) in conjunction with 7 USC 8791 (b)(2)(A), (b)(4), and (b)(6)

(b)(3) in conjunction with 7 USC 8791 (b)(2)(A), (b)(4), and (b)(6)

(b)(3) in conjunction with 7 USC 8791 (b)(2)(A), (b)(4), and (b)(6)

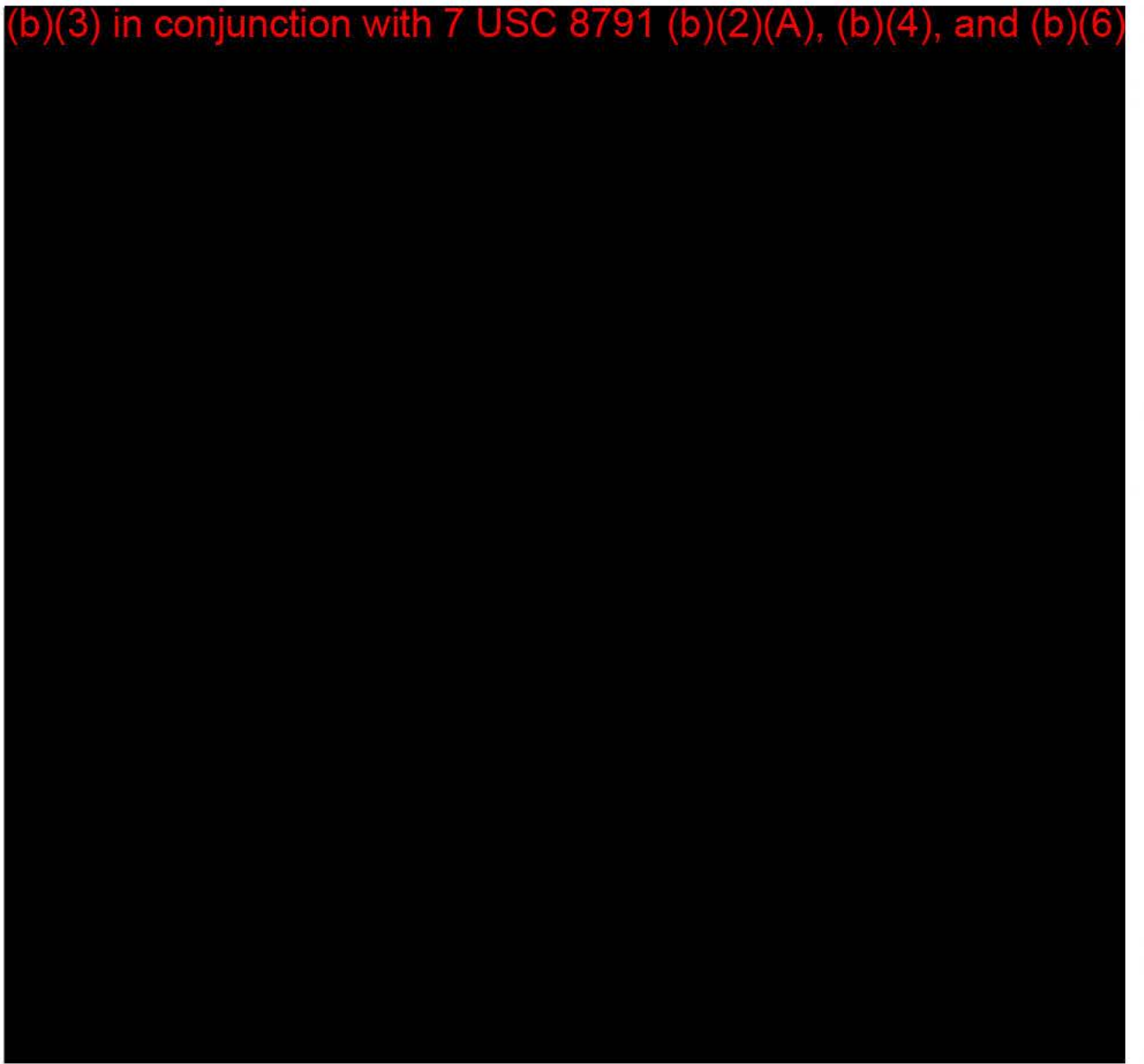
TOTAL

(b)(3) in conjunction with 7 USC 8791 (b)(2)(A), (b)(4), and (b)(6)

THANK YOU FOR YOUR BUSINESS!

(b)(3) in conjunction with 7 USC 8791 (b)(2)(A), (b)(4), and (b)(6)

(b)(3) in conjunction with 7 USC 8791 (b)(2)(A), (b)(4), and (b)(6)



(b)(3) in conjunction with 7 USC 8791 (b)(2)(A), (b)(4), and (b)(6)



(b)(3) in conjunction with 7 USC 8791 (b)(2)(A), (b)(4), and (b)(6)

From: [Bachmann, Peter - OCR, Washington, DC](#)
To: [Dan McFaul](#)
Subject: Re: Drought Data -- (b)(3) in conjunction with 7 USC 8791
Date: Monday, August 13, 2018 2:52:58 PM
Attachments: [image001.png](#)

Thanks, Dan. Passing this along as well!

Peter

On Aug 13, 2018, at 2:44 PM, Dan McFaul (b) (6) <[@ballardfl.com](mailto:(b)(6)@ballardfl.com)> wrote:

Peter,

Thank you again for accepting this data related to RMA's potential changes to PRF insurance.

Please see the attached data from the (b)(3) in conjunction with 7 USC 8791 (b)(2)(A), (b)(4), and (b)(6). This shows their feed costs, which are significantly different from the county estimates. Clearly the PRF insurance has been working. We have more of these examples and data on the way.

Please let me know what else we can provide to help on this issue.

Thank you.

Dan

Dan McFaul

<[image001.png](#)>

Ballard Partners
601 Thirteenth St, NW, Suite #200 N
Washington, DC 20005

P: 202.800.5620

F: 202.800.5623

(b) (6) <[@ballardfl.com](mailto:(b)(6)@ballardfl.com)>

<Scan180813132034-0001.pdf>

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From: [Bachmann, Peter - OCR, Washington, DC](#)
To: [Flournoy, Richard - RMA](#); [Tolle, Francie - RMA](#); [Aulbur, Chris - RMA](#)
Subject: FW: PRF insurance -- ranchers and cattlegrowers issue
Date: Wednesday, August 8, 2018 2:07:08 PM
Attachments: [image001.png](#)
[drought losses data.docx](#)
[Data \[REDACTED\] \(002\).docx](#)

Team RMA –

Please see the attached PRF data requested on our call last Monday. Any additional feedback we should provide to these folks?

From: Dan McFaul [\(b\) \(6\)@ballardfl.com](#)>
Sent: Wednesday, August 8, 2018 9:51 AM
To: Bachmann, Peter - OCR, Washington, DC <Peter.Bachmann@osec.usda.gov>
Cc: Young, Joby - OSEC, Washington, DC <Joby.Young@osec.usda.gov>
Subject: PRF insurance -- ranchers and cattlegrowers issue

Peter,

Thank you for taking the time and participating in a call last week to discuss PRF insurance and the RMA's potential changes.

Please see the attached data from the [\(b\)\(3\) in conjunction with 7 USC 8791 \(b\)\(2\)\(A\), \(b\)\(4\), and \(b\)\(6\)](#)
[REDACTED] This shows their feed costs, which are off from the county estimates. Clearly the PRF insurance has been working. We have more of these examples and data on the way.

Please let me know what else we can provide to help on this issue.

Thank you.

Dan

Dan McFaul

BALLARD | PARTNERS

Ballard Partners
601 Thirteenth St, NW, Suite #200 N
Washington, DC 20005
P: 202.800.5620
F: 202.800.5623
[\(b\) \(6\)@ballardfl.com](#)

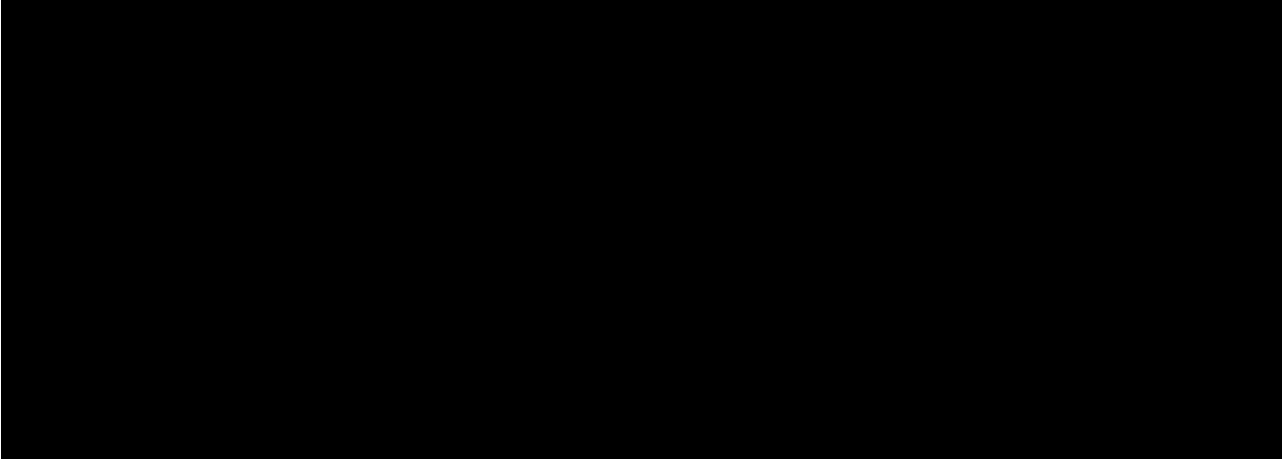
Sent: Saturday, August 4, 2018 3:37 PM

To: Dan McFaul (b) (6) @ballardfl.com>

Subject: FW: Drought Response Letter (b)(3) in conjunction with 7 USC 8791 (b)(2)(A), (b)(4), and (b)(6)

Dan,

(b)(3) in conjunction with 7 USC 8791 (b)(2)(A), (b)(4), and (b)(6)



August 2, 2018

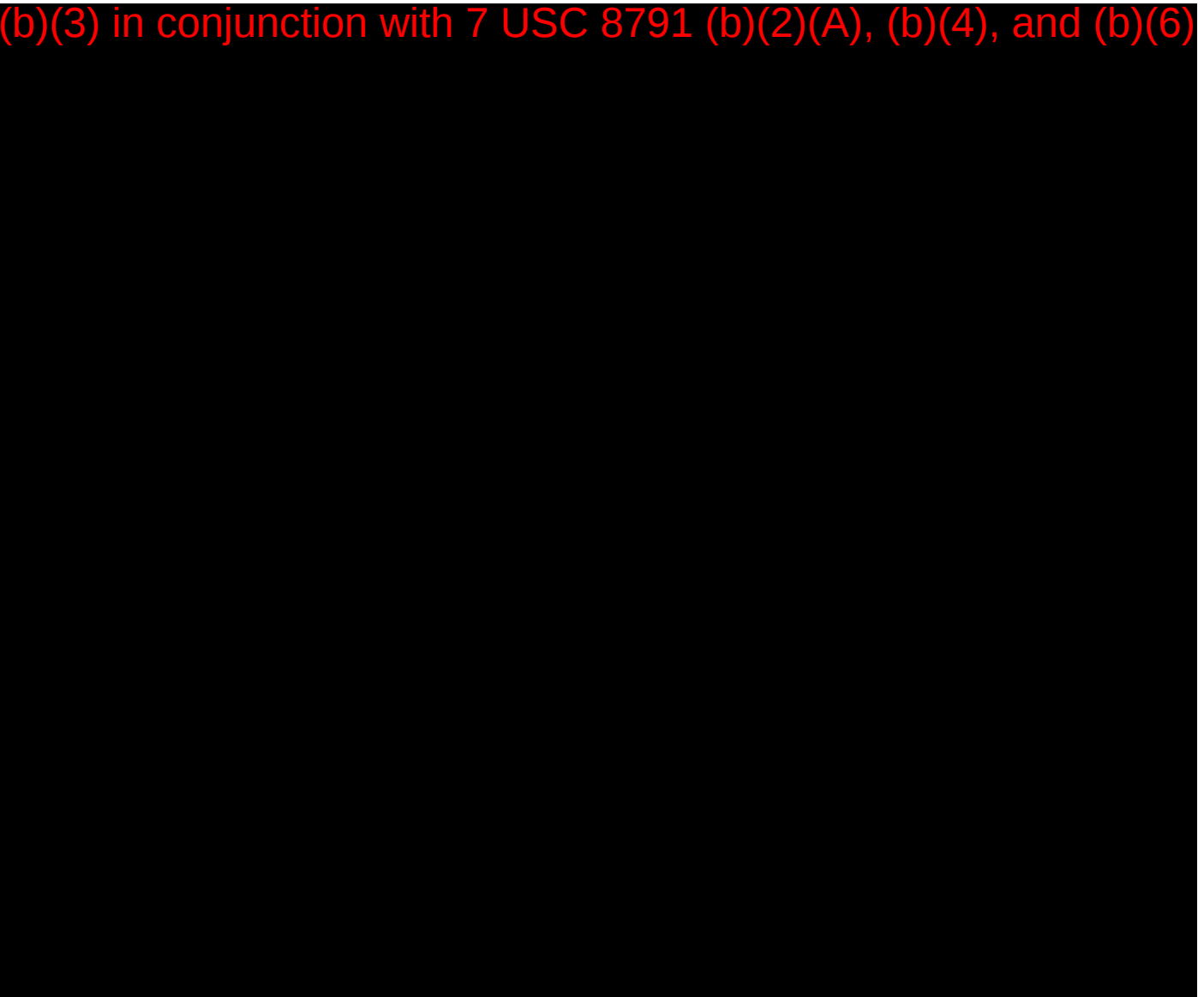
From: (b)(3) in conjunction with 7 USC 8791 (b)(2)(A), (b)(4), and (b)(6)

(b)(3) in conjunction with 7 USC 8791 (b)(2)(A), (b)(4), and (b)(6)

July 31, 2018

From: (b)(3) in conjunction with 7 USC 8791 (b)(3)

(b)(3) in conjunction with 7 USC 8791 (b)(2)(A), (b)(4), and (b)(6)



From: [Tolle, Francie - RMA](#)
To: [Bachmann, Peter - OCR, Washington, DC](#)
Subject: Accepted: FW: Call on PRF Changes with Ballard Partners (Brian Ballard, Susie Wiles, Dan McFaul)

From: [Microsoft Outlook](#) on behalf of [Flourney, Richard - RMA](#)
To: [Bachmann, Peter - OCR, Washington, DC](#)
Subject: Meeting Forward Notification: Call on PRF Changes with Ballard Partners (Brian Ballard, Susie Wiles, Dan McFaul)
Date: Monday, July 30, 2018 9:00:53 AM

Your meeting was forwarded

[Flourney, Richard - RMA](#) has forwarded your meeting request to additional recipients.

