

THE WHITE HOUSE

Washington

May 16, 2022

MEMORANDUM FOR KARINE JEAN-PIERRE

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 CNN. Under 5 C.F.R. § 2635.502(a), you are required to recuse from particular matters involving specific parties with whom you have a covered relationship where the circumstances would cause a reasonable person to question your impartiality in the matter, unless you receive an authorization under Section 502(d). A member of your household, Suzanne Malveaux, is employed by CNN as a national correspondent. Although you do not have a covered relationship with CNN as defined in Section 502(b)(1)(iii) or a financial interest as defined in 18 U.S.C. § 208, in an abundance of caution, you have sought guidance under Section 502(a)(2) regarding your participation in such matters involving CNN given the possibility that your impartiality could be questioned.

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 Press Secretary, it is important that you be able to communicate freely with all members of the press across a wide range of media outlets. CNN is a major news outlet that reaches millions of people and participates in press briefings on a daily basis. CNN has stated that Ms. Malveaux “will not cover politics, Capitol Hill, or the White House while [you are] serving as White House Press Secretary.”¹ Additionally, while Ms. Malveaux receives a salary from CNN, she has no equity or ownership interests. As such, the performance of your duties will have no direct or predictable effect on the value of her financial interests.

In light of these circumstances, the Government’s interest in allowing you to communicate with CNN about matters of public interest outweighs any concerns about the integrity of the White House’s programs and operations being called into question. Moreover, without this authorization, your ability to perform your duties for the Government on matters of public concern might be hampered. Accordingly, an authorization under Section 502(d) is hereby granted.

¹ Statement by CNN spokesman Matt Dornic to Washington Examiner (May 6, 2022).