

From: [Nada Culver](#)
To: [Garcia, Monica L](#); [Gottry, Heather C](#)
Subject: [EXTERNAL] additional questions
Date: Tuesday, February 23, 2021 1:33:20 AM
Attachments: [TriState Broch 2021 \(draft3\).pdf](#)

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Hi Monica and Heather - Prior to finding out I'd be working in the Department of the Interior, I'd agreed to do a couple of public-ish events that I wanted to run by you.

1. Teaching a class at the University of Wyoming Law School. This would be for 75 minutes or so on March 8th and I was asked to give an overview of the sage-grouse planning process that the BLM has conducted since 2010 and is still going on today due to ongoing litigation. I would be presenting to a class of law students and could do that as an individual, not on behalf of the Department. However, since this is such a key issue for the BLM and Department right now, i wasn't sure if it would be appropriate.

2. Participating in a panel on "Public Lands in the Biden Era" at a conference the Wyoming Bar is putting on for federal judges on March 11th. I've attached the brochure in case that's helpful for context. I can certainly indicate I'm only participating on my own behalf and could either present on wildlife issues or limit my role to being a moderator. Again, this seemed a bit touchy so I can also bow out.

Your advice would be appreciated. Thank you so much.

Nada Culver



**The Wyoming, Idaho, and Utah Chapters
of the Federal Bar Association**
present the 16th Annual

Tri-State Conference

March 11-12, 2021

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7.5 Hours of Free CLE FBA Members!

Thursday, March 11

8:15 a.m.

Welcome and Opening Remarks

DESSA REIMER, Holland & Hart LLP, Wyoming Chapter President

8:30 a.m.

States and the Making of American Constitutional Law

JEFFREY S. SUTTON, Judge

U.S. Court of Appeals for the Sixth Circuit

9:30 a.m.

Elections and Voter Fraud: Fact or Fiction

STEPHEN S. TROTT, Ret. Judge

U.S. Court of Appeals for the Ninth Circuit

10:30 a.m.

Break

10:45 a.m.

Public Lands in the Biden Era

RICH HALL, Stoel Rives LLP (Moderator)

NADA CULVER, National Audubon Society

JOHN LESHY, Professor of Law, U.C. Hastings

MINDY MORGAN, Director of Sustainability Studies Program,
University of New Mexico

MEGAN OLMSTEAD, Parsons Behle & Latimer

12:00 p.m.

Supreme Court Review

ERWIN CHEMERINSKY, Dean, Berkeley Law School

Friday, March 12

8:30 a.m.

Message from the FBA President

W. West Allen, FBA National President

9:00 a.m.

What's Happening in Washington

BRUCE MOYER, Counsel for Government Relations,
Federal Bar Association

9:30 a.m.

Developments in Intellectual Property

TEAGUE DONAHEY, Holland & Hart LLP (Moderator)

RANDALL R. RADER, Ret. Chief Judge
U.S. Court of Appeals for the D.C. Circuit

MICHAEL MYERS, Micron

MOLLY KOCIALSKI, Director of the Rocky Mountain Regional U.S.
Patent and Trademark Office

10:30

Break

10:45

Chief Judges' Panel

DAVID C. NYE, Chief Judge, District of Idaho

ROBERT J. SHELBY, Chief Judge, District of Utah

SCOTT W. SKAVDAHL, Chief Judge, District of Wyoming

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<https://www.fedbar.org/membership/join/>
- To register, please fill out the form at the link **here**.

Email questions to Dessa Reimer at hmreimer@hollandhart.com

From: [Nada Culver](#)
To: [Garcia, Monica L](#)
Cc: [Gottry, Heather C](#)
Subject: [EXTERNAL] Re: Audubon Meeting with FWS
Date: Monday, February 22, 2021 10:03:26 AM

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Hi Monica- I was not intending to attend the meeting. That meeting request started before I was officially coming on board. It seemed like that would be very awkward.

I look forward to talking with you when I'm on board.

Nada

On Mon, Feb 22, 2021 at 4:38 AM Garcia, Monica L <monica.garcia@sol.doi.gov> wrote:

Nada,

Good morning and I hope this message finds you doing well! We have been working with our HR officials on the onboarding actions and are looking forward to your arrival as a Biden Administration appointee next month.

In the meantime, we noticed that you were listed as a representative of the National Audubon Society on a meeting request with Martha Williams, Principal Deputy Director for the U.S. Fish & Wildlife Service. While there is no ethics prohibition that limits your ability to take meetings and interface with DOI employees before you begin your federal employment, we wanted to connect and offer a quick meeting or phone call in the event that you have any questions or concerns.

We are available to chat this week if it would be helpful.

-Monica

Please note: I will be teleworking until further notice

Monica L. Garcia

Deputy Director for Ethics Law & Policy

and Alternate Designated Agency Ethics Official

Departmental Ethics Office | Office of the Solicitor

U.S. Department of the Interior | MIB 5316

(O): (202) 208-0460

(C): (202) 880-4474

Email: monica.garcia@sol.doi.gov

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From: [Nada Culver](#)
To: [Lee, Eric S](#)
Cc: [Culver, Nada L](#); [Schasberger, Paula I](#); [Garcia, Monica L](#); [Gottry, Heather C](#)
Subject: [EXTERNAL] Re: Outside teaching/speaking: University of Wyoming College of Law
Date: Wednesday, March 3, 2021 11:45:03 PM

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Thank you so much, Eric and Team.

Nada

On Wed, Mar 3, 2021 at 2:21 PM Lee, Eric S <eric.lee@sol.doi.gov> wrote:

Nada,

We have determined that there is no legal objection under the ethics statutes and regulations, or the Administration's Ethics Pledge (Pledge) to you teaching a one-time class at the University of Wyoming College of Law on March 8, 2021.

Based on the information provided, we understand that you will be teaching a class at the University of Wyoming College of Law on BLM's conservation process of the sage-grouse. You were invited to speak at the University of Wyoming College of Law before you joined the Department of the Interior due to your professional expertise, and not because of your official government position. This lecture will be delivered in your personal capacity and you will not be compensated for this lecture.

The University of Wyoming (the law school is a college within the university) is a prohibited source under 5 C.F.R. § 3501.105 as a search on USASpending.gov indicates that there is a history of financial agreements (contracts, grants, etc.) between DOI and the University of Wyoming as recent as 2020.

We have analyzed your request as a personal capacity outside activity under the applicable regulations governing teaching, speaking, and writing. Under 5 C.F.R. § 2635.807(a), you may not receive compensation from any source other than the U.S. Government for teaching, speaking, or writing that "relates" to your official duties, subject to limited

exceptions. Based upon the information provided, you will not be compensated for your guest lecture. Please note that delivering a guest lecture would not require prior approval under the Department's supplemental ethics regulations, found at 5 C.F.R. 3501.105(b)(1)(i).

While there are no legal objections to your unpaid outside teaching/speaking activity, please be advised of the following restrictions:

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

Reference to Official Position: You may not use or permit the use of your official title or position to identify you in connection with your outside activity. However, as you will be engaged in teaching/speaking as an outside activity, you may include or permit the inclusion of your title or position as one of several biographical details when such information is given no more prominence than other significant biographical details. 5 C.F.R. § 2635.807(b)(1)-(2).

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

Gifts from a Prohibited Source: Because the University of Wyoming is a prohibited source, please contact our office if you are offered a gift from the University of Wyoming College of Law for further ethics guidance and review. 5 C.F.R. §§ 2635.202, 2635.204.

No Use of Official Time or Government Property: While engaging in outside activities, Federal employees are not permitted to use official time or Government property. 5 C.F.R. §§ 2635.101(b)(9), 704, and 705.

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

I have attached a summary of the statutes and regulations addressing outside activities as a reference. Please feel free to call or email me if you have any other questions or concerns.

Thanks,

Eric

Eric S. Lee

Attorney Advisor | Advice and Counsel Branch

Departmental Ethics Office | Office of the Solicitor

U.S. Department of the Interior

E-mail: eric.lee@sol.doi.gov

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From: [Nada Culver](#)
To: [Garcia, Monica L](#)
Cc: [Gottry, Heather C](#)
Subject: [EXTERNAL] Re: Preliminary ethics review
Date: Monday, January 4, 2021 10:25:06 PM

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I've re-pasted the list of questions and put answers next to them. Hopefully this is what you had in mind for answering. If I need to clarify further, please let me know. I wasn't really sure how to address #7 since that is really the entire focus of a public lands program at a non-profit - i.e., engaging with the Department - but we don't have any monetary or ownership interests at stake.

1.
Do you hold any direct or indirect financial interest in Federal lands or resources administered or controlled by the Department? **NO**
 - a. If so, please describe.
 - b. Please also review the attached list which identifies certain financial holdings which are prohibited for certain Department employees to hold by statute or supplemental regulation.
 - c. Please note that if you will be working on matters for U.S. Geological Survey, Office of Surface Mining Reclamation and Enforcement, U.S. Bureau of Land Management, Bureau of Ocean Energy Management, Bureau of Safety and Environmental Enforcement, and the Office of Natural Resources Revenue, there may be additional prohibitions that you will need to comply with after appointment, if appointed.
2. Do you, your spouse and/or minor children retain any claim, permit, lease, small tract entries, or other rights that are granted by the Department in Federal lands? **NO**
 - a. If so, please describe.
3. Do you currently serve as an officer, director, trustee, or general partner of any entity not listed on your resume? **NO**
 - a. If so, please identify and describe your role and position(s), including whether you plan to continue your position(s) after appointment, if appointed.
4. Please identify your spouse's current employer(s), if applicable. **Benezra and**

Culver, PC, located in Denver, Colorado.

5. Are all of your employers for the preceding two calendar years listed on your resume?

YES

- a. If not, please provide the name of any employers not on your resume and identify your position with the employer.

6. If you provided other personal services to clients (including through your employer), please list all of your clients for the preceding two calendar years, if not already listed on your resume. **IDID NOT**

- a. Please note that personal services can include legal services, consulting services, lobbying services, pro bono, or other uncompensated volunteer activities, *etc.*

7. Did you, your employer, or your clients engage with the Department, including any Bureaus or Offices, on matters pending before the Department in the preceding two calendar years? **YES**

- a. If so, please describe the matters if not already described in your resume **The National Audubon Society regularly comments on projects, plans and regulations issued by the Department. In the context of the Bureau of Land Management, for instance, we have also been part of administrative protests of oil and gas lease sales and land use plans. We do not have any monetary investments or ownership interests at stake.**

On Mon, Jan 4, 2021 at 4:05 PM Garcia, Monica L <monica.garcia@sol.doi.gov> wrote:

Nada – Hello there! Thank you very much for the voice message and updated email address.

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

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

1. Do you hold any direct or indirect financial interest in Federal lands or resources administered or controlled by the Department?
- a. If so, please describe.

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

- a. If so, please describe the matters if not already described in your resume.

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

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

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

-Monica

Please note: I will be teleworking until further notice

Monica L. Garcia

Acting Deputy Director for Ethics Law & Policy

and Acting Alternate Designated Agency Ethics Official

Departmental Ethics Office | Office of the Solicitor

U.S. Department of the Interior | MIB 5316

(O): (202) 208-0460

(C): (202) 880-4474

Email: monica.garcia@sol.doi.gov

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U.S. House of Representatives
Committee on Natural Resources
Washington, DC 20515

June 15, 2021

Ms. Nada Culver
Deputy Director, Policy and Programs
Bureau of Land Management
U.S. Department of the Interior
1849 C Street, N.W.
Washington, D.C. 20240

Ms. Heather Gottry
Director and Designated Agency Ethics Official, Departmental Ethics Office
U.S. Department of the Interior
1849 C Street, N.W.
Washington, D.C. 20240

Dear Mses. Culver and Gottry,

Senior leaders at federal agencies are responsible for fostering cultures of ethical conduct.¹ Employees unable to act impartially are not qualified to perform their role in government.² To ensure appropriate conduct, the U.S. Office of Government Ethics (OGE) issues ethical standards by which all executive branch employees must abide.³ OGE standards require employees to “place loyalty to the Constitution, the laws, and ethical principles above private gain”⁴ and “act impartially and not give preferential treatment to any private organization or individual.”⁵ Transparency is key to ensuring federal employees’ compliance with OGE’s standards.⁶

Yesterday, however, media reports indicate concerns about Ms. Culver’s ability to act impartially and whether she appropriately consulted ethics officials.⁷ Consultation with ethics

¹ *Nomination of Emory A. Rounds III Nominated to be Director of U.S. Office of Government Ethics, Kelly A. Higashi Nominated to be an Associate Judge, Superior Court for the District of Columbia, and Frederick M. Nutt Nominated to be Controller, Officer of Federal Financial Management, Office of Management and Budget: Hearing before the S. Comm. on Homeland Security and Governmental Affairs*, 115th Cong. (2018) (statement of Emory A. Rounds III, Director of U.S. Office of Government Ethics nominee).

² *Id.*

³ 5 C.F.R. Part 2635 (2017) available at [https://www.oge.gov/web/oge/nsf/0/5438912F316A0D26852585B6005A1599/\\$FILE/SOC%20as%20of%2081%20FR%2081641%20FINAL.pdf](https://www.oge.gov/web/oge/nsf/0/5438912F316A0D26852585B6005A1599/$FILE/SOC%20as%20of%2081%20FR%2081641%20FINAL.pdf).

⁴ *Id.* at §2653.101(b)(1).

⁵ *Id.* at §2653.101(b)(8).

⁶ U.S. OFFICE OF GOV’T ETHICS, *The Ethics Program, Transparency, and You* (June 7, 2018), <https://www.oge.gov/web/oge/nsf/Resources/The+Ethics+Program,+Transparency,+and+You>.

⁷ Scott Streater, *Group Urges IG to Investigate BLM Official*, E&E NEWS (June 14, 2021), <https://www.eenews.net/greenwire/stories/1063734907>; Nicholas Sherman, *Watchdog Calls for Probe Into Bureau*

officials prior to participating in matters that may present conflicts of interest or lead to the appearance of preferential treatment for Ms. Culver's former employers is an essential feature of an ethically compliant culture.

Prior to Ms. Culver's political appointment and employment at the Bureau of Land Management (BLM), she made a career of environmental activism related to matters she now handles in an official U.S. government capacity. For example, she is known as a "sharp critic" of the Trump Administration on matters including boundary modifications of Bears Ears and Grand Staircase-Escalante national monuments, sage grouse management, and oil and gas development on federal lands.⁸

In her most recent position, Ms. Culver worked as Vice President, Public Lands and Senior Policy Counsel for the National Audubon Society.⁹ During her tenure, the National Audubon Society opposed and legally challenged matters related to BLM's sage-grouse management,¹⁰ oil and gas leasing, including in the Arctic National Wildlife Refuge (ANWR)¹¹ and in Colorado,¹² and petitioned against modernization of the National Environmental Policy Act.¹³

of Land Management Official for Possible Ethics Violations, JUST THE NEWS (June 14, 2021), <https://justthenews.com/accountability/watchdogs/watchdog-calls-investigation-bureau-land-management-official-possible>.

⁸ Scott Streater, *Biden Names Audubon Attorney to Replace Pendley*, E&E NEWS (Feb. 22, 2021), <https://www.eenews.net/greenwire/stories/1063725669>.

⁹ Press Release, Dep't of the Interior, *Interior Department Welcomes Newest Members of Leadership Team* (Feb. 22, 2021), <https://www.doi.gov/pressreleases/interior-department-welcomes-newest-members-leadership-team>.

¹⁰ Press Release, National Audubon Society, *Audubon: New Sage-Grouse Review Plan is "Nothing More Than Window-Dressing"*, (Feb. 19, 2020) <https://www.audubon.org/news/audubon-new-sage-grouse-review-plan-nothing-more-window-dressing> (Statement of Nada Culver "The environmental review process announced today by the Bureau of Land Management (BLM) is nothing more than window dressing for a process that they should be taking seriously"); Press Release, National Audubon Society, *Assault on Sage-Grouse Advances Absent Serious Considerations for Science or Law*, (Nov. 19, 2020), <https://www.audubon.org/news/assault-sage-grouse-advances-absent-serious-considerations-science-or-law>.

¹¹ Press Release, National Audubon Society, *BLM's Final Environmental Review for Arctic Refuge Drilling Glaringly Underestimates Harm to Wildlife*, (Sept. 12, 2019), <https://www.audubon.org/news/blms-final-environmental-review-arctic-refuge-drilling-glaringly-underestimates>; Press Release, *Audubon: "All-hands-on-deck to defend the Arctic National Wildlife Refuge"*, (Aug. 24, 2020), <https://www.audubon.org/news/audubon-all-hands-deck-defend-arctic-national-wildlife-refuge> (Statement of Nada Culver "Drilling in the Arctic is a political victory with a price that's too high to pay").

¹² *Protest of Bureau of Land Management (BLM) Colorado March 2020 Oil and Gas Lease Sales*, Protest filed by Nada Culver, Vice President, Public Lands, National Audubon Society, on behalf of National Audubon Society, Conservation Colorado, The Wilderness Society, Barbara Vasquez, Audubon Rockies, Roaring Audubon, Evergreen Audubon, Denver Audubon, National Parks Conservation Association, and Western Colorado Alliance, to Jamie Connell, State Director, Bureau of Land Management, Colorado State Office (Feb. 24, 2020), *available at* <https://evergreenaudubon.org/wp-content/uploads/2020/03/BLM-Colorado-March-2020-Lease-Sale-Protest-Audubon.pdf>.

¹³ Press Release, National Audubon Society, *White House Changes to 50 Years of Environmental Review are Irresponsible and Dangerous*, (July 15, 2020), <https://www.audubon.org/news/white-house-changes-50-years-environmental-review-are-irresponsible-and>; Nada Culver, *Environmental Impact Gets No Real Consideration Under New Proposed Rule*, NATIONAL AUDUBON SOCIETY (Jan. 9, 2020), <https://www.audubon.org/news/environmental-impact-gets-no-real-consideration-under-new-proposed-rule>

Most recently, in October 2020, Audubon Alaska, a state chapter of the National Audubon Society, opposed BLM's recommendations to issue Public Land Orders (PLOs) for mineral development in Alaska.¹⁴ Ultimately, the PLOs were signed by then-Secretary Bernhardt in January 2021.¹⁵ By April 15, 2021, BLM, under Ms. Culver's leadership, delayed the PLOs' effective date by two years.¹⁶ One nonprofit organization stated Ms. Culver's involvement in those PLOs "raises serious [ethics] questions."¹⁷

Prior to her role at the National Audubon Society, Ms. Culver spent nearly 16 years at The Wilderness Society as an attorney.¹⁸ She developed legal strategies and created the BLM Action center,¹⁹ which works to "push the BLM toward conservation goals . . . by engaging in the agency's decision making process."²⁰ As Senior Counsel and Director of the BLM Action Center, Ms. Culver engaged directly with BLM and Department of the Interior (DOI) employees during the Trump Administration to advance The Wilderness Society's interests. In multiple disclosed instances, Ms. Culver emailed senior DOI officials to transmit The Wilderness Society's petitions and opposition to matters such as Secretarial Order 3353²¹ and BLM's onshore oil and gas programs.²²

Additionally, during Ms. Culver's tenure, The Wilderness Society filed lawsuits against the Trump Administration, including a 2018 challenge to BLM's decision to lease land in sage grouse habitat.²³ When an Obama-era BLM process faced legal challenges, however, The Wilderness Society categorized the case as meritless.²⁴ Ms. Culver attributed the lawsuit to counties being upset that the new process "pulled the VIP pass away from local governments"

¹⁴ Letter from Michael Chamberlain, Director, Protect the Public's Trust to The Honorable Mark Greenblatt, Inspector General, U.S. Dep't of the Interior & Ms. Heather Gottry, Designated Agency Ethics Official, U.S. Dep't of the Interior (June 14, 2021) *available at* <https://www.protectpublictrust.org/wp-content/uploads/2021/06/Request-for-Ethics-Investigation-Nada-Culver.pdf>.

¹⁵ *Id.*

¹⁶ *Id.*

¹⁷ *Supra* note 7.

¹⁸ Heather Richards, *Nada Culver Shakes up BLM, Oil and Climate Policy*, E&E NEWS (Apr. 7, 2021), <https://www.eenews.net/energywire/stories/1063729361>.

¹⁹ *Id.*

²⁰ *BLM Lands FAQs*, THE WILDERNESS SOCIETY, <https://www.wilderness.org/articles/article/blm-lands-faqs> (last visited June 10, 2021).

²¹ Email from Nada Culver, Senior Counsel and Director, BLM Action Center, to Mike Nedd, Acting Director, Bureau of Land Management, et al. (Aug. 15, 2017 4:49 p m.) *available at* https://www.doi.gov/sites/doi.gov/files/uploads/17-00434di_os.pdf.

²² Email from Nada Culver, Senior Counsel and Director, BLM Action Center, to Margaret Bradley (Sept. 14, 2017 12:09 a m.) *available at* https://www.doi.gov/sites/doi.gov/files/uploads/17-00434di_os.pdf; Email from Nada Culver, Senior Counsel and Director, BLM Action Center, to Katharine MacGregor, Deputy Ass't Sec. for Land and Minerals Management, et al. (Sept. 14, 2017 12:20 a m.) *available at* https://www.doi.gov/sites/doi.gov/files/uploads/17-00434di_os.pdf.

²³ Scott Streater, *Nada Culver Draws Attention as Biden's Possible BLM Director*, E&E NEWS (Mar. 11, 2021), <https://www.eenews.net/stories/1063727239>.

²⁴ M. John Fayhee, *Wilderness Society Decries Lawsuit by Six Counties Against the BLM*, ASPEN DAILY NEWS (Dec. 16, 2016), https://www.aspendailynews.com/wilderness-society-decries-lawsuit-by-six-counties-against-the-blm/article_857a4301-5cc2-5771-97d7-f37e6c42a111.html.

and asserted the new process eliminated the “crony relationship” between BLM and county governments.²⁵

Currently, Ms. Culver is exercising the delegated authority of the BLM Director.²⁶ Although the media reported President Biden considered nominating Ms. Culver as the BLM Director,²⁷ Tracy Stone-Manning was ultimately selected.²⁸ While official reasons for Ms. Culver not being selected are unclear, former President Obama’s BLM Director Bob Abby previously “question[ed] whether Culver’s past positions as an advocate working at the Wilderness Society and Audubon could pose a problem with Senate confirmation.”²⁹

As a result, Ms. Culver leads the BLM without the scrutiny of a Senate confirmation process. Additionally, unlike for Ms. Stone-Manning, Ms. Culver’s ethics agreement and financial disclosure statements are not public.³⁰ Ms. Culver is, however, still subject to President Biden’s ethics standards. Therefore, for two years, she is prohibited from participating in “any particular matter involving specific parties that is directly and substantially related to [her] former employer or former clients, including regulations and contracts.”³¹

Ms. Culver’s known positions on the issues she is now tasked with deliberating raises serious doubts about her impartiality during the decision-making process. The OGE advises federal employees to “not act on a Government matter if a reasonable person . . . could legitimately question your impartiality.”³² Therefore, based on OGE guidance and President Biden’s ethical requirements, transparency related to Ms. Culver’s work while at the National Audubon Society or The Wilderness Society is as critical as related disclosures about her meetings and involvement in policy decision-making processes as a DOI official.

To confirm Ms. Culver’s compliance with ethical standards and to assist with our oversight activities, please provide the following documents as soon as possible, but no later than 5:00 p.m., June 29, 2021:

1. A copy of Ms. Culver’s signed ethics pledge.

²⁵ *Id.*

²⁶ *Nada Wolff Culver*, BUREAU OF LAND MANAGEMENT, DEP’T OF THE INTERIOR, <https://www.blm.gov/bio/nada-wolff-culver> (last visited June 13, 2021).

²⁷ *Supra* note 23.

²⁸ Statement, The White House, *President Biden Announces 12 Key Climate and Infrastructure Administration Nominations* (Apr. 22, 2021), <https://www.whitehouse.gov/briefing-room/statements-releases/2021/04/22/president-biden-announces-12-key-climate-and-infrastructure-administration-nominations/>.

²⁹ *Supra* note 23.

³⁰ *See Officials’ Individual Disclosures Search Collection*, U.S. Office of Government Ethics, <https://www.oge.gov/web/oge/nsf/Officials%20Individual%20Disclosures%20Search%20Collection?OpenForm>.

³¹ Exec. Order No. 13989, 86 Fed. Reg. 14, 7029 (Jan. 20, 2021).

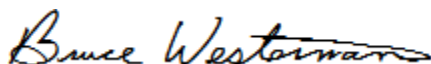
³² U.S. OFFICE OF GOVERNMENT ETHICS, STANDARDS OF ETHICAL CONDUCT: SUMMARY FOR EXEC. BRANCH EMPLOYEES at 12, *available at* [https://www.oge.gov/web/oge/nsf/0/7E9C8E62D239E7C0852585B6005A180E/\\$FILE/Intro%20to%20Standards.pdf](https://www.oge.gov/web/oge/nsf/0/7E9C8E62D239E7C0852585B6005A180E/$FILE/Intro%20to%20Standards.pdf).

2. A copy of Ms. Culver's Ethics Guidance and Recusal Obligations and all related attachments, including, but not limited to, her List of Recusals and Quick Reference Chart.
3. A copy of Ms. Culver's Executive Branch Personnel Public Financial Disclosure Report (OGE Form 278e).
4. A document sufficient to describe all ethics waivers granted to Ms. Culver.
5. A copy of the information Ms. Culver provided to DOI's Ethics Office describing her work at the National Audubon Society and The Wilderness Society.
6. A document listing all petitions, legal, or regulatory challenges against DOI filed by the National Audubon Society from July 1, 2019 through March 1, 2021.
7. A document listing all petitions, legal, or regulatory challenges against DOI filed by The Wilderness Society from October 1, 2003 through June 1, 2019.
8. A document listing all decisions, deliberations, and actions made by Ms. Culver as Deputy Director of Policy and Programs, exercising the delegated authority of the BLM Director or in any other DOI capacity related to any items listed in request items 5 and 6 above.
9. A document sufficient to describe Ms. Culver's role in the ongoing review of oil and gas leasing on federal lands.
10. All documents relating to the alleged ethics violation, including but not limited to any analysis or communications from the Ethics Office to Ms. Culver permitting her to participate in the highlighted Public Land Orders.

Please contact the Oversight and Investigations Subcommittee Minority staff at (202) 225-2761 with any questions about this request and to coordinate the delivery of your response to room 1329 of the Longworth House Office Building.

An attachment contains additional instructions for responding to this request. Thank you for your prompt attention to this matter.

Sincerely,



Bruce Westerman
Ranking Member
Committee on Natural Resources



Paul A. Gosar, D.D.S.
Ranking Member
Subcommittee on Oversight and
Investigations

Mses. Culver and Gottry

June 15, 2021

Page 6

cc: The Honorable Raúl Grijalva, Chair, House Committee on Natural Resources
 The Honorable Katie Porter, Chair, Subcommittee on Oversight and Investigations

Enclosure

From: [Garcia, Monica L](#)
To: [Derting, Elizabeth K](#)
Subject: Accepted: Culver FD Report

From: [Derting, Elizabeth K](#)
To: [Garcia, Monica L](#)
Subject: Accepted: Discuss Culver Report

From: [Culver, Nada L](#)
To: [Gottry, Heather C](#)
Subject: Accepted: Discuss Ethics Recusals

From: [Culver, Nada L](#)
To: [Gottry, Heather C](#)
Subject: Accepted: Discuss Sabinoso Wilderness

From: [Gottry, Heather C](#)
To: [Futrowsky, Steven G](#)
Subject: Accepted: Discussion on Culver complaint

From: [Culver, Nada L](#)
To: [Derting, Elizabeth K](#)
Subject: Accepted: Follow-up on New Entrant Report

From: [Culver, Nada L](#)
To: [Derting, Elizabeth K](#)
Subject: Accepted: New Entrant Report Review

From: [Culver, Nada L](#)
To: [Derting, Elizabeth K](#)
Subject: Accepted: OGE 278 New Entrant Report Review

From: [Nada Culver](#)
To: [Garcia, Monica L](#); [Gottry, Heather C](#)
Subject: additional questions
Date: Tuesday, February 23, 2021 1:31:58 AM
Attachments: [TriState Broch 2021 \(draft3\).pdf](#)

Hi Monica and Heather - Prior to finding out I'd be working in the Department of the Interior, I'd agreed to do a couple of public-ish events that I wanted to run by you.