Meeting

Call on PRF Changes with Ballard Partners (Brian Ballard, Susie Wiles, Dan McFaul)

Meeting Time

Monday, July 30, 2018 11:00 AM-12:00 PM.

Recipients

[Aulbur, Chris - RMA](#)

[Tolle, Francie - RMA](#)

All times listed are in the following time zone: (UTC-05:00) Eastern Time (US & Canada)

Sent by Microsoft Exchange Server

From: [Flournoy, Richard - RMA](#)
To: [Bachmann, Peter - OCR, Washington, DC](#)
Cc: [Dan McFaul](#)
Subject: Re: Feed info
Date: Friday, August 31, 2018 7:43:22 AM

Dan - **RMA: (b)(6)** I should be available later this afternoon.

On Aug 30, 2018, at 3:20 PM, Bachmann, Peter - OCR, Washington, DC
<Peter.Bachmann@osec.usda.gov> wrote:

Hi Dan,

I will be traveling until midnight tonight and have a pretty full schedule of meetings tomorrow before the long weekend. I'm copying Richard Flournoy out of our Kansas City RMA office who essentially runs all of our programs and oversees product development. He should be able to take your call, answer questions, and get your feedback to his team more efficiently than I can.

If you want to provide him some of your availability blocks in ET, that would be helpful.

Thanks!

Peter

On Aug 30, 2018, at 1:48 PM, Dan McFaul **(b) (6)** <dan@ballardfl.com> wrote:

Peter,

Wondering if you had a couple of minutes to talk to Brian and me tomorrow reference the below?

The ranchers received the reduced grazing county base values, and in most of Arizona/New Mexico it is a 41-42% cut to the amount of PRF insurance these ranchers can buy. The impacts for the rancher are quite devastating.

Hoping you have a few brief moments tomorrow for some feedback.

Thank you

Dan

From: Bachmann, Peter - OCR, Washington, DC
<Peter.Bachmann@osec.usda.gov>
Sent: Monday, August 27, 2018 6:23 PM

To: Dan McFaul (b) (6) @ballardfl.com>

Subject: RE: Feed info

Dan,

I can talk briefly this evening but wanted to send this over, first. And see attached!

Key Points:

- RMA is not adjusting the productivity factor or eliminating any intervals for 2019.
- However, grazing county base values will be reduced in areas of Arizona. These values are based on the NASS rental rate, grazing fee, and hay price data adjusted using the NRCS productivity model. Reductions will also occur in the surrounding states as well as throughout the country.
- These values are updated yearly and are part of normal maintenance of the policy.

10:30 AM ET

Call-in: 1 (888) 844-9904; (b) (6)

Peter

From: Dan McFaul (b) (6) @ballardfl.com>

Sent: Monday, August 27, 2018 10:18 AM

To: Bachmann, Peter - OCR, Washington, DC

<Peter.Bachmann@osec.usda.gov>

Subject: Re: Feed info

Peter

Do you have a few moments for a quick call today? Just trying to get some color on tomorrow's conf call. I don't want to have my ranchers walk into a buzzsaw without some preparation.

Thanks

Dan

On Aug 24, 2018, at 7:49 PM, Bachmann, Peter - OCR, Washington, DC
<Peter.Bachmann@osec.usda.gov> wrote:

Perfect. Please hold it and we'll get y'all a call-in number on

Monday.

From: Dan McFaul (b) (6) @ballardfl.com>
Sent: Friday, August 24, 2018 11:59 AM
To: Bachmann, Peter - OCR, Washington, DC
<Peter.Bachmann@osec.usda.gov>
Subject: Re: Feed info

Yes. I think we can make that work.

Sent from my iPhone

On Aug 24, 2018, at 11:49 AM, Bachmann, Peter - OCR, Washington, DC <Peter.Bachmann@osec.usda.gov> wrote:

Dan,

Does 10:30 work for a call on Tuesday? I don't have any additional information to share but our Kansas City staff will provide you and whoever you invite on, an update.

From: Dan McFaul (b) (6) @ballardfl.com>
Sent: Friday, August 24, 2018 10:55 AM
To: Bachmann, Peter - OCR, Washington, DC
<Peter.Bachmann@osec.usda.gov>
Subject: Feed info

Peter,

Two more data points for you. (b)(3) in conjunction with 7 USC 8791 (b)(2)(A), (b)(4)

[REDACTED]

Thanks

Dan

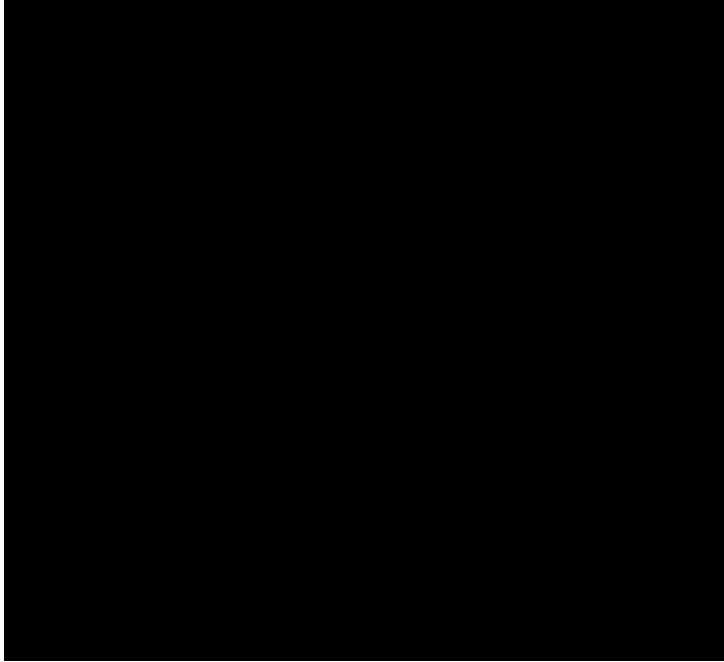
From: (b)(3) in conjunction with 7 USC 8791 (b)(2)(A), (b)(4)

[REDACTED]

(b)(3) in conjunction with 7 USC 8791 (b)(2)(A), (b)(4), and (b)(6)

[REDACTED]

(b)(3) in conjunction with 7 USC 8791 (b)(2)(A), (b)(4), and (b)(6)



Sent from my iPhone

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From: [Bachmann, Peter - OCR, Washington, DC](#)
To: [Hannah Walters](#)
Cc: [Gordon, Julie - OSEC](#)
Subject: RE: Meeting Request with Mr. Starling
Date: Wednesday, October 10, 2018 2:53:23 PM
Attachments: [image003.png](#)

Hi Hannah,

I'm happy to work on setting something up here at the Department. I'm available as early as tomorrow/Friday or I'm pretty flexible next week. I'll be sure to bring along some of the political leadership here with RMA, too.

While this is certainly a priority for Ray and the Department and we're aware of the impact the changes are having on ranchers across the country, it's very weedy and would be better addressed to you by our folks in the Agency and myself from the Secretary's policy realm. If a later meeting with Ray is warranted, we can make that happen.

Peter

From: Gordon, Julie - OSEC
Sent: Wednesday, October 10, 2018 12:07 PM
To: Hannah Walters (b) (6) @ballardfl.com>
Cc: Bachmann, Peter - OCR, Washington, DC <Peter.Bachmann@osec.usda.gov>
Subject: RE: Meeting Request with Mr. Starling

Hannah,

At Ray's request I am connecting you with Sr. Advisor, Peter Bachmann, cc'd. Peter will be happy to set up a meeting w/ Mr. McFaul and RMA.

Thank you!

Julie



Julie Gordon
Special Assistant – Office of the Secretary

United States Department of Agriculture
Office: (b) (6)
Cell: (b) (6)

From: Hannah Walters
(b) (6) @ballardfl.com>

Sent: Tuesday, October 9, 2018 1:11 PM

To: Gordon, Julie - OSEC <Julie.Gordon@osec.usda.gov>

Subject: RE: Meeting Request with Mr. Starling

Good Afternoon Julie,

I wanted to follow up on my email below regarding possibly setting up a meeting with Mr. Starling.

Thank you!

Hannah Walters

BALLARD | PARTNERS

Executive Assistant

Ballard Partners

601 Thirteenth St, NW, Suite # 450 N

Washington, DC 20005

P: 202.800.5620

F: 202.800.5623

(b) (6) @ballardfl.com

From: Hannah Walters

Sent: Friday, October 5, 2018 11:33 AM

To: julie.gordon@osec.usda.gov

Subject: Meeting Request with Mr. Starling

Good Morning Julie,

I am reaching out to you on behalf of Dan McFaul. He asked me to contact you to see if Mr. Starling would be available to meet with him and our firm's president, Brian Ballard next week. The meeting would be regarding PRF insurance.

Thank you for your assistance in setting this meeting up!

Best,

Hannah Walters

BALLARD | PARTNERS

Executive Assistant

Ballard Partners

601 Thirteenth St, NW, Suite # 450 N

Washington, DC 20005

P: 202.800.5620

F: 202.800.5623

(b) (6) @ballardfl.com

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From: [Flourney, Richard - RMA](#)
To: [Bachmann, Peter - OCR, Washington, DC](#)
Subject: Accepted: Call on PRF Changes with Ballard Partners (Brian Ballard, Susie Wiles, Dan McFaul)

From: [Flournoy, Richard - RMA](#)
To: [Bachmann, Peter - OCR, Washington, DC](#); [Tolle, Francie - RMA](#); [Aulbur, Chris - RMA](#)
Cc: [Gray, Keith - RMA](#); [Manzano, Heather - RMA](#); [Ibarra, Robert - RMA](#)
Subject: RE: PRF insurance -- ranchers and cattlegrowers issue
Date: Wednesday, August 8, 2018 2:52:58 PM
Attachments: [image001.png](#)

RMA: (b)(5) pre-decisional deliberative

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From: Bachmann, Peter - OCR, Washington, DC
Sent: Wednesday, August 8, 2018 1:07 PM
To: Flournoy, Richard - RMA <richard.flournoy@rma.usda.gov>; Tolle, Francie - RMA <francie.tolle@rma.usda.gov>; Aulbur, Chris - RMA <chris.aulbur@rma.usda.gov>
Subject: FW: PRF insurance -- ranchers and cattlegrowers issue

Team RMA –

Please see the attached PRF data requested on our call last Monday. Any additional feedback we should provide to these folks?

From: Dan McFaul [\(b\)\(6\)@ballardfl.com](mailto:(b)(6)@ballardfl.com)>
Sent: Wednesday, August 8, 2018 9:51 AM
To: Bachmann, Peter - OCR, Washington, DC <Peter.Bachmann@osec.usda.gov>
Cc: Young, Joby - OSEC, Washington, DC <Joby.Young@osec.usda.gov>
Subject: PRF insurance -- ranchers and cattlegrowers issue

Peter,

Thank you for taking the time and participating in a call last week to discuss PRF insurance and the RMA's potential changes.

Please see the attached data from the **(b)(3) in conjunction with 7 USC 8791 (b)(2)(A), (b)(4), and (b)(6)** [REDACTED]. This shows their feed costs, which are off from the county estimates. Clearly the PRF insurance has been working. We have more of these examples and data on the way.

Please let me know what else we can provide to help on this issue.

Thank you.

