

THE WHITE HOUSE

Washington

April 9, 2021

MEMORANDUM FOR JAKE SULLIVAN

FROM: DANA A. REMUS  
COUNSEL TO THE PRESIDENT



SUBJECT: AUTHORIZATION UNDER 5 C.F.R. § 2635.502(d)

You are hereby granted an authorization under 5 C.F.R. § 2635.502(d) to participate in particular matters involving the New York Times. Under Section 502, you are required to recuse from particular matters involving specific parties that you have a covered relationship with unless you receive an authorization under Section 502(d). You have a covered relationship with the New York Times because it paid you \$250 to write one article for the newspaper in September 2020. Accordingly, without an authorization, you would be required to recuse from particular matters involving the New York Times until September 2021.

Section 502(d) provides that an authorization may be issued based on a determination, made in light of all relevant circumstances, that the interest of the Government in the employee's participation outweighs the concern that a reasonable person may question the integrity of the agency's programs and operations."

Given your role as National Security Advisor, it is important that you be able to communicate freely with the press, including the New York Times, a major news outlet that reaches millions of people on a daily basis. Accordingly, the Government's interest in allowing you to communicate with the New York Times about matters of national security outweighs any concerns about the integrity of the agency's programs and operations being called into question. Accordingly, an authorization under Section 502(d) is hereby granted.