U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, DC 20410-3000

OFFICE OF ADMINISTRATION

December 17, 2020

Mr. Austin R. Evers
Executive Director
American Oversight
030 15th Street, N.W.
Suite B255
Washington, DC 20005

RE: Freedom of Information Act Request
FOIA Control No.: 19-FI-HQ-01441 and 19-FI-HQ-01596
Civil Action No.: 19-cv-2814

Dear Mr. Evers:

This letter is the fourth interim response to your Freedom of Information Act (FOIA) request dated and received on June 24, 2019 and July 19, 2019, respectively. You asked for copies of Department of Housing and Urban Development (HUD) records from September 1, 2018 through the date of the search, consisting of communications between HUD political appointees in the Office of Congressional and Intergovernmental Relations, Office of General Counsel, and HUD leadership offices with specific White House Counsel staff regarding congressional oversight of specific matters and general policies, concerns, and considerations related to congressional oversight of the executive branch.

For this response, please be advised that an electronic search have been conducted and as a result of this search, records responsive to your request have been located. The Department has identified the following:

Program Office/Custodian	Pages Released	Redactions
Office of General Counsel Senior Counsel – Ashley Ludlow	146	9 pages contains b(6) redactions (personal privacy)
TOTALS	146	

Your request is granted in part. Enclosed are documents responsive to your request. I am withholding cell phone numbers, names of organizations where staff were negotiating potential employment, and the signature of the Inspector General pursuant to FOIA Exemption 6. Exemption 6 protects information the release of which would constitute an unwarranted invasion of personal privacy. The interest of the general public in reviewing those portions of government documents does not outweigh the individuals' right to privacy.

AMERICAN OVERSIGHT

For your information, your FOIA request, including your identity and any information made available, is releasable to the public under subsequent FOIA requests. In responding to these requests, the Department does not release personal information, such as home address, telephone number, or Social Security number, all of which are protected from disclosure under FOIA Exemption 6.

If you have any questions regarding your request, you may contact Department of Justice – Federal Programs Branch trial attorney, Alexander Sverdlov, at 202-305-8550. Thank you for your interest in the Department's programs and policies.

Sincerely,

Deborah R. Snowden
Deputy Chief FOIA Officer
Freedom of Information Act Branch
Office of the Executive Secretariat

Enclosures

AMERICAN OVERSIGHT

ETHICS PLEDGE

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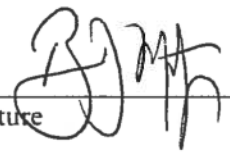
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Signature

06/06, 2018
Date

Montgomery, Brian, Darrell
Print or type your full name (last, first, middle)

AMERICAN OVERSIGHT

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Signature

02/20/18, 20___

Date

MORSE, TRENT, M

Print or type your full name (last, first, middle)

AMERICAN OVERSIGHT

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Adair Odom
Signature

September 4, 2018
Date

Odom, Adair C
Print or type your full name (last, first, middle)

AMERICAN OVERSIGHT

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Colleen Okane
Signature

May 14, 2018
Date

OKane Colleen Marie
Print or type your full name (last, first, middle)

AMERICAN OVERSIGHT

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Signature

02 / 02 . 2019
Date

Quinn, Brendan John
Print or type your full name (last, first, middle)

AMERICAN OVERSIGHT

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5/14, 2018
Date

Print or type your full name (last, first, middle)

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Signature

July 23, 2018
Date

Simon, Ammon, Glenn
Print or type your full name (last, first, middle)

AMERICAN OVERSIGHT

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Signature

September 17, 2018
Date

Thurman, Todd, Matthew
Print or type your full name (last, first, middle)

AMERICAN OVERSIGHT

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Suzanne Israel Tufts — October 2, 2017

Signature — Date

Tufts, Suzanne Israel

Print or type your full name (last, first, middle)

AMERICAN OVERSIGHT

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Signature

September 17, 2018
Date

VANVICK, Caroline
Print or type your full name (last, first, middle)

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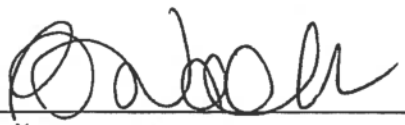
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Signature

July 23, 2018

Date

Brittany J. Walker

Print or type your full name (last, first, middle)

AMERICAN OVERSIGHT

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Kelsie J. Wendelberger
Signature

09-17-18, 2018
Date

WENDELBERGER, KELSIE, JOLYNN
Print or type your full name (last, first, middle)

AMERICAN OVERSIGHT

ETHICS PLEDGE

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Signature

03/06 . 2018
Date

WEYENETH, TAYLOR P.
Print or type your full name (last, first, middle)

AMERICAN OVERSIGHT

ETHICS PLEDGE

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Signature

August 7, 2017
Date

Leonard Wolfson
Print or type your full name (last, first, middle)

AMERICAN OVERSIGHT

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Signature

February 05, 2019
Date

John Coalter Baker Jr
Print or type your full name (last, first, middle)

AMERICAN OVERSIGHT

ETHICS PLEDGE

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Jack N Bobbitt
Signature

02/19/2019, 20___
Date

John N Bobbitt
Print or type your full name (last, first, middle)

AMERICAN OVERSIGHT

ETHICS PLEDGE

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Signature

April 1, 2019
Date

Chretien, Spencer James
Print or type your full name (last, first, middle)

AMERICAN OVERSIGHT

ETHICS PLEDGE

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Signature

March 17, 2019
Date

Coleman, John Elliott
Print or type your full name (last, first, middle)

AMERICAN OVERSIGHT

ETHICS PLEDGE

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M. [signature] 02/12/19

Signature Date

Cummings, Matthew, Lee

Print or type your full name (last, first, middle)

AMERICAN OVERSIGHT

ETHICS PLEDGE

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Paige J. Esterkin
Signature

March 27, 2019
Date

ESTERKIN, PAIGE JESSICA
Print or type your full name (last, first, middle)

AMERICAN OVERSIGHT

ETHICS PLEDGE

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Signature

March 18, 2019
Date

Knittle, Scott Allan
Print or type your full name (last, first, middle)

AMERICAN OVERSIGHT

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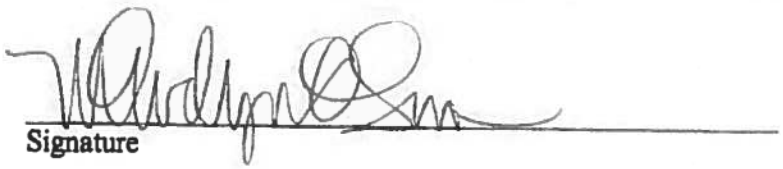
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Signature

2/12/2020

Date

Lim, Marie Evelyn Cunca

Print or type your full name (last, first, middle)

AMERICAN OVERSIGHT

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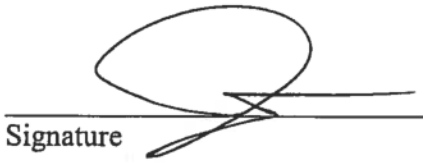
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Signature

4/1, 2019

Date

Lippert, Jeremy Alan

Print or type your full name (last, first, middle)

AMERICAN OVERSIGHT

ETHICS PLEDGE

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William J. Maloney, Jr.
Signature

02/05, 2019
Date

Maloney, William, James
Print or type your full name (last, first, middle)

AMERICAN OVERSIGHT

ETHICS PLEDGE

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2. If, upon my departure from the Government, I am covered by the post-employment restrictions on communicating with employees of my former executive agency set forth in section 207(c) of title 18, United States Code, I agree that I will abide by those restrictions.

3. In addition to abiding by the limitations of paragraphs 1 and 2, I also agree, upon leaving Government service, not to engage in lobbying activities with respect to any covered executive branch official or non-career Senior Executive Service appointee for the remainder of the Administration.

4. I will not, at any time after the termination of my employment in the United States Government, engage in any activity on behalf of any foreign government or foreign political party which, were it undertaken on January 20, 2017, would require me to register under the Foreign Agents Registration Act of 1938, as amended.

5. I will not accept gifts from registered lobbyists or lobbying organizations for the duration of my service as an appointee.

6. I will not for a period of 2 years from the date of my appointment participate in any particular matter involving specific parties that is directly and substantially related to my former employer or former clients, including regulations and contracts.

7. If I was a registered lobbyist within the 2 years before the date of my appointment, in addition to abiding by the limitations of paragraph 6, I will not for a period of 2 years after the date of my appointment participate in any particular matter on which I lobbied within the 2 years before the date of my appointment or participate in the specific issue area in which that particular matter falls.

8. I agree that any hiring or other employment decisions I make will be based on the candidate's qualifications, competence, and experience.

9. I acknowledge that the Executive Order entitled "Ethics Commitments by Executive Branch Appointees," issued by the President on January 28, 2017, which I have read before signing this document, defines certain terms applicable to the foregoing obligations and sets forth the methods for enforcing them. I expressly accept the provisions of that Executive Order as a part of this agreement and as binding on me. I understand that the obligations of this pledge are in addition to any statutory or other legal restrictions applicable to me by virtue of Government service.

Rae Oliver Davis
Signature

11/2019
February 19, 2019
Date

Oliver Davis, Rae
Print or type your full name (last, first, middle)

AMERICAN OVERSIGHT

ETHICS PLEDGE

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

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James E. Redfield III
Signature

March 18, 2019
Date

Redfield, James, Earl
Print or type your full name (last, first, middle)

AMERICAN OVERSIGHT

ETHICS PLEDGE

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2. If, upon my departure from the Government, I am covered by the post-employment restrictions on communicating with employees of my former executive agency set forth in section 207(c) of title 18, United States Code, I agree that I will abide by those restrictions.

3. In addition to abiding by the limitations of paragraphs 1 and 2, I also agree, upon leaving Government service, not to engage in lobbying activities with respect to any covered executive branch official or non-career Senior Executive Service appointee for the remainder of the Administration.

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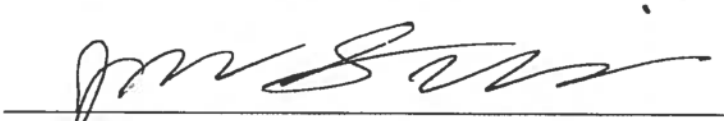
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Signature

3 - 8, 2019

Date

Sullivan, John, Lewis

Print or type your full name (last, first, middle)

AMERICAN OVERSIGHT

ETHICS PLEDGE

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Signature

3/25/19, 20____
Date

Eric Scott Turner
Print or type your full name (last, first, middle)

AMERICAN OVERSIGHT

ETHICS PLEDGE

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Signature

04/04, 2019
Date

Trometter Phillip Thomas Edward
Print or type your full name (last, first, middle)

AMERICAN OVERSIGHT

ETHICS PLEDGE

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P Roff
Signature

4/24, 2019
Date

Coffin, Peter, Roberts
Print or type your full name (last, first, middle)

AMERICAN OVERSIGHT

ETHICS PLEDGE

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Melanie Palmas
Signature

April 23rd, 2019
Date

Palmas, Melanie, Dean
Print or type your full name (last, first, middle)

AMERICAN OVERSIGHT

ETHICS PLEDGE

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Christopher M. Patterson
Signature

5/11, 2019
Date

Christopher Michael Patterson
Print or type your full name (last, first, middle)

AMERICAN OVERSIGHT

ETHICS PLEDGE

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James A. Buntyn — Signature

5/13, 2019 — Date

Buntyn, James, Anthony — Print or type your full name (last, first, middle)

AMERICAN OVERSIGHT

ETHICS PLEDGE

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Signature

05/17, 2019
Date

Daniel Huff
Print or type your full name (last, first, middle)

AMERICAN OVERSIGHT

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
THE SECRETARY
WASHINGTON, DC 20410-0001

MEMORANDUM FOR: Linda M. Cruciani, Deputy General Counsel for Operations, CA

FROM: Leonard Wolfson, Assistant Secretary for the Office of Congressional and Intergovernmental Relations

SUBJECT: Recusal

Consistent with my ethics agreement dated October 25, 2017, this is to notify you that I have recused myself from participating in certain official matters as described below. I take this action in order to comply with the conflict of interest restrictions of 18 U.S.C. § 208, the Standards of Ethical Conduct for Employees of the Executive Branch, and the Ethics Pledge (Executive Order No. 13770).

I resigned from my position with Mortgage Bankers Association (MBA). For a period of one year after my resignation from this entity, I will not participate personally and substantially in any particular matter involving specific parties in which this entity is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d). In addition, I am disqualified from participation in any particular matter involving specific parties in which this entity is a party for two years from July 2017, under the provisions of the Ethics Pledge (Executive Order No. 13770).

Any official matters involving the entity named in this recusal, including decisions, meetings, correspondence, memoranda, and telephone calls, should be forwarded to Michael Kelley for disposition, and handled appropriately without being brought to my attention. My name should not appear on any documents pertaining to such matters. With respect to this entity, I have directed my staff to forward matters requiring official action to Michael Kelley for a determination regarding the applicability of this recusal.

cc: Sheila Greenwood, Chief of Staff
Lindsey Allen, Assistant General Counsel, Ethics and Appeals Law Division

AMERICAN OVERSIGHT

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, D C 20410-0500

MEMORANDUM FOR: Sheila M. Greenwood, Chief of Staff, S

FROM: Adolfo Marzol, Senior Advisor, S

SUBJECT: Conflict of Interest Disqualification

This is to notify you that I have recused myself from participating in certain official matters as described below until May 8, 2019. I take this action in an abundance of caution to avoid any apparent violation of law or ethics regulations in accordance with the Government-wide Standards of Ethical Conduct regulation at 5 C.F.R. §§ 2635.101(b)(14), 2635.502, and 2635.702(d), as well as the President's Ethics Pledge. Effective immediately, I am disqualifying myself from personal participation in any particular matter that will have a direct and predictable effect on the financial interests of Essent Group, Ltd. , or any particular matter in which Essent Group, Ltd. is or represents a party. Any official matter involving Essent Group, Ltd., including decisions, meetings, correspondence, memoranda, and telephone calls, should be referred to Sheila M. Greenwood and handled appropriately without being brought to my attention. My name should not appear on any documents pertaining to such matters. To further clarify this disqualification, nothing in this recusal shall be construed to limit me from participation in any discussion or legislative or regulatory proposal which would be broadly applicable to all members of the mortgage insurance industry in the context of housing finance reform. Further, this recusal shall not limit me from engaging in discussions or meeting with industry trade associations which Essent Group, Ltd. may be a member of, so long as such discussions and meetings do not relate to a particular matter that will have a direct and predictable effect solely on the financial interests of Essent Group, Ltd or in which Essent Group Ltd is a party or represents a party to the matter.

If you should have any questions as to the applicability of this memorandum to any particular situation, please contact Lindsey Allen, Assistant General Counsel for Ethics and Appeals Law Division at 202-402-2736.

I appreciate your cooperation.

cc: Ethics and Appeals Law Division, Room 2130

AMERICAN OVERSIGHT

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
CHIEF FINANCIAL OFFICER
WASHINGTON, DC 20410-0001

MEMORANDUM FOR: Linda M. Cruciani, Deputy General Counsel for Operations, CAG

FROM: Irving L. Dennis, Chief Financial Officer, F

SUBJECT: Recusal

Consistent with my ethics agreement dated October 31, 2017, this is to notify you that I have recused myself from participating in certain official matters as described below. I take this action in order to comply with the conflict of interest restrictions of 18 U.S.C. § 208, the Standards of Ethical Conduct for Employees of the Executive Branch, and the Ethics Pledge (Executive Order No. 13770).

I resigned from my positions with the New Albany Community Foundation, New Albany Symphony Orchestra, and Montclair State University School of Business. For a period of one year after my resignation from each of these entities, I will not participate personally and substantially in any particular matter involving specific parties in which any of these entities is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d). In addition, I am disqualified from participation in any particular matter involving specific parties in which any of these entities are a party for two years from September 17, 2017, under the provisions of the Ethics Pledge (Executive Order No. 13770).

I ~~resigned~~ Retired from my position with Ernst & Young in June 2017. Pursuant to the partnership agreement, I received my final partnership share distributions in October 2017. The total amount of the payments was calculated as of the date of my withdrawal. In addition, pursuant to the partnership agreement, I also received a lump sum payment of my capital account in January 2018. This payment was calculated as of the date of my withdrawal. I will also receive fixed annual retirement payments, pursuant to my partnership agreement. For as long as I receive these payments, I will not participate personally and substantially in any particular matter that to my knowledge has a direct and predictable effect on the ability or willingness of Ernst & Young to make these payments to me, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1). For a period of one year after my resignation, I will not participate personally and substantially in any particular matter involving specific parties in which I know Ernst & Young is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d). In addition, I will not participate personally and substantially in any particular matter involving specific parties in which I know a former client of mine is a party or represents a party, for a period of one year after I last provided service to

AMERICAN OVERSIGHT

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, D.C. 20410-0500

MEMORANDUM FOR: Maren Kasper, WH Liaison, Craig Clemmensen, Acting Secretary, Janet Golrick, Acting Dep Sec, and PIH leadership

FROM: William Russell, HUD Beachhead Team

SUBJECT: Conflict of Interest Disqualification

This is to notify you that I have recused myself from participating in certain official matters as described below. I take this action in an abundance of caution to avoid any conflict of interest that might arise under the Federal conflict of interest statute at 18 U.S.C. § 208 and any apparent violation of law or ethics regulations in accordance with the Government-wide Standards of Ethical Conduct regulation at 5 C.F.R. §§ 2635.101(b)(14) & 2635.502. Effective immediately, I am disqualifying myself from personal participation in any particular matter that will have a direct and predictable effect on the financial interests of Sarasota Housing Authority, or any particular matter in which Sarasota Housing Authority is or represents a party. Any official matter involving Sarasota Housing Authority, including decisions, meetings, correspondence, memoranda, and telephone calls, should be referred to respective HUD officials and handled appropriately without being brought to my attention. My name should not appear on any documents pertaining to such matters.

If you should have any questions as to the applicability of this memorandum to any particular situation, please contact Lindsey Allen, Assistant General Counsel, Ethics and Appeals Law Division, at 202-402-2736.

I appreciate your cooperation.

cc: Ethics and Appeals Law Division, Room 2130

AMERICAN OVERSIGHT

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
GENERAL COUNSEL
WASHINGTON, DC 20410-0001

February 12, 2019

MEMORANDUM FOR: Paul Compton, General Counsel

FROM: Valeria Rae Oliver Davis, Inspector General VROD

SUBJECT: Recusal

Consistent with my ethics agreement dated June 27, 2018, this is to notify you that I have recused myself from participating in certain official matters as described below. I take this action in order to comply with the conflict of interest restrictions of 18 U.S.C. § 208, the Standards of Ethical Conduct for Employees of the Executive Branch, and the Ethics Pledge (Executive Order No. 13770).

My spouse is employed by LifeCents, a position for which he receives a fixed annual salary and a bonus tied to his performance. For as long as my spouse continues to work for LifeCents, I will not participate personally and substantially in any particular matter involving specific parties in which I know LifeCents or any client of my spouse is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

Any official matters involving the entities named in this recusal, including decisions, meetings, correspondence, memoranda, and telephone calls, should be forwarded to Helen Albert for disposition and handled appropriately without being brought to my attention. My name should not appear on any documents pertaining to such matters. With respect to these entities, I have directed my staff to forward matters requiring official action to Helen Albert for a determination regarding the applicability of this recusal.

cc: Jeremy M. Kirkland; Counsel to the Inspector General, Office of Legal Counsel, Office of Inspector General
Anthony Cummings, Associate General Counsel for Ethics, Appeals, and Personnel Law
Lindsey Allen, Assistant General Counsel, Ethics and Appeals Law Division

AMERICAN OVERSIGHT

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
GENERAL COUNSEL
WASHINGTON, DC 20410-0001
AUG 20 2018

MEMORANDUM FOR: Linda M. Cruciani, Deputy General Counsel for Operations, CAG

FROM: Jerome Paul Compton Jr., General Counsel, C

SUBJECT: Recusal – Update #1

Consistent with my ethics agreement dated May 26, 2017, and as an update to my recusal memorandum to you dated January 11, 2018, this is to notify you that I have recused myself from participating in certain official matters as described below. I take this action in order to comply with the conflict of interest restrictions of 18 U.S.C. § 208, the Standards of Ethical Conduct for Employees of the Executive Branch, and the Ethics Pledge (Executive Order No. 13770).

I resigned from my positions with Bradley Arant Boult Cummings LLP. My capital account was returned to me prior to my appointment and I will receive no further payments from the firm. For a period of one year after my resignation, I will not participate personally and substantially in any particular matter involving specific parties in which the firm or any former client of mine is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d). Further, I am disqualified from participation in any particular matter involving specific parties in which any of these entities are a party for two years from January 3, 2018, under the provisions of the Ethics Pledge (Executive Order No. 13770).

In addition, I have resigned from my positions with Brother Bryan Mission and the Truman Scholars Association. For a period of one year after my resignation from each of these entities, I will not participate personally and substantially in any particular matter involving specific parties in which either of these entities is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d). Further, I am disqualified from participation in any particular matter involving specific parties in which either of these entities are a party for two years from January 3, 2018, under the provisions of the Ethics Pledge (Executive Order No. 13770).

My son is employed by Regions Bank, a position for which he receives an annual salary. For as long as my son continues to work for Regions Bank, I will not participate personally and substantially in any particular matter involving Regions Bank unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

AMERICAN OVERSIGHT

Any official matters involving the entities named in this recusal, including decisions, meetings, correspondence, memoranda, and telephone calls, should be forwarded to Joseph J. Grassi for disposition, and handled appropriately without being brought to my attention. My name should not appear on any documents pertaining to such matters. With respect to these entities, I have directed my staff to forward matters requiring official action to Joseph J. Grassi for a determination regarding the applicability of this recusal.

cc: Andrew Hughes, Chief of Staff
Alfonso Costa, Deputy Chief of Staff
Lindsey Allen, Assistant General Counsel, Ethics and Appeals Law Division

AMERICAN OVERSIGHT

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
CHIEF FINANCIAL OFFICER
WASHINGTON, DC 20410-0001

MEMORANDUM FOR: Linda M. Cruciani, Deputy General Counsel for Operations, CAG

FROM: 7/23/18
Irving L. Dennis, Chief Financial Officer, F

SUBJECT: Recusal

Consistent with my ethics agreement dated October 31, 2017, this is to notify you that I have recused myself from participating in certain official matters as described below. I take this action in order to comply with the conflict of interest restrictions of 18 U.S.C. § 208, the Standards of Ethical Conduct for Employees of the Executive Branch, and the Ethics Pledge (Executive Order No. 13770).