Dan

Dan McFaul



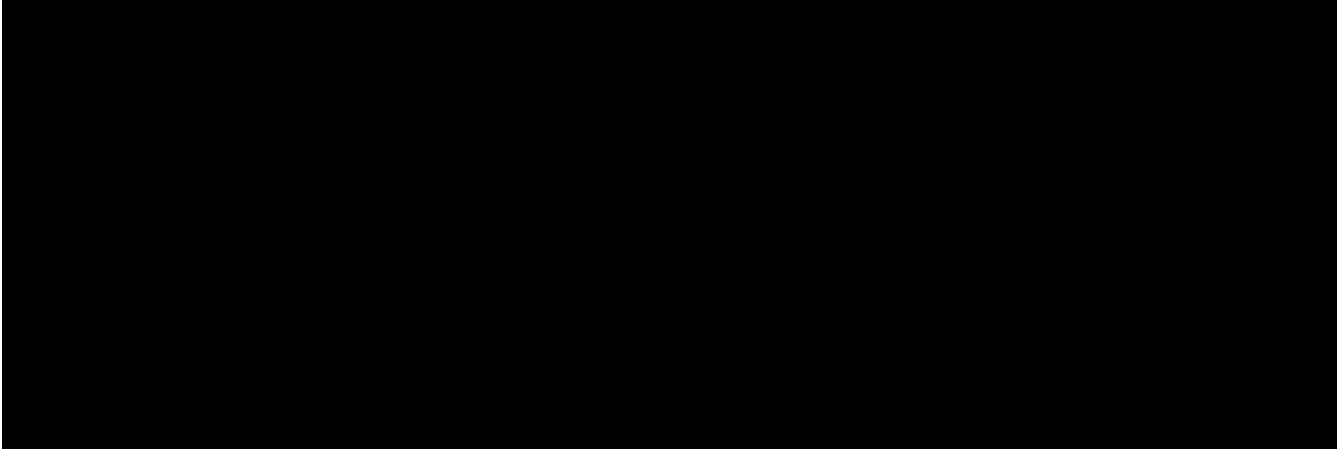
Ballard Partners
601 Thirteenth St, NW, Suite #200 N
Washington, DC 20005
P: 202.800.5620
F: 202.800.5623
(b) (6) [@ballardfl.com](mailto:ballardfl.com)

Sent: Saturday, August 4, 2018 3:37 PM

To: Dan McFaul (b) (6) [@ballardfl.com](mailto:ballardfl.com)>

Subject: FW: Drought Response Letter (b)(3) in conjunction with 7 USC 8791 (b)(2)(A), (b)(4), and (b)(6)

(b)(3) in conjunction with 7 USC 8791 (b)(2)(A), (b)(4), and (b)(6)

A large, solid black rectangular redaction box covers the majority of the page content below the subject line.

From: [Flournoy, Richard - RMA](#)
To: [Bachmann, Peter - OCR, Washington, DC](#)
Cc: [Tolle, Francie - RMA](#); [Ibarra, Robert - RMA](#); [Aulbur, Chris - RMA](#)
Subject: Re: Drought Data -- Francis Creek Ranch
Date: Monday, August 13, 2018 7:15:38 PM

Thanks - I've passed it along to our pricing folks

On Aug 13, 2018, at 2:52 PM, Bachmann, Peter - OCR, Washington, DC
<Peter.Bachmann@osec.usda.gov> wrote:

Here is more PRF data for consideration.

Begin forwarded message:

From: Dan McFaul [\[REDACTED\]@ballardfl.com](mailto:(b) (6)@ballardfl.com) <[mailto:\(b\) \(6\)@ballardfl.com](mailto:(b) (6)@ballardfl.com)>>
Date: August 13, 2018 at 2:44:16 PM EDT
To: "peter.bachmann@osec.usda.gov" <<mailto:peter.bachmann@osec.usda.gov>>"
<peter.bachmann@osec.usda.gov> <<mailto:peter.bachmann@osec.usda.gov>>>
Subject: Drought Data -- [\(b\)\(3\) in conjunction with 7 USC 8791 \(b\)\(2\)\(A\), \(b\)\(4\), and \(b\)\(6\)](#)

Peter,

Thank you again for accepting this data related to RMA's potential changes to PRF insurance.

Please see the attached data from the [\(b\)\(3\) in conjunction with 7 USC 8791 \(b\)\(2\)\(A\), \(b\)\(4\), and \(b\)\(6\)](#). This shows their feed costs, which are significantly different from the county estimates. Clearly the PRF insurance has been working. We have more of these examples and data on the way.

Please let me know what else we can provide to help on this issue.

Thank you.

Dan

Dan McFaul

<image001.png>

Ballard Partners

**601 Thirteenth St, NW, Suite #200 N
Washington, DC 20005
P: 202.800.5620
F: 202.800.5623**

[\[REDACTED\]@ballardfl.com](mailto:(b) (6)@ballardfl.com)

<Scan180813132034-0001.pdf>

From: [Flournoy, Richard - RMA](#)
To: [Bachmann, Peter - OCR, Washington, DC](#)
Subject: RE: Feed info
Date: Tuesday, September 4, 2018 2:43:53 PM

Just us

From: Bachmann, Peter - OCR, Washington, DC
Sent: Tuesday, September 4, 2018 1:43 PM
To: Flournoy, Richard - RMA <richard.flournoy@rma.usda.gov>
Subject: FW: Feed info

Is Northey on this call at 4? Or is it just your team?

From: Bachmann, Peter - OCR, Washington, DC
Sent: Tuesday, September 4, 2018 2:43 PM
To: 'Dan McFaul' (b) (6) <@ballardfl.com>
Subject: RE: Feed info

Dan,

I've got a couple Congressional calls this afternoon beginning at 4:00 ET so I won't be able to join. We did discuss putting Under Secretary Northey (senate confirmed position overseeing FSA, RMA, NRCS) on the phone with Director Killian. I will get a readout from our folks on how this goes, but do know that they are way more in tune with the specifics of the PRF changes than I am and they've certainly dug into the data that your folks sent through you to RMA.

Peter

From: Dan McFaul (b) (6) <@ballardfl.com>
Sent: Tuesday, September 4, 2018 2:38 PM
To: Bachmann, Peter - OCR, Washington, DC <Peter.Bachmann@osec.usda.gov>
Subject: Re: Feed info

Peter

A group of cattlemen from NM, AZ , and Utah are having a conf call with RMA at 4pm today.

Would you be available/willing to listen in?

Attendees are:

Mark Wintch Utah Cattlemen President CONFIRMED (b) (6)

Jay Whetten Arizona Cattlemen President CONFIRMED (b) (6)

Tom Sidwell New Mexico Stockgrowers President CONFIRMED (b) (6) [@jxranch.com](mailto:tom@jxranch.com)

Marshall Wilson Representative Department of Agriculture New Mexico and Rancher
CONFIRMED mwilson@nmda.nmsu.edu

Billy Elkins Arizona Rancher CONFIRMED (b) (6)

Mark Killian Director Arizona Department of Agriculture CONFIRMED mkillian@azda.gov
Assistant Anita Landy CONFIRMED alandy@azda.gov

Thanks
Dan

On Aug 30, 2018, at 3:20 PM, Bachmann, Peter - OCR, Washington, DC
<Peter.Bachmann@osec.usda.gov> wrote:

Hi Dan,

I will be traveling until midnight tonight and have a pretty full schedule of meetings tomorrow before the long weekend. I'm copying Richard Flournoy out of our Kansas City RMA office who essentially runs all of our programs and over sees product development. He should be able to take your call, answer questions, and get your feedback to his team more efficiently than I can.

If you want to provide him some of your availability blocks in ET, that would be helpful.

Thanks!

Peter

On Aug 30, 2018, at 1:48 PM, Dan McFaul (b) (6) [@ballardfl.com](mailto:dan@ballardfl.com)> wrote:

Peter,

Wondering if you had a couple of minutes to talk to Brian and me tomorrow reference the below?

The ranchers received the reduced grazing county base values, and in most of Arizona/New Mexico it is a 41-42% cut to the amount of PRF insurance these ranchers can buy. The impacts for the rancher are quite devastating.

Hoping you have a few brief moments tomorrow for some feedback.

Thank you

Dan

From: Bachmann, Peter - OCR, Washington, DC

<Peter.Bachmann@osec.usda.gov>

Sent: Monday, August 27, 2018 6:23 PM

To: Dan McFaul (b) (6) <[@ballardfl.com](mailto:ballardfl.com)>

Subject: RE: Feed info

Dan,

I can talk briefly this evening but wanted to send this over, first. And see attached!

Key Points:

- RMA is not adjusting the productivity factor or eliminating any intervals for 2019.
- However, grazing county base values will be reduced in areas of Arizona. These values are based on the NASS rental rate, grazing fee, and hay price data adjusted using the NRCS productivity model. Reductions will also occur in the surrounding states as well as throughout the country.
- These values are updated yearly and are part of normal maintenance of the policy.

10:30 AM ET

Call-in: 1 (888) 844-9904; (b) (6)

Peter

From: Dan McFaul (b) (6) <[@ballardfl.com](mailto:ballardfl.com)>

Sent: Monday, August 27, 2018 10:18 AM

To: Bachmann, Peter - OCR, Washington, DC

<Peter.Bachmann@osec.usda.gov>

Subject: Re: Feed info

Peter

Do you have a few moments for a quick call today? Just trying to get some color on tomorrow's conf call. I don't want to have my ranchers walk into a buzzsaw without some preparation.

Thanks

Dan

On Aug 24, 2018, at 7:49 PM, Bachmann, Peter - OCR, Washington, DC
<Peter.Bachmann@osec.usda.gov> wrote:

Perfect. Please hold it and we'll get y'all a call-in number on Monday.

From: Dan McFaul (b) (6) <ballardfl.com>
Sent: Friday, August 24, 2018 11:59 AM
To: Bachmann, Peter - OCR, Washington, DC
<Peter.Bachmann@osec.usda.gov>
Subject: Re: Feed info

Yes. I think we can make that work.

Sent from my iPhone

On Aug 24, 2018, at 11:49 AM, Bachmann, Peter - OCR, Washington, DC <Peter.Bachmann@osec.usda.gov> wrote:

Dan,

Does 10:30 work for a call on Tuesday? I don't have any additional information to share but our Kansas City staff will provide you and whoever you invite on, an update.

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Sent: Friday, August 24, 2018 10:55 AM
To: Bachmann, Peter - OCR, Washington, DC
<Peter.Bachmann@osec.usda.gov>
Subject: Feed info

Peter,

Two more data points for you. (b) (6) in conjunction with (b) (6)

[REDACTED]

Thanks

Dan

From: [REDACTED] (b)(3) in conjunction with 7 USC 8791 (b)(2)(A), (b)(4)

[REDACTED] (b)(3) in conjunction with 7 USC 8791 (b)(2)(A), (b)(4), and (b)(6)

<image001.jpg>

[REDACTED] (b)(3) in conjunction with 7 USC 8791 (b)(2)(A), (b)(4), and (b)(6)

Have a great day - may it be filled with rain!

[REDACTED] (b)(3) in conjunction with 7 USC 8791 (b)(2)(A), (b)(4), and (b)(6)

Sent from my iPhone

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From: [Dan McFaul](#)
To: [Bachmann, Peter - OCR, Washington, DC](#)
Subject: RE: PRF insurance -- ranchers and cattlegrowers issue
Date: Wednesday, August 22, 2018 4:41:20 PM
Attachments: [image001.png](#)

Thanks Peter.

I have a few more data points from some AZ/NM farms. I'm happy to send but I don't want to spam your inbox if you have what you need.

Any chance we can talk broad brush strokes on status before Tuesday?

Dan

From: Bachmann, Peter - OCR, Washington, DC <Peter.Bachmann@osec.usda.gov>
Sent: Tuesday, August 21, 2018 10:33 AM
To: Dan McFaul (b) (6) @ballardfl.com>; (b) (6) @ballardfl.com; Susie Wiles (b) (6) @ballardfl.com>
Subject: RE: PRF insurance -- ranchers and cattlegrowers issue

Dan & Co. —

I'd like to set-up up a follow-up call with RMA and your folks next Tuesday morning to talk through where we are. As we shared last time, we are looking at an August 31 deadline and want to make sure you guys are on the same page and there's no surprises as we proceed.

Peter

From: Dan McFaul (b) (6) @ballardfl.com>
Sent: Wednesday, August 8, 2018 9:51 AM
To: Bachmann, Peter - OCR, Washington, DC <Peter.Bachmann@osec.usda.gov>
Cc: Young, Joby - OSEC, Washington, DC <Joby.Young@osec.usda.gov>
Subject: PRF insurance -- ranchers and cattlegrowers issue

Peter,

Thank you for taking the time and participating in a call last week to discuss PRF insurance and the RMA's potential changes.

Please see the attached data from the (b)(3) in conjunction with 7 USC 8791 (b)(2)(A), (b)(4), and (b)(6) [REDACTED]. This shows their feed costs, which are off from the county estimates. Clearly the PRF insurance has been working. We have more of these examples and data on the way.

Please let me know what else we can provide to help on this issue.

Thank you.

Dan

Dan McFaul

BALLARD | PARTNERS

Ballard Partners
601 Thirteenth St, NW, Suite #200 N
Washington, DC 20005
P: 202.800.5620
F: 202.800.5623
(b) (6) @ballardfl.com

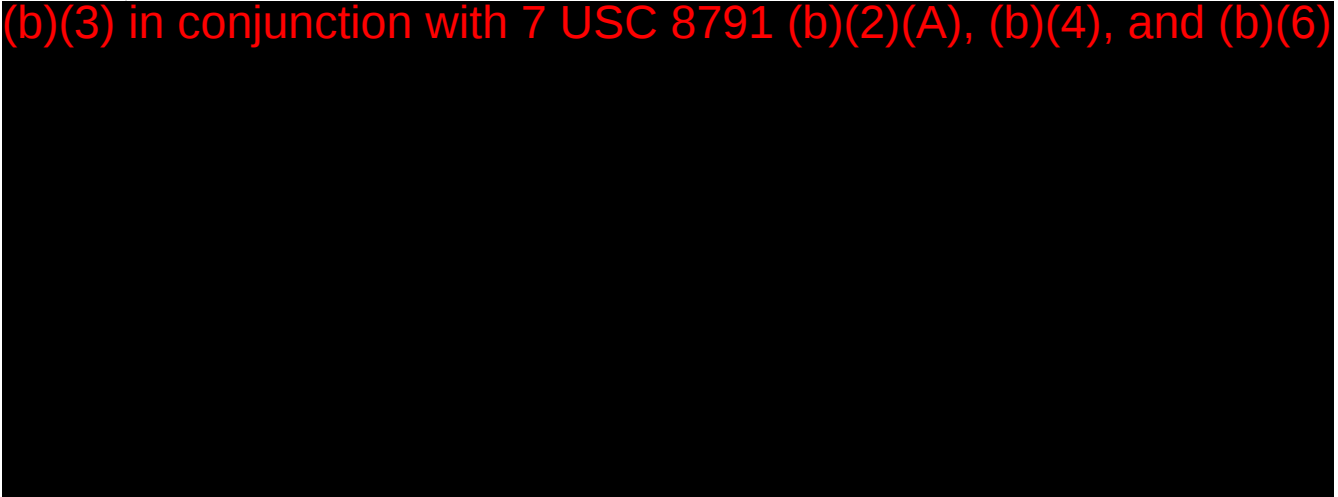
Sent: Saturday, August 4, 2018 3:37 PM

To: Dan McFaul (b) (6) @ballardfl.com>

Subject: FW: Drought Response Letter (b)(3) in conjunction with 7 USC 8791 (b)(2)(A), (b)(4), and (b)(6)

Dan,

(b)(3) in conjunction with 7 USC 8791 (b)(2)(A), (b)(4), and (b)(6)



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From: [Bachmann, Peter - OCR, Washington, DC](#)
To: [Flournoy, Richard - RMA](#)
Subject: FW: PRF insurance
Date: Friday, July 27, 2018 12:10:11 PM

From: Susie Wiles (b) (6) @ballardfl.com>
Sent: Friday, July 27, 2018 6:47 AM
To: Starling, Raymond - OSEC, Washington, DC <Raymond.Starling@osec.usda.gov>
Cc: Bachmann, Peter - OCR, Washington, DC <Peter.Bachmann@osec.usda.gov>
Subject: Re: PRF insurance

Thank you so much - really appreciate the connect. Peter, might you have 20 minutes, or so, any time on Monday to meet with Brian Ballard? I won't be in DC but he knows the issue and can quickly walk you through the concern. Hoping this can work.