1. Teaching a class at the University of Wyoming Law School. This would be for 75 minutes or so on March 8th and I was asked to give an overview of the sage-grouse planning process that the BLM has conducted since 2010 and is still going on today due to ongoing litigation. I would be presenting to a class of law students and could do that as an individual, not on behalf of the Department. However, since this is such a key issue for the BLM and Department right now, i wasn't sure if it would be appropriate.

2. Participating in a panel on "Public Lands in the Biden Era" at a conference the Wyoming Bar is putting on for federal judges on March 11th. I've attached the brochure in case that's helpful for context. I can certainly indicate I'm only participating on my own behalf and could either present on wildlife issues or limit my role to being a moderator. Again, this seemed a bit touchy so I can also bow out.

Your advice would be appreciated. Thank you so much.

Nada Culver

From: [Garcia, Monica L](#)
To: [Nada Culver](#)
Cc: [Gottry, Heather C](#)
Subject: Audubon Meeting with FWS
Date: Monday, February 22, 2021 6:38:20 AM

Nada,

Good morning and I hope this message finds you doing well! We have been working with our HR officials on the onboarding actions and are looking forward to your arrival as a Biden Administration appointee next month.

In the meantime, we noticed that you were listed as a representative of the National Audubon Society on a meeting request with Martha Williams, Principal Deputy Director for the U.S. Fish & Wildlife Service. While there is no ethics prohibition that limits your ability to take meetings and interface with DOI employees before you begin your federal employment, we wanted to connect and offer a quick meeting or phone call in the event that you have any questions or concerns.

We are available to chat this week if it would be helpful.

-Monica

Please note: I will be teleworking until further notice

Monica L. Garcia
Deputy Director for Ethics Law & Policy
and Alternate Designated Agency Ethics Official
Departmental Ethics Office | Office of the Solicitor
U.S. Department of the Interior | MIB 5316
(O): (202) 208-0460
(C): (202) 880-4474
Email: monica.garcia@sol.doi.gov

Visit us online at www.doi.gov/ethics

Integrity is Our Mission.

From: [Derting, Elizabeth K](#)
To: [Culver, Nada L](#)
Subject: Automatic reply: [EXTERNAL] Certificate of Divestiture - Nada Culver
Date: Thursday, September 2, 2021 12:18:57 AM

Thank you for your message. I am participating in work-related training all day, Monday, 8/30 through Friday, 9/3. I will be delayed in responding messages until I return to normal work hours on Tuesday, September 7.

If you need immediate ethics support, please contact doi_ethics@sol.doi.gov

If you need immediate assistance with financial disclosure reporting, please contact doi_fdonline@sol.doi.gov

Thank you!

From: [Raviv, Deborah A](#)
To: [Gottry, Heather C](#)
Subject: Automatic reply: Follow Up on Request for Culver Materials
Date: Tuesday, July 27, 2021 8:56:44 AM

Thank you for your email. I am on leave but will return on Tuesday, August 3. If you need immediate assistance, please contact Steven Futrowsky at steven_futrowsky@doioig.gov or (202) 365-8408 or Elliott Pimental at elliott_pimentel@doioig.gov or 202-794-2221.

From: [Derting, Elizabeth K](#)
To: [Culver, Nada L](#)
Subject: Automatic reply: Follow-up on Remaining Assets that Require Divestiture
Date: Monday, July 5, 2021 9:38:27 AM

I will be out of the office on leave for the July 4th holiday and will return on Tuesday, July 6.

Thanks,
Libby

From: [Gottry, Heather C](#)
To: [Culver, Nada L](#)
Subject: Automatic reply: Updated Ethics Guidance Memo & Recusal for Review and Signature
Date: Wednesday, August 4, 2021 11:02:07 AM

Hello! I am out of the office until Monday, August 9, 2021, and will have only limited ability to review and respond to messages.

For assistance on time sensitive ethics matters, please contact either Monica Garcia, Deputy Director for Ethics Law & Policy, at monica.garcia@sol.doi.gov or (202) 208-0460, or Michelle Sharrow, Deputy Director for Operations, at michelle.sharrow@sol.doi.gov or (202) 208-3474.

I will review and respond to messages as soon as possible when I am back in the office. Thank you.

- Heather

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

Visit us online at www.doi.gov/ethics

Integrity is Our Mission

From: [Hammer, Christine A](#)
To: [Culver, Nada L](#); (b)(6)
Cc: [Gottry, Heather C](#); [Garcia, Monica L](#)
Subject: Biden Administration Ethics Pledge
Date: Monday, March 1, 2021 8:57:25 AM
Attachments: [Biden Administration Ethics Pledge.pdf](#)

Nada,

On his first day in office, President Biden issued Executive Order 13989, [Ethics Commitments by Executive Branch Personnel](#).

As an appointee of the U.S. Department of the Interior appointed on or after January 20, 2021, you are required to review and sign the Ethics Pledge on the effective date of your appointment.

Upon signing the Ethics Pledge, you will be contractually committed to comply with the requirements set forth in the Ethics Pledge which will apply both during and after your appointment. Please carefully review [Executive Order 13989](#) and the attached Ethics Pledge, which must be signed with the U.S. Department of the Interior. The attached Ethics Pledge may be signed electronically or with an ink signature and will be maintained in your official personnel folder or equivalent personnel record.

The Departmental Ethics Office will provide you with ethics training and guidance on the commitments and requirements of the Ethics Pledge. Please contact me if you have any questions about the Ethics Pledge. Thank you.

Best regards,

Christine

--

Christine A. Hammer
Attorney Advisor
Departmental Ethics Office | Office of the Solicitor
U.S. Department of the Interior | MIB 5320
734-536-8215 (cell)
christine.hammer@sol.doi.gov

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

Integrity is our mission.

ETHICS PLEDGE

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

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

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

Signature _____

_____, 20____
Date

Name (Type or Print): _____

From: [Derting, Elizabeth K](#)
To: [Garcia, Monica L](#)
Subject: Canceled: Culver FD Report
Importance: High

From: [Garcia, Monica L](#)
To: [Gottry, Heather C](#)
Subject: Culver - Ethics Guidance and ERSA
Date: Friday, June 18, 2021 6:45:13 PM
Attachments: [Culver Nada - Ethics Recusal Guidance Memorandum \(Draft for Review 6.18.21\).docx](#)
[Attachment A - Ethics Recusal Guidance Memorandum.pdf](#)
[Culver, Nada - Attachment B.pdf](#)
[Cover Page - Attachment C List of Recusals and Quick Reference Chart.docx](#)
[Culver, Nada - Recusal Attachment - Quick Guide Recusal Chart \(Draft for Review 6.18.21\).docx](#)
[Culver, Nada - Attachment D Ethics Pledge.pdf](#)
[Culver, Nada - Draft Recusal and Screening Agreement \(Draft for Review 6.18.21\).docx](#)

Heather – Please see the attached drafts for Nada Culver. Please note that Attachment B includes the DOI plus the BLM prohibited list.

I'll be logging off soon but available tomorrow a.m. if you would like to discuss.

-mlg

Please note: I will be teleworking until further notice

Monica L. Garcia
Deputy Director for Ethics Law & Policy
and Alternate Designated Agency Ethics Official
Departmental Ethics Office | Office of the Solicitor
U.S. Department of the Interior | MIB 5316
(O): (202) 208-0460
(C): (202) 880-4474
Email: monica.garcia@sol.doi.gov

Visit us online at www.doi.gov/ethics

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United States Department of the Interior

OFFICE OF THE SOLICITOR
Washington, D C 20240

March 2, 2021

MEMORANDUM

To: Nada W. Culver, Senior Advisor to the Secretary

From: Heather C. Gottry, Director, Departmental Ethics Office & Designated Agency Ethics Official

Monica L. Garcia, Deputy Director for Ethics Law & Policy, Departmental Ethics Office & Alternate Designated Agency Ethics Official

Subject: Interim Ethics Guidance on Recusal Obligations

Commented [GML1]: Note that we will update your title when you are moved into your permanent appointment

This memorandum provides interim guidance from the Departmental Ethics Office (DEO) about your ethics obligations while you are an appointee of the U.S. Department of the Interior (DOI). This guidance in this memorandum is based on information that you have provided and sets forth your obligation to recuse from participating personally and substantially in certain matters in which you have a financial interest, or personal or business relationship(s) pursuant to ethics laws, regulations, and Executive Order 13989 entitled, "Executive Order on Ethics Commitments by Executive Branch Personnel" (Jan. 20, 2021) (Ethics Pledge).

The DEO anticipates providing you with further guidance about your ethics obligations when your New Entrant OGE Form 278e, Public Financial Disclosure Report (OGE Form 278e), is completed, reviewed, and certified. Your appointment date at DOI was March 1, 2021, and you will be required to submit an OGE Form 278e on or before March 30, 2021. By regulation you have thirty (30) days from the date of your appointment to submit your OGE Form 278e and you may request extensions as necessary and appropriate.

Generally, the DEO makes conflict of interests and recusal determinations based on information reported on signed disclosure reports as the indicia of reliability is greater because filers are subject to criminal prosecution for false statements or representations. We have based the interim ethics guidance contained in this memorandum on the information presented in your resume and provided by you. Please note that the interim ethics guidance contained in this memorandum is subject to revision should additional information be provided to the DEO.

SECTION 1 – FINANCIAL CONFLICTS OF INTEREST

As required by the criminal conflicts of interest law at 18 U.S.C. § 208(a), you may not participate personally and substantially in any particular matter¹ in which you know that you have a financial interest directly and predictably affected by the matter, or in which you know that a person whose interests are imputed to you has a financial interest directly and predictably affected by the particular matter, unless you first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2). The interests of the following persons are imputed to you:

- Any spouse or minor child;
- Any general partner of a partnership in which you are a limited or general partner;
- Any organization in which you serve as an officer, director, trustee, general partner, or employee; and
- Any person or organization with which you are negotiating or have an arrangement concerning prospective employment.

Based on information provided to the DEO, you did not identify specific personal and/or imputed financial interests (including prohibited interests listed on the 2021 List of Prohibited Investments, included as *Attachment B* to this memorandum²) that could create recusal obligations while you are serving in the position of Senior Advisor to the Secretary.

Please note that you are in the best position to know and identify your personal and imputed financial interests for purposes of the criminal conflicts of interest law and will be asked to disclose many of those interests when you file your OGE Form 278e. Please update the DEO if you identify additional personal and imputed financial interests or if your identified personal and imputed financial interests change.

¹ Additional guidance on whether an issue, action, or decision pending at the DOI is a particular matter is found in *Attachment A* to this memorandum.

² Please see Section 3 of this memorandum for a discussion of the additional ethics requirements imposed by the DOI Supplemental Ethics Regulations on certain personally held financial interests. Specifically, while the criminal conflict of interest statute, 18 U.S.C. § 208, requires you to recuse from participating personally and substantially in any particular matter in which you know that you have a personal or imputed financial interest directly and predictably affected by the matter, the DOI Supplemental Ethics Regulations, 5 C.F.R. § 3501.103, prohibit you from personally acquiring or holding “any direct or indirect financial interests in Federal lands or resources administered or controlled by the Department.”

If you currently hold a prohibited interest listed on the 2021 List of Prohibited Investments, included as *Attachment B* to this memorandum, you are required to recuse under 18 U.S.C. § 208 from participating personally and substantially in any particular matter in which any of the prohibited interests you currently hold would be directly and predictably affected by the matter. This recusal is an interim step while you complete your OGE Form 278e and then take steps to divest of any prohibited financial interests as required by 5 C.F.R. § 3501.103. Please consult the DEO about any questions regarding how to divest prohibited interests and the application of 18 U.S.C. § 208 and 5 C.F.R. § 3501.103 to any prohibited interests.

Additionally, during this period while you are working under interim ethics guidance, if you have a managed account or otherwise use the services of an investment professional during your appointment, you should ensure that the account manager or investment professional obtains your 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 regulatory exemption for diversified mutual funds and unit investment trusts at 5 C.F.R. § 2640.201(a), or obligations of the United States.

Finally, in the event that an actual or potential conflict of interest arises during your appointment, you should consult with the DEO immediately and take the measures necessary to resolve the conflict, such as recusal from the particular matter or divestiture of an asset. Throughout your appointment, you must remain vigilant about your personal or imputed financial interests and notify the DEO immediately should either they or your duties and responsibilities at the DOI change so you can receive updated ethics guidance.

SECTION 2 – IMPARTIALITY

As required by 5 C.F.R. § 2635.502(a), if you know that a particular matter involving specific parties³ is likely to have a direct and predictable effect on the financial interest of a member of your household, or know that a person with whom you have a “covered relationship”⁴ is or represents a party to such matter, and where you determine that the circumstances would cause a reasonable person with knowledge of the relevant facts to question your impartiality in the matter, you may not participate in the matter unless you have informed the DEO of the appearance problem and received written authorization from the DEO to participate in the matter.

Based on information provided to the DEO, you identified “covered relationships” with the following individuals and/or entities:

- National Audubon Society (Employed from July 2019-February 2021);
- Benezra and Culver, P.C. law firm (your spouse’s employer); and
- Your Spouse’s Client(s).

³ Additional guidance on whether an issue, action, or decision pending at the DOI is a particular matter involving specific parties is found in *Attachment A* to this memorandum

⁴ Please note that for purposes of 5 C.F.R. § 2635.502 you have a “covered relationship” with: (1) A person, other than a prospective employer described in 5 C.F.R. § 2635.603(c), with whom you have or seek a business, contractual or other financial relationship that involves other than a routine consumer transaction; (2) A person who is a member of your household, or who is a relative with whom you have a close personal relationship; (3) A person for whom your spouse, parent or dependent child is, to your knowledge, serving or seeking to serve as an officer, director, trustee, general partner, agent, attorney, consultant, contractor or employee; (4) Any person for whom you have, within the last year, served as officer, director, trustee, general partner, agent, attorney, consultant, contractor or employee; or (5) An organization, other than a political party described in 26 U.S.C. § 527(e), in which you are an active participant

Commented [GML2]: You will be required to recuse from particular matters involving specific parties involving your spouse’s employer, his clients, or anyone with whom your spouse is “seeking to serve” as an attorney, agent, consultant, contractor, or employee.

To manage these recusals, we recommend either listing your spouse’s clients in the memo or noting that you are maintaining a list of your spouse’s clients in the memo.

You will remain responsible for regularly updating the list of recusals based on your spouse’s business interests and clients. As we work to finalize your memo, we can discuss the best way to implement compliance measures.

Accordingly, you may not participate in any particular matters involving specific parties in which any of the individuals or entities listed above is a party or represents a party unless you have informed the DEO and received written authorization from the DEO to participate in the particular matter involving specific parties. This disqualification requirement may expand to a number of issues, actions, and decisions involving the entities listed above and the DEO is available to provide additional guidance as needed. Please note that you are in the best position to know and identify your “covered relationships.” Please update the DEO if you identify additional “covered relationships” or if your identified “covered relationships” change.

In determining whether circumstances other than those specifically described in 5 C.F.R. § 2635.502(a) would raise a question regarding your impartiality in performing your official duties, you must consider the relevant facts about the particular matter in question and determine whether you believe that a reasonable person with knowledge of those facts would question your impartiality in performing your official duties in the particular matter. If you personally determine that a reasonable person with knowledge of the relevant facts would not question your impartiality in performing your official duties in the particular matter, then you may participate in the particular matter as part of your official duties. Additional guidance on whether an issue, action, or decision pending at the DOI is a particular matter is found in *Attachment A* to this memorandum.

In addition to the requirements discussed above related to 5 C.F.R. § 2635.502, as set forth in the Fourteen General Principles of Ethical Conduct, you must take steps to avoid any action that creates the appearance that you are violating the law or the ethical standards set forth in 5 C.F.R. Part 2635. 5 C.F.R. § 2635.101(b)(14). In considering whether a particular set of circumstances will create an appearance that the law or the ethical standards have been violated, you will need to assess the circumstances from the perspective of a reasonable person with knowledge of the relevant facts. Appearance issues can be complex, please consult as needed and appropriate with the DEO for further ethics guidance and assistance.

SECTION 3 – DOI SUPPLEMENTAL ETHICS REGULATIONS

Pursuant to 5 C.F.R. § 3501.103(b) you are prohibited from holding direct or indirect any financial interest in Federal lands or resources administered or controlled by the DOI. This prohibition precludes stock or bond investments in many companies that hold DOI-granted permits and leases in Federal lands. Each year, the DEO compiles a list of prohibited investments and the 2021 List of Prohibited Investments, included as *Attachment B* to this memorandum, includes investments with oil, gas, solar, wind, geothermal, and mineral rights in Federal lands above certain thresholds.

Additionally, absent a waiver under 5 C.F.R. § 3501.103(e), you, your spouse, and your minor children are prohibited by 5 C.F.R. § 3501.103(c) from acquiring or retaining any claim, permit, lease, small tract entries, or other rights that are granted by the DOI in Federal lands. This prohibition does not limit the recreational or other personal and noncommercial use of

Federal lands by you, or your spouse or minor child, on the same terms as use of Federal lands is available to the general public. 5 C.F.R. § 3501.103(c)(2)(i).

Based on information provided to the DEO, you confirmed:

1. You do not hold financial interests identified on the 2021 List of Prohibited Investments, included as *Attachment B* to this memorandum.
2. You and your spouse and minor children do not occupy or use Federal lands (other than on the same terms as use of Federal lands is available to the general public), and you do not take any benefits from Federal lands, based upon a contract, grant, lease, permit, easement, rental, agreement, mineral rights, grazing rights, or other holdings DOI issues or regulates.

In order to ensure compliance with the requirements of the DOI Supplemental Ethics Regulations, you must not acquire any new acquire any additional financial interests identified on the 2021 List of Prohibited Investments. You also must immediately update the DEO if you or your spouse or your minor child occupy or use Federal lands (other than on the same terms as use of Federal lands is available to the general public), and you do not take any benefits from Federal lands, based upon a contract, grant, lease, permit, easement, rental, agreement, mineral rights, grazing rights, or other holdings DOI issues or regulates.

SECTION 4 - OBLIGATIONS UNDER THE ETHICS PLEDGE

As a Biden Administration political appointee, you signed the Ethics Pledge required under Executive Order No. 13989 entitled, "Executive Order on Ethics Commitments by Executive Branch Personnel" (Jan. 20, 2021), on March 1, 2021, and are bound by the requirements and restrictions contained therein.

First, pursuant to the requirements of paragraph 2 of the Ethics Pledge, you may not participate personally and substantially, for two (2) years after the date of your appointment on March 1, 2021, in any particular matter involving specific parties that is directly and

substantially related to your former employer⁵ or former clients,⁶ including regulations and contracts, unless you are first granted a waiver under the Ethics Pledge.

For purposes of paragraph 2 of the Ethics Pledge and based on information provided to the DEO, your former employer is the National Audubon Society.

Please note that, for purposes of the Ethics Pledge, the term “particular matter involving specific parties” has the meaning set forth in 5 C.F.R. § 2641.201(h),⁷ except that it also includes any meeting or other communication relating to the performance of your official duties, unless the communication applies to a particular matter of general applicability and participation in the meeting or other event is open to all interested parties. OGE has advised the term “open to all interested parties” means that the meeting should include a multiplicity of parties representing a diversity of viewpoints. If a former employer or a former client is present, then, generally speaking, at least four other parties should be present to ensure that a diversity of viewpoints is represented and not the same united perspective. OGE Legal Advisory DO-09-011 (Mar. 26, 2009).

Since you have informed the DEO that you were not a registered lobbyist for any entity, the recusal requirements under paragraph 3 of the Ethics Pledge are not applicable to your work at the DOI.

Finally, you have confirmed that you have complied with paragraph 7 of the Ethics Pledge and not accept and will not accept, including after entering Government, any salary or other cash payment from your former employer the eligibility for and payment of which is limited to individuals accepting a position in the United States Government. You further

⁵ For purposes of paragraph 2 of the Ethics Pledge, “former employer” is any person for whom you have within the two (2) years prior to the date of your appointment served as an employee, officer, director, trustee, or general partner, except that “former employer” does not include any executive agency or other entity of the Federal Government, State or local government, the District of Columbia, Native American tribe, any United States territory or possession, or any international organization in which the United States is a member state. Executive Order 13989, Section 2(k). For additional guidance on the definition of “former employer” please see Office of Government Ethics (OGE) Legal Advisory DO-09-011, *Ethics Pledge: Revolving Door Ban--All Appointees Entering Government* (Mar. 26, 2009) (DO-09-011), which applies to Executive Order 13989 pursuant OGE Legal Advisory LA-21-03, *Executive Orders on Ethics Commitments by Executive Branch Personnel* (Jan. 22, 2021) (LA-21-03).

⁶ For purposes of paragraph 2 of the Ethics Pledge, “former client” is any person for whom you served personally as agent, attorney, or consultant within the two (2) years prior to the date of your appointment, but excluding instances where the service provided was limited to speeches or similar appearances. It does not include clients of the appointee’s former employer to whom the appointee did not personally provide services. Executive Order 13989, Section 2(l). For additional guidance on the definition of “former client” please see DO-09-011, which applies to Executive Order 13989 pursuant LA-21-03.

⁷ A “particular matter involving specific parties” will typically involve “a specific proceeding affecting the legal rights of the parties or an isolatable transaction or related set of transactions between identified parties, such as a specific contract, grant, license, product approval application, enforcement action, administrative adjudication, or court case.” 5 C.F.R. § 2641.201(h).

confirmed that you also have not accepted and will not accept any non-cash benefit from your former employer that is provided in lieu of such a prohibited cash payment.

SECTION 5 – UPDATE THE DEO AS NECESSARY

Please continue to update the DEO about changed circumstances, including changes to your financial interests, changes in your personal or business relationships, or any changes to the nature of your DOI duties and responsibilities, so that the interim ethics guidance provided in this memorandum can be updated as needed and your recusal obligations can be documented.

In the interim, you must diligently screen and decline meeting requests and other communications from a former employer or client, and you must disqualify yourself from participation in party matters where a former employer or client is a party or represents a party to that matter. Please be advised that the identification of party matters pending within the DOI, in which your former employer and/or clients are parties or represent parties, will likely take time and effort on the part of you, your staff, Office of the Secretary or Bureau of Land Management staff assigned to such matters, and the DEO. Additionally, there may be times when there will be a delay in reviewing and potentially clearing your participation in party matters and meetings and other communications as a result of screening for ethics compliance. Please be aware that while efforts can and will be made to minimize any such delays, these delays may impact your ability to promptly participate in party matters and meetings and other communications.

Finally, please note that the Rules of Professional Responsibility are beyond the scope of the DEO's review, so you should review your applicable Rules of Professional Responsibility rules to ensure there you comply with any applicable requirements during your appointment at DOI. In particular, you should ensure that you take all steps, including removing yourself as counsel, to comply with the requirements of 18 U.S.C. § 203, which prohibits an employee from receiving, agreeing to receive, or soliciting compensation for representational services, rendered either personally or by another, before any court or Federal agency or other specified Federal entity, in connection with any particular matter in which the United States is a party or has a direct and substantial interest, and 18 U.S.C. § 205, which prohibits Federal employees from personally representing anyone before any court or Federal agency or other specified Federal entity, in connection with any particular matter in which the United States is a party or has a direct and substantial interest.

Please do not hesitate to contact the DEO with any questions about your recusal obligations discussed above or for further ethics guidance. Please also be advised that only a designated ethics official from the DEO can make ethics determinations on which DOI employees may authoritatively rely upon.

Attachment A - Guidance for Recusal Analysis

Attachment B – 2021 List of Prohibited Investments



United States Department of the Interior

OFFICE OF THE SOLICITOR

Washington, D.C. 20240

March 11, 2021

MEMORANDUM

To: Nada W. Culver, Senior Advisor to the Secretary

From: Heather C. Gottry, Director, Departmental Ethics Office & Designated Agency Ethics Official

Monica L. Garcia, Deputy Director for Ethics Law & Policy, Departmental Ethics Office & Alternate Designated Agency Ethics Official

Subject: Interim Ethics Guidance on Recusal Obligations

This memorandum provides interim guidance from the Departmental Ethics Office (DEO) about your ethics obligations while you are an appointee of the U.S. Department of the Interior (DOI). This guidance in this memorandum is based on information that you have provided and sets forth your obligation to recuse from participating personally and substantially in certain matters in which you have a financial interest, or personal or business relationship(s) pursuant to ethics laws, regulations, and Executive Order 13989 entitled, "Executive Order on Ethics Commitments by Executive Branch Personnel" (Jan. 20, 2021) (Ethics Pledge).

The DEO anticipates providing you with further guidance about your ethics obligations when your New Entrant OGE Form 278e, Public Financial Disclosure Report (OGE Form 278e), is completed, reviewed, and certified. Your appointment date at DOI was March 1, 2021, and you will be required to submit an OGE Form 278e on or before March 30, 2021. By regulation you have thirty (30) days from the date of your appointment to submit your OGE Form 278e and you may request extensions as necessary and appropriate.

Generally, the DEO makes conflict of interests and recusal determinations based on information reported on signed disclosure reports as the indicia of reliability is greater because filers are subject to criminal prosecution for false statements or representations. We have based the interim ethics guidance contained in this memorandum on the information presented in your resume and provided by you. Please note that the interim ethics guidance contained in this memorandum is subject to revision should additional information be provided to the DEO.

SECTION 1 – FINANCIAL CONFLICTS OF INTEREST

As required by the criminal conflicts of interest law at 18 U.S.C. § 208(a), you may not participate personally and substantially in any particular matter¹ in which you know that you have a financial interest directly and predictably affected by the matter, or in which you know that a person whose interests are imputed to you has a financial interest directly and predictably affected by the particular matter, unless you first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2). The interests of the following persons are imputed to you:

- Any spouse or minor child;
- Any general partner of a partnership in which you are a limited or general partner;
- Any organization in which you serve as an officer, director, trustee, general partner, or employee; and
- Any person or organization with which you are negotiating or have an arrangement concerning prospective employment.

Based on information provided to the DEO, you will have an imputed financial interest (including prohibited interests listed on the 2021 List of Prohibited Investments, included as *Attachment B* to this memorandum²) that could create recusal obligations while you are serving in the position of Senior Advisor to the Secretary with Benezra and Culver, P.C., an employment law firm where your spouse is employed as a partner. You must not participate personally and substantially in any particular matter that to your knowledge has a direct and predictable effect on the financial interests of the firm, unless you first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1).

Please note that you are in the best position to know and identify your personal and imputed financial interests for purposes of the criminal conflicts of interest law and will be asked to disclose many of those interests when you file your OGE Form 278e. Please update the DEO

¹ Additional guidance on whether an issue, action, or decision pending at the DOI is a particular matter is found in *Attachment A* to this memorandum.

² Please see Section 3 of this memorandum for a discussion of the additional ethics requirements imposed by the DOI Supplemental Ethics Regulations on certain personally held financial interests. Specifically, while the criminal conflict of interest statute, 18 U.S.C. § 208, requires you to recuse from participating personally and substantially in any particular matter in which you know that you have a personal or imputed financial interest directly and predictably affected by the matter, the DOI Supplemental Ethics Regulations, 5 C.F.R. § 3501.103, prohibit you from personally acquiring or holding “any direct or indirect financial interests in Federal lands or resources administered or controlled by the Department.”