I resigned from my positions with the New Albany Community Foundation, New Albany Symphony Orchestra, and Montclair State University School of Business. For a period of one year after my resignation from each of these entities, I will not participate personally and substantially in any particular matter involving specific parties in which any of these entities is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d). In addition, I am disqualified from participation in any particular matter involving specific parties in which any of these entities are a party for two years from September 17, 2017, under the provisions of the Ethics Pledge (Executive Order No. 13770).

I ~~resigned~~ Retired from my position with Ernst & Young in June 2017. Pursuant to the partnership agreement, I received my final partnership share distributions in October 2017. The total amount of the payments was calculated as of the date of my withdrawal. In addition, pursuant to the partnership agreement, I also received a lump sum payment of my capital account in January 2018. This payment was calculated as of the date of my withdrawal. I will also receive fixed annual retirement payments, pursuant to my partnership agreement. For as long as I receive these payments, I will not participate personally and substantially in any particular matter that to my knowledge has a direct and predictable effect on the ability or willingness of Ernst & Young to make these payments to me, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1). For a period of one year after my resignation, I will not participate personally and substantially in any particular matter involving specific parties in which I know Ernst & Young is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d). In addition, I will not participate personally and substantially in any particular matter involving specific parties in which I know a former client of mine is a party or represents a party, for a period of one year after I last provided service to

AMERICAN OVERSIGHT

that client, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d). Further, I am disqualified from participation in any particular matter involving specific parties in which any of these entities are a party for two years from January 5, 2018, under the provisions of the Ethics Pledge (Executive Order No. 13770).

I will retain my position as a trustee of Revocable Family Trust #1. I will not receive any fees for the services that I provide as a trustee during my appointment to the position of Chief Financial Officer. I will not participate personally and substantially in any particular matter that to my knowledge has a direct and predictable effect on the financial interests of Revocable Family Trust #1, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption, pursuant to 18 U.S.C. 208(b)(2).

Any official matters involving the entities named in this recusal, including decisions, meetings, correspondence, memoranda, and telephone calls, should be forwarded to George Tomchick for disposition, and handled appropriately without being brought to my attention. My name should not appear on any documents pertaining to such matters. With respect to these entities, I have directed my staff to forward matters requiring official action to George Tomchick for a determination regarding the applicability of this recusal.

cc: Sheila Greenwood, Chief of Staff
Deana Bass Williams, Deputy Chief of Staff
Andrew Hughes, Deputy Chief of Staff
Lindsey Allen, Assistant General Counsel, Ethics and Appeals Law Division

AMERICAN OVERSIGHT

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
GENERAL COUNSEL
WASHINGTON, DC 20410-0001

JUL 20 2018

MEMORANDUM FOR: Linda M. Cruciani, Deputy General Counsel for Operations, CAG

FROM: Brian D. Montgomery, Assistant Secretary for Housing/FHA Commissioner, H

SUBJECT: Recusal

Consistent with my ethics agreement dated September 25, 2017, this is to notify you that I have recused myself from participating in certain official matters as described below. I take this action in order to comply with the conflict of interest restrictions of 18 U.S.C. § 208, the Standards of Ethical Conduct for Employees of the Executive Branch, and the Ethics Pledge (Executive Order No. 13770).

I resigned from my positions with The Collingwood Group LLC; Situs Group LLC; Reverse Mortgage Investment Trust; and the Radian Group, Inc. I will not participate personally and substantially in any particular matter involving specific parties in which any of my former employers and former clients is a party or represents a party for a period of one year after I last provided service to that client, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d). Further, I will not participate in any particular matter involving specific parties in which certain entities are a party for two years from June 7, 2018, under the provisions of the Ethics Pledge (Executive Order No. 13770). The following entities are former employers and clients with whom I will recuse myself from particular matters involving these specific parties for 2 years from June 7, 2018:

The Collingwood Group
The Radian Group
Situs Group, LLC
Freedom Mortgage
JB Nutter
Caliber Home Loans
Nationstar Mortgage
Bank of America, NA
Wells Fargo Bank, NA
US Bank
Reverse Mortgage Funding LLC .

AMERICAN OVERSIGHT

Situs Group LLC has converted my ordinary common units to cash and has made a cash payment to me equal to the remaining balance of its acquisition of the Collingwood Group. For a period of two years from the date of the payment of those cast proceeds, I will not participate personally and substantially in any particular matter involving specific parties in which Situs is a party or represents a party, unless I first receive a written waiver pursuant to 5 C.F.R. § 2635.503(c).

In addition, the Radian Group, Inc. has accelerated the vesting of my non-vested restricted stock units. I have divested my stock in the Radian Group, Inc. For a period of two years from the date of the vesting of my non-vested restricted stock units, I will not participate personally and substantially in any particular matter involving specific parties in which The Radian Group, Inc. is a party or represents a party, unless I first receive a written waiver pursuant to 5 C.F.R. § 2635.503(c). I have also divested my interest in Signature Bank.

I will divest my interests in Reverse Mortgage Investment Trust within 90 days of my confirmation. I will not participate personally and substantially in any particular matter that to my knowledge has a direct and predictable effect on the financial interests Reverse Mortgage Investment Trust until I have divested it, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2).

My spouse is employed by The Chertoff Group, a position for which she receives a fixed annual salary and a bonus tied to her performance. For as long as my spouse continues to work for The Chertoff Group, I will not participate personally and substantially in any particular matter involving specific parties in which I know The Chertoff Group or any client of my spouse is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

Any official matters involving the entities named in this recusal, including decisions, meetings, correspondence, memoranda, and telephone calls, should be forwarded to Joseph Gormley for disposition and handled appropriately without being brought to my attention. My name should not appear on any documents pertaining to such matters. With respect to these entities, I have directed my staff to forward matters requiring official action to Joseph Gormley for a determination regarding the applicability of this recusal.

cc: Andrew Hughes, Chief of Staff
Anthony Cummings, Associate General Counsel for Ethics, Appeals, and Personnel Law
Lindsey Allen, Assistant General Counsel, Ethics and Appeals Law Division

AMERICAN OVERSIGHT

FROM: Pamela H. Patenaude

SUBJECT: Recusal

This is to notify you that, in accordance with the Government-wide Standards of Ethical Conduct regulation at 5 C.F.R. § 2635.604, I have recused myself from participating in certain official matters. I have had some preliminary discussions with the Home Builders Institute (HBI). Consequently, until further notice I will not participate personally and substantially in any particular matter that, to my knowledge, will have a direct and predictable effect on the financial interests of HBI. Please note that this recusal will also be effective for the purposes of the Federal conflict of interest statute at 18 U.S.C. § 208 in the event that my conversations rise to the level of "negotiating employment" or having an "any arrangement concerning prospective employment" within the meaning of that statute. Any particular matters involving these named entities or individuals should be referred to Victoria Barton, for disposition without my participation.

If you should have any questions about the applicability of this memorandum to any particular situation, please contact me at (303) 672-5066.

Pamela H. Patenaude
Signature

July 15, 2018
Date

AMERICAN OVERSIGHT

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, D.C. 20410-0500

MEMORANDUM

FOR: Matthew F. Hunter, Assistant Deputy Secretary for Field Policy and Management

DATE: April 5, 2018

FROM: Jeffery W. McMorris, Regional Administrator, Region X

SUBJECT: Conflict of Interest Disqualification

This is to notify you that I have recused myself from participating in certain official matters as described below. I take this action in an abundance of caution to avoid any apparent violation of law or ethics regulations in accordance with the Government-wide Standards of Ethical Conduct regulation at 5 C.F.R. §§ 2635.101(b)(14), 2635.502, and 2635.702(d). Effective immediately, I am disqualifying myself from personal participation in any particular matter that will have a direct and predictable effect on the financial interests of King County, Washington, or any particular matter in which King County is or represents a party. Any official matter involving King County, including decisions, meetings, correspondence, memoranda, and telephone calls, should be referred to Deputy Regional Administrator, Michael Look and handled appropriately without being brought to my attention. My name should not appear on any documents pertaining to such matters.

If you should have any questions as to the applicability of this memorandum to any particular situation, please contact Lindsey Allen, Assistant General Counsel for Ethics and Appeals Law Division at 303-672-5066.

I appreciate your cooperation.

cc: Ethics and Appeals Law Division, Room 2130

AMERICAN OVERSIGHT

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
THE SECRETARY
WASHINGTON, DC 20410-0001

January 16, 2018

MEMORANDUM FOR: Linda M. Cruciani, Deputy General Counsel for Operations, CA

FROM: Suzanne I. Tufts, Assistant Secretary for Administration

SUBJECT: Recusal

Consistent with my ethics agreement dated September 6, 2017, this is to notify you that I have recused myself from participating in certain official matters as described below. I take this action in order to comply with the conflict of interest restrictions of 18 U.S.C. § 208, the Standards of Ethical Conduct for Employees of the Executive Branch, and the Ethics Pledge (Executive Order No. 13770).

I have closed my sole proprietorship. I am not owed any payments from any of my clients. I will not participate personally and substantially in any particular matter involving specific parties in which I know a former client of mine is a party or represents a party for a period of one year after I last provided service to that client, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d). In addition, I am disqualified from participation in any particular matter involving specific parties in which any of my former clients are a party for two years from August 16, 2017, under the provisions of the Ethics Pledge (Executive Order No. 13770).

My spouse is an employee of Yeshiva University. I have a "covered relationship" with Yeshiva University pursuant to 5 C.F.R. § 2635.502. For as long as my spouse continues to work for Yeshiva University, I will not participate personally and substantially in any particular matter that to my knowledge has a direct and predictable effect on my spouse's compensation or employment with Yeshiva University. I will also not participate personally and substantially in any particular matter involving specific parties in which I know Yeshiva University, is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

Any official matters involving the entities named in this recusal, including decisions, meetings, correspondence, memoranda, and telephone calls, should be forwarded to Mason Alexander for disposition, and handled appropriately without being brought to my attention. My name should not appear on any documents pertaining to such matters. With respect to these entities, I have directed my staff to forward matters requiring official action to Mason Alexander for a determination regarding the applicability of this recusal.

AMERICAN OVERSIGHT

cc: Deana Bass Williams, Deputy Chief of Staff
Andrew Hughes, Deputy Chief of Staff
Lindsey Allen, Assistant General Counsel, Ethics and Appeals Law Division

AMERICAN OVERSIGHT

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, D.C. 20410-0500

MEMORANDUM FOR: Wanda Glasper

FROM: Joe Gormley ~~[illegible]~~ 1.19.18

SUBJECT: Conflict of Interest Disqualification

This is to notify you that I have recused myself from participating in certain official matters as described below. I take this action in an abundance of caution to avoid any conflict of interest that might arise under the Federal conflict of interest statute at 18 U.S.C. § 208 and any apparent violation of law or ethics regulations in accordance with the Government-wide Standards of Ethical Conduct regulation at 5 C.F.R. §§ 2635.101(b)(14) & 2635.502. Effective immediately, I am disqualifying myself from personal participation in any particular matter that will have a direct and predictable effect on the financial interests of Independent Community Bankers of America (ICBA), or any particular matter in which ICBA is or represents a party. Any official matter involving ICBA, including decisions, meetings, correspondence, memoranda, and telephone calls, should be referred to Dana Wade and handled appropriately without being brought to my attention. My name should not appear on any documents pertaining to such matters.

If you should have any questions as to the applicability of this memorandum to any particular situation, please contact the Ethics and Appeals Division, at 202-708-3815.

I appreciate your cooperation.

cc:

Ethics and Appeals Division
Room 2130

AMERICAN OVERSIGHT

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, D.C. 20410-0500

MEMORANDUM FOR: Secretary Carson

FROM: Beth Zorc Beth Zorc 11/14/17

SUBJECT: Conflict of Interest Disqualification

This is to notify you that, in accordance with the Government-wide Standards of Ethical Conduct regulation at 5 C.F.R. § 2635.604, I have recused myself from participating in certain official matters as described below. I have had some preliminary discussions related to possible employment with Wells Fargo. Consequently, until further notice, I will not participate personally and substantially in any particular matter that, to my knowledge, will have a direct and predictable effect on the financial interests of Wells Fargo. Any official matter involving Wells Fargo, including decisions, meetings, correspondence, memoranda, and telephone calls, should be referred to **David Woll** and handled appropriately without being brought to my attention. My name should not appear on any documents pertaining to such matters. Please note that this recusal will also be effective for the purposes of the Federal conflict of interest statute at 18 U.S.C. § 208 in the event that my conversations rise to the level of "negotiating employment" or having an "any arrangement concerning prospective employment" within the meaning of that statute.

In addition, any official matter involving regulations, legislation or policy development pertaining to FHA or Ginnie Mae should be referred to **Christina Brown**, the Regulatory Reform Officer for HUD.

If you should have any questions about the applicability of this memorandum to any particular situation, please contact Lindsey Allen, Assistant General Counsel for Ethics and Appeals Law Division, at (303) 672-5066.

cc: Pam Patenaude, Deputy Secretary
Lindsey Allen, Assistant General Counsel for Ethics and Appeals Law Division
David Woll, Deputy General Counsel
Christina Brown, Senior Counsel and Regulatory Reform Officer

AMERICAN OVERSIGHT

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
ASSISTANT SECRETARY FOR COMMUNITY PLANNING AND DEVELOPMENT
WASHINGTON, DC 20410-0001

MEMORANDUM FOR: Linda M. Cruciani, Deputy General Counsel for Operations, CA

FROM: Neal James Rackleff, Assistant Secretary for Community Planning and Development, 9-29-17

SUBJECT: Recusal

Consistent with my ethics agreement dated May 26, 2017, this is to notify you that I have recused myself from participating in certain official matters as described below. I take this action in order to comply with the conflict of interest restrictions of 18 U.S.C. § 208, the Standards of Ethical Conduct for Employees of the Executive Branch, and the Ethics Pledge (Executive Order No. 13770).

I resigned from my position with the law firm of Locke Lord LLP. I have already resigned from my position as Board of Director member of the Coalition for the Homeless of Houston/Harris County. I currently have a capital account with Lock Lord LLP and will receive a refund of that account after my resignation. Until I have received this refund, I will not participate personally and substantially in any particular matter that to my knowledge has a direct and predictable effect on the ability or willingness of the firm to pay this refund, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1). For a period of one year after my resignation, I also will not participate personally and substantially in any particular matter involving specific parties in which I know the firm is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d). In addition, I will not participate personally and substantially in any particular matter involving specific parties in which I know a former client of mine is a party or represents a party for a period of one year after I last provided service to that client, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d). In addition, I am disqualified from participation in any particular matter involving specific parties in which any of these entities are a party for two years from August 3, 2017, under the provisions of the Ethics Pledge (Executive Order No. 13770).

Any official matters involving the entities named in this recusal, including decisions, meetings, correspondence, memoranda, and telephone calls, should be forwarded to Ralph Gaines for disposition, and handled appropriately without being brought to my attention. My name should not appear on any documents pertaining to such matters. With

AMERICAN OVERSIGHT

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
DEPUTY SECRETARY
WASHINGTON, DC 20410-0001

SEP 26 2017

MEMORANDUM FOR: Linda M. Cruciani, Deputy General Counsel for Operations, CAG

FROM: Pamela Patenaude, Deputy Secretary, DS

SUBJECT: Recusal

Consistent with my ethics agreement dated May 2, 2017, this is to notify you that I have recused myself from participating in certain official matters as described below. I take this action in order to comply with the conflict of interest restrictions of 18 U.S.C. § 208, the Standards of Ethical Conduct for Employees of the Executive Branch, and the Ethics Pledge (Executive Order No. 13770).

I resigned from my positions with the J. Ronald Terwilliger Foundation for Housing America's Families; The Reinvestment Fund; HomeBuilders Institute; National Housing Conference; and Tysons Trace HOA. For a period of one year after my resignation from each of these entities, I will not participate personally and substantially in any particular matter involving specific parties in which any of these entities is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d). In addition, I am disqualified from participation in any particular matter involving specific parties in which any of these entities are a party for two years from September 17, 2017, under the provisions of the Ethics Pledge (Executive Order No. 13770).

My spouse is an employee of Doughtery Mortgage, LLC. I have a "covered relationship" with the Doughtery Mortgage, LLC pursuant to 5 C.F.R. § 2635.502. For as long as my spouse continues to work for Dougherty Mortgage, LLC, I will not participate personally and substantially in any particular matter that to my knowledge has a direct and predictable effect on my spouse's compensation or employment with Dougherty Mortgage, LLC. I will also not participate personally and substantially in any particular matter involving specific parties in which I know Dougherty Mortgage, LLC, is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

Any official matters involving the entities named in this recusal, including decisions, meetings, correspondence, memoranda, and telephone calls, should be forwarded to Mike Marshall for disposition, and handled appropriately without being brought to my attention. My name should not appear on any documents pertaining to such matters. With

AMERICAN OVERSIGHT

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
THE SECRETARY
WASHINGTON, DC 20410-0001

AUG 22 2017

MEMORANDUM FOR: Linda M. Cruciani, Deputy General Counsel for Operations, CA

FROM: Anna Maria Farias, Assistant Secretary for Fair Housing and Equal Opportunity

SUBJECT: Recusal

Consistent with my ethics agreement dated June 21, 2017, this is to notify you that I have recused myself from participating in certain official matters as described below. I take this action in order to comply with the conflict of interest restrictions of 18 U.S.C. § 208, the Standards of Ethical Conduct for Employees of the Executive Branch, and the Ethics Pledge (Executive Order No. 13770).

I resigned from my positions with One Star Foundation and the Board of Regents for Texas Woman's University. For a period of one year after my resignation from each of these entities, I will not participate personally and substantially in any particular matter involving specific parties in which any of these entities is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d). In addition, I am disqualified from participation in any particular matter involving specific parties in which any of these entities are a party for two years from August 10, 2017, under the provisions of the Ethics Pledge (Executive Order No. 13770).

Any official matters involving the entities named in this recusal, including decisions, meetings, correspondence, memoranda, and telephone calls, should be forwarded to Bryan Green for disposition, and handled appropriately without being brought to my attention. My name should not appear on any documents pertaining to such matters. With respect to these entities, I have directed my staff to forward matters requiring official action to Bryan Green for a determination regarding the applicability of this recusal.

cc: Sheila Greenwood, Chief of Staff
Lindsey Allen, Assistant General Counsel, Ethics and Appeals Law Division

AMERICAN OVERSIGHT

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, D.C. 20410-0500

July 21, 2017

MEMORANDUM FOR: Tanya Daggett
Confidential Assistant

FROM: David Eagles
Chief Operating Officer

SUBJECT: Conflict of Interest Disqualification

This is to notify you that I have recused myself from participating in certain official matters as described below. I take this action in an abundance of caution to avoid any actual or apparent conflict of interest that might arise under 5 C.F.R. §§ 2635.101(b)(14) & 2635.502 or the Ethics Pledge. Effective immediately, I am disqualifying myself from personal participation in any particular matter involving specific parties in which the Partnership for Public Service is or represents a party. In addition, I will not make any communication with the Partnership for Public Service unless the communication concerns a matter of general applicability and takes place at a meeting open to at least 5 interested parties. Any restricted matter involving the Partnership for Public Service, including decisions, meetings, correspondence, memoranda, and telephone calls, should be referred to Henry Hensley, Director of Office of Strategic Planning and Management and handled appropriately without being brought to my attention. My name should not appear on any documents pertaining to such matters.

If you should have any questions as to the applicability of this memorandum to any situation, please contact the Ethics and Appeals Division, at 202-708-3815.

I appreciate your cooperation.

cc:

Ethics and Appeals Division
Room 2130

AMERICAN OVERSIGHT

U.S. Department of Housing and Urban Development
New York State Office
Jacob K. Javits Federal Building
26 Federal Plaza
New York, New York 10278-0068

Date: July 14, 2017

MEMORANDUM FOR: Mirza Orriols, Deputy Regional Administrator, 2AMA
From: Barbara Gruson, Advisor to the Regional Administrator
SUBJECT: Conflict of Interest Disqualification

This is to notify you that I have recused myself from participating in certain official matters as described below. I take this action in an abundance of caution to avoid any apparent violation of law or ethics regulations in accordance with the Government-wide Standards of Ethical Conduct regulation at 5 C.F.R.2635.101(b)(14),2635.502, and 2635.702(d).
Effective immediately, I am disqualifying myself from personal participation in any matter having to do specifically with the Starrett City, including decisions, meetings, correspondence, memoranda, and telephone calls, should be referred to you and handled appropriately without being brought to my attention. My name should not appear on any documents pertaining to such matters.

If you should have any questions as to the applicability of this memorandum to any particular situation, please contact John Cahill, Regional Counsel for New York/New Jersey.

I appreciate your cooperation.

cc:
Ethics Law Division
Room 2130

AMERICAN OVERSIGHT

U.S. Department of Housing and Urban Development
New York State Office
Jacob K. Javits Federal Building
26 Federal Plaza
New York, New York 10278-0068
http://www.hud.gov/local/nyn/nynopen.html

DATE: July 12, 2017

MEMORANDUM FOR: Mirza Orriols, Deputy Regional Administrator, 2AMA

FROM: Lynne M. Patton, Regional Administrator, 2AMA

SUBJECT: Conflict of Interest Disqualification

This is to notify you that I have recused myself from participating in certain official matters as described below. I take this action in an abundance of caution to avoid any apparent violation of law or ethics regulations in accordance with the Government-wide Standards of Ethical Conduct regulation at 5 C.F.R. §§ 2635.101(b)(14), 2635.502, and 2635.702(d). Effective immediately, I am disqualifying myself from personal participation in any matter having to do specifically with the Starrett City project in Brooklyn, New York. Any official matter involving Starrett City, including decisions, meetings, correspondence, memoranda, and telephone calls, should be referred to you and handled appropriately without being brought to my attention. My name should not appear on any documents pertaining to such matters.

If you should have any questions as to the applicability of this memorandum to any particular situation, please contact John Cahill, Regional Counsel for New York/New Jersey.