Much appreciated,
Susie Wiles

Susie Wiles
Sent from my iPhone so please excuse typos

From: Starling, Raymond - OSEC, Washington, DC <Raymond.Starling@osec.usda.gov>
Sent: Thursday, July 26, 2018 10:31:08 PM
To: Susie Wiles
Cc: Bachmann, Peter - OCR, Washington, DC
Subject: RE: PRF insurance

Susie,

Please meet Peter Bachmann, with whom I hope you can connect early next week. Please be assured that I would not meet with you on any crop insurance related issue without Peter in the room.

Cordially,
-Ray

From: Susie Wiles [[\(b\) \(6\)@ballardfl.com">mailto:\(b\) \(6\)@ballardfl.com](mailto:mailto:<span style=)]
Sent: Thursday, July 26, 2018 10:23 PM
To: Starling, Raymond - OSEC, Washington, DC <Raymond.Starling@osec.usda.gov>
Subject: Re: PRF insurance

That would be most helpful, I think., and hopefully on Monday. Or if you have a deputy - or

both. You certainly know best. We will be there when you say to meet with whomever you say.

Thanks,
Susie Wiles

Sent from my iPhone
Please excuse typos

On Jul 26, 2018, at 10:11 PM, Starling, Raymond - OSEC, Washington, DC
<Raymond.Starling@osec.usda.gov> wrote:

Hi Susie,

I'm out of the office tomorrow through August 6th. Would it be helpful to schedule time with the Senior Advisor to the Secretary for crop insurance issues?

**Thanks,
-Ray**

From: Susie Wiles [[mailto:\(b\) \(6\)@ballardfl.com](mailto:(b) (6)@ballardfl.com)]

Sent: Thursday, July 26, 2018 5:46 PM

To: Starling, Raymond - OSEC, Washington, DC <Raymond.Starling@osec.usda.gov>

Subject: PRF insurance

Ray,

I understand you are out of the office –I hope you getting a nice break from the business of DC.

In your absence, would it be possible to schedule a meeting with my partners Brian Ballard and Dan McFaul – hopefully on Monday or Tuesday of next week regarding the matter of PRF Insurance and the Risk Management Agency at Department of Agriculture?

We will make ourselves available whenever the person you designate might be able to see us for 30 minutes, or so.

I can be reached at (b) (6) or at this email address.

Thanking you in advance,
Susie Wiles

Susan Summerall Wiles
Partner, Ballard Partners
601 13th Street, NW
Washington, DC 20005
(202)800-5620

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From: [Susie Wiles](#)
To: [Bachmann, Peter - OCR, Washington, DC](#)
Subject: Re: PRF insurance
Date: Friday, July 27, 2018 7:54:49 PM

Peter,
Sorry for the delay – I had to check with Brian Ballard. How about 9 a.m.? Any specific instructions about where to come and how to gain entry?
Thanks so much for making time,
susie

Susan Summerall Wiles
Partner, Ballard Partners
601 13th Street, NW
Washington, DC 20005
(202)800-5620

From: "Bachmann, Peter - OCR, Washington, DC" <Peter.Bachmann@osec.usda.gov>
Date: Friday, July 27, 2018 at 5:46 PM
To: Susie Wiles (b) (6) @ballardfl.com>
Subject: RE: PRF insurance

Hi Susie,

Just getting finished digging out of emails from this week. I'm pretty flexible on Monday morning before 12:30, what's a good time for you?

Peter

From: Susie Wiles (b) (6) @ballardfl.com>
Sent: Friday, July 27, 2018 6:47 AM
To: Starling, Raymond - OSEC, Washington, DC <Raymond.Starling@osec.usda.gov>
Cc: Bachmann, Peter - OCR, Washington, DC <Peter.Bachmann@osec.usda.gov>
Subject: Re: PRF insurance

Thank you so much - really appreciate the connect. Peter, might you have 20 minutes, or so, any time on Monday to meet with Brian Ballard? I won't be in DC but he knows the issue and can quickly walk you through the concern. Hoping this can work.
Much appreciated,
Susie Wiles

Susie Wiles
Sent from my iPhone so please excuse typos

From: Starling, Raymond - OSEC, Washington, DC <Raymond.Starling@osec.usda.gov>
Sent: Thursday, July 26, 2018 10:31:08 PM
To: Susie Wiles
Cc: Bachmann, Peter - OCR, Washington, DC
Subject: RE: PRF insurance

Susie,

Please meet Peter Bachmann, with whom I hope you can connect early next week. Please be assured that I would not meet with you on any crop insurance related issue without Peter in the room.

**Cordially,
-Ray**

From: Susie Wiles [[mailto:\(b\)\(6\)@ballardfl.com](mailto:(b)(6)@ballardfl.com)]
Sent: Thursday, July 26, 2018 10:23 PM
To: Starling, Raymond - OSEC, Washington, DC <Raymond.Starling@osec.usda.gov>
Subject: Re: PRF insurance

That would be most helpful, I think., and hopefully on Monday. Or if you have a deputy - or both. You certainly know best. We will be there when you say to meet with whomever you say.

Thanks,
Susie Wiles

Sent from my iPhone
Please excuse typos

On Jul 26, 2018, at 10:11 PM, Starling, Raymond - OSEC, Washington, DC
<Raymond.Starling@osec.usda.gov> wrote:

Hi Susie,

I'm out of the office tomorrow through August 6th. Would it be helpful to schedule time with the Senior Advisor to the Secretary for crop insurance issues?

**Thanks,
-Ray**

From: Susie Wiles [mailto:(b) (6)@ballardfl.com]

Sent: Thursday, July 26, 2018 5:46 PM

To: Starling, Raymond - OSEC, Washington, DC <Raymond.Starling@osec.usda.gov>

Subject: PRF insurance

Ray,

I understand you are out of the office –I hope you getting a nice break from the business of DC.

In your absence, would it be possible to schedule a meeting with my partners Brian Ballard and Dan McFaul – hopefully on Monday or Tuesday of next week regarding the matter of PRF Insurance and the Risk Management Agency at Department of Agriculture?

We will make ourselves available whenever the person you designate might be able to see us for 30 minutes, or so.

I can be reached at (b) (6) or at this email address.

Thanking you in advance,
Susie Wiles

Susan Summerall Wiles
Partner, Ballard Partners
601 13th Street, NW
Washington, DC 20005
(202)800-5620

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From: [Microsoft Outlook](#) on behalf of [Flourney, Richard - RMA](#)
To: [Bachmann, Peter - OCR, Washington, DC](#)
Subject: Meeting Forward Notification: Call on PRF Changes with Ballard Partners (Brian Ballard, Susie Wiles, Dan McFaul)
Date: Monday, July 30, 2018 9:20:05 AM

Your meeting was forwarded

[Flourney, Richard - RMA](#) has forwarded your meeting request to additional recipients.

Meeting

Call on PRF Changes with Ballard Partners (Brian Ballard, Susie Wiles, Dan McFaul)

Meeting Time

Monday, July 30, 2018 11:00 AM-12:00 PM.

Recipients

[Gray, Keith - RMA](#)

[Ibarra, Robert - RMA](#)

[Manzano, Heather - RMA](#)

All times listed are in the following time zone: (UTC-05:00) Eastern Time (US & Canada)

Sent by Microsoft Exchange Server

From: [Flournoy, Richard - RMA](#)
To: [Bachmann, Peter - OCR, Washington, DC](#)
Subject: Re: Feed info
Date: Thursday, August 30, 2018 3:15:59 PM

Yeah

On Aug 30, 2018, at 3:15 PM, Bachmann, Peter - OCR, Washington, DC
<Peter.Bachmann@osec.usda.gov> wrote:

(b)(5) pre-decisional

d lib ti

On Aug 30, 2018, at 2:04 PM, Flournoy, Richard - RMA
<richard.flournoy@rma.usda.gov> wrote:

RMA: (b)(5) pre-decisional
deliberative

On Aug 30, 2018, at 2:50 PM, Bachmann, Peter - OCR, Washington, DC
<Peter.Bachmann@osec.usda.gov> wrote:

Thoughts? (b)(5) pre-decisional deliberative

Begin forwarded message:

From: Dan McFaul [\(b\)\(6\)@ballardfl.com](mailto:(b)(6)@ballardfl.com)
Date: August 30, 2018 at 1:48:34 PM CDT
To: "Bachmann, Peter - OCR, Washington, DC" <Peter.Bachmann@osec.usda.gov>
Subject: RE: Feed info

Peter,

Wondering if you had a couple of minutes to talk to Brian and me tomorrow reference the below?

The ranchers received the reduced grazing county base values, and in most of Arizona/New Mexico it is a 41-42% cut to the

amount of PRF insurance these ranchers can buy. The impacts for the rancher are quite devastating.

Hoping you have a few brief moments tomorrow for some feedback.

Thank you

Dan

From: Bachmann, Peter - OCR, Washington, DC
<Peter.Bachmann@osec.usda.gov>
Sent: Monday, August 27, 2018 6:23 PM
To: Dan McFaul (b) (6) <@ballardfl.com>
Subject: RE: Feed info

Dan,

I can talk briefly this evening but wanted to send this over, first. And see attached!

Key Points:

- RMA is not adjusting the productivity factor or eliminating any intervals for 2019.
- However, grazing county base values will be reduced in areas of Arizona. These values are based on the NASS rental rate, grazing fee, and hay price data adjusted using the NRCS productivity model. Reductions will also occur in the surrounding states as well as throughout the country.
- These values are updated yearly and are part of normal maintenance of the policy.

10:30 AM ET

Call-in: 1 (888) 844-9904; (b) (6)

Peter

From: Dan McFaul (b) (6) <@ballardfl.com>

Sent: Monday, August 27, 2018 10:18 AM
To: Bachmann, Peter - OCR, Washington, DC
<Peter.Bachmann@osec.usda.gov>
Subject: Re: Feed info

Peter

Do you have a few moments for a quick call today? Just trying to get some color on tomorrow's conf call. I don't want to have my ranchers walk into a buzzsaw without some preparation.

Thanks

Dan

On Aug 24, 2018, at 7:49 PM, Bachmann, Peter - OCR, Washington, DC
<Peter.Bachmann@osec.usda.gov> wrote:

Perfect. Please hold it and we'll get y'all a call-in number on Monday.

From: Dan McFaul
(b) @ballardfl.com>
Sent: Friday, August 24, 2018 11:59 AM
To: Bachmann, Peter - OCR, Washington, DC
<Peter.Bachmann@osec.usda.gov>
Subject: Re: Feed info

Yes. I think we can make that work.

Sent from my iPhone

On Aug 24, 2018, at 11:49 AM, Bachmann, Peter - OCR, Washington, DC
<Peter.Bachmann@osec.usda.gov> wrote:

Dan,

Does 10:30 work for
a call on Tuesday? I
don't have any
additional
information to share
but our Kansas City
staff will provide you
and whoever you
invite on, an update.

From: Dan McFaul
(b) (6) @ballardfl.com>
Sent: Friday, August
24, 2018 10:55 AM
To: Bachmann, Peter
- OCR, Washington,
DC
<Peter.Bachmann@osec.usda.gov>
Subject: Feed info

Peter,

Two more data
points for you.