If you currently hold a prohibited interest listed on the 2021 List of Prohibited Investments, included as *Attachment B* to this memorandum, you are required to recuse under 18 U.S.C. § 208 from participating personally and substantially in any particular matter in which any of the prohibited interests you currently hold would be directly and predictably affected by the matter. This recusal is an interim step while you complete your OGE Form 278e and then take steps to divest of any prohibited financial interests as required by 5 C.F.R. § 3501.103. Please consult the DEO about any questions regarding how to divest prohibited interests and the application of 18 U.S.C. § 208 and 5 C.F.R. § 3501.103 to any prohibited interests.

if you identify additional personal and imputed financial interests or if your identified personal and imputed financial interests change.

Additionally, during this period while you are working under interim ethics guidance, if you have a managed account or otherwise use the services of an investment professional during your appointment, you should ensure that the account manager or investment professional obtains your 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 regulatory exemption for diversified mutual funds and unit investment trusts at 5 C.F.R. § 2640.201(a), or obligations of the United States.

Finally, in the event that an actual or potential conflict of interest arises during your appointment, you should consult with the DEO immediately and take the measures necessary to resolve the conflict, such as recusal from the particular matter or divestiture of an asset. Throughout your appointment, you must remain vigilant about your personal or imputed financial interests and notify the DEO immediately should either they or your duties and responsibilities at the DOI change so you can receive updated ethics guidance.

SECTION 2 – IMPARTIALITY

As required by 5 C.F.R. § 2635.502(a), if you know that a particular matter involving specific parties³ is likely to have a direct and predictable effect on the financial interest of a member of your household, or know that a person with whom you have a “covered relationship”⁴ is or represents a party to such matter, and where you determine that the circumstances would cause a reasonable person with knowledge of the relevant facts to question your impartiality in the matter, you may not participate in the matter unless you have informed the DEO of the appearance problem and received written authorization from the DEO to participate in the matter.

Based on information provided to the DEO, you identified “covered relationships” with the following individuals and/or entities:

³ Additional guidance on whether an issue, action, or decision pending at the DOI is a particular matter involving specific parties is found in *Attachment A* to this memorandum.

⁴ Please note that for purposes of 5 C.F.R. § 2635.502 you have a “covered relationship” with: (1) A person, other than a prospective employer described in 5 C.F.R. § 2635.603(c), with whom you have or seek a business, contractual or other financial relationship that involves other than a routine consumer transaction; (2) A person who is a member of your household, or who is a relative with whom you have a close personal relationship; (3) A person for whom your spouse, parent or dependent child is, to your knowledge, serving or seeking to serve as an officer, director, trustee, general partner, agent, attorney, consultant, contractor or employee; (4) Any person for whom you have, within the last year, served as officer, director, trustee, general partner, agent, attorney, consultant, contractor or employee; or (5) An organization, other than a political party described in 26 U.S.C. § 527(e), in which you are an active participant.

- National Audubon Society (former employer, employed from July 2019-February 2021);
- Benezra and Culver, P.C. law firm (your spouse's employer); and
- Clients of Benezra and Culver, P.C. law firm.

Accordingly, you may not participate in any particular matters involving specific parties in which any of the individuals or entities listed above is a party or represents a party unless you have informed the DEO and received written authorization from the DEO to participate in the particular matter involving specific parties. This disqualification requirement may expand to a number of issues, actions, and decisions involving the entities listed above and the DEO is available to provide additional guidance as needed. You have informed us that your spouse's law firm, Benezra and Culver is a plaintiff's employment firm with a focus on representing individual employees, primarily within the State of Colorado. You have not provided a list of current clients at this time, but you will remain responsible for recusals for all covered relationship or other disqualifications based on your spouse's clients. Please note that you are in the best position to know and identify your "covered relationships." Please update the DEO if you identify additional "covered relationships" or if your identified "covered relationships" change.

In determining whether circumstances other than those specifically described in 5 C.F.R. § 2635.502(a) would raise a question regarding your impartiality in performing your official duties, you must consider the relevant facts about the particular matter in question and determine whether you believe that a reasonable person with knowledge of those facts would question your impartiality in performing your official duties in the particular matter. If you personally determine that a reasonable person with knowledge of the relevant facts would not question your impartiality in performing your official duties in the particular matter, then you may participate in the particular matter as part of your official duties. Additional guidance on whether an issue, action, or decision pending at the DOI is a particular matter is found in *Attachment A* to this memorandum.

In addition to the requirements discussed above related to 5 C.F.R. § 2635.502, as set forth in the Fourteen General Principles of Ethical Conduct, you must take steps to avoid any action that creates the appearance that you are violating the law or the ethical standards set forth in 5 C.F.R. Part 2635. 5 C.F.R. § 2635.101(b)(14). In considering whether a particular set of circumstances will create an appearance that the law or the ethical standards have been violated, you will need to assess the circumstances from the perspective of a reasonable person with knowledge of the relevant facts. Appearance issues can be complex, please consult as needed and appropriate with the DEO for further ethics guidance and assistance.

SECTION 3 – DOI SUPPLEMENTAL ETHICS REGULATIONS

Pursuant to 5 C.F.R. § 3501.103(b) you are prohibited from holding direct or indirect any financial interest in Federal lands or resources administered or controlled by the DOI. This

prohibition precludes stock or bond investments in many companies that hold DOI-granted permits and leases in Federal lands. Each year, the DEO compiles a list of prohibited investments and the 2021 List of Prohibited Investments, included as *Attachment B* to this memorandum, includes investments with oil, gas, solar, wind, geothermal, and mineral rights in Federal lands above certain thresholds.

Additionally, absent a waiver under 5 C.F.R. § 3501.103(e), you, your spouse, and your minor children are prohibited by 5 C.F.R. § 3501.103(c) from acquiring or retaining any claim, permit, lease, small tract entries, or other rights that are granted by the DOI in Federal lands. This prohibition does not limit the recreational or other personal and noncommercial use of Federal lands by you, or your spouse or minor child, on the same terms as use of Federal lands is available to the general public. 5 C.F.R. § 3501.103(c)(2)(i).

Based on information provided to the DEO, you confirmed:

1. You do not hold financial interests identified on the 2021 List of Prohibited Investments, included as *Attachment B* to this memorandum.
2. You and your spouse and minor children do not occupy or use Federal lands (other than on the same terms as use of Federal lands is available to the general public), and you do not take any benefits from Federal lands, based upon a contract, grant, lease, permit, easement, rental, agreement, mineral rights, grazing rights, or other holdings DOI issues or regulates.

In order to ensure compliance with the requirements of the DOI Supplemental Ethics Regulations, you must not acquire any new acquire any additional financial interests identified on the 2021 List of Prohibited Investments. You also must immediately update the DEO if you or your spouse or your minor child occupy or use Federal lands (other than on the same terms as use of Federal lands is available to the general public), and you do not take any benefits from Federal lands, based upon a contract, grant, lease, permit, easement, rental, agreement, mineral rights, grazing rights, or other holdings DOI issues or regulates.

SECTION 4 - OBLIGATIONS UNDER THE ETHICS PLEDGE

As a Biden Administration political appointee, you signed the Ethics Pledge required under Executive Order No. 13989 entitled, “Executive Order on Ethics Commitments by Executive Branch Personnel” (Jan. 20, 2021), on March 1, 2021, and are bound by the requirements and restrictions contained therein.

First, pursuant to the requirements of paragraph 2 of the Ethics Pledge, you may not participate personally and substantially, for two (2) years after the date of your appointment on March 1, 2021, in any particular matter involving specific parties that is directly and

substantially related to your former employer⁵ or former clients,⁶ including regulations and contracts, unless you are first granted a waiver under the Ethics Pledge.

For purposes of paragraph 2 of the Ethics Pledge and based on information provided to the DEO, your former employer is the National Audubon Society.

Please note that, for purposes of the Ethics Pledge, the term “particular matter involving specific parties” has the meaning set forth in 5 C.F.R. § 2641.201(h),⁷ except that it also includes any meeting or other communication relating to the performance of your official duties, unless the communication applies to a particular matter of general applicability and participation in the meeting or other event is open to all interested parties. OGE has advised the term “open to all interested parties” means that the meeting should include a multiplicity of parties representing a diversity of viewpoints. If a former employer or a former client is present, then, generally speaking, at least four other parties should be present to ensure that a diversity of viewpoints is represented and not the same united perspective. OGE Legal Advisory DO-09-011 (Mar. 26, 2009).

Since you have informed the DEO that you were not a registered lobbyist for any entity, the recusal requirements under paragraph 3 of the Ethics Pledge are not applicable to your work at the DOI.

Finally, you have confirmed that you have complied with paragraph 7 of the Ethics Pledge and not accept and will not accept, including after entering Government, any salary or other cash payment from your former employer the eligibility for and payment of which is limited to individuals accepting a position in the United States Government. You further

⁵ For purposes of paragraph 2 of the Ethics Pledge, “former employer” is any person for whom you have within the two (2) years prior to the date of your appointment served as an employee, officer, director, trustee, or general partner, except that “former employer” does not include any executive agency or other entity of the Federal Government, State or local government, the District of Columbia, Native American tribe, any United States territory or possession, or any international organization in which the United States is a member state. Executive Order 13989, Section 2(k). For additional guidance on the definition of “former employer” please see Office of Government Ethics (OGE) Legal Advisory DO-09-011, *Ethics Pledge: Revolving Door Ban--All Appointees Entering Government* (Mar. 26, 2009) (DO-09-011), which applies to Executive Order 13989 pursuant OGE Legal Advisory LA-21-03, *Executive Orders on Ethics Commitments by Executive Branch Personnel* (Jan. 22, 2021) (LA-21-03).

⁶ For purposes of paragraph 2 of the Ethics Pledge, “former client” is any person for whom you served personally as agent, attorney, or consultant within the two (2) years prior to the date of your appointment, but excluding instances where the service provided was limited to speeches or similar appearances. It does not include clients of the appointee’s former employer to whom the appointee did not personally provide services. Executive Order 13989, Section 2(l). For additional guidance on the definition of “former client” please see DO-09-011, which applies to Executive Order 13989 pursuant LA-21-03.

⁷ A “particular matter involving specific parties” will typically involve “a specific proceeding affecting the legal rights of the parties or an isolatable transaction or related set of transactions between identified parties, such as a specific contract, grant, license, product approval application, enforcement action, administrative adjudication, or court case.” 5 C.F.R. § 2641.201(h).

confirmed that you also have not accepted and will not accept any non-cash benefit from your former employer that is provided in lieu of such a prohibited cash payment.

SECTION 5 – UPDATE THE DEO AS NECESSARY

Please continue to update the DEO about changed circumstances, including changes to your financial interests, changes in your personal or business relationships, or any changes to the nature of your DOI duties and responsibilities, so that the interim ethics guidance provided in this memorandum can be updated as needed and your recusal obligations can be documented.

In the interim, you must diligently screen and decline meeting requests and other communications from a former employer or client, and you must disqualify yourself from participation in party matters where a former employer or client is a party or represents a party to that matter. Please be advised that the identification of party matters pending within the DOI, in which your former employer and/or clients are parties or represent parties, will likely take time and effort on the part of you, your staff, Office of the Secretary or Bureau of Land Management staff assigned to such matters, and the DEO. Additionally, there may be times when there will be a delay in reviewing and potentially clearing your participation in party matters and meetings and other communications as a result of screening for ethics compliance. Please be aware that while efforts can and will be made to minimize any such delays, these delays may impact your ability to promptly participate in party matters and meetings and other communications.

Finally, please note that the Rules of Professional Responsibility are beyond the scope of the DEO's review, so you should review your applicable Rules of Professional Responsibility rules to ensure there you comply with any applicable requirements during your appointment at DOI. In particular, you should ensure that you take all steps, including removing yourself as counsel, to comply with the requirements of 18 U.S.C. § 203, which prohibits an employee from receiving, agreeing to receive, or soliciting compensation for representational services, rendered either personally or by another, before any court or Federal agency or other specified Federal entity, in connection with any particular matter in which the United States is a party or has a direct and substantial interest, and 18 U.S.C. § 205, which prohibits Federal employees from personally representing anyone before any court or Federal agency or other specified Federal entity, in connection with any particular matter in which the United States is a party or has a direct and substantial interest.

Please do not hesitate to contact the DEO with any questions about your recusal obligations discussed above or for further ethics guidance. Please also be advised that only a designated ethics official from the DEO can make ethics determinations on which DOI employees may authoritatively rely upon.

Attachment A - Guidance for Recusal Analysis

Attachment B – 2021 List of Prohibited Investments

Attachment A

Guidance for Recusal Analysis

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

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

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

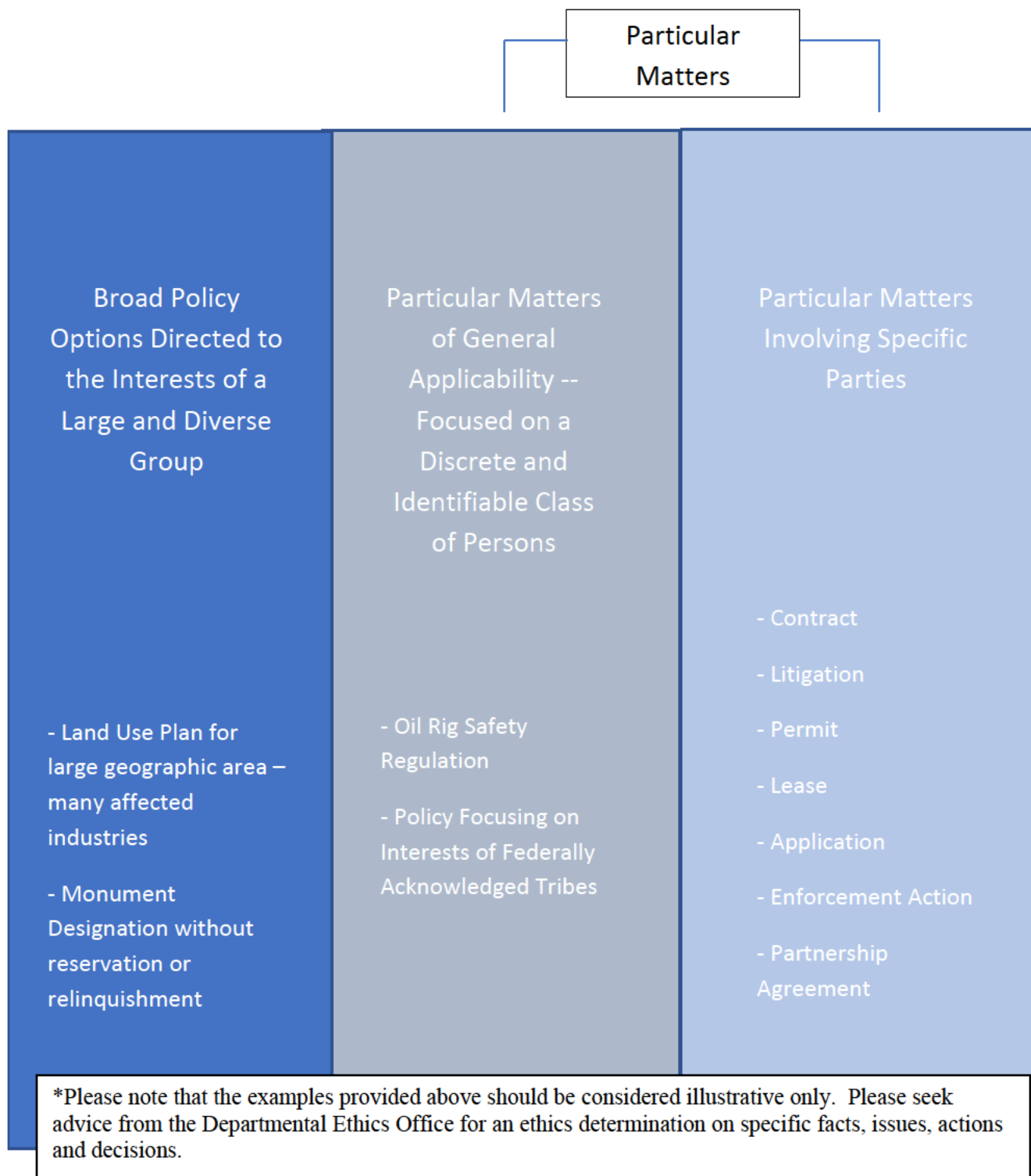
A “particular matter involving specific parties” typically involves a specific proceeding affecting the legal rights of the parties, or an isolatable transaction or related set of transactions between identified parties. Examples include contracts, grants, licenses, investigations, litigation, and partnership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

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

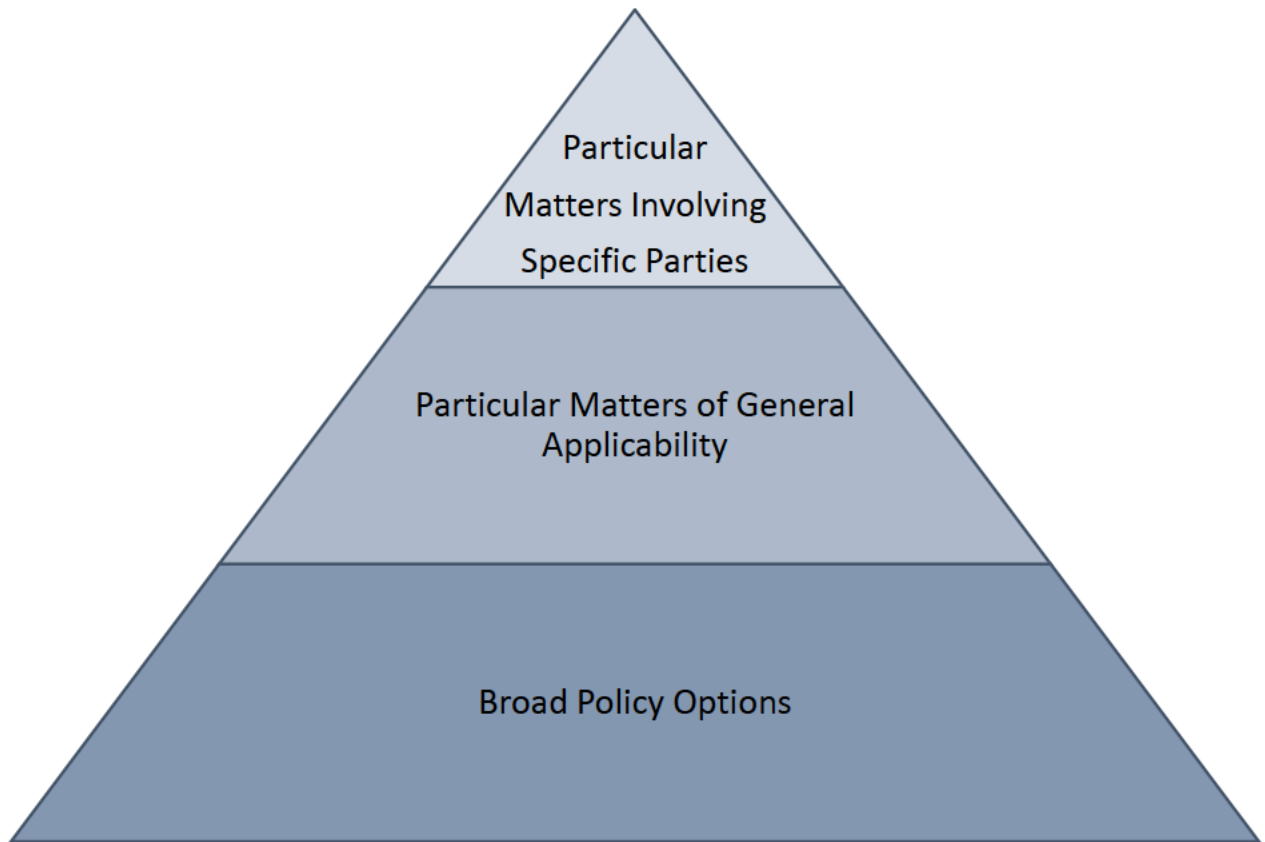
To assist you in complying with his ethics requirements, you and/or your screener must gather sufficient information regarding a matter before the DOI to determine whether the matter constitutes a particular matter involving specific parties or a particular matter of general applicability, or falls into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

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

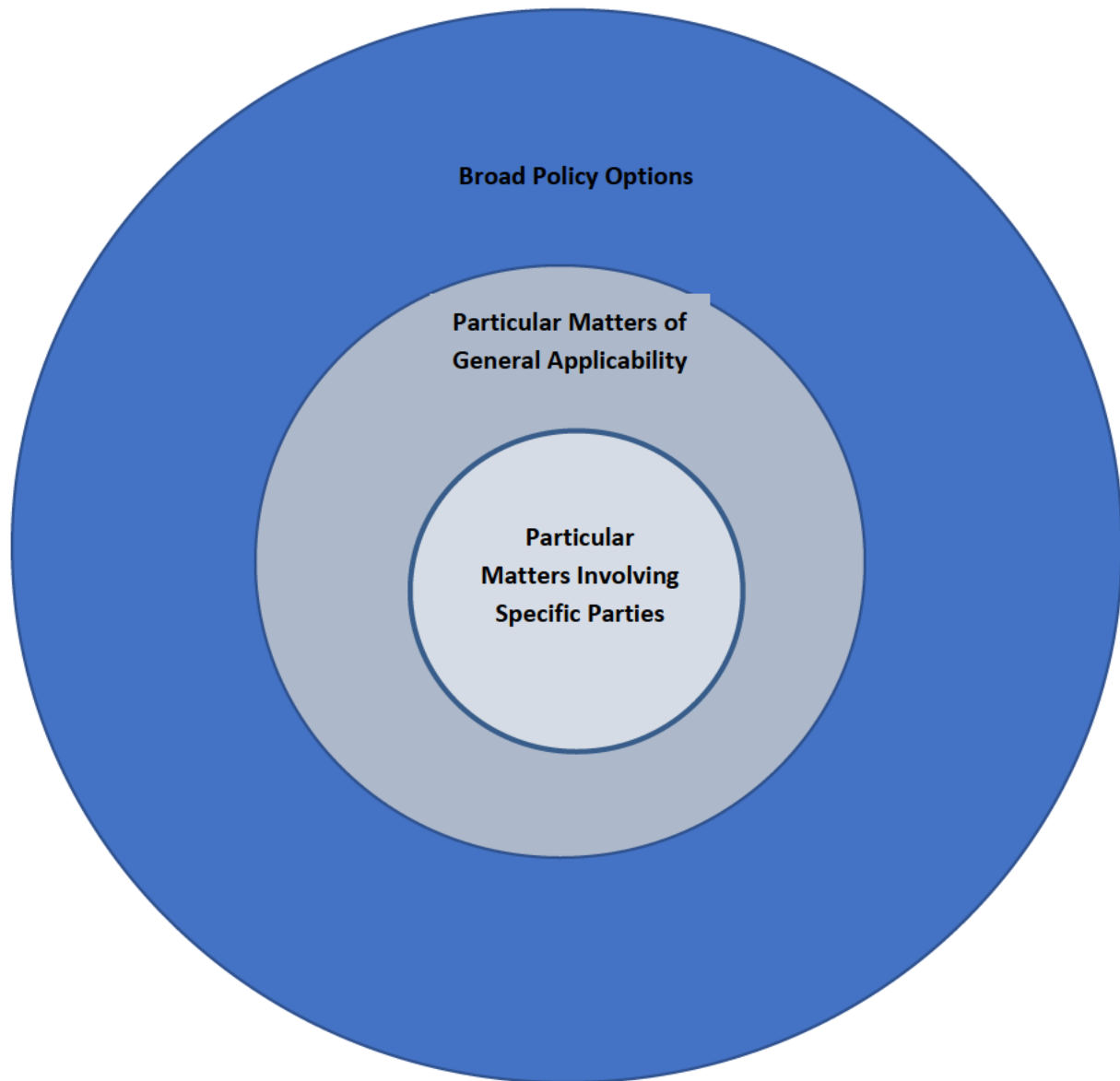
Matters* – Three Types



Three Types of Matters



Three Types of Matters



Attachment B
2021 List of Prohibited Investments



Departmental Ethics Office U.S. Department of the Interior

2021 List of Prohibited Financial Interests for

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

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

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

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

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

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

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

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

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

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

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

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

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

W&T Offshore Incorporated	WTI
WPX Energy Incorporated	WPX

Questions? Please contact an ethics official for more information.

OS/SOL Financial Disclosure Team

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

ONRR Deputy Ethics Counselor

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

From: [Garcia, Monica L](#)
To: [Gottry, Heather C](#)
Subject: Culver - Memo for signature
Date: Friday, September 3, 2021 7:02:29 AM
Attachments: [Culver Nada - Ethics Recusal Guidance Memorandum \(final 9.3.21\).pdf](#)

Please see attached.

-Monica

Please note: I will be teleworking until further notice

Monica L. Garcia
Deputy Director for Ethics Law & Policy
and Alternate Designated Agency Ethics Official
Departmental Ethics Office | Office of the Solicitor
U.S. Department of the Interior | MIB 5316
(O): (202) 208-0460
(C): (202) 880-4474
Email: monica.garcia@sol.doi.gov

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United States Department of the Interior

July 29, 2021

MEMORANDUM

To: Heather C. Gottry, Director, Departmental Ethics Office
& Designated Agency Ethics Official

From: Nada W. Culver, Deputy Director of Policy and Programs,
Bureau of Land Management

Subject: Ethics Recusals & Screening Arrangement

This memorandum serves to document my ethics recusals and the steps that I will take in order to ensure that I comply with all recusal and other ethics obligations required by law. Additionally, this memorandum fulfills the requirement established in Section 4(a)(iii) of Executive Order 13989 entitled, “Executive Order on Ethics Commitments by Executive Branch Personnel” (Jan. 20, 2021) (Ethics Pledge).

I have consulted with the Departmental Ethics Office (DEO) and have been advised about my recusal obligations while serving as an appointee of the U.S. Department of the Interior (DOI). As reflected in my Updated Interim Ethics Guidance on Recusal Obligations memorandum, dated July 27, 2021, which provides ethics guidance based on my certified New Entrant Public Financial Disclosure Report (OGE Form 278e) and information that I have provided to the DEO, I understand that I have a continuing obligation to limit my personal and substantial participation in certain matters in which I have either direct or imputed financial interests, or personal or business relationship(s), pursuant to ethics laws, regulations, and the Ethics Pledge, which I signed on March 1, 2021.

SECTION 1 – SCREENING ARRANGEMENT

After consultation with the DEO, I have elected to self-screen for recusals of all Department matters directed to my attention or that require my participation which involve the entities addressed in the Ethics Guidance Memorandum and listed on the attached List of Recusals and Quick Reference Chart in order to determine whether they involve any of the entities or organizations listed therein. In order to help ensure that I do not participate in matters from which I should be recused, I will take the following steps:

1. I will continue to personally take my calls and screen my e-mail communications, and will review all DOI matters directed to my attention or that require my participation which involve the individuals or entities on the attached List of Recusals and Quick Reference Chart in order to determine whether I am recused from participating in the matter in question.
2. If a particular matter involving any of the entities discussed in the Ethics Guidance Memorandum or listed on the attached List of Recusals and Quick Reference Chart is directed to my attention, I will not take any action, but immediately consult with the DEO, without my further involvement or knowledge of the particulars of the matter if I am uncertain whether or not I may participate in a particular matter.
3. If I determine that a matter involves any of the individuals or entities listed on the attached List of Recusals and Quick Reference Chart and that I am recused from the matter, then I will not take any action on the matter in questions and will refer the matter to Danna Jackson, Counselor to the BLM Director, for action or assignment, without my knowledge or involvement.
4. I will also inform my principal subordinates if I determine that a matter involves any of the individuals or entities listed on the attached List of Recusals and Quick Reference Chart and that I am recused from the matter. I will further instruct my principal subordinates that all inquiries and comments involving my recusal obligations should be directed to the DEO without my involvement or knowledge of the particulars of the matter and will refer my principal subordinates to Danna Jackson, Counselor to the BLM Director, for any further action or assignment on the matter in question.