I appreciate your cooperation.

cc:

Ethics Law Division
Room 2130

AMERICAN OVERSIGHT

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
THE SECRETARY
WASHINGTON, DC 20410-0001

April 3, 2017

MEMORANDUM FOR: Linda M. Cruciani, Deputy General Counsel for Operations, CA

FROM: Benjamin S. Carson, Sr., Secretary

SUBJECT: Recusal

Consistent with my ethics agreement dated January 10, 2017, and subsequent supplements dated January 19 and February 1, 2017, this is to notify you that I have recused myself from participating in certain official matters as described below. I take this action in order to comply with the conflict of interest restrictions of 18 U.S.C. § 208, the Standards of Ethical Conduct for Employees of the Executive Branch, and the Ethics Pledge (Executive Order No. 13770).

I resigned from my positions with Carson Scholars Fund, Inc. and Academy of Achievement. I have already resigned from my position with My Faith Votes. For a period of one year after my resignation from each of these entities, I will not participate personally and substantially in any particular matter involving specific parties in which any of these entities is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d). In addition, I am disqualified from participation in any particular matter involving specific parties in which any of these entities are a party for two years from March 2, 2017, under the provisions of the Ethics Pledge (Executive Order No. 13770).

I resigned from my positions as managing member of American Business Collaborative, LLC and BenCan, LLC, and I became a non-managing member of these entities. During my appointment, I will not manage these entities or provide any other services to them. Instead, I will receive only passive investment income from both entities. I will not participate personally and substantially in any particular matter that to my knowledge has a direct and predictable effect on the financial interests of these entities, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1).

I receive royalties from Review & Herald Publishing Association, Tyndale House Publishers, Inc., HarperCollins Christian Publishing, and Penguin Group USA for sales of my books. I will not participate personally and substantially in any particular matter involving specific parties in which I know any of these entities is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

AMERICAN OVERSIGHT

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, D.C. 20410-0500

MEMORANDUM FOR: The Secretary

FROM: Maren M. Kasper, Senior White House Advisor, S 2/6/17

SUBJECT: Conflict of Interest Disqualification

This is to notify you that I have recused myself from participating in certain official matters as described below. I take this action in an abundance of caution to avoid any conflict of interest that might arise under the Federal conflict of interest statute at 18 U.S.C. § 208 and any apparent violation of law or ethics regulations in accordance with the Government-wide Standards of Ethical Conduct regulation at 5 C.F.R. §§ 2635.101(b)(14) & 2635.502. Effective immediately, I am disqualifying myself from personal participation in any particular matter that will have a direct and predictable effect on the financial interests of Roofstock, Inc., or any particular matter in which Roofstock, Inc. is or represents a party. Any official matter involving Roofstock, Inc., including decisions, meetings, correspondence, memoranda, and telephone calls, should be referred to Tim Pertiz and handled appropriately without being brought to my attention. My name should not appear on any documents pertaining to such matters.

If you should have any questions as to the applicability of this memorandum to any particular situation, please contact the Ethics and Appeals Division, at 202-708-3815.

I appreciate your cooperation.

cc:

Ethics and Appeals Division
Room 2130

AMERICAN OVERSIGHT

MEMORANDUM

TO: Linda M. Cruciani, Deputy General Counsel for Operations

FROM: Seth Appleton, Designate for Assistant Secretary for Policy Development and Research, U.S. Department of Housing and Urban Development

SUBJECT: Ethics Agreement

1/17/14

The purpose of this letter is to describe the steps that I will take to avoid any actual or apparent conflict of interest in the event that I am confirmed for the position of Assistant Secretary for Policy Development and Research of the United States Department of Housing and Urban Development.

As required by 18 U.S.C. § 208(a), I will not participate personally and substantially in any particular matter in which I know that I have a financial interest directly and predictably affected by the matter, or in which I know that a person whose interests are imputed to me has a financial interest directly and predictably affected by the matter, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2). I understand that the interests of the following persons are imputed to me: any spouse or minor child of mine; any general partner of a partnership in which I am a limited or general partner; any organization in which I serve as officer, director, trustee, general partner or employee; and any person or organization with which I am negotiating or have an arrangement concerning prospective employment.

Upon confirmation, I will resign from my position with Family Charitable Trust #1. For a period of one year after my resignation, I will not participate personally and substantially in any particular matter involving specific parties in which I know Family Charitable Trust #1, is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

If I have a managed account or otherwise use the services of an investment professional during my appointment, I will ensure that the account manager or investment professional obtains my prior approval on a case-by-case basis for the purchase of any assets other than cash, cash equivalents, investment funds that qualify for the exemption at 5 C.F.R. § 2640.201(a), obligations of the United States.

I will meet in person with you during the first week of my service in the position of Assistant Secretary for Policy Development and Research in order to complete the initial ethics briefing required under 5 C.F.R. § 2638.305. Within 90 days of my confirmation, I will document my compliance with this ethics agreement by notifying you in writing when I have completed the steps described in this ethics agreement.

I understand that as an appointee I will be required to sign the Ethics Pledge (Exec. Order No. 13770) and that I will be bound by the requirements and restrictions therein in addition to the commitments I have made in this ethics agreement.

AMERICAN OVERSIGHT

I have been advised that this ethics agreement will be posted publicly, consistent with 5 U.S.C. § 552, on the website of the U.S. Office of Government Ethics with ethics agreements of other Presidential nominees who file public financial disclosure reports.

Sincerely,

Seth Appleton

AMERICAN OVERSIGHT

February 6, 2018

MEMORANDUM

TO: Linda M. Cruciani, Deputy General Counsel for Operations

FROM: Seth Appleton, Designate for Assistant Secretary for Policy Development and Research, U.S. Department of Housing and Urban Development

SUBJECT: Ethics Agreement

The purpose of this letter is to describe the steps that I will take to avoid any actual or apparent conflict of interest in the event that I am confirmed for the position of Assistant Secretary for Policy Development and Research of the United States Department of Housing and Urban Development.

As required by 18 U.S.C. § 208(a), I will not participate personally and substantially in any particular matter in which I know that I have a financial interest directly and predictably affected by the matter, or in which I know that a person whose interests are imputed to me has a financial interest directly and predictably affected by the matter, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2). I understand that the interests of the following persons are imputed to me: any spouse or minor child of mine; any general partner of a partnership in which I am a limited or general partner; any organization in which I serve as officer, director, trustee, general partner or employee; and any person or organization with which I am negotiating or have an arrangement concerning prospective employment.

If I have a managed account or otherwise use the services of an investment professional during my appointment, I will ensure that the account manager or investment professional obtains my prior approval on a case-by-case basis for the purchase of any assets other than cash, cash equivalents, investment funds that qualify for the exemption at 5 C.F.R. § 2640.201(a), obligations of the United States.

I will meet in person with you during the first week of my service in the position of Assistant Secretary for Policy Development and Research in order to complete the initial ethics briefing required under 5 C.F.R. § 2638.305. Within 90 days of my confirmation, I will document my compliance with this ethics agreement by notifying you in writing when I have completed the steps described in this ethics agreement.

I understand that as an appointee I will be required to sign the Ethics Pledge (Exec. Order No. 13770) and that I will be bound by the requirements and restrictions therein in addition to the commitments I have made in this ethics agreement.

I have been advised that this ethics agreement will be posted publicly, consistent with 5 U.S.C. § 552, on the website of the U.S. Office of Government Ethics with ethics agreements of other Presidential nominees who file public financial disclosure reports.

Sincerely,

Seth Appleton

AMERICAN OVERSIGHT

MEMORANDUM

TO: Linda M. Cruciani, Deputy General Counsel for Operations

FROM: Michael Bright, President of the Government National Mortgage Association for the U.S. Department of Housing and Urban Development

SUBJECT: Ethics Agreement

The purpose of this letter is to describe the steps that I will take to avoid any actual or apparent conflict of interest in the event that I am confirmed for the position of President of the Government National Mortgage Association for the U.S. Department of Housing and Urban Development.

As required by 18 U.S.C. § 208(a), I will not participate personally and substantially in any particular matter in which I know that I have a financial interest directly and predictably affected by the matter, or in which I know that a person whose interests are imputed to me has a financial interest directly and predictably affected by the matter, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2). I understand that the interests of the following persons are imputed to me: any spouse or minor child of mine; any general partner of a partnership in which I am a limited or general partner; any organization in which I serve as officer, director, trustee, general partner or employee; and any person or organization with which I am negotiating or have an arrangement concerning prospective employment.

I resigned from my position with the Milken Institute in July, 2017. For a period of one year after my resignation from the Milken Institute, I will not participate personally and substantially in any particular matter involving specific parties in which I know that Milken Institute is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

My spouse is employed by Murphy Research as the Senior Vice President for which she receives a fixed annual salary. For as long as my spouse continues to work for Murphy Research, I will not participate personally and substantially in any particular matter involving specific parties in which I know Murphy Research is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

If I have a managed account or otherwise use the services of an investment professional during my appointment, I will ensure that the account manager or investment professional obtains my prior approval on a case-by-case basis for the purchase of any assets other than cash, cash equivalents, investment funds that qualify for the exemption at 5 C.F.R. § 2640.201(a), obligations of the United States, or municipal bonds.

I will meet in person with you during the first week of my service in the position of President in order to complete the initial ethics briefing required under 5 C.F.R.§ 2638.305.

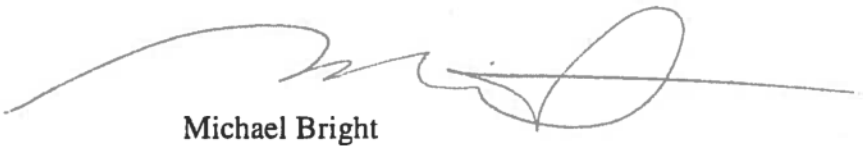
AMERICAN OVERSIGHT

Within 90 days of my confirmation, I will document my compliance with this ethics agreement by notifying you in writing when I have completed the steps described in this ethics agreement.

I understand that as an appointee I will be required to sign the Ethics Pledge (Exec. Order No. 13770) and that I will be bound by the requirements and restrictions therein in addition to the commitments I have made in this ethics agreement.

I have been advised that this ethics agreement will be posted publicly, consistent with 5 U.S.C. § 552, on the website of the U.S. Office of Government Ethics with ethics agreements of other Presidential nominees who file public financial disclosure reports.

Sincerely,



Michael Bright

AMERICAN OVERSIGHT

JAN 1 0 2017

MEMORANDUM

TO: Linda M. Cruciani, Deputy General Counsel for Operations

FROM: Dr. Benjamin S. Carson, Designate for Secretary
U.S. Department of Housing and Urban Development

SUBJECT: Ethics Agreement

The purpose of this letter is to describe the steps that I will take to avoid any actual or apparent conflict of interest in the event that I am confirmed for the position of Secretary of the United States Department of Housing and Urban Development.

As required by 18 U.S.C. § 208(a), I will not participate personally and substantially in any particular matter in which I know that I have a financial interest directly and predictably affected by the matter, or in which I know that a person whose interests are imputed to me has a financial interest directly and predictably affected by the matter, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2). I understand that the interests of the following persons are imputed to me: any spouse or minor child of mine; any general partner of a partnership in which I am a limited or general partner; any organization in which I serve as officer, director, trustee, general partner or employee; and any person or organization with which I am negotiating or have an arrangement concerning prospective employment.

Upon confirmation, I will resign from my positions with the Carson Scholars Fund, Inc., and Academy of Achievement. For a period of one year after my resignation from each of these entities, I will not participate personally and substantially in any particular matter involving specific parties in which that entity is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

Upon confirmation, I will resign from my position as managing member of American Business Collaborative, LLC, and I will become a non-managing member of this entity. During my appointment, I will not manage this entity or provide any other services to it. Instead, it will receive royalties, and I will receive only passive investment income from it. As Secretary, I will not participate personally and substantially in any particular matter that to my knowledge has a direct and predictable effect on the financial interests of American Business Collaborative, LLC, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1).

Upon confirmation, I will resign from my position as managing member BenCan, LLC, and I will become a non-managing member of this entity. During my appointment, I will not manage this entity or provide any other services to it. Instead, I will receive only passive investment income from it. As Secretary, I will not participate personally and substantially in any particular matter that to my knowledge has a direct and predictable effect on the financial interests of BenCan, LLC, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1).

AMERICAN OVERSIGHT

I receive royalties from Review & Herald Publishing Association for sales of my book, *Gifted Hands: The Ben Carson Story*. I will not participate personally and substantially in any particular matter involving specific parties in which I know Review & Herald Publishing Association, is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

I receive royalties from Tyndale House Publishers, Inc., for sales of my book, *One Vote: Make Your Voice Heard*. I will not participate personally and substantially in any particular matter involving specific parties in which I know Tyndale House Publishers, Inc., is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

I receive royalties from HarperCollins Christian Publishing, for sales of my books, *Think Big: Unleashing Your Potential for Excellence*; *The Big Picture*; *Take the Risk: Learning to Identify, Choose, and Live with Acceptable Risk*; *America The Beautiful: Rediscovering What Made This Nation Great*; and *You Have a Brain: A Teen's Guide to T.H.I.N.K. B.I.G.* I will not participate personally and substantially in any particular matter involving specific parties in which I know HarperCollins Christian Publishing, is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

I receive royalties from Penguin Group USA, for sales of my books, *One Nation: What We Can All Do to Save America's Future* and *A More Perfect Union: What We the People Can Do to Reclaim Our Constitutional Liberties*. I will not participate personally and substantially in any particular matter involving specific parties in which I know Penguin Group USA, is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

During my appointment to the position of Secretary, if I have a managed account, I will ensure that the account manager does not purchase any new assets other than cash, cash equivalents, obligations of the United States, and investment funds that qualify for the exemption at 5 C.F.R. § 2640.201(a).

I have been advised that this ethics agreement will be posted publicly, consistent with 5 U.S.C. § 552, on the website of the U.S. Office of Government Ethics with ethics agreements of other Presidential nominees who file public financial disclosure reports.

Sincerely,

Dr. Benjamin S. Carson, Sr.

AMERICAN OVERSIGHT

JAN 19 2017

Linda M. Cruciani
Deputy General Counsel for Operations
Office of General Counsel
U.S. Department of Housing and Urban Development
451 7th St., SW, Room 10240
Washington, DC 20410

Dear Ms. Cruciani:

The purpose of this letter is to supplement my public financial disclosure report signed on January 4, 2017, and my ethics agreement signed on January 10, 2017. The following information was inadvertently omitted from Part I of my report:

Organization Name	City, State of Entity	Organization Type	Position Held	From	To
My Faith Votes	Garland, TX	Non-profit organization	Honorary Chairman	March 2016	November 2016

I resigned from my position with My Faith Votes in November 2016. For a period of one year after my resignation, I will not participate personally and substantially in any particular matter involving specific parties in which I know My Faith Votes is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

I have been advised that this supplement to my ethics agreement will be posted publicly, consistent with 5 U.S.C. § 552, on the website of the U.S. Office of Government Ethics with ethics agreements of other Presidential nominees who file public financial disclosure reports. I understand that this letter will also be released as an attachment to my financial disclosure report.

Sincerely,

Dr. Benjamin S. Carson, Sr.

AMERICAN OVERSIGHT

February 1, 2017

Linda M. Cruciani
Deputy General Counsel for Operations
Office of General Counsel
U.S. Department of Housing and Urban Development
451 7th St., SW, Room 10240
Washington, DC 20410

Dear Ms. Cruciani:

The purpose of this letter is to supplement my ethics agreement signed on January 10, 2017, and the January 19, 2017, supplement to the ethics agreement. The following information supplements my ethics agreement:

I understand that as an appointee I will be required to sign the Ethics Pledge required under the Executive Order dated January 28, 2017 ("Ethics Commitments by Executive Branch Appointees") and that I will be bound by the requirements and restrictions therein in addition to the commitments I made in the ethics agreement I signed on January 10, 2017, and in the supplement that I signed on January 19, 2017.

I have been advised that this supplement to my ethics agreement will be posted publicly, consistent with 5 U.S.C. § 552, on the website of the U.S. Office of Government Ethics with ethics agreements of other Presidential nominees who file public financial disclosure reports.

Sincerely,

Dr. Benjamin S. Carson, Sr.

AMERICAN OVERSIGHT

MAY 26 2017

MEMORANDUM

TO: Linda M. Cruciani, Deputy General Counsel for Operations

FROM: Jerome Paul Compton Jr., Designate for General Counsel
U.S. Department of Housing and Urban Development

SUBJECT: Ethics Agreement

The purpose of this letter is to describe the steps that I will take to avoid any actual or apparent conflict of interest in the event that I am confirmed for the position of General Counsel of the United States Department of Housing and Urban Development.

As required by 18 U.S.C. § 208(a), I will not participate personally and substantially in any particular matter in which I know that I have a financial interest directly and predictably affected by the matter, or in which I know that a person whose interests are imputed to me has a financial interest directly and predictably affected by the matter, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2). I understand that the interests of the following persons are imputed to me: any spouse or minor child of mine; any general partner of a partnership in which I am a limited or general partner; any organization in which I serve as officer, director, trustee, general partner or employee; and any person or organization with which I am negotiating or have an arrangement concerning prospective employment.

Upon confirmation, I will resign from my position with the law firm of Bradley Arant Boult Cummings LLP. I currently have a capital account with the firm, and I will receive interest on that account until it is refunded. I will receive a refund of my capital account after my resignation. Until I have received this refund, I will not participate personally and substantially in any particular matter that to my knowledge has a direct and predictable effect on the ability or willingness of the firm to pay this refund, unless I first obtain a written waiver, pursuant to 18 U.S.C. 208(b)(1). In addition, I am entitled to receive my partnership share as long as the capital account is with the firm. If I do not receive my partnership share prior to assuming the duties of the position of General Counsel, I agree to forfeit my partnership share. If I receive a partnership share, other than the normal monthly distributions, prior to assuming the duties, I will not participate personally and substantially in any particular matter involving specific parties in which I know the firm, is a party or represents a party for a period of two years from the date on which I receive the partnership share. If I do not receive a partnership share, other than the my final monthly distributions, I will not participate personally and substantially in any particular matter involving specific parties in which I know the firm is a party or represents a party for a period of one year from the date of my resignation, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d). In addition, I will not participate personally and substantially in any particular matter involving specific parties in which I know a former client of mine is a party or represents a party for a period of one

AMERICAN OVERSIGHT

year after I last provided service to that client, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

One of my clients with Bradley Arant Boult Cummings LLP is the State of Alabama. For a period of one year after I last provided services, I will have a "covered relationship" under 5 C.F.R. § 2635.502 with the State of Alabama. Pursuant to 5 C.F.R. § 2635.502(d), I will seek written authorization to participate in particular matters involving specific parties in which the State of Alabama is a party or represents a party. I understand that any such authorization will not permit me to: (1) participate personally and substantially in any particular matter involving specific parties in which I previously participated in my position with Bradley Arant Boult Cummings LLP; or (2) participate in any litigation before a court in which the State of Alabama is a party or represents a party.

I will divest my interests in the following entities within 90 days of my confirmation: JP Morgan Chase, Bank of America, PNC Financial, Wells Fargo, Regions Financial, Southpoint Bancshares, US Bancorp, Citigroup, and Keycorp. With regard to each of these entities, I will not participate personally and substantially in any particular matter that to my knowledge has a direct and predictable effect on the financial interests of the entity until I have divested it, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2).

I understand that I may be eligible to request a Certificate of Divestiture for qualifying assets and that a Certificate of Divestiture is effective only if obtained prior to divestiture. Regardless of whether I receive a Certificate of Divestiture, I will ensure that all divestitures discussed in this agreement occur within the agreed upon timeframes and that all proceeds are invested in non-conflicting assets.

If I rely on a *de minimis* exemption under 5 C.F.R. § 2640.201(b) with regard to any of my financial interests in sector mutual funds, I will monitor the value of those interests. If the aggregate value of my interests in sector mutual funds that concentrate in any one sector exceeds $50,000, I will not participate personally and substantially in any particular matter that to my knowledge has a direct and predictable effect on the financial interests of any holdings of the funds that are in the specific sector in which the funds concentrate, unless I first obtain a written waiver pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2).

Upon confirmation, I will resign from my positions with Brother Bryan Mission and the Truman Scholars Association. For a period of one year after my resignation from each of these entities, I will not participate personally and substantially in any particular matter involving specific parties in which I know that entity is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

If I have a managed account or otherwise use the services of an investment professional during my appointment, I will ensure that the account manager or

AMERICAN OVERSIGHT

investment professional obtains my prior approval on a case-by-case basis for the purchase of any assets other than cash, cash equivalents, investment funds that qualify for the exemption at 5 C.F.R. § 2640.201(a), obligations of the United States.

I will meet in person with you during the first week of my service in the position of General Counsel in order to complete the initial ethics briefing required under 5 C.F.R. § 2638.305. Within 90 days of my confirmation, I will document my compliance with this ethics agreement by notifying you in writing when I have completed the steps described in this ethics agreement.

I understand that as an appointee I will be required to sign the Ethics Pledge (Exec. Order No. 13770) and that I will be bound by the requirements and restrictions therein in addition to the commitments I have made in this ethics agreement.

I have been advised that this ethics agreement will be posted publicly, consistent with 5 U.S.C. § 552, on the website of the U.S. Office of Government Ethics with ethics agreements of other Presidential nominees who file public financial disclosure reports.

Sincerely,

Jerome Paul Compton Jr.

AMERICAN OVERSIGHT

February 1, 2017

Linda M. Cruciani
Deputy General Counsel for Operations
Office of General Counsel
U.S. Department of Housing and Urban Development
451 7th St., SW, Room 10240
Washington, DC 20410

Dear Ms. Cruciani:

The purpose of this letter is to supplement my ethics agreement signed on January 10, 2017, and the January 19, 2017, supplement to the ethics agreement. The following information supplements my ethics agreement:

I understand that as an appointee I will be required to sign the Ethics Pledge required under the Executive Order dated January 28, 2017 ("Ethics Commitments by Executive Branch Appointees") and that I will be bound by the requirements and restrictions therein in addition to the commitments I made in the ethics agreement I signed on January 10, 2017, and in the supplement that I signed on January 19, 2017.

I have been advised that this supplement to my ethics agreement will be posted publicly, consistent with 5 U.S.C. § 552, on the website of the U.S. Office of Government Ethics with ethics agreements of other Presidential nominees who file public financial disclosure reports.

Sincerely,

Dr. Benjamin S. Carson, Sr.