(b)(3) in conjunction with 7 USC 8791 (b)(2)(A), (b)(4), and (b)(6)

[REDACTED]

Thanks

Dan

From: (b)(4) in conjunction with 7 USC 8791 (b)(2)(A), (b)(4)

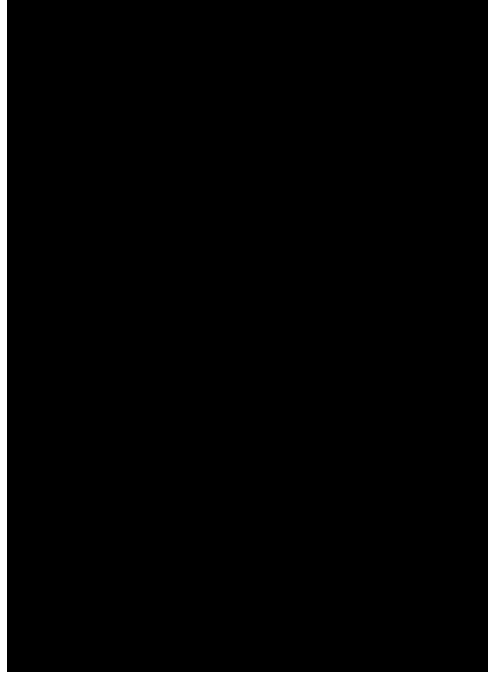
[REDACTED]

[REDACTED]

(b)(3) in conjunction with 7 USC 8791 (b)(2)(A), (b)(4), and (b)(6)

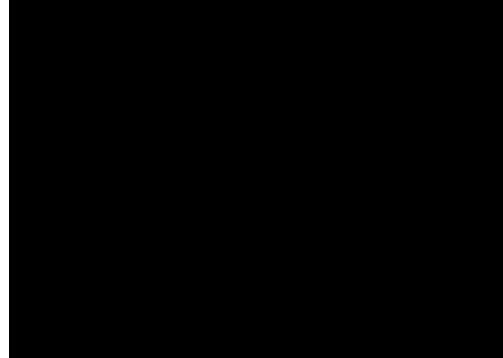
[REDACTED]

(b)(3) in conjunction with 7 USC 8791 (b)(2)(A), (b)(4), and (b)(6)



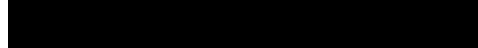
<image001.jpg>

(b)(3) in conjunction with 7 USC 8791 (b)(2)(A), (b)(4), and (b)(6)



Have a great day -
may it be filled with
rain!

(b)(3) in conjunction with 7 USC 8791 (b)(2)(A), (b)(4), and (b)(6)



Sent from my iPhone

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From: [Rebecca Benn](#)
To: [Lyons, Maggie - OSEC, Washington, DC](#)
Subject: RE: Thank you
Date: Tuesday, September 19, 2017 5:57:31 PM

Thank you for all of your help. I really appreciate your time. Good luck with all the recovery efforts.

Rebecca

From: Lyons, Maggie - OSEC, Washington, DC [mailto:Maggie.Lyons@osec.usda.gov]
Sent: Tuesday, September 19, 2017 5:52 PM
To: Rebecca Benn (b) (6) @ballardfl.com>
Subject: Re: Thank you

Those decisions regarding timing of distribution of benefits will be made by the state.

Sent from my iPhone

On Sep 19, 2017, at 3:32 PM, Rebecca Benn (b) (6) @ballardfl.com> wrote:

Thank you, Maggie, this is really helpful information. Are counties able to access the benefits of the program immediately after you all grant the waiver?

From: Lyons, Maggie - OSEC, Washington, DC [mailto:Maggie.Lyons@osec.usda.gov]
Sent: Tuesday, September 19, 2017 2:14 PM
To: Rebecca Benn (b) (6) @ballardfl.com>
Subject: RE: Thank you

Hi Rebecca – yes, the best avenue right now would be for the Mayor to contact the FL Department on Children and Families to see if they have included/plan to include Duval county in their D-SNAP request. I know our team is working extensively with that office to gather the information we need in order to grant the waiver request.

From: Rebecca Benn [mailto:(b) (6) @ballardfl.com]
Sent: Tuesday, September 19, 2017 9:48 AM
To: Lyons, Maggie - OSEC, Washington, DC <Maggie.Lyons@osec.usda.gov>
Subject: RE: Thank you

Maggie – Thank you so much for the quick reply. I can only imagine how busy you and your team are right now.

The City of Jacksonville would like to know the best way to access the resources that D-SNAP provides. In your opinion, does it make the most sense for Mayor Curry to reach

out to the FL Department on Children and Families or is there a formal process they should enter in to first? Thank you again for any advice you can offer.

Rebecca

(b) (6)

From: Lyons, Maggie - OSEC, Washington, DC [<mailto:Maggie.Lyons@osec.usda.gov>]

Sent: Monday, September 18, 2017 5:49 PM

To: Rebecca Benn (b) (6) [@ballardfl.com](mailto:(b)(6)@ballardfl.com)>

Subject: FW: Thank you

Rebecca,

Thanks for reaching out. Happy to connect you with our team; as you can imagine we are all working extensively on disaster recovery efforts in multiple states right now.

Our team in the national office and in the Southeastern region are actively working with the Florida Department on Children and Families regarding the state requesting a D-SNAP waiver for specific counties impacted by Hurricane Irma. Does the city have specific questions about the process? Please let me know what information we can provide.

Maggie

Maggie Lyons

Chief of Staff & Senior Advisor

Office of the Under Secretary

Food, Nutrition and Consumer Services (FNCS)

United States Department of Agriculture

Office: (b) (6)

Cell: (b) (6)

From: Clovis, Sam - OSEC, Washington, DC

Sent: Monday, September 18, 2017 5:39 PM

To: Lyons, Maggie - OSEC, Washington, DC <Maggie.Lyons@osec.usda.gov>

Subject: FW: Thank you

Samuel H. Clovis, Jr., MBA, DPA

Senior White House Advisor - Office of the Secretary

<image001.png>

United States Department of Agriculture

Office: (b) (6)

Cell: (b) (6)

From: Rebecca Benn [[mailto:\(b\) \(6\)@ballardfl.com](mailto:(b) (6)@ballardfl.com)]

Sent: Monday, September 18, 2017 4:33 PM

To: Clovis, Sam - OSEC, Washington, DC <Sam.Clovis@osec.usda.gov>

Subject: FW: Thank you

Dr. Clovis – Thank you again for taking the time to talk about the disaster supplemental nutrition assistance program (D-SNAP) this afternoon. As I mentioned, I represent the City of Jacksonville, FL and the City of Jacksonville is interested in utilizing D-SNAP to help its residents recover after Hurricane Irma. I appreciate any advice or help you can offer.

Best,

Rebecca

Rebecca Benn

<image002.png>

Ballard Partners

601 Thirteenth St, NW, Suite #200 N
Washington, DC 20005

P: 202.800.5620

F: 202.800.5623

(b) (6) [@ballardfl.com](mailto:(b) (6)@ballardfl.com)

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From: [Lyons, Maggie - OSEC, Washington, DC](#)
To: [Lipps, Brandon - OSEC, Washington, DC](#)
Subject: FW: Thank you
Date: Monday, September 18, 2017 5:40:28 PM
Attachments: [image001.png](#)
[image002.png](#)

Just FYI.

From: Clovis, Sam - OSEC, Washington, DC
Sent: Monday, September 18, 2017 5:39 PM
To: Lyons, Maggie - OSEC, Washington, DC <Maggie.Lyons@osec.usda.gov>
Subject: FW: Thank you

Maggie,

(b)(5) pre-decisional deliberative

Thanks.

Sam



Samuel H. Clovis, Jr., MBA, DPA

Senior White House Advisor - Office of the Secretary

United States Department of Agriculture

Office: (b) (6)

Cell: (b) (6)

From: Rebecca Benn

[mailto:(b) (6)@ballardfl.com]

Sent: Monday, September 18, 2017 4:33 PM

To: Clovis, Sam - OSEC, Washington, DC <Sam.Clovis@osec.usda.gov>

Subject: FW: Thank you

Dr. Clovis – Thank you again for taking the time to talk about the disaster supplemental nutrition assistance program (D-SNAP) this afternoon. As I mentioned, I represent the City of Jacksonville, FL and the City of Jacksonville is interested in utilizing D-SNAP to help its residents recover after Hurricane Irma. I appreciate any advice or help you can offer.

Best,
Rebecca

Rebecca Benn

BALLARD | PARTNERS

Ballard Partners
601 Thirteenth St, NW, Suite #200 N
Washington, DC 20005
P: 202.800.5620
F: 202.800.5623
(b) (6) @ballardfl.com

From: [Gray, Keith - RMA](#)
To: [Bachmann, Peter - OCR, Washington, DC](#)
Subject: Accepted: Call on PRF Changes with Ballard Partners (Brian Ballard, Susie Wiles, Dan McFaul)

From: [Gordon, Julie - OSEC](#)
To: [Bachmann, Peter - OCR, Washington, DC](#)
Subject: RE: Meeting Request with Mr. Starling
Date: Wednesday, October 10, 2018 12:04:53 PM
Attachments: [image001.png](#)
[image004.png](#)
[image006.png](#)

Perfect!



Julie Gordon
Special Assistant – Office of the Secretary

United States Department of Agriculture
Office: (b) (6)
Cell: (b) (6)

From: Bachmann, Peter -
OCR, Washington, DC

Sent: Wednesday, October 10, 2018 12:04 PM
To: Gordon, Julie - OSEC <Julie.Gordon@osec.usda.gov>
Subject: Re: Meeting Request with Mr. Starling

(b)(5) pre-decisional deliberative

From: Gordon, Julie - OSEC
Sent: Wednesday, October 10, 2018 11:58:37 AM
To: Bachmann, Peter - OCR, Washington, DC
Subject: FW: Meeting Request with Mr. Starling

Please see Ray's note.

Would you like (b) (6)

Julie



Julie Gordon
Special Assistant – Office of the Secretary

United States Department of Agriculture
Office: (b) (6)
Cell: (b) (6)

From: Starling, Raymond
- OSEC, Washington, DC

Sent: Wednesday, October 10, 2018 11:54 AM
To: Gordon, Julie - OSEC <Julie.Gordon@osec.usda.gov>

Subject: RE: Meeting Request with Mr. Starling

(b)(5) pre-decisional deliberative

From: Gordon, Julie - OSEC

Sent: Wednesday, October 10, 2018 11:52 AM

To: Starling, Raymond - OSEC, Washington, DC <Raymond.Starling@osec.usda.gov>

Subject: FW: Meeting Request with Mr. Starling

(b) (6)



Julie Gordon

Special Assistant – Office of the Secretary

United States Department of Agriculture

Office: (b) (6)

Cell: (b) (6)

From: Hannah Walters

(b) (6) @ballardfl.com>

Sent: Tuesday, October 9, 2018 1:11 PM

To: Gordon, Julie - OSEC <Julie.Gordon@osec.usda.gov>

Subject: RE: Meeting Request with Mr. Starling

Good Afternoon Julie,

I wanted to follow up on my email below regarding possibly setting up a meeting with Mr. Starling.

Thank you!

Hannah Walters

BALLARD | PARTNERS

Executive Assistant

Ballard Partners

601 Thirteenth St, NW, Suite #450 N

Washington, DC 20005

P: 202.800.5620

F: 202.800.5623

(b) (6) @ballardfl.com

From: Hannah Walters

Sent: Friday, October 5, 2018 11:33 AM

To: julie.gordon@osec.usda.gov

Subject: Meeting Request with Mr. Starling

Good Morning Julie,

I am reaching out to you on behalf of Dan McFaul. He asked me to contact you to see if Mr. Starling would be available to meet with him and our firm's president, Brian Ballard next week. The meeting would be regarding PRF insurance.

Thank you for your assistance in setting this meeting up!

Best,

Hannah Walters

BALLARD | PARTNERS

Executive Assistant

Ballard Partners

**601 Thirteenth St, NW, Suite #450 N
Washington, DC 20005**

P: 202.800.5620

F: 202.800.5623

(b) (6) [@ballardfl.com](mailto:(b) (6)@ballardfl.com)

From: [Bachmann, Peter - OCR, Washington, DC](#)
To: [Flournoy, Richard - RMA](#)
Subject: FW: Feed info
Date: Friday, August 24, 2018 11:48:53 AM
Attachments: [Scan180824095037-0001.pdf](#)

One more... trying to get a call time set

From: Dan McFaul (b) (6)@ballardfl.com>
Sent: Friday, August 24, 2018 10:55 AM
To: Bachmann, Peter - OCR, Washington, DC <Peter.Bachmann@osec.usda.gov>
Subject: Feed info

Peter,

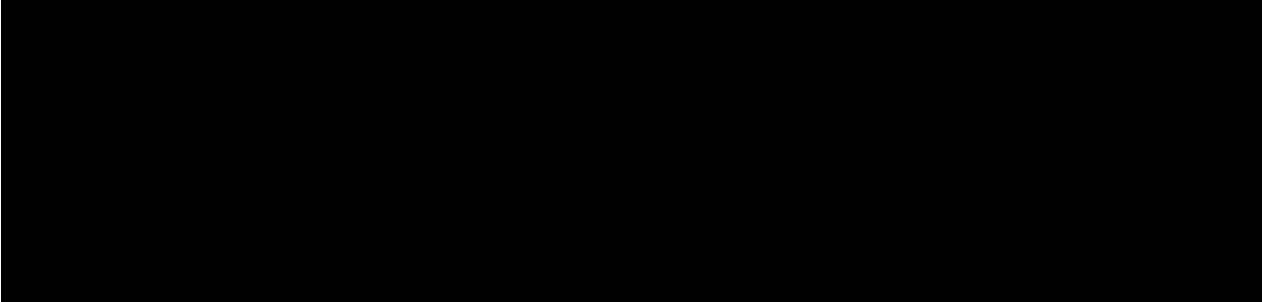
Two more data points for you. (b)(3) in conjunction with 7 USC 8791 (b)(2)(A), (b)(4), and (b)(6)