I understand that for the duration of this screening arrangement that I commit to diligently reviewing issues, actions, and decisions that come before me in order to determine whether any of the individuals or entities discussed in the Ethics Guidance on Recusal Obligations memorandum and listed on the attached List of Recusals and Quick Reference Chart are involved in the issues, actions, and decisions. I have been advised that the identification of party matters pending within the DOI in which the individuals or entities listed on the attached List of Recusals and Quick Reference Chart are parties or represent parties, may require Bureau or Office staff members, Solicitor's Office staff assigned to the matters in question, and the DEO to carefully review my potential participation. Additionally, I understand that there may be times when there will be a delay in reviewing and potentially clearing my participation in matters as a result of screening for ethics compliance. I understand that, while efforts can and will be made to minimize any delays created by ethics recusal reviews, these delays may impact my ability to promptly participate in matters, including certain meetings and other communications.

SECTION 2 – UPDATE THE DEO & SCREENING ARRANGMENT AS NECESSARY

In consultation with the DEO, I will revise and update this memorandum and attachment whenever warranted by changed circumstances, including changes to my financial interests, changes in my personal or business relationships, or any changes to the nature of my Department duties. Finally, I understand that ethics advice must come from the DEO, as only a designated ethics official can make ethics determinations on which Department employees may authoritatively rely upon and will consult with DEO as necessary and appropriate.

Attachment – List of Recusals and Quick Reference Chart

CC: Larry Roberts, Chief of Staff
Laura Daniel-Davis, Principal Deputy Assistant Secretary for Land and Mineral Management
Danna Jackson, Counselor to the BLM Director

Attachment C - List of Recusals and Quick Reference Chart, Nada Culver

Based on information provided to the Departmental Ethics Office (DEO), this attachment lists your recusals from current positions and interests, as well as your former clients, former employers, financial interests, and other recusals. The inclusion of an individual or entity on this list does not necessarily mean that a determination has been made that you will be excluded from participating in all issues, actions, and decisions related to the individual or entity at the Department of the Interior (DOI). Rather, the placement of an individual or entity on this list indicates that further screening must take place and, if necessary, additional advice from the DEO should be sought.

Individual or entity	Within 2 years of appointment (through March 1, 2023)	Within one year of last providing services ¹	At all times	Authorities	Comments
Audubon Society	Do not participate personally and substantially in a particular matter involving specific parties (PMSP), ² including meetings or other communications, that is directly and substantially related to this former employer	As a result of covered relationship, consider whether participating personally and substantially in a PMSP that is directly and substantially related to this former employer raises question of impartiality	Consider appearances and take appropriate steps to avoid an appearance of loss of impartiality in the performance of your official duties and seek DEO advice, as appropriate	E.O. 13989; 5 C.F.R. § 2635.502	
The Wilderness Society	Do not participate personally and substantially in a PMSP, including meetings or other communications, that is directly and substantially related to this former employer		Consider appearances and take appropriate steps to avoid an appearance of loss of impartiality in the performance of your official duties and seek	E.O. 13989; 5 C.F.R. § 2635.502	

¹ Including serving as an “officer, director, trustee, general partner, agent, attorney, consultant, contractor or employee.” 5 C.F.R. § 2635.502(b)(1)(iv).

² For the purpose of the Ethics Pledge, the term “particular matter involving specific parties” has the meaning set forth in 5 C.F.R. § 2641.201(h), except that it also includes **any meeting or other communication relating to the performance of an employee’s official duties**, unless the communication applies to a particular matter of general applicability and participation in the meeting or other event is open to all interested parties.

Individual or entity	Within 2 years of appointment (through March 1, 2023)	Within one year of last providing services ¹	At all times	Authorities	Comments
			DEO advice, as appropriate		
University of Denver Sturm College of Law, your spouse's employer ³			Consider appearances before personal and substantial participation in a PMSP if you know your spouse's employer or client is a party or represents a party to the PMSP and seek DEO guidance if you determine that there is an appearance problem	5 C.F.R. § 2635.502; 5 C.F.R. § 2635.101(b)(14)	Covered relationship ends when your spouse no longer has an employment or client relationship
Benezra and Culver PC, your spouse's law firm			Do not participate personally and substantially in any particular matter that you know has a direct and predictable effect on your personal or imputed financial interests	18 U.S.C. § 208	Participation only permitted if a written waiver, pursuant to 18 U.S.C. § 208(b)(1)
Your spouse's clients ⁴			Consider appearances before personal and	5 C.F.R. § 2635.502;	Covered relationship

³ Including any person or entity for whom your spouse is serving as an "officer, director, trustee, general partner, agent, attorney, consultant, contractor or employee." 5 C.F.R. § 2635.502(b)(1)(iii).

⁴ You have informed us that your spouse's law firm, Benezra and Culver is a plaintiff's employment firm with a focus on representing individual employees, primarily within the State of Colorado. You have not provided a list of current clients at this time, but you will remain responsible for recusals for all covered relationship or other disqualifications based on your spouse's clients.

Individual or entity	Within 2 years of appointment (through March 1, 2023)	Within one year of last providing services ¹	At all times	Authorities	Comments
			substantial participation in a PMSP if you know your spouse's employer or client is a party or represents a party to the PMSP and seek DEO guidance if you determine that there is an appearance problem	5 C.F.R. § 2635.101(b)(14)	ends when your spouse no longer has an employment or client relationship
Ute Distribution Corp.			Do not participate personally and substantially in any particular matter that you know has a direct and predictable effect on your personal or imputed financial interests	18 U.S.C. § 208	Participation only permitted if a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or the asset qualifies for a regulatory exemption
Alphabet, Inc. (GOOG) (GOOGL) stock			Do not participate personally and substantially in any particular matter that you know has a direct and predictable effect on your personal or imputed financial interests	18 U.S.C. § 208	Participation only permitted if a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or the asset qualifies for a

Individual or entity	Within 2 years of appointment (through March 1, 2023)	Within one year of last providing services ¹	At all times	Authorities	Comments
					regulatory exemption
Amazon.com, Inc. (AMZN) stock			Do not participate personally and substantially in any particular matter that you know has a direct and predictable effect on your personal or imputed financial interests	18 U.S.C. § 208	Participation only permitted if a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or the asset qualifies for a regulatory exemption
Caterpillar, Inc. (CAT) stock			Do not participate personally and substantially in any particular matter that you know has a direct and predictable effect on your personal or imputed financial interests	18 U.S.C. § 208	Participation only permitted if a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or the asset qualifies for a regulatory exemption
Citigroup, Inc. (C) stock			Do not participate personally and substantially in any particular matter that you know has a direct and predictable effect	18 U.S.C. § 208	Participation only permitted if a written waiver, pursuant to 18 U.S.C. §

Individual or entity	Within 2 years of appointment (through March 1, 2023)	Within one year of last providing services ¹	At all times	Authorities	Comments
			on your personal or imputed financial interests		208(b)(1), or the asset qualifies for a regulatory exemption
FedEx Corp. (FDX) stock			Do not participate personally and substantially in any particular matter that you know has a direct and predictable effect on your personal or imputed financial interests	18 U.S.C. § 208	Participation only permitted if a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or the asset qualifies for a regulatory exemption
McCormick & Co, Inc. (MKC) stock			Do not participate personally and substantially in any particular matter that you know has a direct and predictable effect on your personal or imputed financial interests	18 U.S.C. § 208	Participation only permitted if a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or the asset qualifies for a regulatory exemption
Microsoft Corp. (MSFT) stock			Do not participate personally and substantially in any	18 U.S.C. § 208	Participation only permitted if a written

Individual or entity	Within 2 years of appointment (through March 1, 2023)	Within one year of last providing services ¹	At all times	Authorities	Comments
			particular matter that you know has a direct and predictable effect on your personal or imputed financial interests		waiver, pursuant to 18 U.S.C. § 208(b)(1), or the asset qualifies for a regulatory exemption
Snap-On, Inc. (SNA) stock			Do not participate personally and substantially in any particular matter that you know has a direct and predictable effect on your personal or imputed financial interests	18 U.S.C. § 208	Participation only permitted if a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or the asset qualifies for a regulatory exemption
Truist Financial (TFC) stock			Do not participate personally and substantially in any particular matter that you know has a direct and predictable effect on your personal or imputed financial interests	18 U.S.C. § 208	Participation only permitted if a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or the asset qualifies for a regulatory exemption

Individual or entity	Within 2 years of appointment (through March 1, 2023)	Within one year of last providing services¹	At all times	Authorities	Comments
The Walt Disney Co. (DIS) stock			Do not participate personally and substantially in any particular matter that you know has a direct and predictable effect on your personal or imputed financial interests	18 U.S.C. § 208	Participation only permitted if a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or the asset qualifies for a regulatory exemption
3M Co. (MMM) stock			Do not participate personally and substantially in any particular matter that you know has a direct and predictable effect on your personal or imputed financial interests	18 U.S.C. § 208	Participation only permitted if a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or the asset qualifies for a regulatory exemption
Johnson & Johnson (JNJ) stock			Do not participate personally and substantially in any particular matter that you know has a direct and predictable effect on your personal or	18 U.S.C. § 208	Participation only permitted if a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or the asset

Individual or entity	Within 2 years of appointment (through March 1, 2023)	Within one year of last providing services ¹	At all times	Authorities	Comments
			imputed financial interests		qualifies for a regulatory exemption
Proctor & Gamble (PG) stock			Do not participate personally and substantially in any particular matter that you know has a direct and predictable effect on your personal or imputed financial interests	18 U.S.C. § 208	Participation only permitted if a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or the asset qualifies for a regulatory exemption
Fortis, Inc. (FTS) stock			Do not participate personally and substantially in any particular matter that you know has a direct and predictable effect on your personal or imputed financial interests	18 U.S.C. § 208	Participation only permitted if a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or the asset qualifies for a regulatory exemption
Adient plc (ADNT) stock			Do not participate personally and substantially in any particular matter that you know has a direct	18 U.S.C. § 208	Participation only permitted if a written waiver, pursuant to 18

Individual or entity	Within 2 years of appointment (through March 1, 2023)	Within one year of last providing services ¹	At all times	Authorities	Comments
			and predictable effect on your personal or imputed financial interests		U.S.C. § 208(b)(1), or the asset qualifies for a regulatory exemption
AT&T (T) stock			Do not participate personally and substantially in any particular matter that you know has a direct and predictable effect on your personal or imputed financial interests	18 U.S.C. § 208	Participation only permitted if a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or the asset qualifies for a regulatory exemption
General Dynamics Corp. (GD) stock			Do not participate personally and substantially in any particular matter that you know has a direct and predictable effect on your personal or imputed financial interests	18 U.S.C. § 208	Participation only permitted if a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or the asset qualifies for a regulatory exemption

Individual or entity	Within 2 years of appointment (through March 1, 2023)	Within one year of last providing services ¹	At all times	Authorities	Comments
Johnson Controls, International plc (JCI) stock			Do not participate personally and substantially in any particular matter that you know has a direct and predictable effect on your personal or imputed financial interests	18 U.S.C. § 208	Participation only permitted if a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or the asset qualifies for a regulatory exemption
Mastercard, Inc. (MA) stock			Do not participate personally and substantially in any particular matter that you know has a direct and predictable effect on your personal or imputed financial interests	18 U.S.C. § 208	Participation only permitted if a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or the asset qualifies for a regulatory exemption
Merck & Co. Inc, (MRK) stock			Do not participate personally and substantially in any particular matter that you know has a direct and predictable effect on your personal or	18 U.S.C. § 208	Participation only permitted if a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or the asset

Individual or entity	Within 2 years of appointment (through March 1, 2023)	Within one year of last providing services ¹	At all times	Authorities	Comments
			imputed financial interests		qualifies for a regulatory exemption
Starbucks Corp. (SBUX) stock			Do not participate personally and substantially in any particular matter that you know has a direct and predictable effect on your personal or imputed financial interests	18 U.S.C. § 208	Participation only permitted if a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or the asset qualifies for a regulatory exemption
Visa, Inc. (V) stock			Do not participate personally and substantially in any particular matter that you know has a direct and predictable effect on your personal or imputed financial interests	18 U.S.C. § 208	Participation only permitted if a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or the asset qualifies for a regulatory exemption
Coty, Inc. (COTY) stock			Do not participate personally and substantially in any particular matter that you know has a direct	18 U.S.C. § 208	Participation only permitted if a written waiver, pursuant to 18

Individual or entity	Within 2 years of appointment (through March 1, 2023)	Within one year of last providing services ¹	At all times	Authorities	Comments
			and predictable effect on your personal or imputed financial interests		U.S.C. § 208(b)(1), or the asset qualifies for a regulatory exemption
Medtronic plc (MDT) stock			Do not participate personally and substantially in any particular matter that you know has a direct and predictable effect on your personal or imputed financial interests	18 U.S.C. § 208	Participation only permitted if a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or the asset qualifies for a regulatory exemption
Synchrony Financial (SYF) stock			Do not participate personally and substantially in any particular matter that you know has a direct and predictable effect on your personal or imputed financial interests	18 U.S.C. § 208	Participation only permitted if a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or the asset qualifies for a regulatory exemption
Alcon (ALC) stock			Do not participate personally and	18 U.S.C. § 208	Participation only permitted

Individual or entity	Within 2 years of appointment (through March 1, 2023)	Within one year of last providing services ¹	At all times	Authorities	Comments
			substantially in any particular matter that you know has a direct and predictable effect on your personal or imputed financial interests		if a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or the asset qualifies for a regulatory exemption
Deere & Co. (DE) stock			Do not participate personally and substantially in any particular matter that you know has a direct and predictable effect on your personal or imputed financial interests	18 U.S.C. § 208	Participation only permitted if a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or the asset qualifies for a regulatory exemption
JPMorgan Chase & Co. (JPM) stock			Do not participate personally and substantially in any particular matter that you know has a direct and predictable effect on your personal or imputed financial interests	18 U.S.C. § 208	Participation only permitted if a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or the asset qualifies for a

Individual or entity	Within 2 years of appointment (through March 1, 2023)	Within one year of last providing services ¹	At all times	Authorities	Comments
					regulatory exemption
Lowe's Companies (LOW) stock			Do not participate personally and substantially in any particular matter that you know has a direct and predictable effect on your personal or imputed financial interests	18 U.S.C. § 208	Participation only permitted if a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or the asset qualifies for a regulatory exemption
Novartis AG (NVS) stock			Do not participate personally and substantially in any particular matter that you know has a direct and predictable effect on your personal or imputed financial interests	18 U.S.C. § 208	Participation only permitted if a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or the asset qualifies for a regulatory exemption
Union Pacific Corp. (UNP) stock			Do not participate personally and substantially in any particular matter that you know has a direct and predictable effect	18 U.S.C. § 208	Participation only permitted if a written waiver, pursuant to 18 U.S.C. §

Individual or entity	Within 2 years of appointment (through March 1, 2023)	Within one year of last providing services ¹	At all times	Authorities	Comments
			on your personal or imputed financial interests		208(b)(1), or the asset qualifies for a regulatory exemption
Verizon Communications, Inc. (VZ) stock			Do not participate personally and substantially in any particular matter that you know has a direct and predictable effect on your personal or imputed financial interests	18 U.S.C. § 208	Participation only permitted if a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or the asset qualifies for a regulatory exemption
Invesco Water Resources ETF (PHO)			Do not participate personally and substantially in any particular matter that you know has a direct and predictable effect on financial interests of any holding of the fund that is invested in the relevant sector	18 U.S.C. § 208	Participation only permitted if a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or the asset qualifies for a regulatory exemption
Alum Rock, California Union			Do not participate personally and substantially in any	18 U.S.C. § 208	Participation only permitted if a written

Individual or entity	Within 2 years of appointment (through March 1, 2023)	Within one year of last providing services ¹	At all times	Authorities	Comments
Elementary school bond			particular matter that you know has a direct and predictable effect on the marketability or market resale value of the bond or the ability or willingness of the issuer to pay the debt obligation		waiver, pursuant to 18 U.S.C. § 208(b)(1), or the asset qualifies for a regulatory exemption
AT&T bond			Do not participate personally and substantially in any particular matter that you know has a direct and predictable effect on the marketability or market resale value of the bond or the ability or willingness of the issuer to pay the debt obligation	18 U.S.C. § 208	Participation only permitted if a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or the asset qualifies for a regulatory exemption
Cisco Systems bond			Do not participate personally and substantially in any particular matter that you know has a direct and predictable effect on the marketability or market resale value of the bond or the ability	18 U.S.C. § 208	Participation only permitted if a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or the asset qualifies for a

Individual or entity	Within 2 years of appointment (through March 1, 2023)	Within one year of last providing services ¹	At all times	Authorities	Comments
			or willingness of the issuer to pay the debt obligation		regulatory exemption
Conoco Phillips bond			Do not participate personally and substantially in any particular matter that you know has a direct and predictable effect on the marketability or market resale value of the bond or the ability or willingness of the issuer to pay the debt obligation	18 U.S.C. § 208	Participation only permitted if a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or the asset qualifies for a regulatory exemption
Berkshire Hathaway bond			Do not participate personally and substantially in any particular matter that you know has a direct and predictable effect on the marketability or market resale value of the bond or the ability or willingness of the issuer to pay the debt obligation	18 U.S.C. § 208	Participation only permitted if a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or the asset qualifies for a regulatory exemption
Verizon Communications, Inc. bond			Do not participate personally and substantially in any	18 U.S.C. § 208	Participation only permitted if a written

Individual or entity	Within 2 years of appointment (through March 1, 2023)	Within one year of last providing services ¹	At all times	Authorities	Comments
			particular matter that you know has a direct and predictable effect on the marketability or market resale value of the bond or the ability or willingness of the issuer to pay the debt obligation		waiver, pursuant to 18 U.S.C. § 208(b)(1), or the asset qualifies for a regulatory exemption
Public Highway Authority Colorado Revenue bond			Do not participate personally and substantially in any particular matter that you know has a direct and predictable effect on the marketability or market resale value of the bond or the ability or willingness of the issuer to pay the debt obligation	18 U.S.C. § 208	Participation only permitted if a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or the asset qualifies for a regulatory exemption



United States Department of the Interior

OFFICE OF THE SOLICITOR

Washington, D.C. 20240

July 27, 2021

MEMORANDUM

To: Nada W. Culver, Deputy Director of Policy and Programs,
Bureau of Land Management

From: Heather C. Gottry, Director, Departmental Ethics Office, and
Designated Agency Ethics Official

Monica L. Garcia, Deputy Director for Ethics Law & Policy, Departmental Ethics
Office & Alternate Designated Agency Ethics Official

Subject: Updated Interim Ethics Guidance on Recusal Obligations

This memorandum provides guidance from the Departmental Ethics Office (DEO) about your ethics obligations while you serve as the Deputy Director of Policy and Programs, Bureau of Land Management for the U.S. Department of the Interior (DOI). The guidance in this memorandum supplements and replaces the Interim Ethics Guidance on Recusal Obligations memorandum issued to you on March 11, 2021 and any interim ethics guidance on recusal obligations provided to you. The guidance in this memorandum is based on information that you have provided and sets forth guidance on your obligation to recuse from participating personally and substantially in certain matters in which you have either direct or imputed financial interests, or personal or business relationship(s), pursuant to ethics laws, regulations, and Executive Order 13989 entitled, “Executive Order on Ethics Commitments by Executive Branch Personnel” (Jan. 20, 2021) (Ethics Pledge).

SECTION 1 – FINANCIAL CONFLICTS OF INTEREST

As required by the criminal conflicts of interest law at 18 U.S.C. § 208(a), you may not participate personally and substantially in any particular matter¹ in which you know that you

¹ Additional guidance provided by the DEO on whether an issue, action, or decision pending at the DOI is a matter, particular matter of general applicability, or a particular matter involving specific parties is found in *Attachment A* to this memorandum.

have a financial interest directly and predictably affected by the matter, or in which you know that a person whose interests are imputed to you has a financial interest directly and predictably affected by the particular matter, unless you first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2), or qualify for a statutory exemption, pursuant to 18 U.S.C. § 208(b)(4). The interests of the following persons are imputed to you:

- Any spouse or minor child;
- Any general partner of a partnership in which you are a limited or general partner;
- Any organization in which you serve as an officer, director, trustee, general partner, or employee; and
- Any person or organization with which you are negotiating or have an arrangement concerning prospective employment.

Your spouse is currently a partner with the law firm of Benezra and Culver, PC. For as long as your spouse continues to work for Benezra and Culver, PC, you should not participate personally and substantially in any particular matter that to your knowledge has a direct and predictable effect on the financial interests of the firm, unless you first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1).

Based on information you have provided to the DEO, including your New Entrant Public Financial Disclosure Report (OGE Form 278e), submitted on May 19, 2021, and certified on June 4, 2021, you have confirmed to the DEO that you or your spouse currently own a number of prohibited interests listed on the 2021 Department of the Interior and 2021 Bureau of Land Management List of Prohibited Investments, both included as *Attachment B* to this memorandum.² Those prohibited interests include:

- AT&T corporate bonds
- Conoco Phillips corporate bonds
- Berkshire Hathaway corporate bonds
- Verizon Communications, Inc. corporate bonds
- AT&T (T) stock
- Fortis, Inc. (FTS) stock
- Union Pacific Corp. (UNP) stock
- Verizon Communications, Inc. (VZ) stock

We note that you have unequivocally committed to divest these interests and are currently working with a member of the DEO's financial disclosure team to seek a certificate of divestiture

² Please see Section 3 of this memorandum for a discussion of the additional ethics requirements imposed by the DOI Supplemental Ethics Regulations on certain personally held financial interests. Your New Entrant OGE Form 278e indicated that you held Berkshire Hathaway, Inc. (BRK.B) stock and Enbridge stock. On May 19, 2021, you submitted a OGE Form 278-T indicating that you sold your interests in BRK.B and Enbridge on April 23, 2021.

(CD) for the sales. While you maintain an ownership interest in these assets, you must recuse from certain matters at the Department, as described below.

In addition, based on information you provided in your OGE Form 278e, the DEO identified a number of stock investments that may require your recusal from certain matters at the Department, including:

- Ute Distribution Corp. stock
- Alphabet, Inc. (GOOG) (GOOGL) stock
- Amazon.com, Inc. (AMZN) stock
- Caterpillar, Inc. (CAT) stock
- Citigroup, Inc. (C) stock
- FedEx Corp. (FDX) stock
- McCormick & Co, Inc. (MKC) stock
- Microsoft Corp. (MSFT) stock
- Snap-On, Inc. (SNA) stock
- Truist Financial (TFC) stock
- The Walt Disney Co. (DIS) stock
- 3M Co. (MMM) stock
- Johnson & Johnson (JNJ) stock
- Proctor & Gamble (PG) stock
- Fortis, Inc. (FTS) stock

The DEO also identified financial interests in securities for which you may potentially rely on a *de minimis* exemption under 5 C.F.R. § 2640.202. If you intend to rely upon this exemption, you must monitor the value of those interests.³ If the aggregate value of interests affected by a particular matter increases and exceeds the *de minimis* threshold, you should not participate personally and substantially in the particular matter that, to your knowledge, has a direct and predictable effect on the interests, unless you first obtain a written waiver pursuant to 18 U.S.C. § 208(b)(1).

In addition, we have identified that you are invested in a sector mutual fund:

- Invesco Water Resources ETF (PHO)

³ Based on the information included in your New Entrant OGE Form 278e, DEO has identified that the following securities may qualify for the *de minimis* exemption: Adient plc (ADNT); AT&T (T); General Dynamics Corp. (GD); Johnson Controls, International plc (JCI); Mastercard, Inc. (MA); Merck & Co. Inc. (MRK); Starbucks Corp. (SBUX); Visa, Inc. (V); Coty, Inc. (COTY); Medtronic plc (MDT); Synchrony Financial (SYF); Alcon (ALC); Deere & Co. (DE); JPMorgan Chase & Co. (JPM); Lowe's Companies (LOW); Novartis AG (NVS); Union Pacific Corp. (UNP); Verizon Communications, Inc. (VZ). Please seek additional guidance if you intend to participate in any particular matter which could have a direct and predictable effect on the financial interest of any of those companies.

Based on the information reported in your New Entrant OGE Form 278e, DEO has identified that the Invesco Water Resources ETF (PHO) may qualify for the *de minimis* exemption for sector mutual funds. If you rely on a *de minimis* exemption under 5 C.F.R. § 2640.201(b) with regard to any of your financial interests in sector mutual funds, please monitor the value of those interests. If the aggregate value of your interests in sector mutual funds that concentrate in any one sector exceeds \$50,000, you should not participate personally and substantially in any particular matter that to your 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 you first obtain a written waiver pursuant to 18 U.S.C. § 208(b)(1).

Furthermore, based on information you provided in your OGE Form 278e, the DEO identified a number of bond investments that may require your recusal from certain matters at the Department, including:

- Alum Rock, California Union Elementary school bond
- AT&T bond
- Cisco Systems bond
- Conoco Phillips bond
- Berkshire Hathaway bond
- Verizon Communications, Inc. bond
- Public Highway Authority Colorado Revenue bond

You should recuse from particular matters in which these bonds pose a conflict of interest and because these corporate bonds constitute a debt owed by the issuer to the bondholder, they are not an equity interest in the entity that issued the debt. Therefore, for as long as you own these interests, you must not participate personally and substantially in any particular matter that to your knowledge has a direct and predictable effect on the marketability or market resale value of any of these bonds or on the ability or willingness of the issuer to pay their debt obligations, unless you first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2).

The list of your financial interests that require your recusal from certain matters at the Department is also included as *Attachment C* to this memorandum for reference.

You have informed the DEO that you currently use the services of a managed account or an investment professional. The DEO advises that you ensure that the account manager or investment professional obtains your prior approval on a case-by-case basis for the purchase of any asset other than cash, cash equivalents, or investment funds that qualify for the regulatory exemption for diversified mutual funds and unit investment trusts at 5 C.F.R. § 2640.201(a), or obligations of the United States.

Finally, in the event that an actual or potential conflict of interest arises during your appointment, you should consult with the DEO immediately and take the measures necessary to

resolve the conflict, such as recusal from the particular matter or divestiture of an asset. Throughout your appointment, you must remain vigilant about your personal and any imputed financial interests and notify the DEO immediately should either they or your duties and responsibilities at the DOI change so you can receive updated ethics guidance.

SECTION 2 – IMPARTIALITY

As required by 5 C.F.R. § 2635.502(a), if you know that a particular matter involving specific parties⁴ is likely to have a direct and predictable effect on the financial interest of a member of your household, or know that a person with whom you have a “covered relationship”⁵ is or represents a party to such matter, and where you determine that the circumstances would cause a reasonable person with knowledge of the relevant facts to question your impartiality in the matter, you will not participate in the matter unless you have informed the DEO of the appearance problem and received written authorization from the DEO to participate in the matter pursuant to 5 C.F.R. § 2635.502(d).

Based on information you have provided, including information in your certified New Entrant OGE Form 278e, the DEO identified that you have a “covered relationship” with the following individuals and/or entities:

- National Audubon Society, former employer – terminated employment in February 2021
- University of Denver Sturm College of Law, your spouse’s employer
- Benezra and Culver, PC, your spouse’s employer
- Your spouse’s clients.⁶

Accordingly, unless you receive prior DEO authorization, you should not participate in any particular matter involving specific parties in which you know any of the individuals or entities listed above is a party or represents a party, if you determine that a reasonable person with knowledge of the relevant facts would question your impartiality in the matter. This

⁴ Additional guidance on whether an issue, action, or decision pending at the DOI is a particular matter involving specific parties is found in *Attachment A* to this memorandum.