AMERICAN OVERSIGHT

JUN 2 7 2018

MEMORANDUM

TO: Linda M. Cruciani, Deputy General Counsel for Operations

FROM: Valeria Rae Oliver Davis, Designate for Inspector General
U.S. Department of Housing and Urban Development

SUBJECT: Ethics Agreement

The purpose of this letter is to describe the steps that I will take to avoid any actual or apparent conflict of interest in the event that I am confirmed for the position of Inspector General of the United States Department of Housing and Urban Development.

As required by 18 U.S.C. § 208(a), I will not participate personally and substantially in any particular matter in which I know that I have a financial interest directly and predictably affected by the matter, or in which I know that a person whose interests are imputed to me has a financial interest directly and predictably affected by the matter, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2). I understand that the interests of the following persons are imputed to me: any spouse or minor child of mine; any general partner of a partnership in which I am a limited or general partner; any organization in which I serve as officer, director, trustee, general partner or employee; and any person or organization with which I am negotiating or have an arrangement concerning prospective employment.

I will divest my interests in the following entities within 90 days of my confirmation: Armada Hoffler Properties; Barclays; Bluerock Residential Growth; Capitol One; Citigroup; Colony Northstar; Corecivic REIT; Cullen Frost Bankers; Financial Institutions, Inc.; GEO Group, Inc.; Jones Lang LaSalle; Legacy Texas Financial; Morgan Stanley; M&T Bank Corp.; PNC Financial Services; Redwood Trust, Inc.; Royal Bank of Scotland; Sabra Health Care REIT; Santander Holdings USA; State Street Corp.; and Texas Capital Bancshares, Inc. With regard to each of these entities, I will not participate personally and substantially in any particular matter that to my knowledge has a direct and predictable effect on the financial interests of the entity until I have divested it, and unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2).

My spouse is employed by Geowealth in a position for which he receives a fixed annual salary and a bonus tied to his performance. For as long as my spouse continues to work for Geowealth, I will not participate personally and substantially in any particular matter involving specific parties in which I know Geowealth is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

I understand that I may be eligible to request a Certificate of Divestiture for qualifying assets and that a Certificate of Divestment is effective only if obtained prior to divestiture. Regardless of whether I receive a Certificate of Divestiture, I will ensure that all divestitures

AMERICAN OVERSIGHT

discussed in this agreement occur within the agreed upon timeframes and that all proceeds are invested in non-conflicting assets.

If I have a managed account or otherwise use the services of an investment professional during my appointment, I will ensure that the account manager or investment professional obtains my prior approval on a case-by-case basis for the purchase of any assets other than cash, cash equivalents, investment funds that qualify for the exemption at 5 C.F.R. § 2640.201(a), obligations of the United States.

I will meet in person with you during the first week of my service in the position of Inspector General in order to complete the initial ethics briefing required under 5 C.F.R. § 2638.305. Within 90 days of my confirmation, I will document my compliance with this ethics agreement by notifying you in writing when I have completed the steps described in this ethics agreement.

I understand that as an appointee I will be required to sign the Ethics Pledge (Exec. Order No. 13770) and that I will be bound by the requirements and restrictions therein in addition to the commitments I have made in this ethics agreement.

I have been advised that this ethics agreement will be posted publicly, consistent with 5 U.S.C. § 552, on the website of the U.S. Office of Government Ethics with ethics agreements of other Presidential nominees who file public financial disclosure reports.

Sincerely,

Valeria Rae Oliver Davis

Valeria Rae Oliver Davis

AMERICAN OVERSIGHT

MEMORANDUM

TO: Linda M. Cruciani, Deputy General Counsel for Operations

FROM: Irving L. Dennis, Designate Chief Financial Officer at the U.S. Department of Housing and Urban Development

10/31/17

SUBJECT: Ethics Agreement

The purpose of this letter is to describe the steps that I will take to avoid any actual or apparent conflict of interest in the event that I am confirmed for the position of Chief Financial Officer for the United States Department of Housing and Urban Development.

As required by 18 U.S.C. § 208(a), I will not participate personally and substantially in any particular matter in which I know that I have a financial interest directly and predictably affected by the matter, or in which I know that a person whose interests are imputed to me has a financial interest directly and predictably affected by the matter, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2). I understand that the interests of the following persons are imputed to me: any spouse or minor child of mine; any general partner of a partnership in which I am a limited or general partner; any organization in which I serve as officer, director, trustee, general partner or employee; and any person or organization with which I am negotiating or have an arrangement concerning prospective employment.

Upon confirmation, I will resign from my positions with the following entities: New Albany Community Foundation, New Albany Symphony Orchestra, and Montclair State University School of Business. For a period of one year after my resignation from each of these entities, I will not participate personally and substantially in any particular matter involving specific parties in which I know that entity is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

I retired from my position with Ernst & Young in June 2017. Pursuant to the partnership agreement, I will receive my final partnership share distributions in October 2017. The total amount of the payments was calculated as of the date of my withdrawal. In addition, pursuant to the partnership agreement, I will receive a lump sum payment of my capital account by December 31, 2017. This payment was calculated as of the date of my withdrawal. I will also receive fixed annual retirement payments, pursuant to my partnership agreement. For as long as I receive these payments, I will not participate personally and substantially in any particular matter that to my knowledge has a direct and predictable effect on the ability or willingness of Ernst & Young to make these payments to me, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1). For a period of one year after my resignation, I will not participate personally and substantially in any particular matter involving specific parties in which I know Ernst & Young is a party or represents a party, unless I am first authorized to participate, pursuant

AMERICAN OVERSIGHT

to 5 C.F.R. § 2635.502(d). In addition, I will not participate personally and substantially in any particular matter involving specific parties in which I know a former client of mine is a party or represents a party, for a period of one year after I last provided service to that client, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

I will retain my position as a trustee of Revocable Family Trust #1. I will not receive any fees for the services that I provide as a trustee during my appointment to the position of Chief Financial Officer. I will not participate personally and substantially in any particular matter that to my knowledge has a direct and predictable effect on the financial interests of Revocable Family Trust #1, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption, pursuant to 18 U.S.C. 208(b)(2).

I will divest my interest in the Davis Financial Fund Class Y (DVFYX) within 90 days of my confirmation. Until I have completed this divestiture, I will not participate personally and substantially in any particular matter that to my knowledge has a direct and predictable effect on the financial interests of any holding of the Davis Financial Fund Class Y that is invested in the financial services sector, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2).

If I have a managed account or otherwise use the services of an investment professional during my appointment, I will ensure that the account manager or investment professional obtains my prior approval on a case-by-case basis for the purchase of any assets other than cash, cash equivalents, investment funds that qualify for the exemption at 5 C.F.R. § 2640.201(a), or obligations of the United States.

I will meet in person with you during the first week of my service in the position of Chief Financial Officer in order to complete the initial ethics briefing required under 5 C.F.R. § 2638.305. Within 90 days of my confirmation, I will document my compliance with this ethics agreement by notifying you in writing when I have completed the steps described in this ethics agreement.

I understand that as an appointee I will be required to sign the Ethics Pledge (Exec. Order No. 13770) and that I will be bound by the requirements and restrictions therein in addition to the commitments I have made in this ethics agreement.

I have been advised that this ethics agreement will be posted publicly, consistent with 5 U.S.C. § 552, on the website of the U.S. Office of Government Ethics with ethics agreements of other Presidential nominees who file public financial disclosure reports.

Sincerely,

Irving L. Dennis 10/31/17

AMERICAN OVERSIGHT

SEP 2 9 2017

MEMORANDUM

TO: Linda M. Cruciani, Deputy General Counsel for Operations

FROM: Robert Kurtz, Designate for Assistant Secretary for Public and Indian Housing
U.S. Department of Housing and Urban Development

SUBJECT: Ethics Agreement

The purpose of this letter is to describe the steps that I will take to avoid any actual or apparent conflict of interest in the event that I am confirmed for the position of Assistant Secretary for Public and Indian Housing of the United States Department of Housing and Urban Development.

As required by 18 U.S.C. § 208(a), I will not participate personally and substantially in any particular matter in which I know that I have a financial interest directly and predictably affected by the matter, or in which I know that a person whose interests are imputed to me has a financial interest directly and predictably affected by the matter, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2). I understand that the interests of the following persons are imputed to me: any spouse or minor child of mine; any general partner of a partnership in which I am a limited or general partner; any organization in which I serve as officer, director, trustee, general partner or employee; and any person or organization with which I am negotiating or have an arrangement concerning prospective employment.

I previously held a position with the Department of Housing and Revitalization for the City of Detroit which ended in May 2017. I currently have an unvested defined benefit pension plan with the City of Detroit, and I will receive a refund of my contributions to the plan. I will also receive a lump sum distribution of my funds in the City of Detroit Annuity Savings Fund. Until I have received the refund and lump sum payment, I will not participate personally and substantially in any particular matter that to my knowledge has a direct and predictable effect on the ability or willingness of the City to pay this money owed to me, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1). In addition, for a period of one year after the end of my service with the Department of Housing and Revitalization, I will not participate personally and substantially in any particular matter involving specific parties in which I know the Department of Housing and Revitalization is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

My spouse is employed by Ramboll Environ US Corp. in a position for which she receives a fixed annual salary. For as long as my spouse continues to work for Ramboll Environ US Corp., I will not participate personally and substantially in any particular matter involving specific parties in which I know Ramboll Environ US Corp., is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

AMERICAN OVERSIGHT

If I rely on a *de minimis* exemption under 5 C.F.R. § 2640.202 with regard to any of my financial interests in securities, I will monitor the value of those interests. If the aggregate value of interests affected by a particular matter increases and exceeds the *de minimis* threshold, I will not participate personally and substantially in the particular matter that to my knowledge has a direct and predictable effect on the interests, unless I first obtain a written waiver pursuant to 18 U.S.C. § 208(b)(1).

If I have a managed account or otherwise use the services of an investment professional during my appointment, I will ensure that the account manager or investment professional obtains my prior approval on a case-by-case basis for the purchase of any assets other than cash, cash equivalents, investment funds that qualify for the exemption at 5 C.F.R. § 2640.201(a), obligations of the United States.

I will meet in person with you during the first week of my service in the position of Assistant Secretary for Public and Indian Housing in order to complete the initial ethics briefing required under 5 C.F.R. § 2638.305. Within 90 days of my confirmation, I will document my compliance with this ethics agreement by notifying you in writing when I have completed the steps described in this ethics agreement.

I understand that as an appointee I must continue to abide by the Ethics Pledge (Exec. Order No. 13770) that I previously signed and that I will be bound by the requirements and restrictions therein in addition to the commitments I have made in this ethics agreement.

I have been advised that this ethics agreement will be posted publicly, consistent with 5 U.S.C. § 552, on the website of the U.S. Office of Government Ethics with ethics agreements of other Presidential nominees who file public financial disclosure reports.

Sincerely,

Robert Kurtz

AMERICAN OVERSIGHT

January 18, 2019

MEMORANDUM

TO: Linda M. Cruciani, Deputy General Counsel for Operations

FROM: Robert Kurtz, Designate for Assistant Secretary for Public and Indian Housing
U.S. Department of Housing and Urban Development

SUBJECT: Ethics Agreement

The purpose of this letter is to describe the steps that I will take to avoid any actual or apparent conflict of interest in the event that I am confirmed for the position of Assistant Secretary for Public and Indian Housing of the United States Department of Housing and Urban Development.

As required by 18 U.S.C. § 208(a), I will not participate personally and substantially in any particular matter in which I know that I have a financial interest directly and predictably affected by the matter, or in which I know that a person whose interests are imputed to me has a financial interest directly and predictably affected by the matter, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2). I understand that the interests of the following persons are imputed to me: any spouse or minor child of mine; any general partner of a partnership in which I am a limited or general partner; any organization in which I serve as officer, director, trustee, general partner or employee; and any person or organization with which I am negotiating or have an arrangement concerning prospective employment.

My spouse is employed by Ramboll US Corp. in a position for which she receives a fixed annual salary and a bonus tied to her performance. For as long as my spouse continues to work for Ramboll US Corp., I will not participate personally and substantially in any particular matter involving specific parties in which I know Ramboll US Corp., is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

If I rely on a *de minimis* exemption under 5 C.F.R. § 2640.202 with regard to any of my financial interests in securities, I will monitor the value of those interests. If the aggregate value of interests affected by a particular matter increases and exceeds the *de minimis* threshold, I will not participate personally and substantially in the particular matter that to my knowledge has a direct and predictable effect on the interests, unless I first obtain a written waiver pursuant to 18 U.S.C. § 208(b)(1).

If I have a managed account or otherwise use the services of an investment professional during my appointment, I will ensure that the account manager or investment professional obtains my prior approval on a case-by-case basis for the purchase of any assets other than cash, cash equivalents, investment funds that qualify for the exemption at 5 C.F.R. § 2640.201(a), obligations of the United States.

I will meet in person with you during the first week of my service in the position of Assistant Secretary for Public and Indian Housing in order to complete the initial ethics briefing

AMERICAN OVERSIGHT

required under 5 C.F.R. § 2638.305. Within 90 days of my confirmation, I will document my compliance with this ethics agreement by notifying you in writing when I have completed the steps described in this ethics agreement.

I understand that as an appointee I must continue to abide by the Ethics Pledge (Exec. Order No. 13770) that I previously signed and that I will be bound by the requirements and restrictions therein in addition to the commitments I have made in this ethics agreement.

I have been advised that this ethics agreement will be posted publicly, consistent with 5 U.S.C. § 552, on the website of the U.S. Office of Government Ethics with ethics agreements of other Presidential nominees who file public financial disclosure reports.

Sincerely,

Robert Kurtz

AMERICAN OVERSIGHT

MEMORANDUM

TO: Linda M. Cruciani, Deputy General Counsel for Operations

FROM: Brian Darrell Montgomery, Designate for Assistant Secretary for Housing/FHA Commissioner, U.S. Department of Housing and Urban Development

9/25/17

SUBJECT: Ethics Agreement

The purpose of this letter is to describe the steps that I will take to avoid any actual or apparent conflict of interest in the event that I am confirmed for the position of Assistant Secretary for Housing/FHA Commissioner of the United States Department of Housing and Urban Development.

As required by 18 U.S.C. § 208(a), I will not participate personally and substantially in any particular matter in which I know that I have a financial interest directly and predictably affected by the matter, or in which I know that a person whose interests are imputed to me has a financial interest directly and predictably affected by the matter, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2). I understand that the interests of the following persons are imputed to me: any spouse or minor child of mine; any general partner of a partnership in which I am a limited or general partner; any organization in which I serve as officer, director, trustee, general partner or employee; and any person or organization with which I am negotiating or have an arrangement concerning prospective employment.

Upon confirmation, I will resign from my positions with The Collingwood Group LLC. and Situs Group LLC. I currently hold ordinary common units in Situs Group Holdings, L.P., and Situs Group Holdings GP, LLC (collectively with Situs Group LLC, "Situs"). I do not own shares of Situs phantom stock; vested or unvested restricted stock; vested or unvested restricted stock units; or vested or unvested stock options for shares in Situs. Upon confirmation, Situs will convert my ordinary common units to cash, which will occur before I assume the duties of Assistant Secretary of Housing/FHA Commissioner. Situs will also make a cash payment to me equal to the remaining balance of its acquisition of The Collingwood Group LLC, in May 2017. Until I have received these payments, I will not participate personally and substantially in any particular matter that to my knowledge has a direct and predictable effect on the ability or willingness of Situs to make these payments to me, unless I first obtain a written waiver, pursuant to 18 U.S.C. 208(b)(1). For a period of two years from the date of the conversion of my ordinary common units to cash, I will not participate personally and substantially in any particular matter involving specific parties in which Situs is a party or represents a party, unless I first receive a written waiver pursuant to 5 C.F.R. § 2635.503(c). In addition, I will not participate personally and substantially in any particular matter involving specific parties in which I know a former client of mine is a party or represents a party for

AMERICAN OVERSIGHT

a period of one year after I last provided service to that client, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

Upon confirmation, I will resign from my position with Reverse Mortgage Investment Trust. I currently hold common stock in Reverse Mortgage Investment Trust. I do not own shares of Reverse Mortgage Investment Trust phantom stock; vested or unvested restricted stock; vested or unvested restricted stock units; or vested or unvested stock options for shares in Reverse Mortgage Investment Trust. I will divest my stock in Reverse Mortgage Investment Trust within 90 days of my confirmation. I will not participate personally and substantially in any particular matter that to my knowledge has a direct and predictable effect on the financial interests of this entity until I have divested it, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2). For a period of one year after my resignation, I will not participate personally and substantially in any particular matter involving specific parties in which I know Reverse Mortgage Investment Trust is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

Upon confirmation, I will resign from my position with The Radian Group, Inc. Consistent with the customary practice for departing directors, The Radian Group, Inc. will make a payment of a prorated portion of my $115,000 annual equity award in cash for time served since the previous annual meeting. I am also entitled to the final installment of my annual retainer of $32,500 for my service (which $8,125 is paid in advance on a quarterly basis) and $2,000 per meeting attended (paid in arrears). If I begin my service as Assistant Secretary for Housing/FHA Commissioner prior to receiving these payments, I will not participate personally and substantially in any particular matter that to my knowledge has a direct and predictable effect on the ability or willingness of The Radian Group, Inc., to make this payment, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1).

I currently hold unvested and vested restricted stock units in The Radian Group, Inc. I do not own shares of The Radian Group, Inc. common stock; phantom stock; vested or unvested restricted stock; or vested or unvested stock options for shares in The Radian Group Inc. The Radian Group, Inc. will accelerate the vesting of my nonvested restricted stock units, which will occur before I assume the duties of Assistant Secretary of Housing/FHA Commissioner. Following my resignation, and pursuant to The Radian Group Inc.'s equity plan, my vested restricted stock units will convert into shares of common stock upon resignation. I will divest my stock in The Radian Group within 90 days of my confirmation. I will not participate personally and substantially in any particular matter that to my knowledge has a direct and predictable effect on the financial interests of this entity until I have divested it, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2). In addition, for a period of two years from the date of the vesting of my nonvested restricted stock units, I will not participate personally and substantially in any particular matter involving specific parties in which The Radian Group, Inc., is a

AMERICAN OVERSIGHT

party or represents a party, unless I first receive a written waiver pursuant to 5 C.F.R. § 2635.503(c).

I will also divest my interests in the Signature Bank within 90 days of my confirmation. I will not participate personally and substantially in any particular matter that to my knowledge has a direct and predictable effect on the financial interests of the entity until I have divested it, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2).

My spouse is employed by The Chertoff Group, a position for which she receives a fixed annual salary and a bonus tied to her performance. For as long as my spouse continues to work for The Chertoff Group, I will not participate personally and substantially in any particular matter involving specific parties in which I know The Chertoff Group or any client of my spouse is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

I understand that I may be eligible to request a Certificate of Divestiture for qualifying assets and that a Certificate of Divestiture is effective only if obtained prior to divestiture. Regardless of whether I receive a Certificate of Divestiture, I will ensure that all divestitures discussed in this agreement occur within the agreed upon timeframes and that all proceeds are invested in non-conflicting assets.

If I have a managed account or otherwise use the services of an investment professional during my appointment, I will ensure that the account manager or investment professional obtains my prior approval on a case-by-case basis for the purchase of any assets other than cash, cash equivalents, investment funds that qualify for the exemption at 5 C.F.R. § 2640.201(a), obligations of the United States, or municipal bonds.

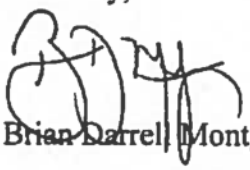
I will meet in person with you during the first week of my service in the position of Assistant Secretary for Housing/FHA Commissioner in order to complete the initial ethics briefing required under 5 C.F.R. § 2638.305. Within 90 days of my confirmation, I will document my compliance with this ethics agreement by notifying you in writing when I have completed the steps described in this ethics agreement.

I understand that as an appointee I will be required to sign the Ethics Pledge (Exec. Order No. 13770) and that I will be bound by the requirements and restrictions therein in addition to the commitments I have made in this ethics agreement.

I have been advised that this ethics agreement will be posted publicly, consistent with 5 U.S.C. § 552, on the website of the U.S. Office of Government Ethics with ethics agreements of other Presidential nominees who file public financial disclosure reports.

AMERICAN OVERSIGHT

Sincerely,



Brian Darrell Montgomery

AMERICAN OVERSIGHT

MAY - 2 2017

MEMORANDUM TO: Linda M. Cruciani, Deputy General Counsel for Operations

FROM: Pamela Hughes Patenaude, Designate for Deputy Secretary
U.S. Department of Housing and Urban Development

SUBJECT: Ethics Agreement

The purpose of this letter is to describe the steps that I will take to avoid any actual or apparent conflict of interest in the event that I am confirmed for the position of Deputy Secretary of the United States Department of Housing and Urban Development.

As required by 18 U.S.C. § 208(a), I will not participate personally and substantially in any particular matter in which I know that I have a financial interest directly and predictably affected by the matter, or in which I know that a person whose interests are imputed to me has a financial interest directly and predictably affected by the matter, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2). I understand that the interests of the following persons are imputed to me: any spouse or minor child of mine; any general partner of a partnership in which I am a limited or general partner; any organization in which I serve as officer, director, trustee, general partner or employee; and any person or organization with which I am negotiating or have an arrangement concerning prospective employment.

Upon confirmation, I will resign from my positions with the following entities: J. Ronald Terwilliger Foundation for Housing America's Families; The Reinvestment Fund; HomeBuilders Institute; National Housing Conference; and Tysons Trace HOA. For a period of one year after my resignation from each of these entities, I will not participate personally and substantially in any particular matter involving specific parties in which that entity is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

My spouse is employed by Dougherty Mortgage, LLC, a position for which he receives a fixed annual salary and a bonus tied to his performance. For as long as my spouse continues to work for Dougherty Mortgage, LLC, I will not participate personally and substantially in any particular matter that to my knowledge has a direct and predictable effect on my spouse's compensation or employment with Dougherty Mortgage, LLC. I will also not participate personally and substantially in any particular matter involving specific parties in which I know Dougherty Mortgage, LLC, is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

If I have a managed account or otherwise use the services of an investment professional during my appointment, I will ensure that the account manager or investment professional obtains my prior approval on a case-by-case basis for the purchase of any assets other than cash, cash equivalents, investment funds that qualify for the exemption at 5 C.F.R. § 2640.201(a), or obligations of the United States.

AMERICAN OVERSIGHT

I will meet in person with you during the first week of my service in the position of Deputy Secretary in order to complete the initial ethics briefing required under 5 C.F.R. § 2638.305. Within 90 days of my confirmation, I will document my compliance with this ethics agreement by notifying you in writing when I have completed the steps described in this ethics agreement.