Thanks

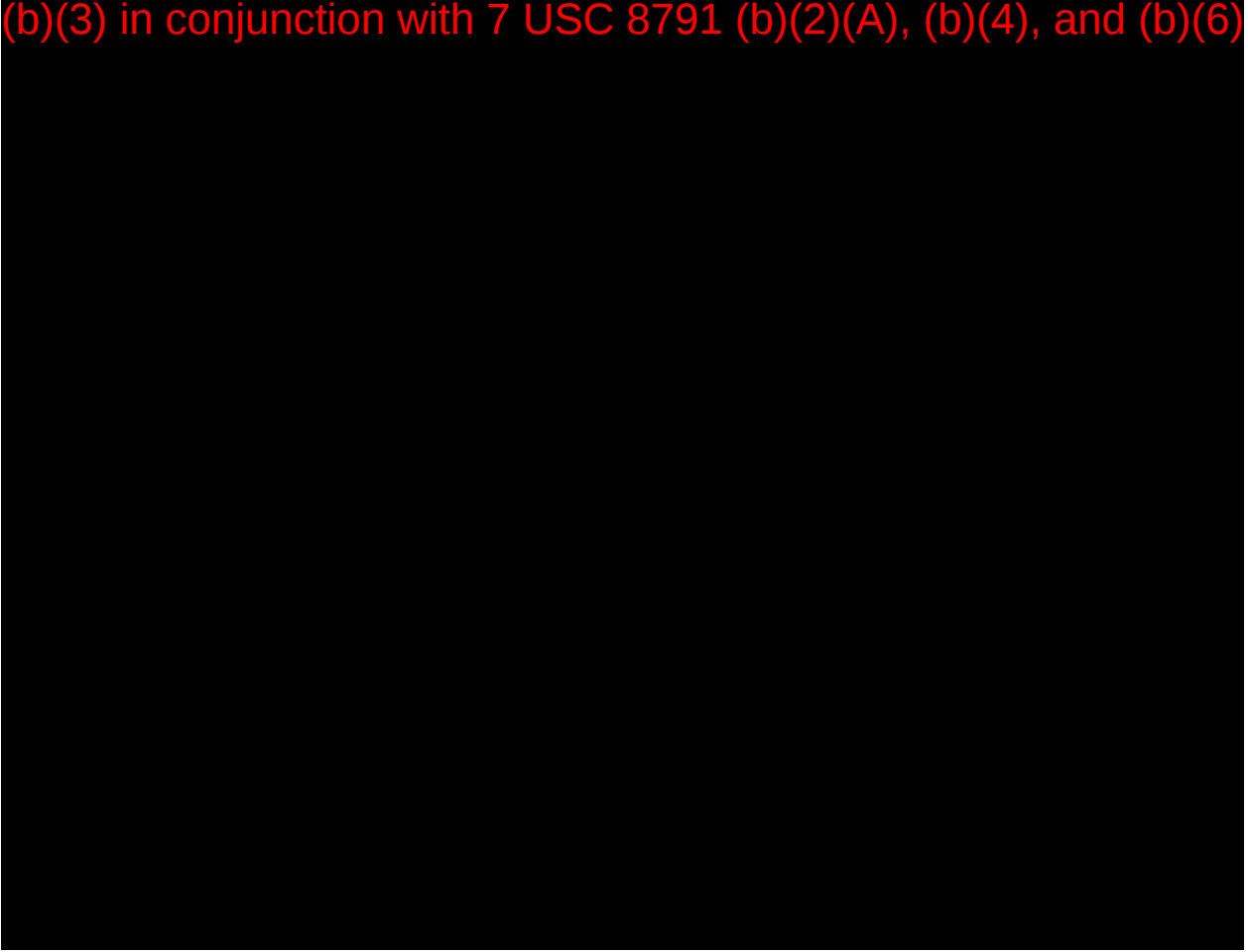
Dan

From: (b)(3) in conjunction with 7 USC 8791 (b)(2)(A), (b)(4), and (b)(6)

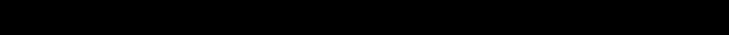
(b)(3) in conjunction with 7 USC 8791 (b)(2)(A), (b)(4), and (b)(6)



(b)(3) in conjunction with 7 USC 8791 (b)(2)(A), (b)(4), and (b)(6)

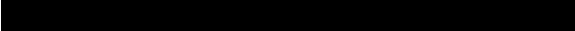


(b)(3) in conjunction with 7 USC 8791 (b)(2)(A), (b)(4), and (b)(6)



Have a great day - may it be filled with rain!

(b)(3) in conjunction with 7 USC 8791 (b)(2)(A), (b)(4), and (b)(6)



From: [Bachmann, Peter - OCR, Washington, DC](#)
To: [Dan McFaul](#)
Subject: RE: PRF data from (b)(3) in conjunction with 7 USC 8791 (b)(2)(A)
Date: Monday, August 20, 2018 11:25:11 AM

Thanks, Dan. Shared!

From: Dan McFaul (b) @ballardfl.com>
Sent: Monday, August 20, 2018 10:19 AM
To: Bachmann, Peter - OCR, Washington, DC <Peter.Bachmann@osec.usda.gov>
Subject: PRF data from (b)(3) in conjunction with 7 USC 8791 (b)(2)(A), (b)(4), and (b)(5)

Peter,

Here is another example of feed costs during the drought. These ranchers have collected \$40,000 in benefit a far cry from the amount they have lost.

Thank you for passing this data on to RMA

Dan McFaul

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Referred to FSA for further review and direct response to requester

Referred to FSA for further review and direct response to requester

-----Original Appointment-----

From: Bachmann, Peter - OCR, Washington, DC

Sent: Friday, August 24, 2018 8:44 PM

To: Bachmann, Peter - OCR, Washington, DC; Brown, Amie - FSA-FPAC, Washington, DC; Shea, John - RMA; Flournoy, Richard - RMA; Aulbur, Chris - RMA; Tolle, Francie - RMA; Ibarra, Robert - RMA; Manzano, Heather - RMA

Subject: FW: Call with Ballard Group on PRF Updates

When: Tuesday, August 28, 2018 10:30 AM-11:00 AM (UTC-05:00) Eastern Time (US & Canada).

Where: Teleconference 1 -888-844-9904, pin (b) (6)

Please dial in to discuss the federal crop insurance program with the Risk Management Agency:

1-888-844-9904

Pin (b) (6)

-----Original Appointment-----

From: Bachmann, Peter - OCR, Washington, DC [<mailto:Peter.Bachmann@osec.usda.gov>]

Sent: Friday, August 24, 2018 7:46 PM

To: Bachmann, Peter - OCR, Washington, DC; Shea, John - RMA; Flournoy, Richard - RMA; Aulbur, Chris - RMA; Tolle, Francie - RMA; Ibarra, Robert - RMA; Manzano, Heather - RMA

Subject: Call with Ballard Group on PRF Updates

When: Tuesday, August 28, 2018 10:30 AM-11:00 AM (UTC-05:00) Eastern Time (US & Canada).

Where: Teleconference 1 -888-844-9904, pin (b) (6)

Please dial in to discuss the federal crop insurance program with the Risk Management Agency:

1-888-844-9904

Pin (b) (6)

From: [Bachmann, Peter - OCR, Washington, DC](#)
To: [Flournoy, Richard - RMA](#); [Aulbur, Chris - RMA](#); [Tolle, Francie - RMA](#)
Subject: FW: PRF data from [REDACTED]
Date: Monday, August 20, 2018 11:25:03 AM
Attachments: [Scan180820091537-0001.pdf](#)

Here is more PRF data for your folks.

Peter

From: Dan McFaul [REDACTED] <[REDACTED]@ballardfl.com>
Sent: Monday, August 20, 2018 10:19 AM
To: Bachmann, Peter - OCR, Washington, DC <Peter.Bachmann@osec.usda.gov>
Subject: PRF data from [REDACTED]

Peter,

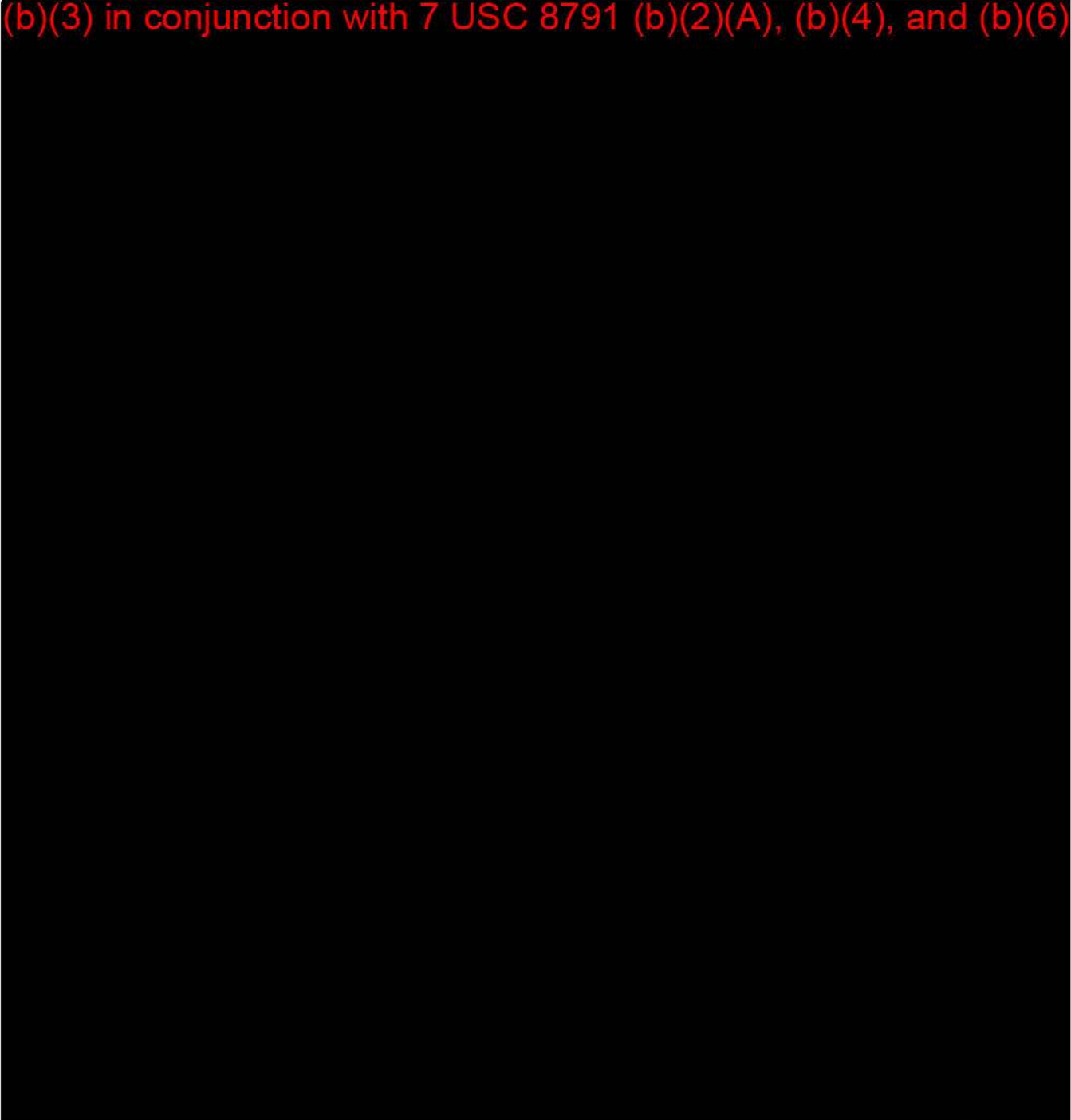
Here is another example of feed costs during the drought. These ranchers have collected \$40,000 in benefit a far cry from the amount they have lost.

Thank you for passing this data on to RMA

Dan McFaul

8-15-18

(b)(3) in conjunction with 7 USC 8791 (b)(2)(A), (b)(4), and (b)(6)



(b)(3) in conjunction with 7 USC 8791 (b)(2)(A), (b)(4), and (b)(6)

From: [Shea, John - RMA](#)
To: [Bachmann, Peter - OCR, Washington, DC](#)
Subject: Re: Feed info
Date: Friday, August 24, 2018 8:18:19 PM

Thanks. I have been cross-training the staff in EA in preparation for the big move to the Business Center.

Get [Outlook for iOS](#)

From: Bachmann, Peter - OCR, Washington, DC <Peter.Bachmann@osec.usda.gov>
Sent: Friday, August 24, 2018 8:01:38 PM
To: Shea, John - RMA
Subject: RE: Feed info

Good with me. It's technically RMA, but it's fine if she initiates. Thanks!

From: Shea, John - RMA <john.shea@rma.usda.gov>
Sent: Friday, August 24, 2018 7:56 PM
To: Bachmann, Peter - OCR, Washington, DC <Peter.Bachmann@osec.usda.gov>
Subject: Re: Feed info

I will send number and set up calendar invite but I won't be around to host next week. I can give Amie the host code to run it if ok with you.

Get [Outlook for iOS](#)

From: Bachmann, Peter - OCR, Washington, DC <peter.bachmann@osec.usda.gov>
Sent: Friday, August 24, 2018 7:47 PM
To: Shea, John - RMA
Subject: FW: Feed info

John,

Can you provide a call-in and dial into it on Tuesday at 10:30, please? I will be headed to the Hill with the trade folks.

From: Dan McFaul (b) (6) <dan.mcfaul@ballardfl.com>
Sent: Friday, August 24, 2018 11:59 AM
To: Bachmann, Peter - OCR, Washington, DC <Peter.Bachmann@osec.usda.gov>
Subject: Re: Feed info

Yes. I think we can make that work.

Sent from my iPhone

On Aug 24, 2018, at 11:49 AM, Bachmann, Peter - OCR, Washington, DC
<Peter.Bachmann@osec.usda.gov> wrote:

Dan,

Does 10:30 work for a call on Tuesday? I don't have any additional information to share but our Kansas City staff will provide you and whoever you invite on, an update.

From: Dan McFaul (b) (6) <ballardfl.com>

Sent: Friday, August 24, 2018 10:55 AM

To: Bachmann, Peter - OCR, Washington, DC <Peter.Bachmann@osec.usda.gov>

Subject: Feed info

Peter,

Two more data points for you. (b)(3) in conjunction with 7 USC 8791 (b)(2)(A).