⁵ Please note that for purposes of 5 C.F.R. § 2635.502(a), you have a “covered relationship” with: (1) A person, other than a prospective employer described in 5 C.F.R. § 2635.603(c), with whom you have or seek a business, contractual or other financial relationship that involves other than a routine consumer transaction; (2) A person who is a member of your household, or who is a relative with whom you have a close personal relationship; (3) A person for whom your spouse, parent or dependent child is, to your knowledge, serving or seeking to serve as an officer, director, trustee, general partner, agent, attorney, consultant, contractor or employee; (4) Any person for whom you have, within the last year, served as officer, director, trustee, general partner, agent, attorney, consultant, contractor or employee; or (5) An organization, other than a political party described in 26 U.S.C. § 527(e), in which you are an active participant.

⁶ You have informed us that your spouse’s law firm, Benezra and Culver is a plaintiff’s employment firm with a focus on representing individual employees, primarily within the State of Colorado. You have not provided a list of current clients at this time, but you will remain responsible for recusals for all covered relationship or other disqualifications based on your spouse’s clients. For ease of reference, your recusals are identified in *Attachment C* to this memorandum.

disqualification requirement may expand to a number of issues, actions, and decisions involving the individuals or entities listed above and we recommend that you consult with the DEO for additional guidance as needed. Please note that you are in the best position to know and identify your “covered relationships.” Please update the DEO if you identify additional “covered relationships” or if your identified “covered relationships” change.

In determining whether circumstances other than those specifically described in 5 C.F.R. § 2635.502(a) would raise a question regarding your impartiality in performing your official duties, you must consider the relevant facts about the particular matter in question and determine whether you believe that a reasonable person with knowledge of those facts would question your impartiality in performing your official duties in the particular matter. If you personally determine that a reasonable person with knowledge of the relevant facts would not question your impartiality in performing your official duties in the particular matter, then you may participate in the particular matter as part of your official duties. Additional guidance on whether an issue, action, or decision pending at the DOI is a particular matter is found in *Attachment A* to this memorandum.

In addition to the requirements discussed above related to 5 C.F.R. § 2635.502, as set forth in the Fourteen General Principles of Ethical Conduct, you must take steps to avoid any action that creates the appearance that you are violating the law or the ethical standards set forth in 5 C.F.R. Part 2635. 5 C.F.R. § 2635.101(b)(14). In considering whether a particular set of circumstances will create an appearance that the law or the ethical standards have been violated, you will need to assess the circumstances from the perspective of a reasonable person with knowledge of the relevant facts. As appearance issues can be complex, please consult as needed and appropriate with the DEO for further ethics guidance and assistance.

SECTION 3 – DOI SUPPLEMENTAL ETHICS REGULATIONS

As you are a Bureau of Land Management employee, you are prohibited by 43 U.S.C. § 11 from directly or indirectly purchasing or becoming interested in the purchase of any public land. In addition, 30 U.S.C. § 1211(f) prohibits you from holding a direct or indirect financial interest in any surface or underground coal mining operation if you perform any function or duty under Chapter 25 of Title 30 of the U.S. Code.

Pursuant to 5 C.F.R. § 3501.103(b) you are also prohibited from acquiring or holding any direct or indirect financial interest in Federal lands or resources administered or controlled by the DOI. This prohibition precludes stock or bond investments in many companies that hold DOI-granted permits and leases in Federal lands. The DEO has provided you with a list of prohibited investments (2021 List of Prohibited Investments and 2021 BLM List of Prohibited Investments), included as *Attachment B* to this memorandum, which includes investments in certain companies with oil, gas, solar, wind, and geothermal permits or leases on, or mineral rights in Federal lands above certain thresholds.

Additionally, absent a waiver under 5 C.F.R. § 3501.103(e), you, your spouse, and any of your minor children are prohibited by 5 C.F.R. § 3501.103(c) from acquiring or retaining any claim, permit, lease, small tract entries, or other rights that are granted by the DOI in Federal lands. This prohibition does not limit the recreational or other personal and noncommercial use of Federal lands on the same terms as use of Federal lands is available to the general public. 5 C.F.R. § 3501.103(c)(2)(i).

Based on information provided to the DEO, including in your certified New Entrant OGE Form 278e:

1. You currently hold financial interests identified on the 2021 Department of the Interior and 2021 BLM List of Prohibited Investments, included as *Attachment B* to this memorandum and are working with DEO to voluntarily divest your interests.
2. You confirmed that neither your spouse, any of your minor children, and you do not occupy or use Federal lands (other than on the same terms as use of Federal lands is available to the general public), and do not take any benefits from Federal lands, based upon a contract, grant, lease, permit, easement, rental, agreement, mineral rights, grazing rights, or other holdings DOI issues or regulates.

In order to ensure compliance with the requirements of the DOI Supplemental Ethics Regulations, you must not acquire any financial interests identified on the 2021 List of Prohibited Investments or such lists published annually thereafter. You also must immediately update the DEO if you or your spouse or any of your minor children occupy or use Federal lands (other than on the same terms as use of Federal lands is available to the general public), and you and your spouse and any of your minor children must not take any benefits from Federal lands, based upon a contract, grant, lease, permit, easement, rental, agreement, mineral rights, grazing rights, or other holdings DOI issues or regulates.

SECTION 4 - OBLIGATIONS UNDER THE ETHICS PLEDGE

As a Biden Administration political appointee, you signed the Ethics Pledge required under Executive Order No. 13989 entitled, “Executive Order on Ethics Commitments by Executive Branch Personnel” (Jan. 20, 2021), on March 1, 2021, and are bound by the requirements and restrictions contained therein. A copy of your signed Ethics Pledge is included as *Attachment D* to this memorandum.

First, pursuant to the requirements of paragraph 2 of the Ethics Pledge, you may not participate personally and substantially, for two (2) years after the date of your appointment on January 20, 2021, in any particular matter involving specific parties that is directly and

substantially related to your former employer⁷ or former clients,⁸ including regulations and contracts, unless you are first granted a waiver under the Ethics Pledge.

For purposes of paragraph 2 of the Ethics Pledge, and based on information provided to the DEO, your former employer(s) and former client(s) under the Ethics Pledge include:

- National Audubon Society
- The Wilderness Society⁹

For purposes of the Ethics Pledge, the term “particular matter involving specific parties” has the meaning set forth in 5 C.F.R. § 2641.201(h),¹⁰ except that it also includes any meeting or other communication relating to the performance of your official duties, unless the communication concerns a particular matter of general applicability and is made at a meeting or other event at which participation is open to all interested parties. OGE has advised the term “open to all interested parties” means that the meeting should include a multiplicity of parties representing a diversity of viewpoints. If a former employer or a former client is present, then, generally speaking, at least four other separate stakeholders should be present to ensure that a diversity of viewpoints is represented and not the same united perspective. DO-09-011.

You have confirmed to the DEO that you were not registered under the Lobbying Disclosure Act, 2 U.S.C. 1601 *et seq.*, or the Foreign Agents Registration Act (FARA), 22 U.S.C. 611 *et seq.*, within the 2 years before the date of your appointment. Accordingly, the

⁷ For purposes of paragraph 2 of the Ethics Pledge, “former employer” is any person for whom you have within the two (2) years prior to the date of your appointment served as an employee, officer, director, trustee, or general partner, except that “former employer” does not include any executive agency or other entity of the Federal Government, State or local government, the District of Columbia, Native American tribe, any United States territory or possession, or any international organization in which the United States is a member state. Executive Order 13989, Section 2(k). For additional guidance on the definition of “former employer” please see OGE Legal Advisory DO-09-011, *Ethics Pledge: Revolving Door Ban--All Appointees Entering Government* (Mar. 26, 2009) (DO-09-011), which applies to Executive Order 13989 pursuant OGE Legal Advisory LA-21-03, *Executive Orders on Ethics Commitments by Executive Branch Personnel* (Jan. 22, 2021) (LA-21-03).

⁸ For purposes of paragraph 2 of the Ethics Pledge, “former client” is any person for whom you served personally as agent, attorney, or consultant within the two (2) years prior to the date of appointment, but excluding instances where the service provided was limited to speeches or similar appearances. It does not include clients of your former employer to whom you did not personally provide services. Executive Order 13989, Section 2(l). Additional guidance on the definition of “former client” is found in DO-09-011, which applies to Executive Order 13989 pursuant LA-21-03. Additionally, “former client” does not include any executive agency or other entity of the Federal Government, State or local government, the District of Columbia, Native American tribe, any United States territory or possession, or any international organization in which the United States is a member state. DO-09-011; LA-21-03.

⁹ You informed the DEO that you terminated employment with The Wilderness Society in May 2019. Therefore, because you were employed by The Wilderness Society in the two (2) years prior to the date of your appointment to the Department, you are required to comply with the disqualification requirements of paragraph 2 of the Ethics Pledge with respect to The Wilderness Society.

¹⁰ A “particular matter involving specific parties” will typically involve “a specific proceeding affecting the legal rights of the parties or an isolatable transaction or related set of transactions between identified parties, such as a specific contract, grant, license, product approval application, enforcement action, administrative adjudication, or court case.” 5 C.F.R. § 2641.201(h).

recusal requirements under paragraph 3 of the Ethics Pledge are not applicable to your work at the DOI.

Finally, you have confirmed for the DEO that you have complied with paragraph 7 of the Ethics Pledge and did not accept and will not accept, including after entering Government, any salary or other cash payment from your former employer the eligibility for and payment of which is limited to individuals accepting a position in the United States Government. You further confirmed that you also have not accepted and will not accept any non-cash benefit from your former employer that is provided in lieu of such a prohibited cash payment.

SECTION 5 – ADDITIONAL ETHICS CONSIDERATIONS

We understand that you are an attorney, and previously provided legal services to clients prior to your assuming your position at DOI. Please be advised that the Rules of Professional Responsibility are beyond the scope of the DEO's review, so you should review your applicable Rules of Professional Responsibility in order to ensure that you are in compliance with any applicable requirements during your appointment at DOI. In particular, you should ensure that you take all necessary steps, including removing yourself as counsel, to comply with the requirements of 18 U.S.C. § 203, which prohibits an employee from receiving, agreeing to receive, or soliciting compensation for representational services, rendered either personally or by another, before any court or Federal agency or other specified Federal entity, in connection with any particular matter in which the United States is a party or has a direct and substantial interest, and 18 U.S.C. § 205, which prohibits Federal employees from personally representing anyone before any court or Federal agency or other specified Federal entity, in connection with any particular matter in which the United States is a party or has a direct and substantial interest.

SECTION 6 – IMPLEMENTATION OF ETHICS GUIDANCE

To assist you in implementing the ethics guidance set forth in this memorandum, the DEO has prepared a List of Recusals and Quick Reference Chart, included as *Attachment C* to this memorandum. You have an obligation to continue to update the DEO about changed circumstances, including changes to your financial interests, changes in your personal or business relationships, or any changes to the nature of your DOI duties and responsibilities, so that the ethics guidance provided in this memorandum can be updated as needed and your recusal obligations can be documented. The DEO will also assist you in documenting your recusal obligations through a separate Ethics Recusals & Screening Arrangement memorandum, which also meets the requirements of Section 4(a)(iii) of Executive Order 13989.

SECTION 7 – UPDATE THE DEO AS NECESSARY

In consultation with the DEO, please revise and update this memorandum and *Attachment C - List of Recusals and Quick Reference Chart* whenever warranted by changed

circumstances, including completion of your required divestitures and other changes to your financial interests, changes in your personal or business relationships, or any changes to the nature of your Department duties.

As a reminder, only a designated ethics official from the DEO can make ethics determinations on which DOI employees may authoritatively rely upon. Therefore, throughout the duration of your appointment, please contact the DEO with any questions about your recusal obligations discussed above or for further ethics guidance.

Attachment A – Guidance for Recusal Analysis

Attachment B – 2021 List of Prohibited Investments

(Department of the Interior and Bureau of Land Management)

Attachment C – List of Recusals and Quick Reference Chart

Attachment D – Ethics Pledge (signed March 1, 2021)

From: [DeLuca, Mary E](#)
To: [Gottry, Heather C](#)
Cc: [Siemer, Heather L](#)
Subject: Culver Complaint
Date: Tuesday, August 31, 2021 10:56:13 AM

Hello Heather.

I am an Investigative Counsel with the DOI OIG. We spoke a few months ago with Deb Raviv and Tom Davis regarding the Jackson matter.

My colleague, Special Agent Heather Siemer, and I have been assigned to investigate the complaint against Ms. Nada Culver. We would like to speak with you to get some background information on the complaint.

Would you be available this week? If so, could you provide us a few dates/times that would work for you? I am unavailable on Friday. We can also push our call into next week if that is better for you.

Thank you.

Mary Beth DeLuca
Investigative Counsel
Department of the Interior
Office of Inspector General
Special Investigations and Reviews
(202) 924-0835

From: [Garcia, Monica L](#)
To: [Gottry, Heather C](#)
Subject: Culver Corrected Guidance
Date: Friday, September 3, 2021 3:17:57 PM
Attachments: [Culver Nada - Ethics Recusal Guidance Memorandum \(final2 9.3.21\).pdf](#)

Please see attached for signature, with typos corrected. My apologies for the oversight.

mlg

Please note: I will be teleworking until further notice

Monica L. Garcia
Deputy Director for Ethics Law & Policy
and Alternate Designated Agency Ethics Official
Departmental Ethics Office | Office of the Solicitor
U.S. Department of the Interior | MIB 5316
(O): (202) 208-0460
(C): (202) 880-4474
Email: monica.garcia@sol.doi.gov

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Nada,

After reviewing the information provided to the Departmental Ethics Office (DEO) and supporting materials, **subject to the guidance in the “Conflict of Interest/Impartiality Review” section below**, we have identified no legal objection under the ethics statutes and regulations, or the Administration’s Ethics Pledge (Ethics Pledge), to you participating in virtual meetings with the following CEOs of the following companies from the energy industry:

Meeting 1

1. Ben Van Beurden, Shell Oil Company (Shell);
2. Bernard Looney, BP PLC (BP);
3. Anders Opedal, Equinor ASA (Equinor); and
4. Chistopher Hunt, Anschutz Exploration Company (Anschutz)

Shell is the United States based wholly owned subsidiary of Royal Dutch Shell, which is amongst the largest oil companies in the world. BP is a British oil and gas company headquartered in London, England. Equinor is a Norwegian state-owned multinational energy company headquartered in Stavanger, Norway. Anschutz is a private, independent oil and gas company with current projects located in Wyoming, Colorado and Utah.

Meeting 2

1. Greg Lalicker, Hilcorp;
2. Tom Jorden, Cimarex;
3. Bill Thomas, EOG Resources, Inc (EOG);
4. Ryan Lance, ConocoPhillips; and
5. Loris Tealdi, Eni S.p.A (ENI).

Hilcorp the largest privately owned oil and natural gas company in the country. Cimarex is an exploration and production company with operations in Oklahoma, Texas and New Mexico. EOG is an American energy company engaged in hydrocarbon exploration. ConocoPhillips is Alaska's largest crude oil producer and largest owner of exploration leases. ENI is an Italian multinational oil and gas company headquartered in Rome.

Meeting 3

1. Thonas M. Hart, Jonah Energy LLC (Jonah);
2. Scott Douglas Sheffield, Pioneer Natural Resources (Pioneer);
3. Ken Waits, Mewbourne Oil Company (Mewbourne);
4. David H. Keyte, Caerus Oil and Gas LLC (Caerus); and
5. Richard E. Muncrief, Devon Energy (Devon).

Jonah is a privately held, growth-oriented company focused on the acquisition and development of producing oil and natural gas properties located in North America. Pioneer is a company engaged in hydrocarbon exploration headquartered in Irving, Texas. Mewbourne specializes in the exploration and production of oil and natural gas. Caerus operates and drills for oil throughout the Rocky Mountains and Kansas. Devon is an American energy company engaged in hydrocarbon exploration in the American market. Headquartered in The Woodlands, Texas.

Official Meetings and Nexus to DOI Mission – It is our understanding that the purpose of these meetings is to broadly discuss: (1) The Department’s priorities to build a clean energy economy; (2) The Federal oil and gas leasing review, including Executive Order 14008 – tackling climate control; (3) The Federal oil and gas review process; and (4) The above CEOs will introduce themselves and share comments with DOI Secretary Deb Haaland. The nexus between DOI’s mission and these topics allows these meetings to be categorized as official meetings for you. We understand that Secretary Deb Haaland, Amanda Lefton, Laura Daniel-Davis, Steve Feldgus, Raina Thiele (meeting no. 2 only), Shantha Ready Alonso, Danielle Decker, Liz Klein, Kate Kelly, and Larry Roberts may also participate for DOI.

Conflicts of Interest/Impartiality Review – Your appointment date at DOI was April 11, 2021. Within 30 days of your appointment date, you were required to file a New Public Financial Disclosure Report (OGE Form 278e). As your OGE Form 278e has not been reviewed and certified and a recusal list finalized, DEO cannot make a complete assessment of any potential conflicts of interest that may prevent or limit your participation in the virtual meeting under 18 U.S.C. § 208 or 5 C.F.R. § 2635.502. We conducted our review based on the available information at this time. Our available information includes information provided on your resume, your responses to preliminary questions, and ethics officials’ notes from discussions. To date, we identified current recusals with the following entities:

- National Audubon Society;
- Benezra and Culver, P.C. law firm; and
- Clients of Benezra and Culver, P.C. law firm.

*Please note that you are in the best position to know and identify your personal and imputed financial interests, your “covered relationships,” and your former employers and clients as defined in the Ethics Pledge, so please let us know if the list above is not complete.

18 U.S.C. § 208 – The following guidance is provided to you in an abundance of caution as your uncertified New Entrant OGE Form 278e reflects that your spouse holds corporate bonds in ConocoPhillips (bonds). Pursuant to 18 U.S.C. § 208, you are prohibited from participating personally and substantially in any particular matter in which you know that you have a financial interest directly and predictably affected by the matter, or in which you know that a person whose interests are imputed to you has a financial interest directly and predictably affected by the particular matter, unless you first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2) or 18 U.S.C. § 208(b)(4). Accordingly, please be advised that you are prohibited from participating personally

and substantially in any particular matter that you know would directly and predictably affect either: (1) ConocoPhillips's ability or willingness to repay its debt obligations; or (2) the market resale value of any of the bonds (by affecting market interest rates or the ConocoPhillips's credit rating, for example). In the unlikely event such a particular matter were to come before you, please consult with DEO prior to participating in the matter for additional guidance.

Ethics Pledge – You are covered by the revolving door ban in the Ethics Pledge stating that you will not, for a period of two years from the date of your appointment, participate in any particular matter involving specific parties that is directly and substantially related to your former employer or former clients, including regulations and contracts. Exec. Order No. 13989. Based on the information currently before the DEO, this meeting should not implicate any restriction under the Ethics Pledge.

General Ethics Guidance on Meetings:

We remind you of the following standard guidance for participating in meetings:

1. **Other External Attendees** – If any additional parties external to the Department are added to the list of expected meeting attendees, please let DEO know sufficiently in advance so that we can review and make a determination with respect to the new expected attendee(s).
2. **Nonpublic Information and Party Matters** – Department officials must refrain from disclosing nonpublic information at meetings with external parties (5 C.F.R. § 2635.703) and should, to the extent possible, refrain from discussing and making any commitments about any particular matters involving specific parties, such as litigation, contracts, leases, permits, etc.
3. **No Endorsement** – Department officials may not use their official position or title, or any authority associated with their public office, to endorse any product, service, or enterprise. This includes nonprofit and charitable organizations. 5 C.F.R. § 2635.702(c).
4. **No Preferential Treatment** – Department officials must act impartially and not give preferential treatment to any private organization or individual and must avoid creating even the appearance that they are violating this requirement. 5 C.F.R. § 2635.101(b)(8), (14).
5. **Gifts** – Outside parties to the meeting are prohibited sources under the rules on gifts from outside sources. Under those rules, a gift from a prohibited source may not normally be accepted. Consequently, we advise that no gifts be accepted in conjunction with this meeting.
6. **No Partisan Political Activity** – While Department officials may discuss the Administration's policy priorities and ideological approach to proposed laws and

regulations at this meeting, they must strictly avoid partisan political activity in order to remain in compliance with the Hatch Act. Partisan political activity is any activity directed toward the success or failure of a political party, candidate for a partisan political office, or partisan political group and can include verbal remarks and speech.

Please let us know if you have any questions or concerns.

Thank you,

Simon

From: [Garcia, Monica L](#)
To: [Gottry, Heather C](#)
Subject: Culver ERSA
Date: Wednesday, June 30, 2021 6:48:58 PM
Attachments: [Culver, Nada - Draft Recusal and Screening Agreement \(Draft for Review 6.18.21\).docx](#)

As we discussed.

Please note: I will be teleworking until further notice

Monica L. Garcia
Deputy Director for Ethics Law & Policy
and Alternate Designated Agency Ethics Official
Departmental Ethics Office | Office of the Solicitor
U.S. Department of the Interior | MIB 5316
(O): (202) 208-0460
(C): (202) 880-4474
Email: monica.garcia@sol.doi.gov

Visit us online at www.doi.gov/ethics

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From: [Derting, Elizabeth K](#)
To: [Garcia, Monica L](#)
Subject: Culver FD Report

Microsoft Teams meeting

Join on your computer or mobile app

Click here to join the meeting (b)(5)

[REDACTED]

Or call in (audio only)

(b)(5) United States, Washington DC

Phone Conference ID: (b)(5)

Find a local number <<https://dialin.teams.microsoft.com/4c997179-2249-4e53-b877-e71d83c10c7a?id=482409210>> | Reset PIN
<<https://mysettings.lync.com/pstnconferencing>>

Learn More <<https://aka.ms/JoinTeamsMeeting>> | Meeting options (b)(5)

[REDACTED]

From: [Gottry, Heather C](#)
To: [Raviv, Deborah A](#); [Futrowsky, Steven G](#)
Cc: [Garcia, Monica L](#)
Subject: Culver Final Ethics Guidance and Follow Up
Date: Thursday, July 29, 2021 8:51:35 AM
Attachments: [Culver Nada - Ethics Guidance on Recusals Memorandum \(07.27.21\).pdf](#)

Deborah and Steve – Good morning! Attached please find the updated ethics guidance memorandum that we provided to Ms. Culver on Tuesday. Also, I confirmed with my team that we do not have any records of requests for advice from/on behalf of, or the provision of guidance to, Ms. Culver specifically about BLM’s recent determinations with respect to Public Land Orders (PLOs) for mineral development in Alaska. However, we did provide guidance to Ms. Culver and her team on certain meetings where it is possible that mineral development in Alaska may have been discussed. Please let me know if it would be helpful to discuss further or if we can be of any assistance. Thank you.

- Heather

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

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

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From: [Garcia, Monica L](#)
To: [Gottry, Heather C](#)
Subject: Culver Guidance & ERSA
Date: Wednesday, July 14, 2021 3:56:30 PM
Attachments: [Culver Nada - Ethics Recusal Guidance Memorandum \(Final 7.14.21\).docx](#)
[Culver, Nada - Draft Recusal and Screening Agreement \(Draft for Review 7.14.21\).docx](#)
[Culver, Nada - Attachments A -D.pdf](#)

Heather – Final draft for review. Please let me know if you'd like me to prep an email to Nada for your review. Thanks!

-Monica

Please note: I will be teleworking until further notice

Monica L. Garcia
Deputy Director for Ethics Law & Policy
and Alternate Designated Agency Ethics Official
Departmental Ethics Office | Office of the Solicitor
U.S. Department of the Interior | MIB 5316
(O): (202) 208-0460
(C): (202) 880-4474
Email: monica.garcia@sol.doi.gov

Visit us online at www.doi.gov/ethics

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From: [Garcia, Monica L](#)
To: [Gottry, Heather C](#)
Subject: Culver Interim Recusal Memo
Date: Thursday, March 11, 2021 2:10:16 PM
Attachments: [Interim Ethics Recusal Memo - Culver \(3.11.21\).pdf](#)

For review and signature.

Monica

Please note: I will be teleworking until further notice

Monica L. Garcia
Deputy Director for Ethics Law & Policy
and Alternate Designated Agency Ethics Official
Departmental Ethics Office | Office of the Solicitor
U.S. Department of the Interior | MIB 5316
(O): (202) 208-0460
(C): (202) 880-4474
Email: monica.garcia@sol.doi.gov

Visit us online at www.doi.gov/ethics

Integrity is Our Mission.

From: [Garcia, Monica L](#)
To: [Gottry, Heather C](#)
Subject: Culver Memo for Signature
Date: Tuesday, July 27, 2021 11:49:06 AM
Attachments: [Culver Nada - Ethics Recusal Guidance Memorandum with Attachments \(7.27.21\).pdf](#)

Please see attached.

Please note: I will be teleworking until further notice

Monica L. Garcia
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Nada,

After reviewing the information provided to the Departmental Ethics Office (DEO) and supporting materials, **and subject to the cautionary guidance in the “Ethics Pledge” section below**, we have identified no legal objection under the ethics statutes and regulations, or the Administration’s Ethics Pledge (Ethics Pledge), to you accepting and participating in a virtual meeting with the following individuals:

- Mayor Harry Brower, Jr., Mayor, North Slope Borough, Alaska (NSB);
- David J. (D.J.) Fauske, Director of Government and External Affairs, NSB;
- Alan Mintz, Partner, Van Ness Feldman LLP, Counsel to NSB; and
- Andrew VanderJack, Partner, Van Ness Feldman LLP, Counsel to NSB.

The official incorporated municipal government of NSB represents eight Alaska Native communities living in a region approximately 94,000 square miles in size located in northern Alaska, north of the Arctic Circle: Anaktuvuk Pass (Anaqtuuvak), Atkasuk, Kaktovik (Qaatuġvik), Nuiqsut (Nuiqsat), Point Hope (Tikiġaq), Point Lay (Kali), Wainwright (Ulġuniq), and Utqiagvik (Barrow). Of note, the Arctic Slope Regional Corporation (ASRC), a private for-profit corporation, is owned by and represents the business interests of its approximately 13,000 Iñupiat shareholders in the villages of Anaktuvuk Pass, Atkasuk, Kaktovik, Nuiqsut, Point Hope, Point Lay, Wainwright, and Utqiagvik. ASRC owns nearly 5 million acres of surface and subsurface lands on the North Slope of Alaska, including 92,000 acres on the coastal edge of the Arctic National Wildlife Refuge (ANWR). The Mayor of NSB, as Chief Administrative Officer, is responsible for the proper administration of all NSB affairs.

Van Ness Feldman is a law and government relations firm specializing in energy, environment, natural resources, and native affairs. As disclosed in the meeting request form and confirmed per our review of the Senate Lobbying database, Mr. Mintz and Mr. VanderJack currently are registered lobbyists, and Van Ness Feldman LLP is a lobbying organization, lobbying on behalf of NSB.

Official Meeting and Nexus to DOI Agency Mission – It is our understanding that the purpose of the meeting is to discuss ways to support a cooperative, working relationship between the NSB and Department of the Interior (DOI) on matters related to land and resource management on the North Slope of Alaska. The Mayor will introduce himself and the NSB, discuss the role of DOI within the NSB region, and discuss areas where DOI’s decisions and policies related to conservation, climate change, oil and gas development, Alaska Native subsistence rights, and a range of other land and resource management issues impact the NSB and its residents. The nexus between the DOI mission and the aforementioned topics allows this to be categorized as an official meeting. Also attending the meeting are Principal Deputy Assistant Secretary for Land and Minerals Management Laura Daniel-Davis, Principal Deputy Assistant Secretary for Fish and Wildlife and Parks Shannon Estenoz, Deputy Assistant Secretary for Land and Minerals Management Steven Feldgus, and Senior Advisor for Alaska Affairs and Strategic Priorities Raina Thiele. As counsel to NSB will be in attendance, we also recommend including a representative from the Office of the Solicitor at the meeting.