I understand that as an appointee I will be required to sign the Ethics Pledge (Exec. Order No. 13770) and that I will be bound by the requirements and restrictions therein in addition to the commitments I have made in this ethics agreement.

I have been advised that this ethics agreement will be posted publicly, consistent with 5 U.S.C. § 552, on the website of the U.S. Office of Government Ethics with ethics agreements of other Presidential nominees who file public financial disclosure reports.

Sincerely,

Pamela Hughes Patenaude

AMERICAN OVERSIGHT

MAY 26 2017

MEMORANDUM

TO: Linda M. Cruciani, Deputy General Counsel for Operations

FROM: Neal James Rackleff

SUBJECT: Ethics Agreement

The purpose of this letter is to describe the steps that I will take to avoid any actual or apparent conflict of interest in the event that I am confirmed for the position of Assistant Secretary for Community Planning and Development at the U.S. Department of Housing and Urban Development.

As required by 18 U.S.C. § 208(a), I will not participate personally and substantially in any particular matter in which I know that I have a financial interest directly and predictably affected by the matter, or in which I know that a person whose interests are imputed to me has a financial interest directly and predictably affected by the matter, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2). I understand that the interests of the following persons are imputed to me: any spouse or minor child of mine; any general partner of a partnership in which I am a limited or general partner; any organization in which I serve as officer, director, trustee, general partner or employee; and any person or organization with which I am negotiating or have an arrangement concerning prospective employment.

Upon confirmation, I will resign from my position with the law firm of Locke Lord LLP. I currently have a capital account with the firm and will receive a refund of that account after my resignation. Until I have received this refund, I will not participate personally and substantially in any particular matter that to my knowledge has a direct and predictable effect on the ability or willingness of the firm to pay this refund, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1). For a period of one year after my resignation, I also will not participate personally and substantially in any particular matter involving specific parties in which I know the firm is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d). In addition, I will not participate personally and substantially in any particular matter involving specific parties in which I know a former client of mine is a party or represents a party for a period of one year after I last provided service to that client, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

If I have a managed account or otherwise use the services of an investment professional during my appointment, I will ensure that the account manager or investment professional obtains my prior approval on a case-by-case basis for the purchase of any assets other than cash, cash equivalents, investment funds that qualify for the exemption at 5 C.F.R. § 2640.201(a), or obligations of the United States.

AMERICAN OVERSIGHT

I will meet in person with you during the first week of my service in the position of Assistant Secretary in order to complete the initial ethics briefing required under 5 C.F.R. § 2638.305. Within 90 days of my confirmation, I will document my compliance with this ethics agreement by notifying you in writing when I have completed the steps described in this ethics agreement.

I understand that as an appointee I will be required to sign the Ethics Pledge (Exec. Order No. 13770) and that I will be bound by the requirements and restrictions therein in addition to the commitments I have made in this ethics agreement.

I have been advised that this ethics agreement will be posted publicly, consistent with 5 U.S.C. § 552, on the website of the U.S. Office of Government Ethics with ethics agreements of other Presidential nominees who file public financial disclosure reports.

Sincerely,

Neal James Rackleff

AMERICAN OVERSIGHT

August 14, 2017

Linda M. Cruciani
Alternate Designated Agency Ethics Official
U.S. Department Housing and Urban Development
451 7th Street, S.W.
Washington, DC 20410

Dear Ms. Cruciani:

The purpose of this letter is to supplement my ethics agreement signed on April 8, 2017. In a separate document, I also am supplementing my financial disclosure report by reporting an agreement and arrangement that I inadvertently omitted from the report.

Upon my withdrawal from the Locke Lord, LLP, I will either receive a lump sum payment from the operating account or owe a lump sum payment to the operating account. Pursuant to the partnership agreement, the calculation of this payment from the operating account is as of the date of my withdrawal from the firm. If I am to receive a payment, I will not participate personally and substantially in any particular matter that to my knowledge will have a direct and predictable effect on the ability or willingness of the firm to pay this money from the operating account, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1).

I have been advised that this supplement to my ethics agreement will be posted publicly, consistent with 5 U.S.C. § 552, on the website of the U.S. Office of Government Ethics with ethics agreements of other Presidential nominees who file public financial disclosure reports.

Sincerely,

Neal James Rackleff

AMERICAN OVERSIGHT

MEMORANDUM

TO: Linda M. Cruciani, Deputy General Counsel for Operations

FROM: Amy Thompson, Assistant Secretary for Public Affairs, U.S. Department of Housing and Urban Development

SUBJECT: Ethics Agreement

The purpose of this letter is to describe the steps that I will take to avoid any actual or apparent conflict of interest in reference to my appointment to the position of Assistant Secretary for Public Affairs for the United States Department of Housing and Urban Development.

As required by 18 U.S.C. § 208(a), I will not participate personally and substantially in any particular matter in which I know that I have a financial interest directly and predictably affected by the matter, or in which I know that a person whose interests are imputed to me has a financial interest directly and predictably affected by the matter, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2). I understand that the interests of the following persons are imputed to me: any spouse or minor child of mine; any general partner of a partnership in which I am a limited or general partner; any organization in which I serve as officer, director, trustee, general partner or employee; and any person or organization with which I am negotiating or have an arrangement concerning prospective employment.

Upon my acceptance of this appointment, I resigned from my position with the Community Financial Services Association of America. For a period of one year after my resignation, I will not participate personally and substantially in any particular matter involving specific parties in which Community Financial Services Association of America is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

If I have a managed account or otherwise use the services of an investment professional during my appointment, I will ensure that the account manager or investment professional obtains my prior approval on a case-by-case basis for the purchase of any assets other than cash, cash equivalents, investment funds that qualify for the exemption at 5 C.F.R. § 2640.201(a), obligations of the United States, or municipal bonds.

I understand that as an appointee I was required to sign the Ethics Pledge (Exec. Order No. 13770) and that I will be bound by the requirements and restrictions therein in addition to the commitments I have made in this ethics agreement.

Sincerely,

Amy Thompson

AMERICAN OVERSIGHT

SEP 0 6 2017

MEMORANDUM

TO: Linda M. Cruciani, Deputy General Counsel for Operations

FROM: Suzanne I. Tufts, Designate for Assistant Secretary for Administration
U.S. Department of Housing and Urban Development

SUBJECT: Ethics Agreement

The purpose of this letter is to describe the steps that I will take to avoid any actual or apparent conflict of interest in the event that I am confirmed for the position of Assistant Secretary for Administration of the United States Department of Housing and Urban Development.

As required by 18 U.S.C. § 208(a), I will not participate personally and substantially in any particular matter in which I know that I have a financial interest directly and predictably affected by the matter, or in which I know that a person whose interests are imputed to me has a financial interest directly and predictably affected by the matter, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2). I understand that the interests of the following persons are imputed to me: any spouse or minor child of mine; any general partner of a partnership in which I am a limited or general partner; any organization in which I serve as officer, director, trustee, general partner or employee; and any person or organization with which I am negotiating or have an arrangement concerning prospective employment.

I have performed consulting work as a sole proprietor, doing business under the name Suzanne I. Tufts. I have not formed a legal entity for this purpose. During my appointment to the position of Assistant Secretary, I will not perform consulting work. Any amounts owed to me by any of my clients will be fixed before I assume the duties of the position of Assistant Secretary, and I will not participate personally and substantially in any particular matter that to my knowledge has a direct and predictable effect on the ability or willingness of any of these clients to pay these amounts. In addition, I will not participate personally and substantially in any particular matter involving specific parties in which I know a former client of mine is a party or represents a party, for a period of one year after I last provided service to that client, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

My spouse is employed by Yeshiva University in a position for which he receives a fixed annual salary. For as long as my spouse continues to work for Yeshiva University, I will not participate personally and substantially in any particular matter involving specific parties in which I know Yeshiva University is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

If I have a managed account or otherwise use the services of an investment professional during my appointment, I will ensure that the account manager or investment professional obtains my prior approval on a case-by-case basis for the purchase of any assets other than cash,

AMERICAN OVERSIGHT

cash equivalents, investment funds that qualify for the exemption at 5 C.F.R. § 2640.201(a), obligations of the United States, or municipal bonds.

I will meet in person with you during the first week of my service in the position of Assistant Secretary in order to complete the initial ethics briefing required under 5 C.F.R. § 2638.305. Within 90 days of my confirmation, I will document my compliance with this ethics agreement by notifying you in writing when I have completed the steps described in this ethics agreement.

I understand that as an appointee I will be required to sign the Ethics Pledge (Exec. Order No. 13770) and that I will be bound by the requirements and restrictions therein in addition to the commitments I have made in this ethics agreement.

I have been advised that this ethics agreement will be posted publicly, consistent with 5 U.S.C. § 552, on the website of the U.S. Office of Government Ethics with ethics agreements of other Presidential nominees who file public financial disclosure reports.

Sincerely,

Suzanne I. Tufts

AMERICAN OVERSIGHT

OCT 2 5 2017

MEMORANDUM

TO: Linda M. Cruciani, Deputy General Counsel for Operations

FROM: Leonard Wolfson, Designate for Assistant Secretary for the Office of Congressional and Intergovernmental Relations, US Department of Housing and Urban Development

SUBJECT: Ethics Agreement

The purpose of this letter is to describe the steps that I will take to avoid any actual or apparent conflict of interest in the event that I am confirmed for the position of Assistant Secretary for the Office of Congressional and Intergovernmental Relations for the Department of Housing and Urban Development.

As required by 18 U.S.C. § 208(a), I will not participate personally and substantially in any particular matter in which I know that I have a financial interest directly and predictably affected by the matter, or in which I know that a person whose interests are imputed to me has a financial interest directly and predictably affected by the matter, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2). I understand that the interests of the following persons are imputed to me: any spouse or minor child of mine; any general partner of a partnership in which I am a limited or general partner; any organization in which I serve as officer, director, trustee, general partner or employee; and any person or organization with which I am negotiating or have an arrangement concerning prospective employment.

I resigned from my position with the Mortgage Bankers Association (MBA) in July, 2017. For a period of one year after my resignation from MBA, I will not participate personally and substantially in any particular matter involving specific parties in which I know that entity is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

If I rely on a de minimis exemption under 5 C.F.R. § 2640.202 with regard to any of my financial interests in securities, I will monitor the value of those interests. If the aggregate value of interests affected by a particular matter increases and exceeds the de minimis threshold, I will not participate personally and substantially in the particular matter that to my knowledge has a direct and predictable effect on the interests, unless I first obtain a written waiver pursuant to 18 U.S.C. § 208(b)(1).

If I have a managed account or otherwise use the services of an investment professional during my appointment, I will ensure that the account manager or investment professional obtains my prior approval on a case-by-case basis for the purchase of any assets other than cash, cash equivalents, investment funds that qualify for the exemption at 5 C.F.R. § 2640.201(a), or obligations of the United States.

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I will meet in person with you during the first week of my service in the position of Assistant Secretary for the Office of Congressional and Intergovernmental Relations in order to complete the initial ethics briefing required under 5 C.F.R. § 2638.305. Within 90 days of my confirmation, I will also document my compliance with this ethics agreement by notifying you in writing when I have completed the steps described in this ethics agreement.

I understand that as an appointee I will be required to abide by the Ethics Pledge (Exec. Order No. 13770) and that I will continue to be bound by the requirements and restrictions therein in addition to the commitments I have made in this ethics agreement.

I have been advised that this ethics agreement will be posted publicly, consistent with 5 U.S.C. § 552, on the website of the U.S. Office of Government Ethics with ethics agreements of other Presidential nominees who file public financial disclosure reports.

Sincerely,

Leonard Wolfson

AMERICAN OVERSIGHT

CERTIFICATION OF ETHICS AGREEMENT COMPLIANCE

Senate Confirmed Presidential Appointee

1. Appointee's Information	a. Appointee's Name:	to be completed by OGE: Jerome Paul Compton, Jr.
	b. Position Title:	to be completed by OGE: General Counsel
	c. Agency:	to be completed by OGE: U.S. Department of Housing and Urban Development
	d. Date Ethics Agreement Signed:	to be completed by OGE: May 26, 2017
	e. Date Confirmed:	to be completed by OGE: December 18, 2017
	f. Due Date for Certification of Ethics Agreement Compliance:	to be completed by OGE: **March 26, 2018**
2. Resignations	*I completed all of the resignations indicated in my ethics agreement before I assumed the duties of my current government position.*	(X) Yes ( ) No ( ) N/A
3. Divestitures	a. *I have completed all of the divestitures indicated in my ethics agreement. I also understand that I may not repurchase these assets during my appointment without OGE's prior approval.*	(X) Yes ( ) No ( ) N/A
	b. *I have filed a period transaction report, or periodic transaction reports, (OGE Form 278-T) to disclose the completion of these agreed upon divestitures.*	(X) Yes ( ) No ( ) N/A Filing Date(s) of OGE Form 278-T Report(s): 1/24/18; 1/25/18
4. Managed Accounts	*If I have a managed account or use the services of an investment professional, I have notified the manager or professional of the limitations indicated in my ethics agreement. In addition, I am continuing to monitor purchases.*	( ) Yes ( ) No (X) N/A TERMINATED MANAGED ACCTS.
5. Interim Recusals	*I complied with my interim recusal obligations pending the divestitures required by my ethics agreement.*	(X) Yes ( ) No ( ) N/A

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AMERICAN OVERSIGHT

6. Recusals *(Note: These factual statements describe the appointee's current status. They are not intended to modify ethics agreement commitments or create new recusal obligations.)*	a. *I am recusing from particular matters in which I know I have a personal or imputed financial interest directly and predictably affected by the matter, unless I have received a waiver or qualify for a regulatory exemption.*	☒ Yes ○ No
	b. *I am recusing from particular matters in which any former employer or client I served in the past year is a party or represents a party, unless I have been authorized under 5 C.F.R. § 2635.502(d).*	☒ Yes ○ No ○ N/A
	c. *I am recusing from particular matters in which any former employer or client I served in the two years prior to my appointment is a party or represents a party, unless I have received a waiver under Exec. Order 13770.*	☒ Yes ○ No ○ N/A
7. Waivers and Authorizations	a. *I received a waiver pursuant to 18 U.S.C. § 208.*	○ Yes ☒ No
	If yes, indicate the date of the waiver and indicate the financial interest covered by the waiver.	Date: Financial interest:
	b. *I received a waiver pursuant to Executive Order 13770.*	○ Yes ☒ No
	If yes, indicate the date of the waiver and the subject of the waiver (i.e., applicable paragraph of the ethics pledge, parties, particular matters, specific issue areas, as applicable).	Date: Subject:
	c. *I received an authorization pursuant to 5 C.F.R. § 2635.502(d).*	○ Yes ☒ No
	If yes, indicate date of authorization and identify the covered person(s) as to whom you have been authorized (e.g., former employer, former client, spouse's employer, spouse's current client, etc.).	Date: Covered person(s):
	d. *I received a waiver pursuant to 5 C.F.R. § 2635.503(c).*	○ Yes ☒ No
	If yes, indicate the date of the waiver and identify the former employer or payer.	Date: Former employer or payer:

AMERICAN OVERSIGHT

Jerome Paul Compton, Jr.

8. Payments, Accelerations, or Divestitures Required to be Completed Prior to Entering Government Service	Mark this box if not applicable: ☐	a. *If I committed that I would forfeit a financial interest or payment, unless it was received or accelerated prior to my assumption of the duties of the government position:*	☒ *I received it (or it was accelerated) prior to my assumption of the duties of the position.* ○ *I received it (or it was accelerated) after my assumption of the duties of the position.* ○ *I forfeited it.*
		b. Financial interest or payment at issue:	RETURN OF CAPITAL ACCOUNT FROM BRADLEY ARANT BOULT CUMMINGS
9. Requirements for Regular Appointees		*I have completed my initial ethics briefing, pursuant to 5 C.F.R. § 2638.305.* If you are a Special Government Employee (SGE) or career Foreign Service Officer (FSO), select N/A.	☒ Yes ○ No ○ N/A
		I have signed the ethics pledge pursuant to Executive Order 13770. If you are a SGE or career FSO or previously signed the pledge, select N/A.	☒ Yes ○ No ○ N/A
10. Additional Ethics Agreement Requirements		to be completed by OGE	to be completed by appointee *I am complying with these requirements as described in the adjacent box.* ○ Yes ○ No ☒ N/A
11. Comments of Appointee			

Any intentionally false or misleading statement or response provided in this certification is a violation of law punishable by a fine or imprisonment, or both, under 18 U.S.C. § 1001.

I certify that the information I have provided is complete and accurate.	Appointee's Signature:	Date: 1-26-18

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AMERICAN OVERSIGHT

CERTIFICATION OF ETHICS AGREEMENT COMPLIANCE

Senate Confirmed Presidential Appointee

1. Appointee's Information	a. Appointee's Name:	to be completed by OGE: Rae Oliver
	b. Position Title:	to be completed by OGE: Inspector General
	c. Agency:	to be completed by OGE: Department of Housing and Urban Development
	d. Date Ethics Agreement Signed:	to be completed by OGE: June 27, 2018
	e. Date Confirmed:	to be completed by OGE: January 2, 2019
	f. Due Date for Certification of Ethics Agreement Compliance:	to be completed by OGE: April 9, 2019
2. Resignations	*I completed all of the resignations indicated in my ethics agreement before I assumed the duties of my current government position.*	(●) Yes ( ) No ( ) N/A
3. Divestitures	a. *I have completed all of the divestitures indicated in my ethics agreement. I also understand that I may not repurchase these assets during my appointment without OGE's prior approval.*	(●) Yes ( ) No ( ) N/A
	b. *I have filed a period transaction report, or periodic transaction reports, (OGE Form 278-T) to disclose the completion of these agreed upon divestitures.*	( ) Yes ( ) No (●) N/A Filing Date(s) of OGE Form 278-T Report(s):
4. Managed Accounts	*If I have a managed account or use the services of an investment professional, I have notified the manager or professional of the limitations indicated in my ethics agreement. In addition, I am continuing to monitor purchases.*	(●) Yes ( ) No ( ) N/A
5. Interim Recusals	*I complied with my interim recusal obligations pending the divestitures required by my ethics agreement.*	(●) Yes ( ) No ( ) N/A

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6. Recusals *(Note: These factual statements describe the appointee's current status. They are not intended to modify ethics agreement commitments or create new recusal obligations.)*	a. *I am recusing from particular matters in which I know I have a personal or imputed financial interest directly and predictably affected by the matter, unless I have received a waiver or qualify for a regulatory exemption.*	◉ Yes ○ No
	b. *I am recusing from particular matters in which any former employer or client I served in the past year is a party or represents a party, unless I have been authorized under 5 C.F.R. § 2635.502(d).*	◉ Yes ○ No ○ N/A
	c. *I am recusing from particular matters in which any former employer or client I served in the two years prior to my appointment is a party or represents a party, unless I have received a waiver under Exec. Order 13770.*	◉ Yes ○ No ○ N/A
7. Waivers and Authorizations	a. *I received a waiver pursuant to 18 U.S.C. § 208.* If yes, indicate the date of the waiver and indicate the financial interest covered by the waiver.	○ Yes ◉ No Date: Financial interest:
	b. *I received a waiver pursuant to Executive Order 13770.* If yes, indicate the date of the waiver and the subject of the waiver (i.e., applicable paragraph of the ethics pledge, parties, particular matters, specific issue areas, as applicable).	○ Yes ◉ No Date: Subject:
	c. *I received an authorization pursuant to 5 C.F.R. § 2635.502(d).* If yes, indicate date of authorization and identify the covered person(s) as to whom you have been authorized (e.g., former employer, former client, spouse's employer, spouse's current client, etc.).	○ Yes ◉ No Date: Covered person(s):
	d. *I received a waiver pursuant to 5 C.F.R. § 2635.503(c).* If yes, indicate the date of the waiver and identify the former employer or payer.	○ Yes ◉ No Date: Former employer or payer:

AMERICAN OVERSIGHT

Rae Oliver

8. Payments, Accelerations, or Divestitures Required to be Completed Prior to Entering Government Service	Mark this box if not applicable: ☑	a. *If I committed that I would forfeit a financial interest or payment, unless it was received or accelerated prior to my assumption of the duties of the government position:*	○ *I received it (or it was accelerated) prior to my assumption of the duties of the position.* ○ *I received it (or it was accelerated) after my assumption of the duties of the position.* ○ *I forfeited it.*
		b. Financial interest or payment at issue:	
9. Requirements for Regular Appointees	*I have completed my initial ethics briefing, pursuant to 5 C.F.R. § 2638.305.* If you are a Special Government Employee (SGE) or career Foreign Service Officer (FSO), select N/A.		◉ Yes ○ No ○ N/A
	I have signed the ethics pledge pursuant to Executive Order 13770. If you are a SGE or career FSO or previously signed the pledge, select N/A.		◉ Yes ○ No ○ N/A
10. Additional Ethics Agreement Requirements	to be completed by OGE		to be completed by appointee *I am complying with these requirements as described in the adjacent box.* ○ Yes ○ No ◉ N/A
11. Comments of Appointee	I did not complete a 278T because I divested of the securities prior to my confirmation.		

Any intentionally false or misleading statement or response provided in this certification is a violation of law punishable by a fine or imprisonment, or both, under 18 U.S.C. § 1001.