Thanks

Dan

From: (b)(3) in conjunction with 7 USC 8791 (b)(2)(A), (b)(4), and (b)(6)

(b)(3) in conjunction with 7 USC 8791 (b)(2)(A), (b)(4), and (b)(6)

<image001.jpg>

(b)(3) in conjunction with 7 USC 8791 (b)(2)(A), (b)(4), and (b)(6)

Have a great day - may it be filled with rain!

(b)(3) in conjunction with 7 USC 8791 (b)(2)(A)

Sent from my iPhone

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From: [Bachmann, Peter - OCR, Washington, DC](#)
To: [Flournoy, Richard - RMA](#)
Subject: RE: 9 a.m. on Monday
Date: Monday, July 30, 2018 8:32:09 AM

Thank you, sir! If you think others need to be on, feel free to share.

From: Flournoy, Richard - RMA
Sent: Monday, July 30, 2018 8:31 AM
To: Bachmann, Peter - OCR, Washington, DC <Peter.Bachmann@osec.usda.gov>
Subject: Re: 9 a.m. on Monday

Yes I can join

On Jul 30, 2018, at 7:29 AM, Bachmann, Peter - OCR, Washington, DC
<Peter.Bachmann@osec.usda.gov> wrote:

Richard – would you be willing to jump on an introductory call with these folks TODAY at 11 AM ET?

It will just be me from the OSEC side, Ray is (b) (6) this week.

From: Susie Wiles (b) (6) <[@ballardfl.com](mailto:(b)(6)@ballardfl.com)>
Sent: Sunday, July 29, 2018 9:00 PM
To: Bachmann, Peter - OCR, Washington, DC <Peter.Bachmann@osec.usda.gov>
Cc: Starling, Raymond - OSEC, Washington, DC <Raymond.Starling@osec.usda.gov>
Subject: 9 a.m. on Monday
Importance: High

Peter,

Taking the liberty of arriving to see you at 9 tomorrow a.m. The meeting will be with my partners, Brian Ballard and Dan McFaul. It turns out I'm not in DC until Wednesday because I'm a Floridian and participating with the President in Tampa on Tuesday. I can be reached at (b) (6) and you can reach Dan at (b) (6).

They'll see you at 9. Please let Dan or me know where, exactly, to go when we get to the building entrance.

Many thanks,
Susie

Susan Summerall Wiles
Partner, Ballard Partners
601 13th Street, NW
Washington, DC 20005

(202)800-5620

From: "Bachmann, Peter - OCR, Washington, DC"

<Peter.Bachmann@osec.usda.gov>

Date: Friday, July 27, 2018 at 5:46 PM

To: Susie Wiles (b) (6) <[\[REDACTED\]@ballardfl.com](mailto:[REDACTED]@ballardfl.com)>

Subject: RE: PRF insurance

Hi Susie,

Just getting finished digging out of emails from this week. I'm pretty flexible on Monday morning before 12:30, what's a good time for you?

Peter

From: Susie Wiles (b) (6) <[\[REDACTED\]@ballardfl.com](mailto:[REDACTED]@ballardfl.com)>

Sent: Friday, July 27, 2018 6:47 AM

To: Starling, Raymond - OSEC, Washington, DC <Raymond.Starling@osec.usda.gov>

Cc: Bachmann, Peter - OCR, Washington, DC <Peter.Bachmann@osec.usda.gov>

Subject: Re: PRF insurance

Thank you so much - really appreciate the connect. Peter, might you have 20 minutes, or so, any time on Monday to meet with Brian Ballard? I won't be in DC but he knows the issue and can quickly walk you through the concern. Hoping this can work.

Much appreciated,

Susie Wiles

Susie Wiles

Sent from my iPhone so please excuse typos

From: Starling, Raymond - OSEC, Washington, DC <Raymond.Starling@osec.usda.gov>

Sent: Thursday, July 26, 2018 10:31:08 PM

To: Susie Wiles

Cc: Bachmann, Peter - OCR, Washington, DC

Subject: RE: PRF insurance

Susie,

Please meet Peter Bachmann, with whom I hope you can connect early next week. Please be assured that I would not meet with you on any crop insurance related issue without Peter in the room.

Cordially,
-Ray

From: Susie Wiles [[mailto:\(b\) \(6\)@ballardfl.com](mailto:(b) (6)@ballardfl.com)]
Sent: Thursday, July 26, 2018 10:23 PM
To: Starling, Raymond - OSEC, Washington, DC <Raymond.Starling@osec.usda.gov>
Subject: Re: PRF insurance

That would be most helpful, I think., and hopefully on Monday. Or if you have a deputy - or both. You certainly know best. We will be there when you say to meet with whomever you say.

Thanks,
Susie Wiles

Sent from my iPhone
Please excuse typos

On Jul 26, 2018, at 10:11 PM, Starling, Raymond - OSEC, Washington, DC
<Raymond.Starling@osec.usda.gov> wrote:

Hi Susie,

I'm out of the office tomorrow through August 6th. Would it be helpful to schedule time with the Senior Advisor to the Secretary for crop insurance issues?

Thanks,
-Ray

From: Susie Wiles [[mailto:\(b\) \(6\)@ballardfl.com](mailto:(b) (6)@ballardfl.com)]
Sent: Thursday, July 26, 2018 5:46 PM
To: Starling, Raymond - OSEC, Washington, DC
<Raymond.Starling@osec.usda.gov>
Subject: PRF insurance

Ray,
I understand you are out of the office –I hope you getting a nice break from the business of DC.

In your absence, would it be possible to schedule a meeting with my

partners Brian Ballard and Dan McFaul – hopefully on Monday or Tuesday of next week regarding the matter of PRF Insurance and the Risk Management Agency at Department of Agriculture?

We will make ourselves available whenever the person you designate might be able to see us for 30 minutes, or so.

I can be reached at (b) (6) or at this email address.

Thanking you in advance,
Susie Wiles

Susan Summerall Wiles
Partner, Ballard Partners
601 13th Street, NW
Washington, DC 20005
(202)800-5620

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From: [Susie Wiles](#)
To: [Bachmann, Peter - OCR, Washington, DC](#)
Subject: Re: 9 a.m. on Monday
Date: Monday, July 30, 2018 8:40:03 AM

Thanks, Peter. Brian and Dan will call in at 11 a.m. Appreciate it very much.
susie

Susan Summerall Wiles
Partner, Ballard Partners
601 13th Street, NW
Washington, DC 20005
(202)800-5620

From: "Bachmann, Peter - OCR, Washington, DC" <Peter.Bachmann@osec.usda.gov>
Date: Monday, July 30, 2018 at 8:28 AM
To: Susie Wiles (b) (6) @ballardfl.com>
Subject: RE: 9 a.m. on Monday

Thanks, Susie. Apologies for not getting back in touch sooner than Sunday on this. I am fine with in-person, however, while I'm the policy expert in the Secretary's Office, I cannot dig very deep on this specific issue. Our folks are aware of concerns out there (we've heard from at least one other firm in town) and nothing is moving so fast that we cannot take some comments. The reason I've asked for phone is that we've got most of our experts on this at our Kansas City RMA Office and I'd like for them to be able to participate on equal footing, if some of us are in the room and some on the phone, it makes things a bit more difficult.

Hope that makes sense!

Call in: 1-888-844-9904; Passcode: (b) (6)

Peter

From: Susie Wiles (b) (6) @ballardfl.com>
Sent: Monday, July 30, 2018 6:35 AM
To: Bachmann, Peter - OCR, Washington, DC <Peter.Bachmann@osec.usda.gov>
Subject: Re: 9 a.m. on Monday

Okay. Our Friday emails said pick a time, so I did. I think they'd really like to discuss in person but if you prefer a call, of course we can do that.

Let me know — and we will make 11 work. If we'd doing a call, what's the best#?

Thanks so much,

Susie Wiles

Sent from my iPhone
Please excuse typos

On Jul 29, 2018, at 10:27 PM, Bachmann, Peter - OCR, Washington, DC
<Peter.Bachmann@osec.usda.gov> wrote:

Susie,

9 am tomorrow is not good for me, can we try to get on the phone later in the morning? 11 works great. No need for an in-person for this check-in, I'd like to include my colleagues in Kansas City with RMA.

Peter

On Jul 29, 2018, at 8:59 PM, Susie Wiles (b) (6) <[@ballardfl.com](mailto:(b) (6)@ballardfl.com)> wrote:

Peter,

Taking the liberty of arriving to see you at 9 tomorrow a.m. The meeting will be with my partners, Brian Ballard and Dan McFaul. It turns out I'm not in DC until Wednesday because I'm a Floridian and participating with the President in Tampa on Tuesday. I can be reached at (b) (6) and you can reach Dan at (b) (6).

They'll see you at 9. Please let Dan or me know where, exactly, to go when we get to the building entrance.

Many thanks,
Susie

Susan Summerall Wiles
Partner, Ballard Partners
601 13th Street, NW
Washington, DC 20005
(202)800-5620

From: "Bachmann, Peter - OCR, Washington, DC"

<Peter.Bachmann@osec.usda.gov>

Date: Friday, July 27, 2018 at 5:46 PM

To: Susie Wiles (b) (6) <[@ballardfl.com](mailto:(b) (6)@ballardfl.com)>

Subject: RE: PRF insurance

Hi Susie,

Just getting finished digging out of emails from this week. I'm pretty flexible on Monday morning before 12:30, what's a good time for you?

Peter

From: Susie Wiles (b) (6) <[\[REDACTED\]@ballardfl.com](mailto:[REDACTED]@ballardfl.com)>
Sent: Friday, July 27, 2018 6:47 AM
To: Starling, Raymond - OSEC, Washington, DC
<Raymond.Starling@osec.usda.gov>
Cc: Bachmann, Peter - OCR, Washington, DC
<Peter.Bachmann@osec.usda.gov>
Subject: Re: PRF insurance

Thank you so much - really appreciate the connect. Peter, might you have 20 minutes, or so, any time on Monday to meet with Brian Ballard? I won't be in DC but he knows the issue and can quickly walk you through the concern. Hoping this can work.

Much appreciated,
Susie Wiles

Susie Wiles
Sent from my iPhone so please excuse typos

From: Starling, Raymond - OSEC, Washington, DC
<Raymond.Starling@osec.usda.gov>
Sent: Thursday, July 26, 2018 10:31:08 PM
To: Susie Wiles
Cc: Bachmann, Peter - OCR, Washington, DC
Subject: RE: PRF insurance

Susie,

Please meet Peter Bachmann, with whom I hope you can connect early next week. Please be assured that I would not meet with you on any crop insurance related issue without Peter in the room.

Cordially,
-Ray

From: Susie Wiles [mailto:(b) (6)@ballardfl.com]
Sent: Thursday, July 26, 2018 10:23 PM
To: Starling, Raymond - OSEC, Washington, DC
<Raymond.Starling@osec.usda.gov>
Subject: Re: PRF insurance

That would be most helpful, I think., and hopefully on Monday. Or if you have a deputy - or both. You certainly know best. We will be there when you say to meet with whomever you say.

Thanks,
Susie Wiles

Sent from my iPhone
Please excuse typos

On Jul 26, 2018, at 10:11 PM, Starling, Raymond - OSEC, Washington, DC <Raymond.Starling@osec.usda.gov> wrote:

Hi Susie,

**I'm out of the office tomorrow through August 6th.
Would it be helpful to schedule time with the Senior
Advisor to the Secretary for crop insurance issues?**

**Thanks,
-Ray**

From: Susie Wiles [mailto:(b) (6)@ballardfl.com]
Sent: Thursday, July 26, 2018 5:46 PM
To: Starling, Raymond - OSEC, Washington, DC
<Raymond.Starling@osec.usda.gov>
Subject: PRF insurance

Ray,
I understand you are out of the office –I hope you getting a nice break from the business of DC.

In your absence, would it be possible to schedule a meeting with my partners Brian Ballard and Dan McFaul – hopefully on Monday or Tuesday of next week regarding the matter of PRF Insurance and the Risk Management Agency at Department of Agriculture?

We will make ourselves available whenever the person you designate might be able to see us for 30 minutes, or so.

I can be reached at (b) (6) or at this email address.

Thanking you in advance,
Susie Wiles

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From: [Flournoy, Richard - RMA](#)
To: [Bachmann, Peter - OCR, Washington, DC](#)
Subject: RE: Feed info
Date: Friday, August 24, 2018 11:51:34 AM

thanks

From: Bachmann, Peter - OCR, Washington, DC
Sent: Friday, August 24, 2018 10:49 AM
To: Flournoy, Richard - RMA <richard.flournoy@rma.usda.gov>
Subject: FW: Feed info

One more... trying to get a call time set

From: Dan McFaul [\(b\) \(6\)@ballardfl.com](#)>
Sent: Friday, August 24, 2018 10:55 AM
To: Bachmann, Peter - OCR, Washington, DC <Peter.Bachmann@osec.usda.gov>
Subject: Feed info

Peter,

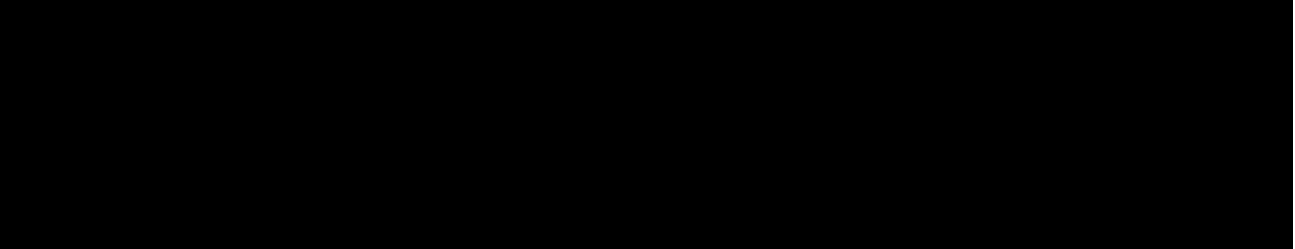
Two more data points for you. [\(b\)\(3\) in conjunction with 7 USC 8791 \(b\)\(2\)\(A\), \(b\)\(4\), and \(b\)\(6\)](#).