We also note for your awareness that, although not included among the topics of discussion based on the information provided to DEO, NSB has intervened in support of the Bureau of Land Management (BLM) in four lawsuits challenging BLM's approval of the ANWR oil and gas leasing program. Additionally, NSB submitted an amicus brief in support of BLM in two lawsuits challenging BLM's approval of the Master Development Plan for the Willow Project. Further, NSB filed an amicus brief supporting the Fish and Wildlife Service's determination that listing the Pacific walrus is not warranted.

Of further note, Van Ness Feldman disclosed the following cases, in which the firm is currently actively involved, and which may come up as part of the meeting discussion:

- Case No. 21-35095, AK No. 3:30-cv-00308-SLG (*Center for Biological Diversity, et al., v. Bureau of Land Management, et al., and ConocoPhillips Alaska, Inc., et al.*)
- Case No. 21-35085, AK No. 3:20-cv-00290-SLG (*Sovereign Inupiat for a Living Arctic, et al., v. Bureau of Land Management, et al., and ConocoPhillips Alaska Inc., et al.*)
- Case No. 3:20-cv-00224-SLG (*State of Washington, et al., v. Haaland, et al.*)
- Case No. 3:20-cv-00223-SLG (*Native Village of Venetie Tribal Government, et al., v. Haaland, et al.*)
- Case No. 3:20-cv-00205-SLG (*National Audubon Society, et al., v. Haaland, et al.*)
- Case No. 3:20-cv-00204-SLG (*Gwich'in Steering Committee, et al., v. Haaland, et al.*)
- Case No. 19-35981, D.C. No. 3:20-cv-00064-SLG (*Center for Biological Diversity v. Haaland, et al.*)

Based on the information provided, as well as our review of the parties and representatives to this litigation identified in PACER, we have identified that your former employer, the National Audubon Society, is a party to one of the cases above: Case No. 3:20-cv-00205-SLG (*National Audubon Society, et al., v. Haaland, et al.*). Therefore, the National Audubon Society is considered a specific party to the ANWR litigation. If you were involved in any other case listed above, your former employers or former clients are parties to any other cases above, or you have filed an amicus brief in these matters, please inform us immediately so that we may further assess whether you may participate in issues, actions, or decisions at DOI related to such litigation, as we will first need to determine whether the issue, action, or decision in front of you is a particular matter involving specific parties.

Conflicts of Interest/Impartiality Review – Your appointment date at DOI was April 11, 2021. Within 30 days of your appointment date, you were required to file a New Public Financial Disclosure Report (OGE Form 278e). As your OGE Form 278e has not been reviewed and certified and a recusal list finalized, DEO cannot make a complete assessment of any potential conflicts of interest that may prevent or limit your participation in this virtual meeting under 18 U.S.C. § 208 or 5 C.F.R. § 2635.502. We conducted our review based on the information available at this time. Our available information includes information provided on your resume, your responses to preliminary questions, and ethics officials' notes from discussions. To date, we identified current recusals with the following entities:

- National Audubon Society;

Commented [BKM1]: FYSA, the Wilderness Society was also a party in the ANWR litigation. See case number: 3:20-cv-00204-SLG (*Gwich'in Steering Committee et al. v. Haaland et al.*). However, because Culver has not worked for this organization since May 2019, Culver no longer has a "covered relationship" with this entity. Thus, I have not mentioned it here.

Commented [BKM2]: Highlighting here that Culver's former employer was also involved in the ANWR litigation to which NSB submitted an amicus brief as an intervenor-defendant. See case number: 3:20-cv-00205-SLG (*National Audubon Society et al. v. Haaland et al.*).

Commented [BKM3]: Unsure how to address the specific party issue here. Highlighting for your review.

- Benezra and Culver, P.C. law firm; and
- Clients of Benezra and Culver, P.C. law firm.

*Please note that you are in the best position to know and identify your personal and imputed financial interests, your “covered relationships,” and your former employers and clients as defined in the Ethics Pledge, so please let us know if the list above is not complete.

18 U.S.C. § 208 – The following guidance is provided to you in an abundance of caution as your uncertified New Entrant OGE Form 278e reflects that your spouse holds corporate bonds in ConocoPhillips. Like NSB, ConocoPhillips was an intervenor-defendant in the aforementioned ANWR litigation. Under 18 U.S.C. § 208, you are prohibited from participating personally and substantially in any particular matter in which you know that you have a financial interest directly and predictably affected by the matter, or in which you know that a person whose interests are imputed to you has a financial interest directly and predictably affected by the particular matter, unless you first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2) or 18 U.S.C. § 208(b)(4). Accordingly, please be advised you are prohibited from participating personally and substantially in any particular matter that you know would directly and predictably affect either: (1) ConocoPhillips’s ability or willingness to repay its debt obligations; or (2) the market resale value of any of the bonds (by affecting market interest rates or the ConocoPhillips’s credit rating, for example). In the unlikely event such a particular matter was to come before you, please consult with DEO prior to participating in the matter for additional guidance.

Commented [BKM4]: Unsure whether this guidance/discussion is necessary given that ConocoPhillips is not a party to this meeting. However, I’ve included it here to flag as a potential conflict of interest for your review, given ConocoPhillips’s signing on as intervenor-defendant in the ANWR litigation. See case numbers: (1) 3:20-cv-00308-SLG and (2) 3:20-cv-00290-SLG.

Catch All Provision – We recommend you consider the “catch all provision” in 5 C.F.R. § 2635.502 before accepting this meeting. Under the “catch all provision,” you are asked to consider whether circumstances other than those specifically described in 5 C.F.R. § 2635.502(a) would raise a question regarding your impartiality in performing your official duties. In making this determination, you should consider the relevant facts about the particular matter in question and determine whether you believe that a reasonable person with knowledge of those facts would question your impartiality in performing your official duties in the particular matter.

Commented [BKM5]: Again, unsure whether this guidance is necessary here, but have included in case relevant given the potential former employer and financial interest issues presented.

Ethics Pledge – You are covered by the revolving door ban in the Ethics Pledge stating that you will not, for a period of two years from the date of your appointment, participate in any particular matter involving specific parties that is directly and substantially related to your former employer or former clients, including regulations and contracts. Exec. Order No. 13,989 sec. 1(2) (Jan. 26, 2021). Based on the information currently before the DEO, this meeting should not implicate any restriction under the Ethics Pledge. **However, you should be cautious in the event any topics to which the aforementioned entities are parties or represent parties be raised for discussion during the meeting.**

Commented [BKM6]: Language added to address former employer’s participation in the ANWR litigation (please see above comment). In addition to this guidance, I considered including the following language:

“As such, you should excuse yourself from any portion of the meeting pertaining to the aforementioned ANWR litigation in which the National Audubon Society was a party should the litigation be raised for discussion during the meeting.”

General Ethics Guidance on Meetings – Please remember the following standard guidance for participating in meetings:

I ultimately did not include this because the National Audubon Society is not a party to this meeting.

1. Other External Attendees – If any additional parties external to DOI are added to the list of expected meeting attendees, please let DEO know sufficiently in advance so that we can review and make a determination with respect to the new expected attendee(s).
2. Nonpublic Information and Party Matters – DOI officials must refrain from disclosing nonpublic information at meetings with external parties (5 C.F.R. § 2635.703) and should, to the extent possible, refrain from discussing and making any commitments about any particular matters involving specific parties, such as litigation, contracts, leases, permits, etc.
3. No Endorsement – DOI officials may not use their official position or title, or any authority associated with their public office, to endorse any product, service, or enterprise. This includes nonprofit and charitable organizations. 5 C.F.R. § 2635.702(c).
4. No Preferential Treatment – DOI officials must act impartially and not give preferential treatment to any private organization or individual and must avoid creating even the appearance that they are violating this requirement. 5 C.F.R. § 2635.101(b)(8), (14).
5. Gifts – Outside parties to the meeting are prohibited sources under the rules on gifts from outside sources. Under those rules, a gift from a prohibited source may not normally be accepted. Consequently, we advise that no gifts be accepted in conjunction with this meeting.
6. No Partisan Political Activity – While DOI officials may discuss the Administration’s policy priorities and ideological approach to proposed laws and regulations at this meeting, they must strictly avoid partisan political activity in order to remain in compliance with the Hatch Act. Partisan political activity is any activity directed toward the success or failure of a political party, candidate for a partisan political office, or partisan political group and can include verbal remarks and speech.

Please let us know if you have any questions or concerns.

Thank you,

Danielle



United States Department of the Interior

OFFICE OF THE SOLICITOR
Washington, D.C. 20240

July 14, 2021

MEMORANDUM

To: Nada L. Culver, Deputy Director of Policy and Programs,
Bureau of Land Management

From: Heather C. Gottry, Director, Departmental Ethics Office, and
Designated Agency Ethics Official

Monica L. Garcia, Deputy Director for Ethics Law & Policy, Departmental Ethics
Office & Alternate Designated Agency Ethics Official

Subject: Updated Interim Ethics Guidance on Recusal Obligations

This memorandum provides guidance from the Departmental Ethics Office (DEO) about your ethics obligations while you serve as the Deputy Director of Policy and Programs, Bureau of Land Management for the U.S. Department of the Interior (DOI). The guidance in this memorandum supplements and replaces the Interim Ethics Guidance on Recusal Obligations memorandum issued to you on March 11, 2021 and any interim ethics guidance on recusal obligations provided to you. The guidance in this memorandum is based on information that you have provided and sets forth guidance on your obligation to recuse from participating personally and substantially in certain matters in which you have either direct or imputed financial interests, or personal or business relationship(s), pursuant to ethics laws, regulations, and Executive Order 13989 entitled, “Executive Order on Ethics Commitments by Executive Branch Personnel” (Jan. 20, 2021) (Ethics Pledge).

SECTION 1 – FINANCIAL CONFLICTS OF INTEREST

As required by the criminal conflicts of interest law at 18 U.S.C. § 208(a), you may not participate personally and substantially in any particular matter¹ in which you know that you have a financial interest directly and predictably affected by the matter, or in which you know

¹ Additional guidance provided by the DEO on whether an issue, action, or decision pending at the DOI is a matter, particular matter of general applicability, or a particular matter involving specific parties is found in *Attachment A* to this memorandum.

that a person whose interests are imputed to you has a financial interest directly and predictably affected by the particular matter, unless you first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2), or qualify for a statutory exemption, pursuant to 18 U.S.C. § 208(b)(4). The interests of the following persons are imputed to you:

- Any spouse or minor child;
- Any general partner of a partnership in which you are a limited or general partner;
- Any organization in which you serve as an officer, director, trustee, general partner, or employee; and
- Any person or organization with which you are negotiating or have an arrangement concerning prospective employment.

Your spouse is currently a partner with the law firm of Benezra and Culver, PC. For as long as your spouse continues to work for Benezra and Culver, PC, you should not participate personally and substantially in any particular matter that to your knowledge has a direct and predictable effect on the financial interests of the firm, unless you first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1).

Based on information you have provided to the DEO, including your New Entrant Public Financial Disclosure Report (OGE Form 278e), submitted on May 19, 2021, and certified on June 4, 2021, you have confirmed to the DEO that you or your spouse currently own a number of prohibited interests listed on the 2021 Department of the Interior and 2021 Bureau of Land Management List of Prohibited Investments, both included as *Attachment B* to this memorandum.² Those prohibited interests include:

- AT&T corporate bonds
- Conoco Phillips corporate bonds
- Berkshire Hathaway corporate bonds
- Verizon Communications, Inc. corporate bonds
- AT&T (T) stock
- Fortis, Inc. (FTS) stock
- Union Pacific Corp. (UNP) stock
- Verizon Communications, Inc. (VZ) stock

We note that you have unequivocally committed to divest these interests and are currently working with a member of the DEO's financial disclosure team to seek a certificate of divestiture

² Please see Section 3 of this memorandum for a discussion of the additional ethics requirements imposed by the DOI Supplemental Ethics Regulations on certain personally held financial interests. Your New Entrant OGE Form 278e indicated that you held Berkshire Hathaway, Inc. (BRK.B) stock and Enbridge stock. On May 19, 2021, you submitted a OGE Form 278-T indicating that you sold your interests in BRK.B and Enbridge on April 23, 2021.

(CD) for the sales. While you maintain an ownership interest in these assets, you must recuse from certain matters at the Department, as described below.

In addition, based on information you provided in your OGE Form 278e, the DEO identified a number of stock investments that may require your recusal from certain matters at the Department, including:

- Ute Distribution Corp. stock
- Alphabet, Inc. (GOOG) (GOOGL) stock
- Amazon.com, Inc. (AMZN) stock
- Caterpillar, Inc. (CAT) stock
- Citigroup, Inc. (C) stock
- FedEx Corp. (FDX) stock
- McCormick & Co, Inc. (MKC) stock
- Microsoft Corp. (MSFT) stock
- Snap-On, Inc. (SNA) stock
- Truist Financial (TFC) stock
- The Walt Disney Co. (DIS) stock
- 3M Co. (MMM) stock
- Johnson & Johnson (JNJ) stock
- Proctor & Gamble (PG) stock
- Fortis, Inc. (FTS) stock

The DEO also identified financial interests in securities for which you may potentially rely on a *de minimis* exemption under 5 C.F.R. § 2640.202. If you intend to rely upon this exemption, you must monitor the value of those interests.³ If the aggregate value of interests affected by a particular matter increases and exceeds the *de minimis* threshold, you should not participate personally and substantially in the particular matter that, to your knowledge, has a direct and predictable effect on the interests, unless you first obtain a written waiver pursuant to 18 U.S.C. § 208(b)(1).

In addition, we have identified that you are invested in a sector mutual fund:

- Invesco Water Resources ETF (PHO)

³ Based on the information included in your New Entrant OGE Form 278e, DEO has identified that the following securities may qualify for the *de minimis* exemption: Adient plc (ADNT); AT&T (T); General Dynamics Corp. (GD); Johnson Controls, International plc (JCI); Mastercard, Inc. (MA); Merck & Co. Inc. (MRK); Starbucks Corp. (SBUX); Visa, Inc. (V); Coty, Inc. (COTY); Medtronic plc (MDT); Synchrony Financial (SYF); Alcon (ALC); Deere & Co. (DE); JPMorgan Chase & Co. (JPM); Lowe's Companies (LOW); Novartis AG (NVS); Union Pacific Corp. (UNP); Verizon Communications, Inc. (VZ). Please seek additional guidance if you intend to participate in any particular matter which could have a direct and predictable effect on the financial interest of any of those companies.

Based on the information reported in your New Entrant OGE Form 278e, DEO has identified that the Invesco Water Resources ETF (PHO) may qualify for the *de minimis* exemption for sector mutual funds. If you rely on a *de minimis* exemption under 5 C.F.R. § 2640.201(b) with regard to any of your financial interests in sector mutual funds, please monitor the value of those interests. If the aggregate value of your interests in sector mutual funds that concentrate in any one sector exceeds \$50,000, you should not participate personally and substantially in any particular matter that to your 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 you first obtain a written waiver pursuant to 18 U.S.C. § 208(b)(1).

Furthermore, based on information you provided in your OGE Form 278e, the DEO identified a number of bond investments that may require your recusal from certain matters at the Department, including:

- Alum Rock, California Union Elementary school bond
- AT&T bond
- Cisco Systems bond
- Conoco Phillips bond
- Berkshire Hathaway bond
- Verizon Communications, Inc. bond
- Public Highway Authority Colorado Revenue bond

You should recuse from particular matters in which these bonds pose a conflict of interest and because these corporate bonds constitute a debt owed by the issuer to the bondholder, they are not an equity interest in the entity that issued the debt. Therefore, for as long as you own these interests, you must not participate personally and substantially in any particular matter that to your knowledge has a direct and predictable effect on the marketability or market resale value of any of these bonds or on the ability or willingness of the issuer to pay their debt obligations, unless you first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2).

The list of your financial interests that require your recusal from certain matters at the Department is also included as *Attachment C* to this memorandum for reference.

You have informed the DEO that you currently use the services of a managed account or an investment professional. The DEO advises that you ensure that the account manager or investment professional obtains your prior approval on a case-by-case basis for the purchase of any asset other than cash, cash equivalents, or investment funds that qualify for the regulatory exemption for diversified mutual funds and unit investment trusts at 5 C.F.R. § 2640.201(a), or obligations of the United States.

Finally, in the event that an actual or potential conflict of interest arises during your appointment, you should consult with the DEO immediately and take the measures necessary to resolve the conflict, such as recusal from the particular matter or divestiture of an asset. Throughout your appointment, you must remain vigilant about your personal and any imputed financial interests and notify the DEO immediately should either they or your duties and responsibilities at the DOI change so you can receive updated ethics guidance.

SECTION 2 – IMPARTIALITY

As required by 5 C.F.R. § 2635.502(a), if you know that a particular matter involving specific parties⁴ is likely to have a direct and predictable effect on the financial interest of a member of your household, or know that a person with whom you have a “covered relationship”⁵ is or represents a party to such matter, and where you determine that the circumstances would cause a reasonable person with knowledge of the relevant facts to question your impartiality in the matter, you will not participate in the matter unless you have informed the DEO of the appearance problem and received written authorization from the DEO to participate in the matter pursuant to 5 C.F.R. § 2635.502(d).

Based on information you have provided, including information in your certified New Entrant OGE Form 278e, the DEO identified that you have a “covered relationship” with the following individuals and/or entities:

- National Audubon Society, former employer – terminated employment in February 2021
- The Wilderness Society, former employer – terminated employment in May 2019
- University of Denver Sturm College of Law, your spouse’s employer
- Benezra and Culver, PC, your spouse’s employer
- Your spouse’s clients.⁶

⁴ Additional guidance on whether an issue, action, or decision pending at the DOI is a particular matter involving specific parties is found in *Attachment A* to this memorandum.

⁵ Please note that for purposes of 5 C.F.R. § 2635.502(a), you have a “covered relationship” with: (1) A person, other than a prospective employer described in 5 C.F.R. § 2635.603(c), with whom you have or seek a business, contractual or other financial relationship that involves other than a routine consumer transaction; (2) A person who is a member of your household, or who is a relative with whom you have a close personal relationship; (3) A person for whom your spouse, parent or dependent child is, to your knowledge, serving or seeking to serve as an officer, director, trustee, general partner, agent, attorney, consultant, contractor or employee; (4) Any person for whom you have, within the last year, served as officer, director, trustee, general partner, agent, attorney, consultant, contractor or employee; or (5) An organization, other than a political party described in 26 U.S.C. § 527(e), in which you are an active participant.

⁶ You have informed us that your spouse’s law firm, Benezra and Culver is a plaintiff’s employment firm with a focus on representing individual employees, primarily within the State of Colorado. You have not provided a list of current clients at this time, but you will remain responsible for recusals for all covered relationship or other disqualifications based on your spouse’s clients. For ease of reference, your recusals are identified in *Attachment C* to this memorandum.

Accordingly, unless you receive prior DEO authorization, you should not participate in any particular matter involving specific parties in which you know any of the individuals or entities listed above is a party or represents a party, if you determine that a reasonable person with knowledge of the relevant facts would question your impartiality in the matter. This disqualification requirement may expand to a number of issues, actions, and decisions involving the individuals or entities listed above and we recommend that you consult with the DEO for additional guidance as needed. Please note that you are in the best position to know and identify your “covered relationships.” Please update the DEO if you identify additional “covered relationships” or if your identified “covered relationships” change.

In determining whether circumstances other than those specifically described in 5 C.F.R. § 2635.502(a) would raise a question regarding your impartiality in performing your official duties, you must consider the relevant facts about the particular matter in question and determine whether you believe that a reasonable person with knowledge of those facts would question your impartiality in performing your official duties in the particular matter. If you personally determine that a reasonable person with knowledge of the relevant facts would not question your impartiality in performing your official duties in the particular matter, then you may participate in the particular matter as part of your official duties. Additional guidance on whether an issue, action, or decision pending at the DOI is a particular matter is found in *Attachment A* to this memorandum.

In addition to the requirements discussed above related to 5 C.F.R. § 2635.502, as set forth in the Fourteen General Principles of Ethical Conduct, you must take steps to avoid any action that creates the appearance that you are violating the law or the ethical standards set forth in 5 C.F.R. Part 2635. 5 C.F.R. § 2635.101(b)(14). In considering whether a particular set of circumstances will create an appearance that the law or the ethical standards have been violated, you will need to assess the circumstances from the perspective of a reasonable person with knowledge of the relevant facts. As appearance issues can be complex, please consult as needed and appropriate with the DEO for further ethics guidance and assistance.

SECTION 3 – DOI SUPPLEMENTAL ETHICS REGULATIONS

As you are a Bureau of Land Management employee, you are prohibited by 43 U.S.C. § 11 from directly or indirectly purchasing or becoming interested in the purchase of any public land. In addition, 30 U.S.C. § 1211(f) prohibits you from holding a direct or indirect financial interest in any surface or underground coal mining operation if you perform any function or duty under Chapter 25 of Title 30 of the U.S. Code.

Pursuant to 5 C.F.R. § 3501.103(b) you are also prohibited from acquiring or holding any direct or indirect financial interest in Federal lands or resources administered or controlled by the DOI. This prohibition precludes stock or bond investments in many companies that hold DOI-granted permits and leases in Federal lands. The DEO has provided you with a list of prohibited investments (2021 List of Prohibited Investments and 2021 BLM List of Prohibited

Investments), included as *Attachment B* to this memorandum, which includes investments in certain companies with oil, gas, solar, wind, and geothermal permits or leases on, or mineral rights in Federal lands above certain thresholds.

Additionally, absent a waiver under 5 C.F.R. § 3501.103(e), you, your spouse, and any of your minor children are prohibited by 5 C.F.R. § 3501.103(c) from acquiring or retaining any claim, permit, lease, small tract entries, or other rights that are granted by the DOI in Federal lands. This prohibition does not limit the recreational or other personal and noncommercial use of Federal lands on the same terms as use of Federal lands is available to the general public. 5 C.F.R. § 3501.103(c)(2)(i).

Based on information provided to the DEO, including in your certified New Entrant OGE Form 278e:

1. You currently hold financial interests identified on the 2021 Department of the Interior and 2021 BLM List of Prohibited Investments, included as *Attachment B* to this memorandum and are working with DEO to voluntarily divest your interests.
2. You confirmed that neither your spouse, any of your minor children, and you do not occupy or use Federal lands (other than on the same terms as use of Federal lands is available to the general public), and do not take any benefits from Federal lands, based upon a contract, grant, lease, permit, easement, rental, agreement, mineral rights, grazing rights, or other holdings DOI issues or regulates.

In order to ensure compliance with the requirements of the DOI Supplemental Ethics Regulations, you must not acquire any financial interests identified on the 2021 List of Prohibited Investments or such lists published annually thereafter. You also must immediately update the DEO if you or your spouse or any of your minor children occupy or use Federal lands (other than on the same terms as use of Federal lands is available to the general public), and you and your spouse and any of your minor children must not take any benefits from Federal lands, based upon a contract, grant, lease, permit, easement, rental, agreement, mineral rights, grazing rights, or other holdings DOI issues or regulates.

SECTION 4 - OBLIGATIONS UNDER THE ETHICS PLEDGE

As a Biden Administration political appointee, you signed the Ethics Pledge required under Executive Order No. 13989 entitled, “Executive Order on Ethics Commitments by Executive Branch Personnel” (Jan. 20, 2021), on March 1, 2021, and are bound by the requirements and restrictions contained therein. A copy of your signed Ethics Pledge is included as *Attachment D* to this memorandum.

First, pursuant to the requirements of paragraph 2 of the Ethics Pledge, you may not participate personally and substantially, for two (2) years after the date of your appointment on January 20, 2021, in any particular matter involving specific parties that is directly and substantially related to your former employer⁷ or former clients,⁸ including regulations and contracts, unless you are first granted a waiver under the Ethics Pledge.

For purposes of paragraph 2 of the Ethics Pledge, and based on information provided to the DEO, your former employer(s) and former client(s) under the Ethics Pledge include:

- National Audubon Society
- The Wilderness Society

For purposes of the Ethics Pledge, the term “particular matter involving specific parties” has the meaning set forth in 5 C.F.R. § 2641.201(h),⁹ except that it also includes any meeting or other communication relating to the performance of your official duties, unless the communication concerns a particular matter of general applicability and is made at a meeting or other event at which participation is open to all interested parties. OGE has advised the term “open to all interested parties” means that the meeting should include a multiplicity of parties representing a diversity of viewpoints. If a former employer or a former client is present, then, generally speaking, at least four other separate stakeholders should be present to ensure that a diversity of viewpoints is represented and not the same united perspective. DO-09-011.

You have confirmed to the DEO that you were not registered under the Lobbying Disclosure Act, 2 U.S.C. 1601 *et seq.*, or the Foreign Agents Registration Act (FARA), 22 U.S.C. 611 *et seq.*, within the 2 years before the date of your appointment. Accordingly, the

⁷ For purposes of paragraph 2 of the Ethics Pledge, “former employer” is any person for whom you have within the two (2) years prior to the date of your appointment served as an employee, officer, director, trustee, or general partner, except that “former employer” does not include any executive agency or other entity of the Federal Government, State or local government, the District of Columbia, Native American tribe, any United States territory or possession, or any international organization in which the United States is a member state. Executive Order 13989, Section 2(k). For additional guidance on the definition of “former employer” please see OGE Legal Advisory DO-09-011, *Ethics Pledge: Revolving Door Ban--All Appointees Entering Government* (Mar. 26, 2009) (DO-09-011), which applies to Executive Order 13989 pursuant OGE Legal Advisory LA-21-03, *Executive Orders on Ethics Commitments by Executive Branch Personnel* (Jan. 22, 2021) (LA-21-03).

⁸ For purposes of paragraph 2 of the Ethics Pledge, “former client” is any person for whom you served personally as agent, attorney, or consultant within the two (2) years prior to the date of appointment, but excluding instances where the service provided was limited to speeches or similar appearances. It does not include clients of your former employer to whom you did not personally provide services. Executive Order 13989, Section 2(l). Additional guidance on the definition of “former client” is found in DO-09-011, which applies to Executive Order 13989 pursuant LA-21-03. Additionally, “former client” does not include any executive agency or other entity of the Federal Government, State or local government, the District of Columbia, Native American tribe, any United States territory or possession, or any international organization in which the United States is a member state. DO-09-011; LA-21-03.

⁹ A “particular matter involving specific parties” will typically involve “a specific proceeding affecting the legal rights of the parties or an isolatable transaction or related set of transactions between identified parties, such as a specific contract, grant, license, product approval application, enforcement action, administrative adjudication, or court case.” 5 C.F.R. § 2641.201(h).

recusal requirements under paragraph 3 of the Ethics Pledge are not applicable to your work at the DOI.

Finally, you have confirmed for the DEO that you have complied with paragraph 7 of the Ethics Pledge and did not accept and will not accept, including after entering Government, any salary or other cash payment from your former employer the eligibility for and payment of which is limited to individuals accepting a position in the United States Government. You further confirmed that you also have not accepted and will not accept any non-cash benefit from your former employer that is provided in lieu of such a prohibited cash payment.