I certify that the information I have provided is complete and accurate.	Appointee's Signature:	Date:
	VALERIA OLIVER DAVIS Digitally signed by VALERIA OLIVER DAVIS Date: 2019.04.02 09:18:18 -04'00'	

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AMERICAN OVERSIGHT

CERTIFICATION OF ETHICS AGREEMENT COMPLIANCE

Senate Confirmed Presidential Appointee

1. Appointee's Information	a. Appointee's Name:	to be completed by OGE Irving L. Dennis
	b. Position Title:	to be completed by OGE Chief Financial Officer
	c. Agency:	to be completed by OGE U.S. Department of Housing and Urban Development
	d. Date Ethics Agreement Signed:	to be completed by OGE October 31, 2017
	e. Date Confirmed:	to be completed by OGE December 21, 2017
	f. Due Date for Certification of Ethics Agreement Compliance:	to be completed by OGE: March 28, 2018
2. Resignations	*I completed all of the resignations indicated in my ethics agreement before I assumed the duties of my current government position.*	☑ Yes ☐ No ☐ N/A
3. Divestitures	a. *I have completed all of the divestitures indicated in my ethics agreement. I also understand that I may not repurchase these assets during my appointment without OGE's prior approval.*	☑ Yes ☐ No ☐ N/A
	b. *I have filed a period transaction report, or periodic transaction reports, (OGE Form 278-T) to disclose the completion of these agreed upon divestitures.*	☐ Yes ☐ No ☑ N/A Filing Date(s) of OGE Form 278-T Report(s):
4. Managed Accounts	*If I have a managed account or use the services of an investment professional, I have notified the manager or professional of the limitations indicated in my ethics agreement. In addition, I am continuing to monitor purchases.*	☑ Yes ☐ No ☐ N/A
5. Interim Recusals	*I complied with my interim recusal obligations pending the divestitures required by my ethics agreement.*	☑ Yes ☐ No ☐ N/A

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AMERICAN OVERSIGHT

6. Recusals *(Note: These factual statements describe the appointee's current status. They are not intended to modify ethics agreement commitments or create new recusal obligations.)*	a. *I am recusing from particular matters in which I know I have a personal or imputed financial interest directly and predictably affected by the matter, unless I have received a waiver or qualify for a regulatory exemption.*	☑ Yes ☐ No
	b. *I am recusing from particular matters in which any former employer or client I served in the past year is a party or represents a party, unless I have been authorized under 5 C.F.R. § 2635.502(d).*	☑ Yes ☐ No ☐ N/A
	c. *I am recusing from particular matters in which any former employer or client I served in the two years prior to my appointment is a party or represents a party, unless I have received a waiver under Exec. Order 13770.*	☑ Yes ☐ No ☑ N/A
7. Waivers and Authorizations	a. *I received a waiver pursuant to 18 U.S.C. § 208.* If yes, indicate the date of the waiver and indicate the financial interest covered by the waiver.	☐ Yes ☑ No Date: Financial interest:
	b. *I received a waiver pursuant to Executive Order 13770.* If yes, indicate the date of the waiver and the subject of the waiver (i.e., applicable paragraph of the ethics pledge, parties, particular matters, specific issue areas, as applicable).	☐ Yes ☑ No Date: Subject:
	c. *I received an authorization pursuant to 5 C.F.R. § 2635.502(d).* If yes, indicate date of authorization and identify the covered person(s) as to whom you have been authorized (e.g., former employer, former client, spouse's employer, spouse's current client, etc.).	☐ Yes ☑ No Date: Covered person(s):
	d. *I received a waiver pursuant to 5 C.F.R. § 2635.503(c).* If yes, indicate the date of the waiver and identify the former employer or payer.	☐ Yes ☑ No Date: Former employer or payer:

AMERICAN OVERSIGHT

8. Payments, Accelerations, or Divestitures Required to be Completed Prior to Entering Government Service	Mark this box if not applicable: ☑	a. *If I committed that I would forfeit a financial interest or payment, unless it was received or accelerated prior to my assumption of the duties of the government position:*	○ *I received it (or it was accelerated) prior to my assumption of the duties of the position.* ○ *I received it (or it was accelerated) after my assumption of the duties of the position.* ○ *I forfeited it.*
		b. Financial interest or payment at issue:	
9. Requirements for Regular Appointees	*I have completed my initial ethics briefing, pursuant to 5 C.F.R. § 2638.305.* If you are a Special Government Employee (SGE) or career Foreign Service Officer (FSO), select N/A.		☑ Yes ○ No ○ N/A
	I have signed the ethics pledge pursuant to Executive Order 13770. If you are a SGE or career FSO or previously signed the pledge, select N/A.		☑ Yes ○ No ○ N/A
10. Additional Ethics Agreement Requirements	to be completed by OGE	to be completed by appointee *I am complying with these requirements as described in the adjacent box.*	○ Yes ○ No ☑ N/A
11. Comments of Appointee			

Any intentionally false or misleading statement or response provided in this certification is a violation of law punishable by a fine or imprisonment, or both, under 18 U.S.C. § 1001.

I certify that the information I have provided is complete and accurate.	Appointee's Signature:	Date: 1/10/18

THIS CERTIFICATION WILL BE POSTED FOR PUBLIC VIEWING ON OGE'S WEBSITE.

AMERICAN OVERSIGHT

CERTIFICATION OF ETHICS AGREEMENT COMPLIANCE

Senate Confirmed Presidential Appointee

1. Appointee's Information	a. Appointee's Name:	to be completed by OGE Anna Maria Farias
	b. Position Title:	to be completed by OGE Assistant Secretary for Fair Housing and Equal Opportunity
	c. Agency:	to be completed by OGE Department of Housing and Urban Development
	d. Date Ethics Agreement Signed:	to be completed by OGE June 21, 2017
	e. Date Confirmed:	to be completed by OGE August 3, 2017
	f. Due Date for Certification of Ethics Agreement Compliance:	to be completed by OGE **November 8, 2017**
2. Resignations	*I completed all of the resignations indicated in my ethics agreement before I assumed the duties of my current government position.*	☑ Yes ☐ No ☐ N/A
3. Divestitures	a. *I have completed all of the divestitures indicated in my ethics agreement. I also understand that I may not repurchase these assets during my appointment without OGE's prior approval.*	☑ Yes ☐ No ☑ N/A
	b. *I have filed a period transaction report, or periodic transaction reports, (OGE Form 278-T) to disclose the completion of these agreed upon divestitures.*	☑ Yes ☐ No ☑ N/A Filing Date(s) of OGE Form 278-T Report(s):
4. Managed Accounts	*If I have a managed account or use the services of an investment professional, I have notified the manager or professional of the limitations indicated in my ethics agreement. In addition, I am continuing to monitor purchases.*	☑ Yes ☐ No ☐ N/A
5. Interim Recusals	*I complied with my interim recusal obligations pending the divestitures required by my ethics agreement.*	☑ Yes ☐ No ☐ N/A

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Anna Maria Farias

6. Recusals *(Note: These factual statements describe the appointee's current status. They are not intended to modify ethics agreement commitments or create new recusal obligations.)*	a. *I am recusing from particular matters in which I know I have a personal or imputed financial interest directly and predictably affected by the matter, unless I have received a waiver or qualify for a regulatory exemption.*	☑ Yes ☐ No
	b. *I am recusing from particular matters in which any former employer or client I served in the past year is a party or represents a party, unless I have been authorized under 5 C.F.R. § 2635.502(d).*	☐ Yes ☐ No ☑ N/A
	c. *I am recusing from particular matters in which any former employer or client I served in the two years prior to my appointment is a party or represents a party, unless I have received a waiver under Exec. Order 13770.*	☐ Yes ☐ No ☑ N/A
7. Waivers and Authorizations	a. *I received a waiver pursuant to 18 U.S.C. § 208.* If yes, indicate the date of the waiver and indicate the financial interest covered by the waiver.	☐ Yes ☑ No Date: Financial interest:
	b. *I received a waiver pursuant to Executive Order 13770.* If yes, indicate the date of the waiver and the subject of the waiver (i.e., applicable paragraph of the ethics pledge, parties, particular matters, specific issue areas, as applicable).	☐ Yes ☑ No Date: Subject:
	c. *I received an authorization pursuant to 5 C.F.R. § 2635.502(d).* If yes, indicate date of authorization and identify the covered person(s) as to whom you have been authorized (e.g., former employer, former client, spouse's employer, spouse's current client, etc.).	☐ Yes ☑ No Date: Covered person(s):
	d. *I received a waiver pursuant to 5 C.F.R. § 2635.503(c).* If yes, indicate the date of the waiver and identify the former employer or payer.	☐ Yes ☑ No Date: Former employer or payer:

AMERICAN OVERSIGHT

Anna Maria Farias

8. Payments, Accelerations, or Divestitures Required to be Completed Prior to Entering Government Service	Mark this box if not applicable: ☑	a. *If I committed that I would forfeit a financial interest or payment, unless it was received or accelerated prior to my assumption of the duties of the government position:*	○ *I received it (or it was accelerated) prior to my assumption of the duties of the position.* ○ *I received it (or it was accelerated) after my assumption of the duties of the position.* ○ *I forfeited it.*
		b. Financial interest or payment at issue:	
9. Requirements for Regular Appointees	*I have completed my initial ethics briefing, pursuant to 5 C.F.R. § 2638.305.* If you are a Special Government Employee (SGE) or career Foreign Service Officer (FSO), select N/A.		● Yes ○ No ○ N/A
	I have signed the ethics pledge pursuant to Executive Order 13770. If you are a SGE or career FSO or previously signed the pledge, select N/A.		● Yes ○ No ○ N/A
10. Additional Ethics Agreement Requirements	to be completed by OGE		to be completed by appointee *I am complying with these requirements as described in the adjacent box.* ● Yes ○ No ○ N/A
11. Comments of Appointee			

Any intentionally false or misleading statement or response provided in this certification is a violation of law punishable by a fine or imprisonment, or both, under 18 U.S.C. § 1001.

I certify that the information I have provided is complete and accurate.	Appointee's Signature: Anna Maria Farias	Date: 08/22/2019

THIS CERTIFICATION WILL BE POSTED FOR PUBLIC VIEWING ON OGE'S WEBSITE. 3

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CERTIFICATION OF ETHICS AGREEMENT COMPLIANCE

Senate Confirmed Presidential Appointee

1. Appointee's Information	a. Appointee's Name:	to be completed by OGE Brian Montgomery
	b. Position Title:	to be completed by OGE Assistant Secretary for Housing/FHA Commissioner
	c. Agency:	to be completed by OGE U.S. Department of Housing and Urban Development
	d. Date Ethics Agreement Signed:	to be completed by OGE September 25, 2017
	e. Date Confirmed:	to be completed by OGE May 23, 2018
	f. Due Date for Certification of Ethics Agreement Compliance:	to be completed by OGE **August 28, 2018**
2. Resignations	*I completed all of the resignations indicated in my ethics agreement before I assumed the duties of my current government position.*	(●) Yes ( ) No ( ) N/A
3. Divestitures	a. *I have completed all of the divestitures indicated in my ethics agreement. I also understand that I may not repurchase these assets during my appointment without OGE's prior approval.*	(●) Yes ( ) No ( ) N/A
	b. *I have filed a period transaction report, or periodic transaction reports, (OGE Form 278-T) to disclose the completion of these agreed upon divestitures.*	(●) Yes ( ) No ( ) N/A Filing Date(s) of OGE Form 278-T Report(s): 08/10/2018
4. Managed Accounts	*If I have a managed account or use the services of an investment professional, I have notified the manager or professional of the limitations indicated in my ethics agreement. In addition, I am continuing to monitor purchases.*	(●) Yes ( ) No ( ) N/A
5. Interim Recusals	*I complied with my interim recusal obligations pending the divestitures required by my ethics agreement.*	(●) Yes ( ) No ( ) N/A

THIS CERTIFICATION WILL BE POSTED FOR PUBLIC VIEWING ON OGE'S WEBSITE. 1

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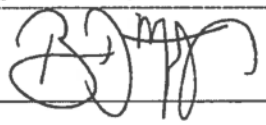
6. Recusals *(Note: These factual statements describe the appointee's current status. They are not intended to modify ethics agreement commitments or create new recusal obligations.)*	a. *I am recusing from particular matters in which I know I have a personal or imputed financial interest directly and predictably affected by the matter, unless I have received a waiver or qualify for a regulatory exemption.*	◉ Yes ○ No
	b. *I am recusing from particular matters in which any former employer or client I served in the past year is a party or represents a party, unless I have been authorized under 5 C.F.R. § 2635.502(d).*	◉ Yes ○ No ○ N/A
	c. *I am recusing from particular matters in which any former employer or client I served in the two years prior to my appointment is a party or represents a party, unless I have received a waiver under Exec. Order 13770.*	◉ Yes ○ No ○ N/A
7. Waivers and Authorizations	a. *I received a waiver pursuant to 18 U.S.C. § 208.* If yes, indicate the date of the waiver and indicate the financial interest covered by the waiver.	○ Yes ◉ No Date: Financial interest:
	b. *I received a waiver pursuant to Executive Order 13770.* If yes, indicate the date of the waiver and the subject of the waiver (i.e., applicable paragraph of the ethics pledge, parties, particular matters, specific issue areas, as applicable).	○ Yes ◉ No Date: Subject:
	c. *I received an authorization pursuant to 5 C.F.R. § 2635.502(d).* If yes, indicate date of authorization and identify the covered person(s) as to whom you have been authorized (e.g., former employer, former client, spouse's employer, spouse's current client, etc.).	○ Yes ◉ No Date: Covered person(s):
	d. *I received a waiver pursuant to 5 C.F.R. § 2635.503(c).* If yes, indicate the date of the waiver and identify the former employer or payer.	○ Yes ◉ No Date: Former employer or payer:

AMERICAN OVERSIGHT

Brian Montgomery

8. Payments, Accelerations, or Divestitures Required to be Completed Prior to Entering Government Service	Mark this box if not applicable: ☑	a. *If I committed that I would forfeit a financial interest or payment, unless it was received or accelerated prior to my assumption of the duties of the government position:*	○ *I received it (or it was accelerated) prior to my assumption of the duties of the position.* ○ *I received it (or it was accelerated) after my assumption of the duties of the position.* ○ *I forfeited it.*
		b. Financial interest or payment at issue:	
9. Requirements for Regular Appointees	*I have completed my initial ethics briefing, pursuant to 5 C.F.R. § 2638.305.* If you are a Special Government Employee (SGE) or career Foreign Service Officer (FSO), select N/A.		◉ Yes ○ No ○ N/A
	I have signed the ethics pledge pursuant to Executive Order 13770. If you are a SGE or career FSO or previously signed the pledge, select N/A.		◉ Yes ○ No ○ N/A
10. Additional Ethics Agreement Requirements	to be completed by OGE		to be completed by appointee *I am complying with these requirements as described in the adjacent box.* ○ Yes ○ No ○ N/A
11. Comments of Appointee			

Any intentionally false or misleading statement or response provided in this certification is a violation of law punishable by a fine or imprisonment, or both, under 18 U.S.C. § 1001.

I certify that the information I have provided is complete and accurate.	Appointee's Signature:	Date:
		08/20/2018

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U.S. OFFICE OF GOVERNMENT ETHICS
Certification of Ethics Agreement Compliance
(June 2017 version)

CERTIFICATION OF ETHICS AGREEMENT COMPLIANCE

Senate Confirmed Presidential Appointee

1. Appointee's Information	a. Appointee's Name:	to be completed by OGE: Pamela Hughes Patenaude
	b. Position Title:	to be completed by OGE: Deputy Secretary
	c. Agency:	to be completed by OGE: U.S. Department of Housing and Urban Development
	d. Date Ethics Agreement Signed:	to be completed by OGE: May 2, 2017
	e. Date Confirmed:	to be completed by OGE: September 14, 2017
	f. Due Date for Certification of Ethics Agreement Compliance:	to be completed by OGE: December 20, 2017
2. Resignations	*I completed all of the resignations indicated in my ethics agreement before I assumed the duties of my current government position.*	☑ Yes ○ No ○ N/A
3. Divestitures	a. *I have completed all of the divestitures indicated in my ethics agreement. I also understand that I may not repurchase these assets during my appointment without OGE's prior approval.*	○ Yes ○ No ☑ N/A
	b. *I have filed a period transaction report, or periodic transaction reports, (OGE Form 278-T) to disclose the completion of these agreed upon divestitures.*	○ Yes ○ No ☑ N/A Filing Date(s) of OGE Form 278-T Report(s):
4. Managed Accounts	*If I have a managed account or use the services of an investment professional, I have notified the manager or professional of the limitations indicated in my ethics agreement. In addition, I am continuing to monitor purchases.*	☑ Yes ○ No ○ N/A
5. Interim Recusals	*I complied with my interim recusal obligations pending the divestitures required by my ethics agreement.*	○ Yes ○ No ☑ N/A

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Pamela Hughes Patenaude

8. Payments, Accelerations, or Divestitures Required to be Completed Prior to Entering Government Service	Mark this box if not applicable: ☑	a. *If I committed that I would forfeit a financial interest or payment, unless it was received or accelerated prior to my assumption of the duties of the government position:*	○ *I received it (or it was accelerated) prior to my assumption of the duties of the position.* ○ *I received it (or it was accelerated) after my assumption of the duties of the position.* ○ *I forfeited it.*
		b. Financial interest or payment at issue:	
9. Requirements for Regular Appointees	*I have completed my initial ethics briefing, pursuant to 5 C.F.R. § 2638.305.* If you are a Special Government Employee (SGE) or career Foreign Service Officer (FSO), select N/A.		☑ Yes ○ No ○ N/A
	I have signed the ethics pledge pursuant to Executive Order 13770. If you are a SGE or career FSO or previously signed the pledge, select N/A.		☑ Yes ○ No ○ N/A
10. Additional Ethics Agreement Requirements	to be completed by OGE		to be completed by appointee *I am complying with these requirements as described in the adjacent box.* ○ Yes ○ No ○ N/A
11. Comments of Appointee			

Any intentionally false or misleading statement or response provided in this certification is a violation of law punishable by a fine or imprisonment, or both, under 18 U.S.C. § 1001.

I certify that the information I have provided is complete and accurate.	Appointee's Signature: Pamela Patenaude	Date: 9/20/17

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AMERICAN OVERSIGHT

CERTIFICATION OF ETHICS AGREEMENT COMPLIANCE

Senate Confirmed Presidential Appointee

1. Appointee's Information	a. Appointee's Name:	to be completed by OGE Neal James Rackleff
	b. Position Title:	to be completed by OGE Assistant Secretary for Community Planning and Development
	c. Agency:	to be completed by OGE U.S. Department of Housing and Urban Development
	d. Date Ethics Agreement Signed:	to be completed by OGE May 26, 2017
	e. Date Confirmed:	to be completed by OGE August 3, 2017
	f. Due Date for Certification of Ethics Agreement Compliance:	to be completed by OGE **November 8, 2017**
2. Resignations	*I completed all of the resignations indicated in my ethics agreement before I assumed the duties of my current government position.*	◉ Yes ○ No ○ N/A
3. Divestitures	a. *I have completed all of the divestitures indicated in my ethics agreement. I also understand that I may not repurchase these assets during my appointment without OGE's prior approval.*	○ Yes ○ No ◉ N/A
	b. *I have filed a period transaction report, or periodic transaction reports, (OGE Form 278-T) to disclose the completion of these agreed upon divestitures.*	○ Yes ○ No ◉ N/A Filing Date(s) of OGE Form 278-T Report(s):
4. Managed Accounts	*If I have a managed account or use the services of an investment professional, I have notified the manager or professional of the limitations indicated in my ethics agreement. In addition, I am continuing to monitor purchases.*	○ Yes ○ No ◉ N/A
5. Interim Recusals	*I complied with my interim recusal obligations pending the divestitures required by my ethics agreement.*	○ Yes ○ No ◉ N/A

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6. Recusals *(Note: These factual statements describe the appointee's current status. They are not intended to modify ethics agreement commitments or create new recusal obligations.)*	a. *I am recusing from particular matters in which I know I have a personal or imputed financial interest directly and predictably affected by the matter, unless I have received a waiver or qualify for a regulatory exemption.*	(●) Yes ( ) No
	b. *I am recusing from particular matters in which any former employer or client I served in the past year is a party or represents a party, unless I have been authorized under 5 C.F.R. § 2635.502(d).*	(●) Yes ( ) No ( ) N/A
	c. *I am recusing from particular matters in which any former employer or client I served in the two years prior to my appointment is a party or represents a party, unless I have received a waiver under Exec. Order 13770.*	(●) Yes ( ) No ( ) N/A
7. Waivers and Authorizations	a. *I received a waiver pursuant to 18 U.S.C. § 208.*	( ) Yes (●) No
	If yes, indicate the date of the waiver and indicate the financial interest covered by the waiver.	Date: Financial interest:
	b. *I received a waiver pursuant to Executive Order 13770.*	( ) Yes (●) No
	If yes, indicate the date of the waiver and the subject of the waiver (i.e., applicable paragraph of the ethics pledge, parties, particular matters, specific issue areas, as applicable).	Date: Subject:
	c. *I received an authorization pursuant to 5 C.F.R. § 2635.502(d).*	( ) Yes (●) No
	If yes, indicate date of authorization and identify the covered person(s) as to whom you have been authorized (e.g., former employer, former client, spouse's employer, spouse's current client, etc.).	Date: Covered person(s):
	d. *I received a waiver pursuant to 5 C.F.R. § 2635.503(c).*	( ) Yes (●) No
	If yes, indicate the date of the waiver and identify the former employer or payer.	Date: Former employer or payer:

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Neal James Rackleff

8. Payments, Accelerations, or Divestitures Required to be Completed Prior to Entering Government Service	Mark this box if not applicable: ☑	a. *If I committed that I would forfeit a financial interest or payment, unless it was received or accelerated prior to my assumption of the duties of the government position:*	○ *I received it (or it was accelerated) prior to my assumption of the duties of the position.* ○ *I received it (or it was accelerated) after my assumption of the duties of the position.* ○ *I forfeited it.*
		b. Financial interest or payment at issue:	
9. Requirements for Regular Appointees	*I have completed my initial ethics briefing, pursuant to 5 C.F.R. § 2638.305.* If you are a Special Government Employee (SGE) or career Foreign Service Officer (FSO), select N/A.		◉ Yes ○ No ○ N/A
	I have signed the ethics pledge pursuant to Executive Order 13770. If you are a SGE or career FSO or previously signed the pledge, select N/A.		◉ Yes ○ No ○ N/A
10. Additional Ethics Agreement Requirements	to be completed by OGE		to be completed by appointee *I am complying with these requirements as described in the adjacent box.* ○ Yes ○ No ◉ N/A
11. Comments of Appointee			

Any intentionally false or misleading statement or response provided in this certification is a violation of law punishable by a fine or imprisonment, or both, under 18 U.S.C. § 1001.