Thanks

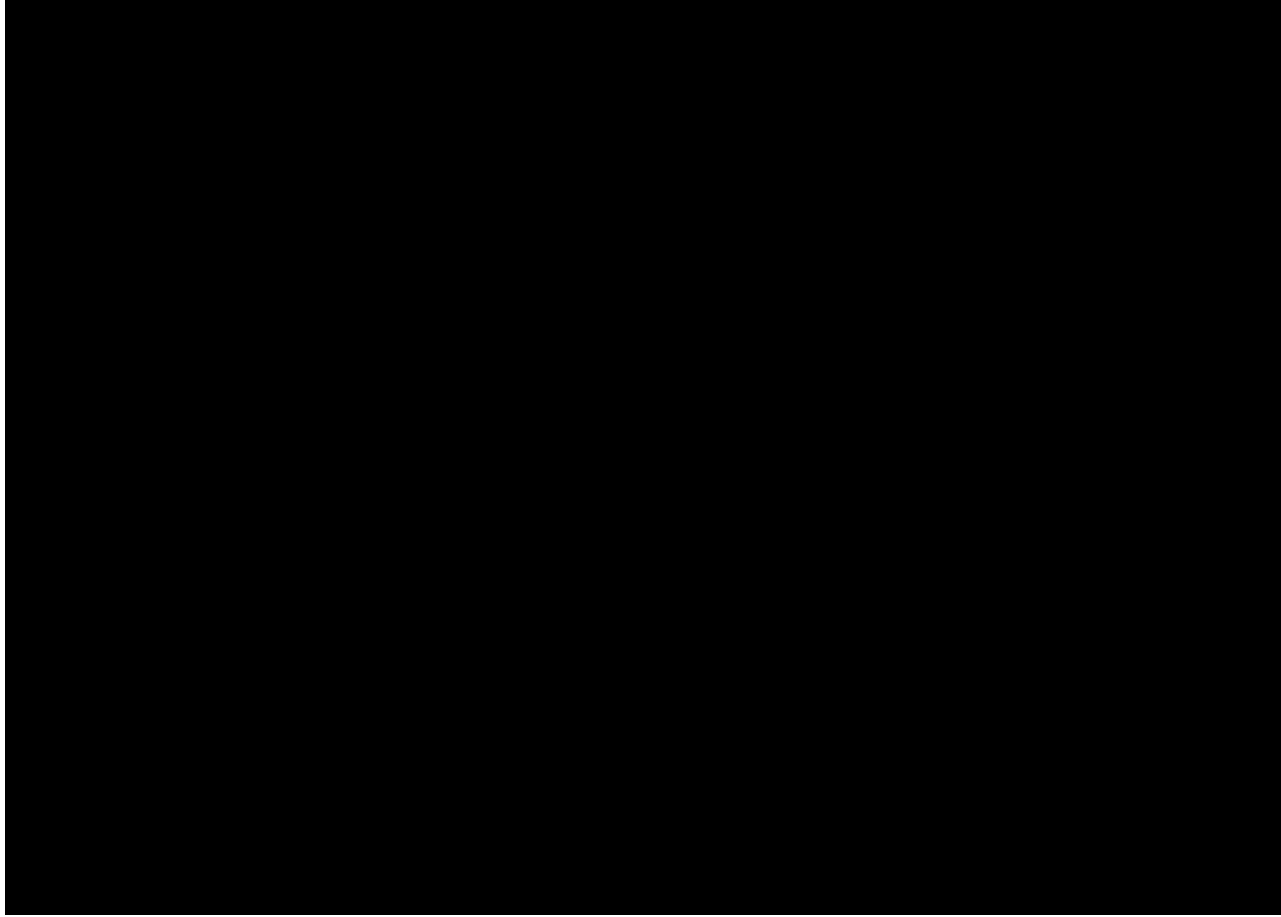
Dan

From: [\(b\)\(3\) in conjunction with 7 USC 8791 \(b\)\(2\)\(A\), \(b\)\(4\), and \(b\)\(6\)](#)

[\(b\)\(3\) in conjunction with 7 USC 8791 \(b\)\(2\)\(A\), \(b\)\(4\), and \(b\)\(6\)](#)



(b)(3) in conjunction with 7 USC 8791 (b)(2)(A), (b)(4), and (b)(6)

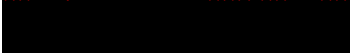


(b)(3) in conjunction with 7 USC 8791 (b)(2)(A), (b)(4), and (b)(6)



Have a great day - may it be filled with rain!

(b)(3) in conjunction with 7 USC 8791 (b)(2)(A), (b)(4), and (b)(6)



Sent from my iPhone

From: [Dan McFaul](#)
To: [Bachmann, Peter - OCR, Washington, DC](#)
Subject: Re: Feed info
Date: Tuesday, August 28, 2018 11:16:16 AM

Thanks Peter. Tremendous job from you and your team.

Sent from my iPhone

On Aug 28, 2018, at 10:33 AM, Bachmann, Peter - OCR, Washington, DC
<Peter.Bachmann@osec.usda.gov> wrote:

We're all on the call, you guys still calling in?

From: Bachmann, Peter - OCR, Washington, DC
Sent: Monday, August 27, 2018 6:23 PM
To: 'Dan McFaul' (b) (6) <ballardfl.com>
Subject: RE: Feed info

Dan,

I can talk briefly this evening but wanted to send this over, first. And see attached!

Key Points:

- RMA is not adjusting the productivity factor or eliminating any intervals for 2019.
- However, grazing county base values will be reduced in areas of Arizona. These values are based on the NASS rental rate, grazing fee, and hay price data adjusted using the NRCS productivity model. Reductions will also occur in the surrounding states as well as throughout the country.
- These values are updated yearly and are part of normal maintenance of the policy.

10:30 AM ET

Call-in: 1 (888) 844-9904; (b) (6)

Peter

From: Dan McFaul (b) (6) <ballardfl.com>
Sent: Monday, August 27, 2018 10:18 AM
To: Bachmann, Peter - OCR, Washington, DC <Peter.Bachmann@osec.usda.gov>
Subject: Re: Feed info

Peter

Do you have a few moments for a quick call today? Just trying to get some color on

tomorrow's conf call. I don't want to have my ranchers walk into a buzzsaw without some preparation.

Thanks

Dan

On Aug 24, 2018, at 7:49 PM, Bachmann, Peter - OCR, Washington, DC
<Peter.Bachmann@osec.usda.gov> wrote:

Perfect. Please hold it and we'll get y'all a call-in number on Monday.

From: Dan McFaul (b) (6) <[@ballardfl.com](mailto:(b)(6)@ballardfl.com)>
Sent: Friday, August 24, 2018 11:59 AM
To: Bachmann, Peter - OCR, Washington, DC
<Peter.Bachmann@osec.usda.gov>
Subject: Re: Feed info

Yes. I think we can make that work.

Sent from my iPhone

On Aug 24, 2018, at 11:49 AM, Bachmann, Peter - OCR, Washington, DC
<Peter.Bachmann@osec.usda.gov> wrote:

Dan,

Does 10:30 work for a call on Tuesday? I don't have any additional information to share but our Kansas City staff will provide you and whoever you invite on, an update.

From: Dan McFaul (b) (6) <[@ballardfl.com](mailto:(b)(6)@ballardfl.com)>
Sent: Friday, August 24, 2018 10:55 AM
To: Bachmann, Peter - OCR, Washington, DC
<Peter.Bachmann@osec.usda.gov>
Subject: Feed info

Peter,

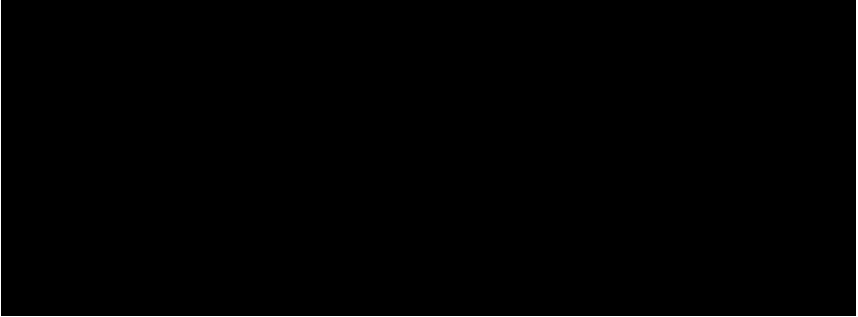
Two more data points for you. (b)(3) in conjunction with 7 USC 8791 (b)(2)(A), (b)(4), and (b)(6)

Thanks

Dan

From: (b)(3) in conjunction with 7 USC 8791 (b)(2)(A), (b)(4), and (b)(6)

(b)(3) in conjunction with 7 USC 8791 (b)(2)(A), (b)(4), and (b)(6)



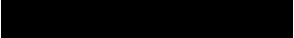
<image001.jpg>

(b)(3) in conjunction with 7 USC 8791 (b)(2)(A), (b)(4), and (b)(6)



Have a great day - may it be filled with rain!

(b)(3) in conjunction with 7 USC 8791 (b)(2)(A), (b)(4), and (b)(6)



Sent from my iPhone

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From: [Ibarra, Robert - RMA](#)
To: [Bachmann, Peter - OCR, Washington, DC](#)
Subject: Accepted: FW: Call on PRF Changes with Ballard Partners (Brian Ballard, Susie Wiles, Dan McFaul)

From: [Bachmann, Peter - OCR, Washington, DC](#)
To: [Dan McFaul](#)
Subject: RE: PRF insurance -- ranchers and cattlegrowers issue
Date: Wednesday, August 8, 2018 5:23:02 PM
Attachments: [image001.png](#)

Thanks, Dan!

We are reviewing the information and will let you know if we have any questions. Appreciate that y'all got on the line last week, too.

Peter

From: Dan McFaul (b) (6) @ballardfl.com>
Sent: Wednesday, August 8, 2018 9:51 AM
To: Bachmann, Peter - OCR, Washington, DC <Peter.Bachmann@osec.usda.gov>
Cc: Young, Joby - OSEC, Washington, DC <Joby.Young@osec.usda.gov>
Subject: PRF insurance -- ranchers and cattlegrowers issue

Peter,

Thank you for taking the time and participating in a call last week to discuss PRF insurance and the RMA's potential changes.

Please see the attached data from the (b) (5) in conjunction with 7 USC 8791 (b)(2)(A), (b)(4), and (b) (6) and the (b) (5) in conjunction with 7 USC 8791 (b)(2)(A), (b)(4), and (b) (6). This shows their feed costs, which are off from the county estimates. Clearly the PRF insurance has been working. We have more of these examples and data on the way.

Please let me know what else we can provide to help on this issue.

Thank you.

Dan

Dan McFaul

BALLARD | PARTNERS

Ballard Partners
601 Thirteenth St, NW, Suite #200 N
Washington, DC 20005
P: 202.800.5620
F: 202.800.5623
(b) (6) @ballardfl.com

Sent: Saturday, August 4, 2018 3:37 PM

To: Dan McFaul (b) (6) @ballardfl.com>

Subject: FW: Drought Response Letter (b)(3) in conjunction with 7 USC 8791 (b)(2)(A), (b)(4), and (b)(6)

Dan

(b)(3) in conjunction with 7 USC 8791 (b)(2)(A), (b)(4), and (b)(6)

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From: [Starling, Raymond - OSEC, Washington, DC](#)
To: [Bachmann, Peter - OCR, Washington, DC](#)
Subject: Re: PRF insurance
Date: Friday, July 27, 2018 8:29:00 AM

Thanks so much!

From: "Bachmann, Peter - OCR, Washington, DC" <Peter.Bachmann@osec.usda.gov>
Date: Friday, July 27, 2018 at 8:00:00 AM
To: "Starling, Raymond - OSEC, Washington, DC" <Raymond.Starling@osec.usda.gov>
Cc: "Shuford, Campbell - OSEC, Washington, DC" <Campbell.Shuford@osec.usda.gov>
Subject: Re: PRF insurance

We are already dealing with the same rumors from a couple of other folks through Cassidy and Associates. (b)(5) pre-decisional deliberative



I'll follow-up.

Peter

On Jul 26, 2018, at 10:12 PM, Starling, Raymond - OSEC, Washington, DC
<Raymond.Starling@osec.usda.gov> wrote:

Peter,

Just putting you on notice that you may (b)(5) pre-decisional
deliberative



Thanks,
-Ray

From: Starling, Raymond - OSEC, Washington, DC
Sent: Thursday, July 26, 2018 10:11 PM
To: 'Susie Wiles' (b) (6) <@ballardfl.com>
Subject: RE: PRF insurance

Hi Susie,

I'm out of the office tomorrow through August 6th. Would it be helpful to schedule time with the Senior Advisor to the Secretary for crop insurance issues?

Thanks,
-Ray

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Sent: Thursday, July 26, 2018 5:46 PM
To: Starling, Raymond - OSEC, Washington, DC <Raymond.Starling@osec.usda.gov>
Subject: PRF insurance

Ray,
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In your absence, would it be possible to schedule a meeting with my partners Brian Ballard and Dan McFaul – hopefully on Monday or Tuesday of next week regarding the matter of PRF Insurance and the Risk Management Agency at Department of Agriculture?

We will make ourselves available whenever the person you designate might be able to see us for 30 minutes, or so.

I can be reached at (b) (6) or at this email address.

Thanking you in advance,
Susie Wiles

Susan Summerall Wiles
Partner, Ballard Partners
601 13th Street, NW
Washington, DC 20005
(202)800-5620