SECTION 5 – IMPLEMENTATION OF ETHICS GUIDANCE

To assist you in implementing the ethics guidance set forth in this memorandum, the DEO has prepared a List of Recusals and Quick Reference Chart, included as *Attachment C* to this memorandum. You have an obligation to continue to update the DEO about changed circumstances, including changes to your financial interests, changes in your personal or business relationships, or any changes to the nature of your DOI duties and responsibilities, so that the ethics guidance provided in this memorandum can be updated as needed and your recusal obligations can be documented. The DEO will also assist you in documenting your recusal obligations through a separate Ethics Recusals & Screening Arrangement memorandum, which also meets the requirements of Section 4(a)(iii) of Executive Order 13989.

SECTION 6 – UPDATE THE DEO AS NECESSARY

In consultation with the DEO, please revise and update this memorandum and *Attachment C - List of Recusals and Quick Reference Chart* whenever warranted by changed circumstances, including completion of your required divestitures and other changes to your financial interests, changes in your personal or business relationships, or any changes to the nature of your Department duties.

As a reminder, only a designated ethics official from the DEO can make ethics determinations on which DOI employees may authoritatively rely upon. Therefore, throughout the duration of your appointment, please contact the DEO with any questions about your recusal obligations discussed above or for further ethics guidance.

Attachment A – Guidance for Recusal Analysis

Attachment B – 2021 List of Prohibited Investments

(Department of the Interior and Bureau of Land Management)

Attachment C – List of Recusals and Quick Reference Chart

Attachment D – Ethics Pledge (signed March 1, 2021)



United States Department of the Interior

OFFICE OF THE SOLICITOR
Washington, D.C. 20240

September 3, 2021

MEMORANDUM

To: Nada W. Culver, Deputy Director of Policy and Programs,
Bureau of Land Management

From: Heather C. Gottry, Director, Departmental Ethics Office, and
Designated Agency Ethics Official

Monica L. Garcia, Deputy Director for Ethics Law & Policy, Departmental Ethics
Office & Alternate Designated Agency Ethics Official

Subject: Updated Ethics Guidance on Recusal Obligations

This memorandum provides guidance from the Departmental Ethics Office (DEO) about your ethics obligations while you serve as the Deputy Director of Policy and Programs, Bureau of Land Management for the U.S. Department of the Interior (DOI). The guidance in this memorandum supplements and replaces the Interim Ethics Guidance on Recusal Obligations memoranda issued to you on March 11, 2021 and July 27, 2021 and any interim ethics guidance on recusal obligations provided to you. The guidance in this memorandum is based on information that you have provided and sets forth guidance on your obligation to recuse from participating personally and substantially in certain matters in which you have either direct or imputed financial interests, or personal or business relationship(s), pursuant to ethics laws, regulations, and Executive Order 13989 entitled, “Executive Order on Ethics Commitments by Executive Branch Personnel” (Jan. 20, 2021) (Ethics Pledge).

SECTION 1 – FINANCIAL CONFLICTS OF INTEREST

As required by the criminal conflicts of interest law at 18 U.S.C. § 208(a), you may not participate personally and substantially in any particular matter¹ in which you know that you

¹ Additional guidance provided by the DEO on whether an issue, action, or decision pending at the DOI is a matter, particular matter of general applicability, or a particular matter involving specific parties is found in *Attachment A* to this memorandum.

have a financial interest directly and predictably affected by the matter, or in which you know that a person whose interests are imputed to you has a financial interest directly and predictably affected by the particular matter, unless you first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2), or qualify for a statutory exemption, pursuant to 18 U.S.C. § 208(b)(4). The interests of the following persons are imputed to you:

- Any spouse or minor child;
- Any general partner of a partnership in which you are a limited or general partner;
- Any organization in which you serve as an officer, director, trustee, general partner, or employee; and
- Any person or organization with which you are negotiating or have an arrangement concerning prospective employment.

Your spouse is currently a partner with the law firm of Benezra and Culver, PC. For as long as your spouse continues to work for Benezra and Culver, PC, you should not participate personally and substantially in any particular matter that to your knowledge has a direct and predictable effect on the financial interests of the firm, unless you first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1).

Based on information you have provided to the DEO, you and your spouse have fully divested your ownership interests in any prohibited interests listed on the 2021 Department of the Interior and 2021 Bureau of Land Management List of Prohibited Investments, both included as *Attachment B* to this memorandum.²

In addition, based on information you provided in your OGE Form 278e, the DEO identified a number of stock investments that may require your recusal from certain matters at the Department, including:

- Ute Distribution Corp. stock
- Alphabet, Inc. (GOOG) (GOOGL) stock
- Amazon.com, Inc. (AMZN) stock
- Caterpillar, Inc. (CAT) stock
- Citigroup, Inc. (C) stock
- FedEx Corp. (FDX) stock

² Please see Section 3 of this memorandum for a discussion of the additional ethics requirements imposed by the DOI Supplemental Ethics Regulations on certain personally held financial interests. Your New Entrant OGE Form 278e indicated that you held Berkshire Hathaway, Inc. (BRK.B) stock and Enbridge stock. On May 19, 2021, you submitted a OGE Form 278-T indicating that you sold your interests in BRK.B and Enbridge on April 23, 2021. Furthermore, you have confirmed that you have sold your interests in AT&T corporate bonds, Conoco Phillips corporate bonds, Berkshire Hathaway corporate bonds, Verizon Communications, Inc. corporate bonds, AT&T stock, Fortis, Inc. stock, Union Pacific Corp. stock, and Verizon Communications, Inc. stock and will submit an OGE Form 278-T reporting the sales.

- McCormick & Co, Inc. (MKC) stock
- Microsoft Corp. (MSFT) stock
- Snap-On, Inc. (SNA) stock
- Truist Financial (TFC) stock
- The Walt Disney Co. (DIS) stock
- 3M Co. (MMM) stock
- Johnson & Johnson (JNJ) stock
- Proctor & Gamble (PG) stock

The DEO also identified financial interests in securities for which you may potentially rely on a *de minimis* exemption under 5 C.F.R. § 2640.202. If you intend to rely upon this exemption, you must monitor the value of those interests.³ If the aggregate value of interests affected by a particular matter increases and exceeds the *de minimis* threshold, you should not participate personally and substantially in the particular matter that, to your knowledge, has a direct and predictable effect on the interests, unless you first obtain a written waiver pursuant to 18 U.S.C. § 208(b)(1).

In addition, we have identified that you are invested in a sector mutual fund:

- Invesco Water Resources ETF (PHO)

Based on the information reported in your New Entrant OGE Form 278e, DEO has identified that the Invesco Water Resources ETF (PHO) may qualify for the *de minimis* exemption for sector mutual funds. If you rely on a *de minimis* exemption under 5 C.F.R. § 2640.201(b) with regard to any of your financial interests in sector mutual funds, please monitor the value of those interests. If the aggregate value of your interests in sector mutual funds that concentrate in any one sector exceeds \$50,000, you should not participate personally and substantially in any particular matter that to your 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 you first obtain a written waiver pursuant to 18 U.S.C. § 208(b)(1).

Furthermore, based on information you provided in your OGE Form 278e, the DEO identified a number of bond investments that may require your recusal from certain matters at the Department, including:

- Alum Rock, California Union Elementary school bond

³ Based on the information included in your New Entrant OGE Form 278e, DEO has identified that the following securities may qualify for the *de minimis* exemption: Adient plc (ADNT); General Dynamics Corp. (GD); Johnson Controls, International plc (JCI); Mastercard, Inc. (MA); Merck & Co. Inc. (MRK); Starbucks Corp. (SBUX); Visa, Inc. (V); Coty, Inc. (COTY); Medtronic plc (MDT); Synchrony Financial (SYF); Alcon (ALC); Deere & Co. (DE); JPMorgan Chase & Co. (JPM); Lowe's Companies (LOW); and Novartis AG (NVS);. Please seek additional guidance if you intend to participate in any particular matter which could have a direct and predictable effect on the financial interest of any of those companies.

- Cisco Systems bond
- Public Highway Authority Colorado Revenue bond

You should recuse from particular matters in which these bonds pose a conflict of interest and because these corporate bonds constitute a debt owed by the issuer to the bondholder, they are not an equity interest in the entity that issued the debt. Therefore, for as long as you own these interests, you must not participate personally and substantially in any particular matter that to your knowledge has a direct and predictable effect on the marketability or market resale value of any of these bonds or on the ability or willingness of the issuer to pay their debt obligations, unless you first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2).

The list of your financial interests that require your recusal from certain matters at the Department is also included as *Attachment C* to this memorandum for reference.

You have informed the DEO that you currently use the services of a managed account or an investment professional. The DEO advises that you ensure that the account manager or investment professional obtains your prior approval on a case-by-case basis for the purchase of any asset other than cash, cash equivalents, or investment funds that qualify for the regulatory exemption for diversified mutual funds and unit investment trusts at 5 C.F.R. § 2640.201(a), or obligations of the United States.

Finally, in the event that an actual or potential conflict of interest arises during your appointment, you should consult with the DEO immediately and take the measures necessary to resolve the conflict, such as recusal from the particular matter or divestiture of an asset. Throughout your appointment, you must remain vigilant about your personal and any imputed financial interests and notify the DEO immediately should either they or your duties and responsibilities at the DOI change so you can receive updated ethics guidance.

SECTION 2 – IMPARTIALITY

As required by 5 C.F.R. § 2635.502(a), if you know that a particular matter involving specific parties⁴ is likely to have a direct and predictable effect on the financial interest of a member of your household, or know that a person with whom you have a “covered relationship”⁵

⁴ Additional guidance on whether an issue, action, or decision pending at the DOI is a particular matter involving specific parties is found in *Attachment A* to this memorandum.

⁵ Please note that for purposes of 5 C.F.R. § 2635.502(a), you have a “covered relationship” with: (1) A person, other than a prospective employer described in 5 C.F.R. § 2635.603(c), with whom you have or seek a business, contractual or other financial relationship that involves other than a routine consumer transaction; (2) A person who is a member of your household, or who is a relative with whom you have a close personal relationship; (3) A person for whom your spouse, parent or dependent child is, to your knowledge, serving or seeking to serve as an officer, director, trustee, general partner, agent, attorney, consultant, contractor or employee; (4) Any person for whom you have, within the last year, served as officer, director, trustee, general partner, agent, attorney, consultant,

is or represents a party to such matter, and where you determine that the circumstances would cause a reasonable person with knowledge of the relevant facts to question your impartiality in the matter, you will not participate in the matter unless you have informed the DEO of the appearance problem and received written authorization from the DEO to participate in the matter pursuant to 5 C.F.R. § 2635.502(d).

Based on information you have provided, including information in your certified New Entrant OGE Form 278e, the DEO identified that you have a “covered relationship” with the following individuals and/or entities:

- National Audubon Society, former employer – terminated employment in February 2021
- University of Denver Sturm College of Law, your spouse’s employer
- Benezra and Culver, PC, your spouse’s employer
- Your spouse’s clients.⁶

Accordingly, unless you receive prior DEO authorization, you should not participate in any particular matter involving specific parties in which you know any of the individuals or entities listed above is a party or represents a party, if you determine that a reasonable person with knowledge of the relevant facts would question your impartiality in the matter. This disqualification requirement may expand to a number of issues, actions, and decisions involving the individuals or entities listed above and we recommend that you consult with the DEO for additional guidance as needed. Please note that you are in the best position to know and identify your “covered relationships.” Please update the DEO if you identify additional “covered relationships” or if your identified “covered relationships” change.

In determining whether circumstances other than those specifically described in 5 C.F.R. § 2635.502(a) would raise a question regarding your impartiality in performing your official duties, you must consider the relevant facts about the particular matter in question and determine whether you believe that a reasonable person with knowledge of those facts would question your impartiality in performing your official duties in the particular matter. If you personally determine that a reasonable person with knowledge of the relevant facts would not question your impartiality in performing your official duties in the particular matter, then you may participate in the particular matter as part of your official duties. Additional guidance on whether an issue, action, or decision pending at the DOI is a particular matter is found in *Attachment A* to this memorandum.

contractor or employee; or (5) An organization, other than a political party described in 26 U.S.C. § 527(e), in which you are an active participant.

⁶ You have informed us that your spouse’s law firm, Benezra and Culver is a plaintiff’s employment firm with a focus on representing individual employees, primarily within the State of Colorado. You have not provided a list of current clients at this time, but you will remain responsible for recusals for all covered relationship or other disqualifications based on your spouse’s clients. For ease of reference, your recusals are identified in *Attachment C* to this memorandum.

In addition to the requirements discussed above related to 5 C.F.R. § 2635.502, as set forth in the Fourteen General Principles of Ethical Conduct, you must take steps to avoid any action that creates the appearance that you are violating the law or the ethical standards set forth in 5 C.F.R. Part 2635. 5 C.F.R. § 2635.101(b)(14). In considering whether a particular set of circumstances will create an appearance that the law or the ethical standards have been violated, you will need to assess the circumstances from the perspective of a reasonable person with knowledge of the relevant facts. As appearance issues can be complex, please consult as needed and appropriate with the DEO for further ethics guidance and assistance.

SECTION 3 – DOI SUPPLEMENTAL ETHICS REGULATIONS

As you are a Bureau of Land Management employee, you are prohibited by 43 U.S.C. § 11 from directly or indirectly purchasing or becoming interested in the purchase of any public land. In addition, 30 U.S.C. § 1211(f) prohibits you from holding a direct or indirect financial interest in any surface or underground coal mining operation if you perform any function or duty under Chapter 25 of Title 30 of the U.S. Code.

Pursuant to 5 C.F.R. § 3501.103(b) you are also prohibited from acquiring or holding any direct or indirect financial interest in Federal lands or resources administered or controlled by the DOI. This prohibition precludes stock or bond investments in many companies that hold DOI-granted permits and leases in Federal lands. The DEO has provided you with a list of prohibited investments (2021 List of Prohibited Investments and 2021 BLM List of Prohibited Investments), included as *Attachment B* to this memorandum, which includes investments in certain companies with oil, gas, solar, wind, and geothermal permits or leases on, or mineral rights in Federal lands above certain thresholds.

Additionally, absent a waiver under 5 C.F.R. § 3501.103(e), you, your spouse, and any of your minor children are prohibited by 5 C.F.R. § 3501.103(c) from acquiring or retaining any claim, permit, lease, small tract entries, or other rights that are granted by the DOI in Federal lands. This prohibition does not limit the recreational or other personal and noncommercial use of Federal lands on the same terms as use of Federal lands is available to the general public. 5 C.F.R. § 3501.103(c)(2)(i).

Based on information provided to the DEO, including in your certified New Entrant OGE Form 278e:

1. You currently hold financial interests identified on the 2021 Department of the Interior and 2021 BLM List of Prohibited Investments, included as *Attachment B* to this memorandum and are working with DEO to voluntarily divest your interests.

2. You confirmed that neither your spouse, any of your minor children, and you do not occupy or use Federal lands (other than on the same terms as use of Federal lands is available to the general public), and do not take any benefits from Federal lands, based upon a contract, grant, lease, permit, easement, rental, agreement, mineral rights, grazing rights, or other holdings DOI issues or regulates.

In order to ensure compliance with the requirements of the DOI Supplemental Ethics Regulations, you must not acquire any financial interests identified on the 2021 List of Prohibited Investments or such lists published annually thereafter. You also must immediately update the DEO if you or your spouse or any of your minor children occupy or use Federal lands (other than on the same terms as use of Federal lands is available to the general public), and you and your spouse and any of your minor children must not take any benefits from Federal lands, based upon a contract, grant, lease, permit, easement, rental, agreement, mineral rights, grazing rights, or other holdings DOI issues or regulates.

SECTION 4 - OBLIGATIONS UNDER THE ETHICS PLEDGE

As a Biden Administration political appointee, you signed the Ethics Pledge required under Executive Order No. 13989 entitled, “Executive Order on Ethics Commitments by Executive Branch Personnel” (Jan. 20, 2021), on March 1, 2021, and are bound by the requirements and restrictions contained therein. A copy of your signed Ethics Pledge is included as *Attachment D* to this memorandum.

First, pursuant to the requirements of paragraph 2 of the Ethics Pledge, you may not participate personally and substantially, for two (2) years after the date of your appointment on January 20, 2021, in any particular matter involving specific parties that is directly and substantially related to your former employer⁷ or former clients,⁸ including regulations and contracts, unless you are first granted a waiver under the Ethics Pledge.

⁷ For purposes of paragraph 2 of the Ethics Pledge, “former employer” is any person for whom you have within the two (2) years prior to the date of your appointment served as an employee, officer, director, trustee, or general partner, except that “former employer” does not include any executive agency or other entity of the Federal Government, State or local government, the District of Columbia, Native American tribe, any United States territory or possession, or any international organization in which the United States is a member state. Executive Order 13989, Section 2(k). For additional guidance on the definition of “former employer” please see OGE Legal Advisory DO-09-011, *Ethics Pledge: Revolving Door Ban--All Appointees Entering Government* (Mar. 26, 2009) (DO-09-011), which applies to Executive Order 13989 pursuant OGE Legal Advisory LA-21-03, *Executive Orders on Ethics Commitments by Executive Branch Personnel* (Jan. 22, 2021) (LA-21-03).

⁸ For purposes of paragraph 2 of the Ethics Pledge, “former client” is any person for whom you served personally as agent, attorney, or consultant within the two (2) years prior to the date of appointment, but excluding instances where the service provided was limited to speeches or similar appearances. It does not include clients of your former employer to whom you did not personally provide services. Executive Order 13989, Section 2(l). Additional guidance on the definition of “former client” is found in DO-09-011, which applies to Executive Order 13989 pursuant LA-21-03. Additionally, “former client” does not include any executive agency or other entity of the Federal Government, State or local government, the District of Columbia, Native American tribe, any United States territory or possession, or any international organization in which the United States is a member state. DO-09-011; LA-21-03.

For purposes of paragraph 2 of the Ethics Pledge, and based on information provided to the DEO, your former employer(s) and former client(s) under the Ethics Pledge include:

- National Audubon Society
- The Wilderness Society⁹

For purposes of the Ethics Pledge, the term “particular matter involving specific parties” has the meaning set forth in 5 C.F.R. § 2641.201(h),¹⁰ except that it also includes any meeting or other communication relating to the performance of your official duties, unless the communication concerns a particular matter of general applicability and is made at a meeting or other event at which participation is open to all interested parties. OGE has advised the term “open to all interested parties” means that the meeting should include a multiplicity of parties representing a diversity of viewpoints. If a former employer or a former client is present, then, generally speaking, at least four other separate stakeholders should be present to ensure that a diversity of viewpoints is represented and not the same united perspective. DO-09-011.

You have confirmed to the DEO that you were not registered under the Lobbying Disclosure Act, 2 U.S.C. 1601 *et seq.*, or the Foreign Agents Registration Act (FARA), 22 U.S.C. 611 *et seq.*, within the 2 years before the date of your appointment. Accordingly, the recusal requirements under paragraph 3 of the Ethics Pledge are not applicable to your work at the DOI.

Finally, you have confirmed for the DEO that you have complied with paragraph 7 of the Ethics Pledge and did not accept and will not accept, including after entering Government, any salary or other cash payment from your former employer the eligibility for and payment of which is limited to individuals accepting a position in the United States Government. You further confirmed that you also have not accepted and will not accept any non-cash benefit from your former employer that is provided in lieu of such a prohibited cash payment.

SECTION 5 – ADDITIONAL ETHICS CONSIDERATIONS

We understand that you are an attorney, and previously provided legal services to clients prior to your assuming your position at DOI. Please ensure that you take all necessary steps, including removing yourself as counsel, to comply with the requirements of 18 U.S.C. § 203, which prohibits an employee from receiving, agreeing to receive, or soliciting compensation for representational services, rendered either personally or by another, before any court or Federal

⁹ You informed the DEO that you terminated employment with The Wilderness Society in May 2019. Therefore, because you were employed by The Wilderness Society in the two (2) years prior to the date of your appointment to the Department, you are required to comply with the disqualification requirements of paragraph 2 of the Ethics Pledge with respect to The Wilderness Society.

¹⁰ A “particular matter involving specific parties” will typically involve “a specific proceeding affecting the legal rights of the parties or an isolatable transaction or related set of transactions between identified parties, such as a specific contract, grant, license, product approval application, enforcement action, administrative adjudication, or court case.” 5 C.F.R. § 2641.201(h).

agency or other specified Federal entity, in connection with any particular matter in which the United States is a party or has a direct and substantial interest, and 18 U.S.C. § 205, which prohibits Federal employees from personally representing anyone before any court or Federal agency or other specified Federal entity, in connection with any particular matter in which the United States is a party or has a direct and substantial interest.

Finally, please be advised that the Rules of Professional Responsibility are beyond the scope of the DEO's review, so you should review your applicable Rules of Professional Responsibility in order to ensure that you are in compliance with any applicable requirements during your appointment at DOI. As a general matter, the DEO recommends that you review the American Bar Association (ABA) Model Rule of Professional Conduct 1.11: Special Conflicts of Interest For Former And Current Government Officers And Employees as well as any similar rule applicable in jurisdictions in which you are currently a member of the Bar. In addition to other requirements, ABA Model Rule 1.11 requires that a lawyer currently serving as a public officer or employee shall not "participate in a matter in which the lawyer participated personally and substantially while in private practice or nongovernmental employment, unless the appropriate government agency gives its informed consent, confirmed in writing." ABA Model Rule 1.11(d)(2)(i).

SECTION 6 – IMPLEMENTATION OF ETHICS GUIDANCE

To assist you in implementing the ethics guidance set forth in this memorandum, the DEO has prepared a List of Recusals and Quick Reference Chart, included as *Attachment C* to this memorandum. You have an obligation to continue to update the DEO about changed circumstances, including changes to your financial interests, changes in your personal or business relationships, or any changes to the nature of your DOI duties and responsibilities, so that the ethics guidance provided in this memorandum can be updated as needed and your recusal obligations can be documented. The DEO will also assist you in documenting your recusal obligations through a separate Ethics Recusals & Screening Arrangement memorandum, which also meets the requirements of Section 4(a)(iii) of Executive Order 13989.

SECTION 7 – UPDATE THE DEO AS NECESSARY

In consultation with the DEO, please revise and update this memorandum and *Attachment C - List of Recusals and Quick Reference Chart* whenever warranted by changed circumstances, including completion of your required divestitures and other changes to your financial interests, changes in your personal or business relationships, or any changes to the nature of your Department duties.

As a reminder, only a designated ethics official from the DEO can make ethics determinations on which DOI employees may authoritatively rely upon. Therefore, throughout the duration of your appointment, please contact the DEO with any questions about your recusal obligations discussed above or for further ethics guidance.

Attachment A – Guidance for Recusal Analysis

Attachment B – 2021 List of Prohibited Investments

(Department of the Interior and Bureau of Land Management)

Attachment C – List of Recusals and Quick Reference Chart

Attachment D – Ethics Pledge (signed March 1, 2021)



United States Department of the Interior

September 3, 2021

MEMORANDUM

To: Heather C. Gottry, Director, Departmental Ethics Office
& Designated Agency Ethics Official

From: Nada W. Culver, Deputy Director of Policy and Programs,
Bureau of Land Management

Subject: Ethics Recusals & Screening Arrangement

This memorandum serves to document my ethics recusals and the steps that I will take in order to ensure that I comply with all recusal and other ethics obligations required by law. Additionally, this memorandum fulfills the requirement established in Section 4(a)(iii) of Executive Order 13989 entitled, “Executive Order on Ethics Commitments by Executive Branch Personnel” (Jan. 20, 2021) (Ethics Pledge).

I have consulted with the Departmental Ethics Office (DEO) and have been advised about my recusal obligations while serving as an appointee of the U.S. Department of the Interior (DOI). As reflected in my Updated Interim Ethics Guidance on Recusal Obligations memorandum, dated July 27, 2021, which provides ethics guidance based on my certified New Entrant Public Financial Disclosure Report (OGE Form 278e) and information that I have provided to the DEO, I understand that I have a continuing obligation to limit my personal and substantial participation in certain matters in which I have either direct or imputed financial interests, or personal or business relationship(s), pursuant to ethics laws, regulations, and the Ethics Pledge, which I signed on March 1, 2021.

SECTION 1 – SCREENING ARRANGEMENT

After consultation with the DEO, I have elected to self-screen for recusals of all Department matters directed to my attention or that require my participation which involve the entities addressed in the Ethics Guidance Memorandum and listed on the attached List of Recusals and Quick Reference Chart in order to determine whether they involve any of the entities or organizations listed therein. In order to help ensure that I do not participate in matters from which I should be recused, I will take the following steps:

1. I will continue to personally take my calls and screen my e-mail communications, and will review all DOI matters directed to my attention or that require my participation which involve the individuals or entities on the attached List of Recusals and Quick Reference Chart in order to determine whether I am recused from participating in the matter in question.
2. If a particular matter involving any of the entities discussed in the Ethics Guidance Memorandum or listed on the attached List of Recusals and Quick Reference Chart is directed to my attention, I will not take any action, but immediately consult with the DEO, without my further involvement or knowledge of the particulars of the matter if I am uncertain whether or not I may participate in a particular matter.
3. If I determine that a matter involves any of the individuals or entities listed on the attached List of Recusals and Quick Reference Chart and that I am recused from the matter, then I will not take any action on the matter in questions and will refer the matter to Danna Jackson, Counselor to the BLM Director, for action or assignment, without my knowledge or involvement.
4. I will also inform my principal subordinates if I determine that a matter involves any of the individuals or entities listed on the attached List of Recusals and Quick Reference Chart and that I am recused from the matter. I will further instruct my principal subordinates that all inquiries and comments involving my recusal obligations should be directed to the DEO without my involvement or knowledge of the particulars of the matter and will refer my principal subordinates to Danna Jackson, Counselor to the BLM Director, for any further action or assignment on the matter in question.

I understand that for the duration of this screening arrangement that I commit to diligently reviewing issues, actions, and decisions that come before me in order to determine whether any of the individuals or entities discussed in the Ethics Guidance on Recusal Obligations memorandum and listed on the attached List of Recusals and Quick Reference Chart are involved in the issues, actions, and decisions. I have been advised that the identification of party matters pending within the DOI in which the individuals or entities listed on the attached List of Recusals and Quick Reference Chart are parties or represent parties, may require Bureau or Office staff members, Solicitor's Office staff assigned to the matters in question, and the DEO to carefully review my potential participation. Additionally, I understand that there may be times when there will be a delay in reviewing and potentially clearing my participation in matters as a result of screening for ethics compliance. I understand that, while efforts can and will be made to minimize any delays created by ethics recusal reviews, these delays may impact my ability to promptly participate in matters, including certain meetings and other communications.

SECTION 2 – UPDATE THE DEO & SCREENING ARRANGMENT AS NECESSARY

In consultation with the DEO, I will revise and update this memorandum and attachment whenever warranted by changed circumstances, including changes to my financial interests, changes in my personal or business relationships, or any changes to the nature of my Department duties. Finally, I understand that ethics advice must come from the DEO, as only a designated ethics official can make ethics determinations on which Department employees may authoritatively rely upon and will consult with DEO as necessary and appropriate.

Attachment – List of Recusals and Quick Reference Chart

CC: Larry Roberts, Chief of Staff
Laura Daniel-Davis, Principal Deputy Assistant Secretary for Land and Mineral Management
Danna Jackson, Counselor to the BLM Director

July 14, 2021

To: Heather C. Gottry, Director, Departmental Ethics Office and
Designated Agency Ethics Official

From: Nada Culver, Deputy Director, Programs and Policy,
Bureau of Land Management, U.S. Department of the Interior

Subject: Request for a Certificate of Divestiture

I am the Deputy Director, Programs and Policy, for the U.S. Bureau of Land Management (BLM). I was first hired at the Department of the Interior (DOI) in the Office of the Secretary in March 2021 and was appointed as Deputy Director, Programs and Policy, at BLM as of April 11, 2021.