I certify that the information I have provided is complete and accurate.	Appointee's Signature:	Date:
	NEAL RACKLEFF Digitally signed by NEAL RACKLEFF Date: 2017.09.29 20:32:32 -04'00'	09/29/17

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CERTIFICATION OF ETHICS AGREEMENT COMPLIANCE

Senate Confirmed Presidential Appointee

1. Appointee's Information	a. Appointee's Name:	to be completed by OGE: Suzanne I. Tufts
	b. Position Title:	to be completed by OGE: Assistant Secretary for Administration
	c. Agency:	to be completed by OGE: U.S. Department of Housing and Urban Development
	d. Date Ethics Agreement Signed:	to be completed by OGE: September 6, 2017
	e. Date Confirmed:	to be completed by OGE: December 21, 2017
	f. Due Date for Certification of Ethics Agreement Compliance:	to be completed by OGE: **March 28, 2018**
2. Resignations	*I completed all of the resignations indicated in my ethics agreement before I assumed the duties of my current government position.*	(•) Yes ( ) No ( ) N/A
3. Divestitures	a. *I have completed all of the divestitures indicated in my ethics agreement. I also understand that I may not repurchase these assets during my appointment without OGE's prior approval.*	( ) Yes ( ) No (•) N/A
	b. *I have filed a period transaction report, or periodic transaction reports, (OGE Form 278-T) to disclose the completion of these agreed upon divestitures.*	( ) Yes ( ) No (•) N/A Filing Date(s) of OGE Form 278-T Report(s):
4. Managed Accounts	*If I have a managed account or use the services of an investment professional, I have notified the manager or professional of the limitations indicated in my ethics agreement. In addition, I am continuing to monitor purchases.*	( ) Yes ( ) No (•) N/A
5. Interim Recusals	*I complied with my interim recusal obligations pending the divestitures required by my ethics agreement.*	( ) Yes ( ) No (•) N/A

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6. Recusals *(Note: These factual statements describe the appointee's current status. They are not intended to modify ethics agreement commitments or create new recusal obligations.)*	a. *I am recusing from particular matters in which I know I have a personal or imputed financial interest directly and predictably affected by the matter, unless I have received a waiver or qualify for a regulatory exemption.*	◉ Yes ○ No
	b. *I am recusing from particular matters in which any former employer or client I served in the past year is a party or represents a party, unless I have been authorized under 5 C.F.R. § 2635.502(d).*	◉ Yes ○ No ○ N/A
	c. *I am recusing from particular matters in which any former employer or client I served in the two years prior to my appointment is a party or represents a party, unless I have received a waiver under Exec. Order 13770.*	◉ Yes ○ No ○ N/A
7. Waivers and Authorizations	a. *I received a waiver pursuant to 18 U.S.C. § 208.* If yes, indicate the date of the waiver and indicate the financial interest covered by the waiver.	○ Yes ◉ No Date: Financial interest:
	b. *I received a waiver pursuant to Executive Order 13770.* If yes, indicate the date of the waiver and the subject of the waiver (i.e., applicable paragraph of the ethics pledge, parties, particular matters, specific issue areas, as applicable).	○ Yes ◉ No Date: Subject:
	c. *I received an authorization pursuant to 5 C.F.R. § 2635.502(d).* If yes, indicate date of authorization and identify the covered person(s) as to whom you have been authorized (e.g., former employer, former client, spouse's employer, spouse's current client, etc.).	○ Yes ◉ No Date: Covered person(s):
	d. *I received a waiver pursuant to 5 C.F.R. § 2635.503(c).* If yes, indicate the date of the waiver and identify the former employer or payer.	○ Yes ◉ No Date: Former employer or payer:

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Suzanne I. Tufts

8. Payments, Accelerations, or Divestitures Required to be Completed Prior to Entering Government Service	Mark this box if not applicable: ☑	a. *If I committed that I would forfeit a financial interest or payment, unless it was received or accelerated prior to my assumption of the duties of the government position:*	○ *I received it (or it was accelerated) prior to my assumption of the duties of the position.* ○ *I received it (or it was accelerated) after my assumption of the duties of the position.* ○ *I forfeited it.*
		b. Financial interest or payment at issue:	
9. Requirements for Regular Appointees	*I have completed my initial ethics briefing, pursuant to 5 C.F.R. § 2638.305.* If you are a Special Government Employee (SGE) or career Foreign Service Officer (FSO), select N/A.		◉ Yes ○ No ○ N/A
	I have signed the ethics pledge pursuant to Executive Order 13770. If you are a SGE or career FSO or previously signed the pledge, select N/A.		◉ Yes ○ No ○ N/A
10. Additional Ethics Agreement Requirements	to be completed by OGE		to be completed by appointee *I am complying with these requirements as described in the adjacent box.* ○ Yes ○ No ◉ N/A
11. Comments of Appointee			

Any intentionally false or misleading statement or response provided in this certification is a violation of law punishable by a fine or imprisonment, or both, under 18 U.S.C. § 1001.

I certify that the information I have provided is complete and accurate.	Appointee's Signature: SUZANNE TUFTS Digitally signed by SUZANNE TUFTS Date: 2018.01.31 14:46:10 -05'00'	Date: 1/31/2018

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CERTIFICATION OF ETHICS AGREEMENT COMPLIANCE

Senate Confirmed Presidential Appointee

1. Appointee's Information	a. Appointee's Name:	to be completed by OGE Leonard Wolfson
	b. Position Title:	to be completed by OGE Assistant Secretary for the Office of Congressional and Intergovernmental Relations
	c. Agency:	to be completed by OGE U.S. Department of Housing and Urban Development
	d. Date Ethics Agreement Signed:	to be completed by OGE October 25, 2017
	e. Date Confirmed:	to be completed by OGE December 21, 2017
	f. Due Date for Certification of Ethics Agreement Compliance:	to be completed by OGE **March 28, 2018**
2. Resignations	*I completed all of the resignations indicated in my ethics agreement before I assumed the duties of my current government position.*	◯ Yes ◯ No ◉ N/A
3. Divestitures	a. *I have completed all of the divestitures indicated in my ethics agreement. I also understand that I may not repurchase these assets during my appointment without OGE's prior approval.*	◯ Yes ◯ No ◉ N/A
	b. *I have filed a period transaction report, or periodic transaction reports, (OGE Form 278-T) to disclose the completion of these agreed upon divestitures.*	◯ Yes ◯ No ◉ N/A Filing Date(s) of OGE Form 278-T Report(s):
4. Managed Accounts	*If I have a managed account or use the services of an investment professional, I have notified the manager or professional of the limitations indicated in my ethics agreement. In addition, I am continuing to monitor purchases.*	◯ Yes ◯ No ◉ N/A
5. Interim Recusals	*I complied with my interim recusal obligations pending the divestitures required by my ethics agreement.*	◯ Yes ◯ No ◉ N/A

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6. Recusals *(Note: These factual statements describe the appointee's current status. They are not intended to modify ethics agreement commitments or create new recusal obligations.)*	a. *I am recusing from particular matters in which I know I have a personal or imputed financial interest directly and predictably affected by the matter, unless I have received a waiver or qualify for a regulatory exemption.*	◉ Yes ○ No
	b. *I am recusing from particular matters in which any former employer or client I served in the past year is a party or represents a party, unless I have been authorized under 5 C.F.R. § 2635.502(d).*	◉ Yes ○ No ○ N/A
	c. *I am recusing from particular matters in which any former employer or client I served in the two years prior to my appointment is a party or represents a party, unless I have received a waiver under Exec. Order 13770.*	◉ Yes ○ No ○ N/A
7. Waivers and Authorizations	a. *I received a waiver pursuant to 18 U.S.C. § 208.* If yes, indicate the date of the waiver and indicate the financial interest covered by the waiver.	○ Yes ◉ No Date: Financial interest:
	b. *I received a waiver pursuant to Executive Order 13770.* If yes, indicate the date of the waiver and the subject of the waiver (i.e., applicable paragraph of the ethics pledge, parties, particular matters, specific issue areas, as applicable).	○ Yes ◉ No Date: Subject:
	c. *I received an authorization pursuant to 5 C.F.R. § 2635.502(d).* If yes, indicate date of authorization and identify the covered person(s) as to whom you have been authorized (e.g., former employer, former client, spouse's employer, spouse's current client, etc.).	○ Yes ◉ No Date: Covered person(s):
	d. *I received a waiver pursuant to 5 C.F.R. § 2635.503(c).* If yes, indicate the date of the waiver and identify the former employer or payer.	○ Yes ◉ No Date: Former employer or payer:

AMERICAN OVERSIGHT

Leonard Wolfson

8. Payments, Accelerations, or Divestitures Required to be Completed Prior to Entering Government Service	Mark this box if not applicable: ☑	a. *If I committed that I would forfeit a financial interest or payment, unless it was received or accelerated prior to my assumption of the duties of the government position:*	○ *I received it (or it was accelerated) prior to my assumption of the duties of the position.* ○ *I received it (or it was accelerated) after my assumption of the duties of the position.* ○ *I forfeited it.*
		b. Financial interest or payment at issue:	
9. Requirements for Regular Appointees	*I have completed my initial ethics briefing, pursuant to 5 C.F.R. § 2638.305.* If you are a Special Government Employee (SGE) or career Foreign Service Officer (FSO), select N/A.		◉ Yes ○ No ○ N/A
	I have signed the ethics pledge pursuant to Executive Order 13770. If you are a SGE or career FSO or previously signed the pledge, select N/A.		◉ Yes ○ No ○ N/A
10. Additional Ethics Agreement Requirements	to be completed by OGE		to be completed by appointee *I am complying with these requirements as described in the adjacent box.* ○ Yes ○ No ◉ N/A
11. Comments of Appointee			

Any intentionally false or misleading statement or response provided in this certification is a violation of law punishable by a fine or imprisonment, or both, under 18 U.S.C. § 1001.

I certify that the information I have provided is complete and accurate.	Appointee's Signature: LEONARD WOLFSON Digitally signed by LEONARD WOLFSON Date: 2018.01.30 14:58:11 -05'00'	Date: 1-30-2018

THIS CERTIFICATION WILL BE POSTED FOR PUBLIC VIEWING ON OGE'S WEBSITE.

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NOTIFICATION OF POST-EMPLOYMENT NEGOTIATION OR AGREEMENT AND RECUSAL STATEMENT

Section 17 of the Stop Trading on Congressional Knowledge Act of 2012 (STOCK Act) requires certain employees to file a statement notifying their agency ethics official of any negotiation for or agreement of future employment or compensation with a non-federal entity within three business days after commencement of the negotiation or agreement. Employees who file this notification statement also must file with their agency ethics official a recusal statement whenever there is a conflict of interest or appearance of a conflict of interest with the entity. In any such case, the employee must recuse, unless the employee has first obtained a written waiver or authorization as discussed in 5 C.F.R. § 2635.605, or qualifies for a regulatory exemption pursuant to 18 U.S.C. § 208(b)(2).

NOTIFICATION OF POST-EMPLOYMENT NEGOTIATION OR AGREEMENT

Name of Employee	Neal Rackleff
Agency/Office	HUD - C.P.D.
Date Negotiation or Agreement Commenced	10-18-18
Name(s) of Non-Federal Entity or Entities Disclose each non-federal entity with which you are negotiating for or have an agreement of future employment or compensation.	(b)(6)

RECUSAL STATEMENT

For as long as I am negotiating for or have an agreement of employment or compensation with any entity listed above, I will not participate personally and substantially in any particular matter that has a direct and predictable effect on the financial interests of that entity, unless I first obtain a written waiver or authorization consistent with 5 C.F.R. § 2635.605, or qualify for a regulatory exemption pursuant to 18 U.S.C. § 208(b)(2).

Employee Signature	**Date Submitted**
[signature]	10-19-18
Agency Ethics Official Signature	**Date Received**
[signature]	10/19/18

AMERICAN OVERSIGHT

NOTIFICATION OF POST-EMPLOYMENT NEGOTIATION OR AGREEMENT AND RECUSAL STATEMENT

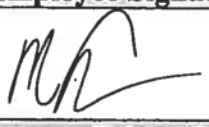
Section 17 of the Stop Trading on Congressional Knowledge Act of 2012 (STOCK Act) requires certain employees to file a statement notifying their agency ethics official of any negotiation for or agreement of future employment or compensation with a non-federal entity within three business days after commencement of the negotiation or agreement. Employees who file this notification statement also must file with their agency ethics official a recusal statement whenever there is a conflict of interest or appearance of a conflict of interest with the entity. In any such case, the employee must recuse, unless the employee has first obtained a written waiver or authorization as discussed in 5 C.F.R. § 2635.605, or qualifies for a regulatory exemption pursuant to 18 U.S.C. § 208(b)(2).

NOTIFICATION OF POST-EMPLOYMENT NEGOTIATION OR AGREEMENT

Name of Employee	Matthew Lee Cummings
Agency/Office	Department of Housing and Urban Development
Date Negotiation or Agreement Commenced	June 21st, 2018
Name(s) of Non-Federal Entity or Entities Disclose each non-federal entity with which you are negotiating for or have an agreement of future employment or compensation.	(b)(6)

RECUSAL STATEMENT

For as long as I am negotiating for or have an agreement of employment or compensation with any entity listed above, I will not participate personally and substantially in any particular matter that has a direct and predictable effect on the financial interests of that entity, unless I first obtain a written waiver or authorization consistent with 5 C.F.R. § 2635.605, or qualify for a regulatory exemption pursuant to 18 U.S.C. § 208(b)(2).

Employee Signature	**Date Submitted**
	July 2nd, 2018
Agency Ethics Official Signature	**Date Received**

AMERICAN OVERSIGHT

From: Ludlow, Ashley
Sent: 19 Apr 2019 13:22:17 +0000
To: McGaughey, Tyler T. EOP/WHO
Subject: FW: Waters Announces Updates to April Committee Schedule and May Hearings

FYI

Ashley Ludlow
Senior Counsel
Office of General Counsel
U.S. Department of Housing and Urban Development
T: (202) 402-5963 | C: (b)(6)

The information in this communication may be confidential and privileged, is intended only for the use of the recipient(s) named above, and may be subject to additional legal non-disclosure requirements. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please re-send it to the sender and delete the original message and any copy of it from your computer system.

From: Financial Services Committee <democrats.financialservices@mail.house.gov>
Sent: Thursday, April 18, 2019 8:04:41 PM
To: Kelley, Michael J
Subject: Waters Announces Updates to April Committee Schedule and May Hearings

Click here if you have trouble viewing this e-mail

For Immediate Release
April 18, 2019

Waters Announces Updates to April Committee Schedule and May Hearings

WASHINGTON, D.C. - Today, **Congresswoman Maxine Waters (D-CA)**, Chairwoman of the House Financial Services Committee, announced several Committee hearings and a markup:

Tuesday, April 30 at 10:00 AM – The full Committee will convene a

AMERICAN OVERSIGHT

hearing entitled, "Housing in America: Assessing the Infrastructure Needs of America's Housing Stock."

Tuesday, April 30 at 2:00 PM – The Subcommittee on Consumer Protection and Financial Institutions will convene a hearing entitled, "Ending Debt Traps in the Payday and Small Dollar Credit Industry."

Wednesday, May 1 at 10:00 AM – The Subcommittee on Oversight and Investigations will convene a hearing entitled, "Examining Discrimination in the Automobile Loan and Insurance Industries."

Wednesday, May 1 at 2:00 PM – The Subcommittee on Diversity and Inclusion will convene a hearing entitled, "Good for the Bottom Line: A Review of the Business Case for Diversity and Inclusion."

Wednesday, May 8 at 10:00 AM – The Subcommittee on Housing, Community Development and Insurance will convene a hearing entitled, "A Review of the State of and Barriers to Minority Homeownership."

Wednesday, May 8 at 2:00 PM – The full Committee will convene for a markup.

Thursday, May 9 at 10:00 AM – The full Committee will convene for a continuation of the May 8 markup.

Wednesday, May 15 at 10:00 AM – The Subcommittee on Investor Protection, Entrepreneurship and Capital Markets will convene a hearing entitled, "Promoting Economic Growth: A Review of Proposals to Strengthen the Rights and Protections for Workers."

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Wednesday, May 15 at 2:00 PM – The Subcommittee on National Security, International Development and Monetary Policy will convene a hearing entitled, "Assessing the Use of Sanctions in Addressing National Security and Foreign Policy Challenges."

Thursday, May 16 at 10:00 AM – The full Committee will convene a hearing entitled, "Oversight of Prudential Regulators: Ensuring the Safety, Soundness and Accountability of Megabanks and Other Depository Institutions."

Tuesday, May 21 at 10:00 AM – The full Committee will convene a hearing entitled, "Housing in America: Oversight of the U.S. Department of Housing and Urban Development."

Please note that the Full Committee hearing entitled, "The Annual Testimony of the Secretary of the Treasury on the State of the International Financial System," which began on April 9 will be continued on a date to be determined in May and the schedule will change to accommodate the Secretary's testimony. Committee activities are finalized once an official notice is issued by the House Financial Services Committee. Visit **https://financialservices.house.gov/calendar/** for the most up-to-date Committee schedule.

Hearings and markups will take place in 2128 Rayburn House Office Building and will be broadcast live on **https://financialservices.house.gov/live/**.

###

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Sent from the Committee on Financial Services Democrats

2129 Rayburn House Office Building, Washington, DC 20515 | T (202) 225-4247

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AMERICAN OVERSIGHT

From: Ludlow, Ashley
Sent: 22 May 2019 19:56:03 +0000
To: McGaughey, Tyler T. EOP/WHO
Subject: FW: Senate HSGAC Hearing

FYI

Ashley Ludlow
Senior Counsel
Office of General Counsel
U.S. Department of Housing and Urban Development
T: (202) 402-5963 | C: (b)(6)

The information in this communication may be confidential and privileged, is intended only for the use of the recipient(s) named above, and may be subject to additional legal non-disclosure requirements. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please re-send it to the sender and delete the original message and any copy of it from your computer system.

From: Dendas, Michael W <Michael.W.Dendas@hud.gov>
Sent: Wednesday, May 22, 2019 3:30 PM
To: Wolfson, Len <Len.Wolfson@hud.gov>; Kelley, Michael J <Michael.J.Kelley@hud.gov>
Cc: Ludlow, Ashley <Ashley.Ludlow@hud.gov>
Subject: Senate HSGAC Hearing

Senate HSCAG's Subcommittee on Investigations is working on a hearing on June 13. The hearing will focus on Federal IT systems. Staff has indicated they are going to invite HUD's CIO and the OIG, along with OMB, DHS and GAO.

They have cited issues raised in the below OIG report and GAO study:

- https://www.hudoig.gov/sites/default/files/documents/2018-OE-0004.pdf
- https://www.gao.gov/assets/700/693668.pdf

Staff has also requested information on HUD's IT, specifically spending on legacy systems. I am currently working with CIO's office to get them information and set up an in-person briefing the week of June 3.

Thanks,

-Mike Dendas

Michael Dendas
Director, Legislative Affairs

AMERICAN OVERSIGHT

Congressional and Intergovernmental Relations
U.S. Department of Housing and Urban Development
202-402-3761
Michael.w.dendas@hud.gov

AMERICAN OVERSIGHT

From: Ludlow, Ashley
Sent: 2 May 2019 18:59:57 +0000
To: McGaughey, Tyler T. EOP/WHO
Subject: FW: Requested Briefing
Attachments: HUDOIGApril2019ManagementAlert.pdf

FYI

Ashley Ludlow
Senior Counsel
Office of General Counsel
U.S. Department of Housing and Urban Development
T: (202) 402-5963 | C: (b)(6)

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From: Kelley, Michael J <Michael.J.Kelley@hud.gov>
Sent: Thursday, May 02, 2019 2:58 PM
To: Ludlow, Ashley <Ashley.Ludlow@hud.gov>
Subject: Fwd: Requested Briefing

FYI.

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From: Heinemann, John <John.Heinemann@mail.house.gov>
Sent: Thursday, May 2, 2019 12:58:50 PM
To: Kelley, Michael J
Cc: Burris, Kevin; Johnson, Bruce
Subject: Requested Briefing

Mr. Kelley,

We are very interested in learning more about the issues discussed in the attached Management Alert. Please let us know a convenient time for your office to provide a briefing to the committee.

Sincerely,

John

John Heinemann
Counsel

AMERICAN OVERSIGHT

House Committee on Financial Services
O'Neill House Office Building, Room 3300
Direct: (202) 226-9117
Mobile: (b)(6)
john.heinemann@mail.house.gov

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Management Alert

OIG Access to Electronically-Stored Information

2019-IG-001

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OFFICE OF INSPECTOR GENERAL
U.S. Department of Housing and Urban Development

HUD-19-0775, 19-0894-C-000131

April 29, 2019

TO: Benjamin Carson, Sr.,
Secretary, S

(b)(6)

FROM: Rae Oliver Davis,
Inspector General, G

SUBJECT: Management Alert: OIG Access to Electronically-Stored Information
Memorandum No: 2019-IG-001

I write to inform you of the deficiencies in the process used by the U.S. Department of Housing and Urban Development ("Department") to respond to requests for electronically-stored information ("ESI"), which result in unreasonable delays in the Office of Inspector General's (OIG) access to departmental information. Failure to obtain timely access to Departmental ESI hampers the OIG's ability to carry out its oversight function. Delayed access to Departmental records causes OIG oversight efforts to be diluted, become stale, or worse, halt entirely. Access to ESI—most notably e-mail communications—is critical for the OIG to operate effectively.

The Department must take immediate action to address the shortcomings in its process to ensure that the OIG has timely access to all requested records as required by the Inspector General Act of 1978 ("IG Act").[1]

HUD's Process for Responding to OIG Requests for ESI Produces Unacceptable Delays

Currently, the Department processes OIG requests for ESI through an e-Discovery management system that the Office of General Counsel (OGC) controls and maintains. OGC relies on contractors to collect and process ESI in response to such requests. The OIG has repeatedly notified the Department that OGC's process unreasonably delays production of records in response to OIG requests.

In December 2017, the OIG published an evaluation report ("the Evaluation") detailing the inefficiencies in the Department's process for responding to requests for ESI. The OIG's evaluation showed (1) the Department provides untimely responses to OIG requests for ESI, (2) untimely responses have significant, negative effects on OIG investigations and other oversight work, and (3) untimely responses to OIG requests fail to comply with the law requiring timely

[1] The Inspector General Act of 1978 ("IG Act"), as amended, authorizes the OIG to "have *timely* access to *all* records, reports, audits, reviews, documents, papers, recommendations, or other material available to [HUD] which relate to the programs and operations with respect to that which the Inspector General has responsibilities under [the] Act." 5 U.S.C. app 3, § 6(a)(1) (emphasis added). The IG Act's access provision applies "notwithstanding any other provision of law," except pursuant to a law that expressly refers to and limits the access of OIG. Id. at § 6(b).

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OIG access to all Department information.[2] The Evaluation determined that the Department's reliance on a poorly-scoped contract to process requests for ESI, which includes those made by OIG as well as those made in litigation, under the FOIA, and by congressional oversight committees, was causing the unacceptable delays. The OIG also noted that the consequences for a failure to respond timely to requests for ESI have serious legal, financial, and reputational implications.[3]

The Evaluation forecasted that the volume of ESI requests would increase. The OIG recommended that OGC conduct a capacity study to project future ESI demands and utilize that study to inform future contracting decisions affecting its ability to respond to requests for ESI. OGC concurred with the Evaluation's findings and recommendations. Since the Department completed its capacity study, the OIG has continued to highlight the delays caused by the Department's contract and e-Discovery management system.

HUD Has Not Taken Adequate Steps to Address Known Deficiencies in its Process that Continue to Delay Responses to Requests for ESI

Despite being aware of the fact that its process lacks the sufficient capacity to respond to the demand for ESI requests, the Department has not acted to improve the process or the timeliness of its ESI productions. Regarding the delays specific to OIG, the OIG has put the Department on ample notice that responses to our requests are untimely, that such delays negatively affect our work, and that the delays in OIG access fail to comply with the law. In fact, the OIG's average wait time for ESI has increased from approximately 95 calendar days in 2017 to 151 calendar days in 2018, an increase of more than 60 percent.

Moreover, 20 requests in 2018 took longer than 6 months, and in one instance, it took the Department 8 months to produce four Department employees' emails. Notably, during the OIG's evaluation of the Department's oversight of the Alexander County Housing Authority, the OIG submitted a request for five employees' emails on November 22, 2017, and waited until May 21 and June 6, 2018, before we received the requested records.

Delays in Timely Access to ESI Harm the Effectiveness of OIG Oversight Activities

The Department's lengthy delays in producing ESI hamper the OIG in carrying out its statutory mission to detect and prevent fraud, waste, and abuse. The delays impact critical investigative decisions. The Department's failure to deliver ESI in a timely manner forces our oversight staff to consider how long such requests will delay the completion of their work, as opposed to focusing solely on how useful relevant ESI may be.

---

[2] *See* HUD OIG Evaluation Report 2017-OE-0008, E-Discovery Management System's Capacity to Meet Customer Demands for Electronic Data (Dec. 6, 2017).

[3] For example, the Department could face sanctions and money judgments if it fails to meet court deadlines to produce ESI.

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Effective witness interviews depend on timely receipt of ESI. This is particularly true of e-mails, which can be evidence that provides insight into a witness's knowledge, and a means to challenge or refresh the witness's recollection. Because it is important to have documentary evidence before conducting witness interviews, the OIG has delayed scheduling or postponed certain interviews in many investigative matters while waiting for the Department to produce e-mails. In other instances, the OIG has proceeded with witness interviews without critical documentary evidence and learned later that the scope or nature of an interview would have been materially different if the Department had produced the requested ESI timely. [4]

It is important to note that the OIG often requests ESI to carry out our most significant oversight work in matters that will likely be of great interest to the public and to Congress. These matters can involve allegations of senior-official misconduct, ethics violations, insider threats, leaks of nonpublic or pre-decisional information, theft of government information, misuse of government funds, or gross mismanagement. These matters also involve significant, nationwide risks to the health and safety of HUD beneficiaries, the stability of HUD's insurance funds, and the integrity of the agency's housing finance platforms. Simply put, these matters represent the greatest risks to the Department, the American public, and the overall economy, and the delayed completion of our work while we wait for ESI exacerbates those risks.

OGC's Involvement in the Process for Providing the OIG with Requested ESI Raises Additional Concerns

Under the Department's current process, OGC reviews and approves all OIG requests for ESI. While OGC has pointed out that it has never formally rejected an OIG request for ESI, the fact that all such requests go through OGC creates a threat to the OIG's independence. Because OGC must approve all OIG requests, the potential exists for the Department to attempt to scope and direct our work.

The current process provides OGC with knowledge of which particular employees' emails the OIG wishes to review and for what time period. This compromises the independence of the OIG's oversight and law enforcement responsibilities by providing the Department insight into our investigative matters, priorities, and processes. It also provides the Department with an opportunity to slow or delay particular OIG requests for ESI based on whose emails the OIG requests or on speculation about the OIG's investigative interests.

The current process also threatens the OIG's ability to keep the identity of whistleblowers confidential, as required by IG Act. OGC's role in the process of reviewing and approving OIG requests may allow Department officials to identify confidential witnesses or whistleblowers and may reveal the contents of protected communications they have made to the OIG.

[4] In a significant criminal investigation that the OIG worked jointly with the Department of Justice, prosecutors requested a grand jury subpoena for Department e-mails rather than continuing to wait for the same e-mails to be produced to the OIG through the Department's process and risk further detriment to the investigation.

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Disclosures about OIG reviews to Department officials could jeopardize our ability to gather documentary evidence and testimony from witnesses. The OIG must also keep information about our work confidential to ensure the safety of OIG staff conducting law enforcement operations. Moreover, a conflict-of-interest may arise when the OIG requests the e-mails of OGC employees who have access to our requests and have the authority to review and approve them.

The Department Must Change Its Process to Provide the OIG with Timely Access to ESI

The Department needs to take action immediately to improve its process for producing ESI to the OIG and ensure that the OIG has timely access to Departmental records. The Department must also put in place a process that protects the confidentiality of our requests to avoid threatening our independence and to protect the identity of whistleblowers.

Given the Department's past challenges in managing this process, the OIG should have direct access to Departmental ESI to ensure the OIG can obtain ESI in a manner that does not hinder the OIG's ability to perform its oversight function. While Department officials have confirmed that this solution would be technically possible, OGC has apparently recommended against it, citing a concern for preserving executive and attorney-client privilege. Such an objection is without merit, as OIG access to the Department's records does not waive any departmental privilege.

I respectfully request a response to this memorandum outlining the actions you plan to take within 15 days.

AMERICAN OVERSIGHT

From: Ludlow, Ashley
Sent: 24 May 2019 21:21:27 +0000
To: McGaughey, Tyler T. EOP/WHO
Subject: FW: INVITATION TO CHOW - JUNE 13 PSI HEARING
Attachments: 2019-05-23 Portman and Carper Invitation to Chow HUDCIO.pdf

FYI

Ashley Ludlow
Senior Counsel
Office of General Counsel
U.S. Department of Housing and Urban Development
T: (202) 402-5963 | C: (b)(6)

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From: Kielceski, Kate (HSGAC) <Kate_Kielceski@hsgac.senate.gov>
Sent: Thursday, May 23, 2019 5:46 PM
To: Dendas, Michael W <Michael.W.Dendas@hud.gov>
Cc: Dockham, Andrew (HSGAC) <Andrew_Dockham@hsgac.senate.gov>; Warren, Patrick (HSGAC) <Patrick_Warren@hsgac.senate.gov>; Kilvington, John (HSGAC) <John_Kilvington@hsgac.senate.gov>; Kielceski, Kate (HSGAC) <Kate_Kielceski@hsgac.senate.gov>; Hayes, Monica (HSGAC) <Monica_Hayes@hsgac.senate.gov>
Subject: INVITATION TO CHOW - JUNE 13 PSI HEARING

Good afternoon,

The U.S. Senate Committee on Homeland Security and Governmental Affairs' Permanent Subcommittee on Investigations invites Mr. David Chow to testify on **Thursday, June 13, 2019 at 10:00 a.m.** in Room 342 of the Dirksen Senate Office Building in Washington, D.C. The invitation is in the mail.

Please email Mr. Chow's 1) biography as soon as possible and (2) prepared statement by **10:00 a.m. on Tuesday, June 11** which I will circulate to subcommittee members and staff. There is no page limit for prepared statements. However, for oral testimony, please summarize the statement in five minutes or less.

Please respond to confirm that you have received this invitation and please let me know if you have any questions.

Thank you,
Kate Kielceski

Kate Kielceski

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Subcommittee Clerk
Committee on Homeland Security and Governmental Affairs
U.S. Senate
Washington, D.C. 20510
202-224-9868

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United States Senate

COMMITTEE ON
HOMELAND SECURITY AND GOVERNMENTAL AFFAIRS
WASHINGTON, DC 20510–6250

May 23, 2019

VIA U.S. MAIL & E-MAIL (Michael.W.Dendas@hud.gov)

Mr. David Chow
Chief Information Officer
U.S. Department of Housing & Urban Development
451 7th Street, SW
Washington, D.C. 20410

Dear Mr. Chow:

On June 13, 2019, the U.S. Senate Permanent Subcommittee on Investigations will hold a hearing examining federal agency compliance with federal cybersecurity standards based on Inspector General reports for the last decade. The hearing will begin at 10:00 a.m. in room 342 in the Dirksen Senate Office Building in Washington, D.C.

The Subcommittee respectfully requests that you testify at the hearing. To assist the Subcommittee's understanding of these issues, we ask that you please be prepared to address and answer questions about recent Inspector General reports on the Department of Housing and Urban Development's information security program.

You may submit a written statement to be included in its entirety in the printed hearing record. Subcommittee rules require that the written statement be received by 10:00 a.m. on Tuesday, June 11, 2019. Please send your written statement and a brief biography via email to the Subcommittee's clerk, Kate Kielceski, at Kate_Kielceski@hsgac.senate.gov. In addition, you may present an oral statement at the hearing. We request that any oral statement be limited in length to five minutes to allow adequate time for you to engage in questions and answers with members of the Subcommittee.

We look forward to your participation in this hearing.

Sincerely,

Rob Portman
Chairman
Permanent Subcommittee on Investigations

Tom Carper
Ranking Member
Permanent Subcommittee on Investigations

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From: Ludlow, Ashley
Sent: 17 May 2019 18:08:18 +0000
To: McGaughey, Tyler T. EOP/WHO
Subject:
Attachments: 2019-05-16.EEC to Carson-HUD re Ethics Waivers.pdf

FYI

Ashley Ludlow
Senior Counsel
Office of General Counsel
U.S. Department of Housing and Urban Development
T: (202) 402-5963 | C: (b)(6)

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ELIJAH E. CUMMINGS, MARYLAND
CHAIRMAN

ONE HUNDRED SIXTEENTH CONGRESS

JIM JORDAN, OHIO
RANKING MINORITY MEMBER

Congress of the United States

House of Representatives

COMMITTEE ON OVERSIGHT AND REFORM
2157 RAYBURN HOUSE OFFICE BUILDING
WASHINGTON, DC 20515–6143
MAJORITY (202) 225–5051
MINORITY (202) 225–5074
http://oversight.house.gov

May 16, 2019

The Honorable Benjamin S. Carson, M.D.
Secretary
U.S. Department of Housing and Urban Development
451 7th Street, S.W.
Washington, D.C. 20410

Dear Mr. Secretary:

The Committee is investigating the Trump Administration's use and disclosure of ethics waivers as part of an effort to reform and improve existing ethics laws. As part of this investigation, the Committee requests copies of documents on the implementation of ethics rules by the Trump Administration, including copies of any waivers issued by the White House that permit political appointees to participate in official action despite potential conflicts of interest.

On April 28, 2017, the Office of Government Ethics (OGE) issued a directive that required all agencies to provide information and documents related to certain ethics waivers and authorizations issued to Executive Branch appointees from May 1, 2016, through April 30, 2017. The OGE directive sought information related to the White House process for issuing waivers of the ethics pledge required by Executive Order 13770.[1]

OGE reviewed this information to evaluate procedures for issuing waivers and authorizations. OGE found "that agencies largely complied with statutory, regulatory, and procedural requirements when issuing the waivers and authorizations produced" for the data call.[2] There has, however, been a large amount of turnover within the Trump Administration.[3]

---

[1] U.S. Office of Government Ethics, *PA-17-02, Data Call for Certain Waivers and Authorizations* (Apr. 28, 2017) (online at www.oge.gov/web/OGE.nsf/Program%20Management%20Advisories/5B5DECAECCE6CB8185258110007ADC76/$FILE/PA-17-02.pdf?open); *see* Exec. Order No. 13770, *Ethics Commitments by Executive Branch Appointees*, 82 Fed. Reg. 9333 (Jan. 28, 2017) (online at www.govinfo.gov/content/pkg/FR-2017-02-03/pdf/2017-02450.pdf).

[2] U.S. Office of Government Ethics, *Special Review of Executive Branch Agency Waivers & Authorizations* (Sep. 2017) (online at https://oge.gov/web/OGE.nsf/0/F916A3C42996EF618525819A006D12EB/$FILE/Final%20Report%20Package%20.pdf).

[3] *See, e.g., Tracking Turnover in the Trump Administration*, Brookings Institution (Apr. 2019) (online at www.brookings.edu/research/tracking-turnover-in-the-trump-administration) (noting that not less than 15 members of President Trump's Cabinet have departed the administration since the beginning of his term, all of which occurred after the time frame of the OGE data call).

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Accordingly, the Committee seeks updated information related to ethics waivers and authorizations.

To assist in the Committee's review, please produce the following information and documents by May 30, 2019:

1. For each person who meets the definition of "appointee" under Executive Order 13770 who served in the Department of Housing and Urban Development on or after January 20, 2017:

   a. signed and dated copies of the pledge (or documents evidencing the signing of the pledge) required by Executive Order 13770; or, in the alternative, a certification that the appointee has not signed the pledge required by Executive Order 13770 and any explanation of why the appointee has not signed the pledge;

   b. signed and dated copies of any waiver issued or obtained under Executive Order 13770;

   c. signed and dated copies of any waiver issued or approved under 18 U.S.C. § 208(b)(1);

   d. signed and dated copies of any authorization issued or approved under 5 C.F.R. § 2635.502(d);

   e. signed and dated copies of any waiver issued or approved under 5 C.F.R. § 2635.503(c);

   f. copies of any documents evidencing an oral or written promise by an appointee to undertake specific action in order to alleviate an actual or apparent conflict of interest, including:

      i. recusal;

      ii. divestiture of a financial interest;

      iii. resignation from a position with a non-Federal business or other entity;

      iv. procurement of a waiver pursuant to 18 U.S.C. § 208(b)(1) or 18 U.S.C. § 208(b)(3); or

      v. establishment of a qualified blind or diversified trust under the Ethics in Government Act of 1978 and Subpart D of 5 C.F.R. Part 2635; and

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g. copies of any waiver or recusal related to or issued pursuant to 5 C.F.R. § 2635.607.

The Committee on Oversight and Reform is the principal oversight committee of the House of Representatives and has broad authority to investigate "any matter" at "any time" under House Rule X. In addition, House Rule X, clause 3(i) specifically charges the Committee with conducting oversight of "the operation of Government activities at all levels, including the Executive Office of the President."

An attachment to this letter provides additional instructions for responding to this request. If you have any questions regarding this request, please contact Committee staff at (202) 225-5051.

Sincerely,

Elijah E. Cummings
Chairman

Enclosure

cc: The Honorable Jim Jordan, Ranking Member

AMERICAN OVERSIGHT

Responding to Oversight Committee Document Requests

1. In complying with this request, produce all responsive documents that are in your possession, custody, or control, whether held by you or your past or present agents, employees, and representatives acting on your behalf. Produce all documents that you have a legal right to obtain, that you have a right to copy, or to which you have access, as well as documents that you have placed in the temporary possession, custody, or control of any third party.

2. Requested documents, and all documents reasonably related to the requested documents, should not be destroyed, altered, removed, transferred, or otherwise made inaccessible to the Committee.

3. In the event that any entity, organization, or individual denoted in this request is or has been known by any name other than that herein denoted, the request shall be read also to include that alternative identification.

4. The Committee's preference is to receive documents in electronic form (i.e., CD, memory stick, thumb drive, or secure file transfer) in lieu of paper productions.

5. Documents produced in electronic format should be organized, identified, and indexed electronically.

6. Electronic document productions should be prepared according to the following standards:

    a. The production should consist of single page Tagged Image File ("TIF"), files accompanied by a Concordance-format load file, an Opticon reference file, and a file defining the fields and character lengths of the load file.

    b. Document numbers in the load file should match document Bates numbers and TIF file names.

    c. If the production is completed through a series of multiple partial productions, field names and file order in all load files should match.

    d. All electronic documents produced to the Committee should include the following fields of metadata specific to each document, and no modifications should be made to the original metadata:

    BEGDOC, ENDDOC, TEXT, BEGATTACH, ENDATTACH, PAGECOUNT, CUSTODIAN, RECORDTYPE, DATE, TIME, SENTDATE, SENTTIME, BEGINDATE, BEGINTIME, ENDDATE, ENDTIME, AUTHOR, FROM, CC, TO, BCC, SUBJECT, TITLE, FILENAME, FILEEXT, FILESIZE, DATECREATED, TIMECREATED, DATELASTMOD, TIMELASTMOD,

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INTMSGID, INTMSGHEADER, NATIVELINK, INTFILPATH, EXCEPTION, BEGATTACH.

7. Documents produced to the Committee should include an index describing the contents of the production. To the extent more than one CD, hard drive, memory stick, thumb drive, zip file, box, or folder is produced, each should contain an index describing its contents.

8. Documents produced in response to this request shall be produced together with copies of file labels, dividers, or identifying markers with which they were associated when the request was served.

9. When you produce documents, you should identify the paragraph(s) or request(s) in the Committee's letter to which the documents respond.

10. The fact that any other person or entity also possesses non-identical or identical copies of the same documents shall not be a basis to withhold any information.

11. The pendency of or potential for litigation shall not be a basis to withhold any information.

12. In accordance with 5 U.S.C.§ 552(d), the Freedom of Information Act (FOIA) and any statutory exemptions to FOIA shall not be a basis for withholding any information.

13. Pursuant to 5 U.S.C. § 552a(b)(9), the Privacy Act shall not be a basis for withholding information.

14. If compliance with the request cannot be made in full by the specified return date, compliance shall be made to the extent possible by that date. An explanation of why full compliance is not possible shall be provided along with any partial production.

15. In the event that a document is withheld on the basis of privilege, provide a privilege log containing the following information concerning any such document: (a) every privilege asserted; (b) the type of document; (c) the general subject matter; (d) the date, author, addressee, and any other recipient(s); (e) the relationship of the author and addressee to each other; and (f) the basis for the privilege(s) asserted.

16. If any document responsive to this request was, but no longer is, in your possession, custody, or control, identify the document (by date, author, subject, and recipients), and explain the circumstances under which the document ceased to be in your possession, custody, or control.

17. If a date or other descriptive detail set forth in this request referring to a document is inaccurate, but the actual date or other descriptive detail is known to you or is otherwise apparent from the context of the request, produce all documents that would be responsive as if the date or other descriptive detail were correct.

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18. This request is continuing in nature and applies to any newly-discovered information. Any record, document, compilation of data, or information not produced because it has not been located or discovered by the return date shall be produced immediately upon subsequent location or discovery.

19. All documents shall be Bates-stamped sequentially and produced sequentially.

20. Two sets of each production shall be delivered, one set to the Majority Staff and one set to the Minority Staff. When documents are produced to the Committee, production sets shall be delivered to the Majority Staff in Room 2157 of the Rayburn House Office Building and the Minority Staff in Room 2105 of the Rayburn House Office Building.

21. Upon completion of the production, submit a written certification, signed by you or your counsel, stating that: (1) a diligent search has been completed of all documents in your possession, custody, or control that reasonably could contain responsive documents; and (2) all documents located during the search that are responsive have been produced to the Committee.

Definitions

1. The term "document" means any written, recorded, or graphic matter of any nature whatsoever, regardless of how recorded, and whether original or copy, including, but not limited to, the following: memoranda, reports, expense reports, books, manuals, instructions, financial reports, data, working papers, records, notes, letters, notices, confirmations, telegrams, receipts, appraisals, pamphlets, magazines, newspapers, prospectuses, communications, electronic mail (email), contracts, cables, notations of any type of conversation, telephone call, meeting or other inter-office or intra-office communication, bulletins, printed matter, computer printouts, teletypes, invoices, transcripts, diaries, analyses, returns, summaries, minutes, bills, accounts, estimates, projections, comparisons, messages, correspondence, press releases, circulars, financial statements, reviews, opinions, offers, studies and investigations, questionnaires and surveys, and work sheets (and all drafts, preliminary versions, alterations, modifications, revisions, changes, and amendments of any of the foregoing, as well as any attachments or appendices thereto), and graphic or oral records or representations of any kind (including without limitation, photographs, charts, graphs, microfiche, microfilm, videotape, recordings and motion pictures), and electronic, mechanical, and electric records or representations of any kind (including, without limitation, tapes, cassettes, disks, and recordings) and other written, printed, typed, or other graphic or recorded matter of any kind or nature, however produced or reproduced, and whether preserved in writing, film, tape, disk, videotape, or otherwise. A document bearing any notation not a part of the original text is to be considered a separate document. A draft or non-identical copy is a separate document within the meaning of this term.

2. The term "communication" means each manner or means of disclosure or exchange of information, regardless of means utilized, whether oral, electronic, by document or otherwise, and whether in a meeting, by telephone, facsimile, mail, releases, electronic

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message including email (desktop or mobile device), text message, instant message, MMS or SMS message, message application, or otherwise.

3. The terms "and" and "or" shall be construed broadly and either conjunctively or disjunctively to bring within the scope of this request any information that might otherwise be construed to be outside its scope. The singular includes plural number, and vice versa. The masculine includes the feminine and neutral genders.

4. The term "including" shall be construed broadly to mean "including, but not limited to."

5. The term "Company" means the named legal entity as well as any units, firms, partnerships, associations, corporations, limited liability companies, trusts, subsidiaries, affiliates, divisions, departments, branches, joint ventures, proprietorships, syndicates, or other legal, business or government entities over which the named legal entity exercises control or in which the named entity has any ownership whatsoever.

6. The term "identify," when used in a question about individuals, means to provide the following information: (a) the individual's complete name and title; (b) the individual's business or personal address and phone number; and (c) any and all known aliases.

7. The term "related to" or "referring or relating to," with respect to any given subject, means anything that constitutes, contains, embodies, reflects, identifies, states, refers to, deals with, or is pertinent to that subject in any manner whatsoever.

8. The term "employee" means any past or present agent, borrowed employee, casual employee, consultant, contractor, de facto employee, detailee, fellow, independent contractor, intern, joint adventurer, loaned employee, officer, part-time employee, permanent employee, provisional employee, special government employee, subcontractor, or any other type of service provider.

9. The term "individual" means all natural persons and all persons or entities acting on their behalf.

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