As an employee of the BLM, I am prohibited by 43 U.S.C. § 11 from directly or indirectly purchasing or becoming interested in the purchase of any public land and my position is subject to the prohibitions applicable to BLM employees in accordance with DOI supplemental ethics regulation 43 C.F.R. § 20.401(a).

On April 12, 2021, I submitted my New Entrant Public Financial Disclosure Report (OGE Form 278), which reflected that my spouse and I owned certain prohibited or otherwise conflicting financial interests. After reviewing my financial disclosure, ethics officials informed me that I owned a number of assets that were prohibited for BLM employees under the above-referenced authorities. In consultation with ethics officials, my spouse and I previously divested a number of interests that were prohibited or otherwise presented a conflict of interest with my official duties. I have also agreed to divest prohibited assets held in a retirement account. I am not seeking a certificate of divestiture (CD) for previously divested property or property held in a retirement account.

However, my spouse and I retain four prohibited interests and, at this time, we are seeking a CD prior to the sale of the following additional prohibited interests:

- AT&T
- Fortis, Inc.
- Union Pacific Corp.
- Verizon Communications

1. Financial Interests Held in a Joint Brokerage Account

While my spouse and I have unconditionally agreed to divest these financial interests to comply with 43 U.S.C. § 11 and 43 C.F.R. § 20.401(a), we would like to request a CD to defer paying capital gains tax on the financial interests sold to comply with the Department's supplemental regulations. These investments are not held in a tax-deferred or tax-advantaged account, such as an Individual Retirement Account or 401(k).

Below, please find detailed information on each investment for which I am requesting a CD, as required by 5 C.F.R. § 2634.1005:

Description of property	Owner of property	How the property was acquired	Number of shares	Approximate value
(b)(6)	Joint with spouse, John A. Culver	Purchased on the open market in 2010	(b)(6)	
	Joint with spouse, John A. Culver	Purchased on the open market from 2016 to 2021 (due to stock splits)		
	Joint with spouse, John A. Culver	Purchased on the open market in 2020		
	Joint with spouse, John A. Culver	Purchased on the open market from 2000 to 2014 (due to stock splits)		

2. Agreement to Divest and Recusal Requirement

I have agreed to divest in order to resolve the potential for a conflict of interest, real or perceived, and to comply with 43 U.S.C. § 11 and 43 C.F.R. § 20.401(a) by divesting these financial interests. Prior to divesting these assets, I have been recused from participating in particular matters that have a direct and predictable effect on any of my financial interests, including each of the entities listed in this request for a CD. I understand and agree that my recusal must remain in effect until I divest my financial interests in each of these entities.

3. Reinvestment in Permitted Property

I agree to reinvest the proceeds from the sale of the all financial interests divested pursuant to a CD into permitted property during the 60-day period beginning on the date of the sale per 5 C.F.R. § 2634.1006. I understand that permitted property includes any obligation of the United States or a diversified investment fund, provided that any permitted property must not be any holding prohibited by statute, regulation, rule, or Executive Order. I will contact the Departmental Ethics Office with any questions on what is considered permitted property for reinvestment.

For these reasons, I request that you submit a request for a CD covering the financial interests listed in this letter to the Office of Government Ethics on my behalf.

Nada Culver, Deputy Director, Programs and Policy,
Bureau of Land Management, U.S. Department of the Interior

Date

July 14, 2021

To: Heather C. Gottry, Director, Departmental Ethics Office and
Designated Agency Ethics Official

From: Nada Culver, Deputy Director, Programs and Policy,
Bureau of Land Management, U.S. Department of the Interior

Subject: Request for a Certificate of Divestiture

I am the Deputy Director, Programs and Policy, for the U.S. Bureau of Land Management (BLM). I was first hired at the Department of the Interior (DOI) in the Office of the Secretary in March 2021 and was appointed as Deputy Director, Programs and Policy, at BLM as of April 11, 2021.

As an employee of the BLM, I am prohibited by 43 U.S.C. § 11 from directly or indirectly purchasing or becoming interested in the purchase of any public land and my position is subject to the prohibitions applicable to BLM employees in accordance with DOI supplemental ethics regulation 43 C.F.R. § 20.401(a).

On April 12, 2021, I submitted my New Entrant Public Financial Disclosure Report (OGE Form 278), which reflected that my spouse and I owned certain prohibited or otherwise conflicting financial interests. After reviewing my financial disclosure, ethics officials informed me that I owned a number of assets that were prohibited for BLM employees under the above-referenced authorities. In consultation with ethics officials, my spouse and I previously divested a number of interests that were prohibited or otherwise presented a conflict of interest with my official duties. I am not seeking a certificate of divestiture (CD) for previously divested property.

However, my spouse and I retain four prohibited interests and, at this time, we are seeking a CD prior to the sale of the following additional prohibited interests:

- AT&T
- Fortis, Inc.
- Union Pacific Corp.
- Verizon Communications

1. Financial Interests Held in a Joint Brokerage Account

While my spouse and I have unconditionally agreed to divest these financial interests to comply with 43 U.S.C. § 11 and 43 C.F.R. § 20.401(a), we would like to request a CD to defer paying capital gains tax on the financial interests sold to comply with the Department's supplemental regulations. These investments are not held in a tax-deferred or tax-advantaged account, such as an Individual Retirement Account or 401(k).

Below, please find detailed information on each investment for which I am requesting a CD, as required by 5 C.F.R. § 2634.1005:

Description of property	Owner of property	How the property was acquired	Number of shares	Approximate value
(b)(6)	Joint with spouse, John A. Culver	purchased on the open market in 2010	(b)(6)	
	Joint with spouse, John A. Culver	purchased on the open market from 2016 to 2021 (due to stock splits)		
	Joint with spouse, John A. Culver	purchased on the open market in 2020		
	Joint with spouse, John A. Culver	purchased on the open market from 2000 to 2014 (due to stock splits)		

Commented [GML1]: Flagging because this information will be required for each stock

2. Agreement to Divest and Recusal Requirement

I have agreed to divest in order to resolve the potential for a conflict of interest, real or perceived, and to comply with 43 U.S.C. § 11 and 43 C.F.R. § 20.401(a) by divesting these financial interests. Prior to divesting these assets, I have been recused from participating in particular matters that have a direct and predictable effect on any of my financial interests, including each of the entities listed in this request for a CD. I understand and agree that my recusal must remain in effect until I divest my financial interests in each of these entities.

3. Reinvestment in Permitted Property

I agree to reinvest the proceeds from the sale of the all financial interests divested pursuant to a CD into permitted property during the 60-day period beginning on the date of the

sale per 5 C.F.R. § 2634.1006. I understand that permitted property includes any obligation of the United States or a diversified investment fund, provided that any permitted property must not be any holding prohibited by statute, regulation, rule, or Executive Order. I will contact the Departmental Ethics Office with any questions on what is considered permitted property for reinvestment.

For these reasons, I request that you submit a request for a CD covering the financial interests listed in this letter to the Office of Government Ethics on my behalf.

7/14/21

Nada Culver
Deputy Director, Programs and Policy
Bureau of Land Management

Date



United States Department of the Interior

OFFICE OF THE SOLICITOR
Washington, D.C. 20240

September 3, 2021

MEMORANDUM

To: Nada W. Culver, Deputy Director of Policy and Programs,
Bureau of Land Management

From: Heather C. Gottry, Director, Departmental Ethics Office, and
Designated Agency Ethics Official

HEATHER GOTTRY Digitally signed by
HEATHER GOTTRY
Date: 2021.09.03
15:18:34 -04'00'

Monica L. Garcia, Deputy Director for Ethics Law & Policy, Departmental Ethics
Office & Alternate Designated Agency Ethics Official

Subject: Updated Ethics Guidance on Recusal Obligations

MONICA
GARCIA Digitally signed by
MONICA GARCIA
Date: 2021.09.03
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This memorandum provides guidance from the Departmental Ethics Office (DEO) about your ethics obligations while you serve as the Deputy Director of Policy and Programs, Bureau of Land Management for the U.S. Department of the Interior (DOI). The guidance in this memorandum supplements and replaces the Interim Ethics Guidance on Recusal Obligations memoranda issued to you on March 11, 2021 and July 27, 2021 and any interim ethics guidance on recusal obligations provided to you. The guidance in this memorandum is based on information that you have provided and sets forth guidance on your obligation to recuse from participating personally and substantially in certain matters in which you have either direct or imputed financial interests, or personal or business relationship(s), pursuant to ethics laws, regulations, and Executive Order 13989 entitled, "Executive Order on Ethics Commitments by Executive Branch Personnel" (Jan. 20, 2021) (Ethics Pledge).

SECTION 1 – FINANCIAL CONFLICTS OF INTEREST

As required by the criminal conflicts of interest law at 18 U.S.C. § 208(a), you may not participate personally and substantially in any particular matter¹ in which you know that you

¹ Additional guidance provided by the DEO on whether an issue, action, or decision pending at the DOI is a matter, particular matter of general applicability, or a particular matter involving specific parties is found in *Attachment A* to this memorandum.

have a financial interest directly and predictably affected by the matter, or in which you know that a person whose interests are imputed to you has a financial interest directly and predictably affected by the particular matter, unless you first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2), or qualify for a statutory exemption, pursuant to 18 U.S.C. § 208(b)(4). The interests of the following persons are imputed to you:

- Any spouse or minor child;
- Any general partner of a partnership in which you are a limited or general partner;
- Any organization in which you serve as an officer, director, trustee, general partner, or employee; and
- Any person or organization with which you are negotiating or have an arrangement concerning prospective employment.

Your spouse is currently a partner with the law firm of Benezra and Culver, PC. For as long as your spouse continues to work for Benezra and Culver, PC, you should not participate personally and substantially in any particular matter that to your knowledge has a direct and predictable effect on the financial interests of the firm, unless you first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1).

Based on information you have provided to the DEO, you and your spouse have fully divested your ownership interests in any prohibited interests listed on the 2021 Department of the Interior and 2021 Bureau of Land Management List of Prohibited Investments, both included as *Attachment B* to this memorandum.²

In addition, based on information you provided in your OGE Form 278e, the DEO identified a number of stock investments that may require your recusal from certain matters at the Department, including:

- Ute Distribution Corp. stock
- Alphabet, Inc. (GOOG) (GOOGL) stock
- Amazon.com, Inc. (AMZN) stock
- Caterpillar, Inc. (CAT) stock
- Citigroup, Inc. (C) stock
- FedEx Corp. (FDX) stock

² Please see Section 3 of this memorandum for a discussion of the additional ethics requirements imposed by the DOI Supplemental Ethics Regulations on certain personally held financial interests. Your New Entrant OGE Form 278e indicated that you held Berkshire Hathaway, Inc. (BRK.B) stock and Enbridge stock. On May 19, 2021, you submitted a OGE Form 278-T indicating that you sold your interests in BRK.B and Enbridge on April 23, 2021. Furthermore, you have confirmed that you have sold your interests in AT&T corporate bonds, Conoco Phillips corporate bonds, Berkshire Hathaway corporate bonds, Verizon Communications, Inc. corporate bonds, AT&T stock, Fortis, Inc. stock, Union Pacific Corp. stock, and Verizon Communications, Inc. stock and will submit an OGE Form 278-T reporting the sales.

- McCormick & Co, Inc. (MKC) stock
- Microsoft Corp. (MSFT) stock
- Snap-On, Inc. (SNA) stock
- Truist Financial (TFC) stock
- The Walt Disney Co. (DIS) stock
- 3M Co. (MMM) stock
- Johnson & Johnson (JNJ) stock
- Proctor & Gamble (PG) stock

The DEO also identified financial interests in securities for which you may potentially rely on a *de minimis* exemption under 5 C.F.R. § 2640.202. If you intend to rely upon this exemption, you must monitor the value of those interests.³ If the aggregate value of interests affected by a particular matter increases and exceeds the *de minimis* threshold, you should not participate personally and substantially in the particular matter that, to your knowledge, has a direct and predictable effect on the interests, unless you first obtain a written waiver pursuant to 18 U.S.C. § 208(b)(1).

In addition, we have identified that you are invested in a sector mutual fund:

- Invesco Water Resources ETF (PHO)

Based on the information reported in your New Entrant OGE Form 278e, DEO has identified that the Invesco Water Resources ETF (PHO) may qualify for the *de minimis* exemption for sector mutual funds. If you rely on a *de minimis* exemption under 5 C.F.R. § 2640.201(b) with regard to any of your financial interests in sector mutual funds, please monitor the value of those interests. If the aggregate value of your interests in sector mutual funds that concentrate in any one sector exceeds \$50,000, you should not participate personally and substantially in any particular matter that to your 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 you first obtain a written waiver pursuant to 18 U.S.C. § 208(b)(1).

Furthermore, based on information you provided in your OGE Form 278e, the DEO identified a number of bond investments that may require your recusal from certain matters at the Department, including:

- Alum Rock, California Union Elementary school bond

³ Based on the information included in your New Entrant OGE Form 278e, DEO has identified that the following securities may qualify for the *de minimis* exemption: Adient plc (ADNT); General Dynamics Corp. (GD); Johnson Controls, International plc (JCI); Mastercard, Inc. (MA); Merck & Co. Inc. (MRK); Starbucks Corp. (SBUX); Visa, Inc. (V); Coty, Inc. (COTY); Medtronic plc (MDT); Synchrony Financial (SYF); Alcon (ALC); Deere & Co. (DE); JPMorgan Chase & Co. (JPM); Lowe's Companies (LOW); and Novartis AG (NVS);. Please seek additional guidance if you intend to participate in any particular matter which could have a direct and predictable effect on the financial interest of any of those companies.

- Cisco Systems bond
- Public Highway Authority Colorado Revenue bond

You should recuse from particular matters in which these bonds pose a conflict of interest and because these corporate bonds constitute a debt owed by the issuer to the bondholder, they are not an equity interest in the entity that issued the debt. Therefore, for as long as you own these interests, you must not participate personally and substantially in any particular matter that to your knowledge has a direct and predictable effect on the marketability or market resale value of any of these bonds or on the ability or willingness of the issuer to pay their debt obligations, unless you first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2).

The list of your financial interests that require your recusal from certain matters at the Department is also included as *Attachment C* to this memorandum for reference.

You have informed the DEO that you currently use the services of a managed account or an investment professional. The DEO advises that you ensure that the account manager or investment professional obtains your prior approval on a case-by-case basis for the purchase of any asset other than cash, cash equivalents, or investment funds that qualify for the regulatory exemption for diversified mutual funds and unit investment trusts at 5 C.F.R. § 2640.201(a), or obligations of the United States.

Finally, in the event that an actual or potential conflict of interest arises during your appointment, you should consult with the DEO immediately and take the measures necessary to resolve the conflict, such as recusal from the particular matter or divestiture of an asset. Throughout your appointment, you must remain vigilant about your personal and any imputed financial interests and notify the DEO immediately should either they or your duties and responsibilities at the DOI change so you can receive updated ethics guidance.

SECTION 2 – IMPARTIALITY

As required by 5 C.F.R. § 2635.502(a), if you know that a particular matter involving specific parties⁴ is likely to have a direct and predictable effect on the financial interest of a member of your household, or know that a person with whom you have a “covered relationship”⁵

⁴ Additional guidance on whether an issue, action, or decision pending at the DOI is a particular matter involving specific parties is found in *Attachment A* to this memorandum.

⁵ Please note that for purposes of 5 C.F.R. § 2635.502(a), you have a “covered relationship” with: (1) A person, other than a prospective employer described in 5 C.F.R. § 2635.603(c), with whom you have or seek a business, contractual or other financial relationship that involves other than a routine consumer transaction; (2) A person who is a member of your household, or who is a relative with whom you have a close personal relationship; (3) A person for whom your spouse, parent or dependent child is, to your knowledge, serving or seeking to serve as an officer, director, trustee, general partner, agent, attorney, consultant, contractor or employee; (4) Any person for whom you have, within the last year, served as officer, director, trustee, general partner, agent, attorney, consultant,

is or represents a party to such matter, and where you determine that the circumstances would cause a reasonable person with knowledge of the relevant facts to question your impartiality in the matter, you will not participate in the matter unless you have informed the DEO of the appearance problem and received written authorization from the DEO to participate in the matter pursuant to 5 C.F.R. § 2635.502(d).

Based on information you have provided, including information in your certified New Entrant OGE Form 278e, the DEO identified that you have a “covered relationship” with the following individuals and/or entities:

- National Audubon Society, former employer – terminated employment in February 2021
- University of Denver Sturm College of Law, your spouse’s employer
- Benezra and Culver, PC, your spouse’s employer
- Your spouse’s clients.⁶

Accordingly, unless you receive prior DEO authorization, you should not participate in any particular matter involving specific parties in which you know any of the individuals or entities listed above is a party or represents a party, if you determine that a reasonable person with knowledge of the relevant facts would question your impartiality in the matter. This disqualification requirement may expand to a number of issues, actions, and decisions involving the individuals or entities listed above and we recommend that you consult with the DEO for additional guidance as needed. Please note that you are in the best position to know and identify your “covered relationships.” Please update the DEO if you identify additional “covered relationships” or if your identified “covered relationships” change.

In determining whether circumstances other than those specifically described in 5 C.F.R. § 2635.502(a) would raise a question regarding your impartiality in performing your official duties, you must consider the relevant facts about the particular matter in question and determine whether you believe that a reasonable person with knowledge of those facts would question your impartiality in performing your official duties in the particular matter. If you personally determine that a reasonable person with knowledge of the relevant facts would not question your impartiality in performing your official duties in the particular matter, then you may participate in the particular matter as part of your official duties. Additional guidance on whether an issue, action, or decision pending at the DOI is a particular matter is found in *Attachment A* to this memorandum.

contractor or employee; or (5) An organization, other than a political party described in 26 U.S.C. § 527(e), in which you are an active participant.

⁶ You have informed us that your spouse’s law firm, Benezra and Culver is a plaintiff’s employment firm with a focus on representing individual employees, primarily within the State of Colorado. You have not provided a list of current clients at this time, but you will remain responsible for recusals for all covered relationship or other disqualifications based on your spouse’s clients. For ease of reference, your recusals are identified in *Attachment C* to this memorandum.

In addition to the requirements discussed above related to 5 C.F.R. § 2635.502, as set forth in the Fourteen General Principles of Ethical Conduct, you must take steps to avoid any action that creates the appearance that you are violating the law or the ethical standards set forth in 5 C.F.R. Part 2635. 5 C.F.R. § 2635.101(b)(14). In considering whether a particular set of circumstances will create an appearance that the law or the ethical standards have been violated, you will need to assess the circumstances from the perspective of a reasonable person with knowledge of the relevant facts. As appearance issues can be complex, please consult as needed and appropriate with the DEO for further ethics guidance and assistance.

SECTION 3 – DOI SUPPLEMENTAL ETHICS REGULATIONS

As you are a Bureau of Land Management employee, you are prohibited by 43 U.S.C. § 11 from directly or indirectly purchasing or becoming interested in the purchase of any public land. In addition, 30 U.S.C. § 1211(f) prohibits you from holding a direct or indirect financial interest in any surface or underground coal mining operation if you perform any function or duty under Chapter 25 of Title 30 of the U.S. Code.

Pursuant to 5 C.F.R. § 3501.103(b) you are also prohibited from acquiring or holding any direct or indirect financial interest in Federal lands or resources administered or controlled by the DOI. This prohibition precludes stock or bond investments in many companies that hold DOI-granted permits and leases in Federal lands. The DEO has provided you with a list of prohibited investments (2021 List of Prohibited Investments and 2021 BLM List of Prohibited Investments), included as *Attachment B* to this memorandum, which includes investments in certain companies with oil, gas, solar, wind, and geothermal permits or leases on, or mineral rights in Federal lands above certain thresholds.

Additionally, absent a waiver under 5 C.F.R. § 3501.103(e), you, your spouse, and any of your minor children are prohibited by 5 C.F.R. § 3501.103(c) from acquiring or retaining any claim, permit, lease, small tract entries, or other rights that are granted by the DOI in Federal lands. This prohibition does not limit the recreational or other personal and noncommercial use of Federal lands on the same terms as use of Federal lands is available to the general public. 5 C.F.R. § 3501.103(c)(2)(i).

Based on information provided to the DEO, including in your certified New Entrant OGE Form 278e, OGE Form 278-Ts, and subsequent communications:

1. You do not currently hold financial interests identified on the 2021 Department of the Interior and 2021 BLM List of Prohibited Investments, included as *Attachment B* to this memorandum.
2. You confirmed that neither your spouse, any of your minor children, and you do not occupy or use Federal lands (other than on the same terms as use of Federal lands is available to the general public), and do not take any benefits from Federal

lands, based upon a contract, grant, lease, permit, easement, rental, agreement, mineral rights, grazing rights, or other holdings DOI issues or regulates.

In order to ensure compliance with the requirements of the DOI Supplemental Ethics Regulations, you must not acquire any financial interests identified on the 2021 List of Prohibited Investments or such lists published annually thereafter. You also must immediately update the DEO if you or your spouse or any of your minor children occupy or use Federal lands (other than on the same terms as use of Federal lands is available to the general public), and you and your spouse and any of your minor children must not take any benefits from Federal lands, based upon a contract, grant, lease, permit, easement, rental, agreement, mineral rights, grazing rights, or other holdings DOI issues or regulates.

SECTION 4 - OBLIGATIONS UNDER THE ETHICS PLEDGE

As a Biden Administration political appointee, you signed the Ethics Pledge required under Executive Order No. 13989 entitled, “Executive Order on Ethics Commitments by Executive Branch Personnel” (Jan. 20, 2021), on March 1, 2021, and are bound by the requirements and restrictions contained therein. A copy of your signed Ethics Pledge is included as *Attachment D* to this memorandum.

First, pursuant to the requirements of paragraph 2 of the Ethics Pledge, you may not participate personally and substantially, for two (2) years after the date of your appointment on January 20, 2021, in any particular matter involving specific parties that is directly and substantially related to your former employer⁷ or former clients,⁸ including regulations and contracts, unless you are first granted a waiver under the Ethics Pledge.

For purposes of paragraph 2 of the Ethics Pledge, and based on information provided to the DEO, your former employer(s) and former client(s) under the Ethics Pledge include:

⁷ For purposes of paragraph 2 of the Ethics Pledge, “former employer” is any person for whom you have within the two (2) years prior to the date of your appointment served as an employee, officer, director, trustee, or general partner, except that “former employer” does not include any executive agency or other entity of the Federal Government, State or local government, the District of Columbia, Native American tribe, any United States territory or possession, or any international organization in which the United States is a member state. Executive Order 13989, Section 2(k). For additional guidance on the definition of “former employer” please see OGE Legal Advisory DO-09-011, *Ethics Pledge: Revolving Door Ban--All Appointees Entering Government* (Mar. 26, 2009) (DO-09-011), which applies to Executive Order 13989 pursuant OGE Legal Advisory LA-21-03, *Executive Orders on Ethics Commitments by Executive Branch Personnel* (Jan. 22, 2021) (LA-21-03).

⁸ For purposes of paragraph 2 of the Ethics Pledge, “former client” is any person for whom you served personally as agent, attorney, or consultant within the two (2) years prior to the date of appointment, but excluding instances where the service provided was limited to speeches or similar appearances. It does not include clients of your former employer to whom you did not personally provide services. Executive Order 13989, Section 2(l). Additional guidance on the definition of “former client” is found in DO-09-011, which applies to Executive Order 13989 pursuant LA-21-03. Additionally, “former client” does not include any executive agency or other entity of the Federal Government, State or local government, the District of Columbia, Native American tribe, any United States territory or possession, or any international organization in which the United States is a member state. DO-09-011; LA-21-03.

- National Audubon Society
- The Wilderness Society⁹

For purposes of the Ethics Pledge, the term “particular matter involving specific parties” has the meaning set forth in 5 C.F.R. § 2641.201(h),¹⁰ except that it also includes any meeting or other communication relating to the performance of your official duties, unless the communication concerns a particular matter of general applicability and is made at a meeting or other event at which participation is open to all interested parties. OGE has advised the term “open to all interested parties” means that the meeting should include a multiplicity of parties representing a diversity of viewpoints. If a former employer or a former client is present, then, generally speaking, at least four other separate stakeholders should be present to ensure that a diversity of viewpoints is represented and not the same united perspective. DO-09-011.

You have confirmed to the DEO that you were not registered under the Lobbying Disclosure Act, 2 U.S.C. 1601 *et seq.*, or the Foreign Agents Registration Act (FARA), 22 U.S.C. 611 *et seq.*, within the 2 years before the date of your appointment. Accordingly, the recusal requirements under paragraph 3 of the Ethics Pledge are not applicable to your work at the DOI.

Finally, you have confirmed for the DEO that you have complied with paragraph 7 of the Ethics Pledge and did not accept and will not accept, including after entering Government, any salary or other cash payment from your former employer the eligibility for and payment of which is limited to individuals accepting a position in the United States Government. You further confirmed that you also have not accepted and will not accept any non-cash benefit from your former employer that is provided in lieu of such a prohibited cash payment.

SECTION 5 – ADDITIONAL ETHICS CONSIDERATIONS

We understand that you are an attorney, and previously provided legal services to clients prior to your assuming your position at DOI. Please ensure that you take all necessary steps, including removing yourself as counsel, to comply with the requirements of 18 U.S.C. § 203, which prohibits an employee from receiving, agreeing to receive, or soliciting compensation for representational services, rendered either personally or by another, before any court or Federal agency or other specified Federal entity, in connection with any particular matter in which the United States is a party or has a direct and substantial interest, and 18 U.S.C. § 205, which

⁹ You informed the DEO that you terminated employment with The Wilderness Society in May 2019. Therefore, because you were employed by The Wilderness Society in the two (2) years prior to the date of your appointment to the Department, you are required to comply with the disqualification requirements of paragraph 2 of the Ethics Pledge with respect to The Wilderness Society.

¹⁰ A “particular matter involving specific parties” will typically involve “a specific proceeding affecting the legal rights of the parties or an isolatable transaction or related set of transactions between identified parties, such as a specific contract, grant, license, product approval application, enforcement action, administrative adjudication, or court case.” 5 C.F.R. § 2641.201(h).

prohibits Federal employees from personally representing anyone before any court or Federal agency or other specified Federal entity, in connection with any particular matter in which the United States is a party or has a direct and substantial interest.

Finally, please be advised that the Rules of Professional Responsibility are beyond the scope of the DEO's review, so you should review your applicable Rules of Professional Responsibility in order to ensure that you are in compliance with any applicable requirements during your appointment at DOI. As a general matter, the DEO recommends that you review the American Bar Association (ABA) Model Rule of Professional Conduct 1.11: Special Conflicts of Interest For Former And Current Government Officers And Employees as well as any similar rule applicable in jurisdictions in which you are currently a member of the Bar. In addition to other requirements, ABA Model Rule 1.11 requires that a lawyer currently serving as a public officer or employee shall not "participate in a matter in which the lawyer participated personally and substantially while in private practice or nongovernmental employment, unless the appropriate government agency gives its informed consent, confirmed in writing." ABA Model Rule 1.11(d)(2)(i).

SECTION 6 – IMPLEMENTATION OF ETHICS GUIDANCE

To assist you in implementing the ethics guidance set forth in this memorandum, the DEO has prepared a List of Recusals and Quick Reference Chart, included as *Attachment C* to this memorandum. You have an obligation to continue to update the DEO about changed circumstances, including changes to your financial interests, changes in your personal or business relationships, or any changes to the nature of your DOI duties and responsibilities, so that the ethics guidance provided in this memorandum can be updated as needed and your recusal obligations can be documented. The DEO will also assist you in documenting your recusal obligations through a separate Ethics Recusals & Screening Arrangement memorandum, which also meets the requirements of Section 4(a)(iii) of Executive Order 13989.

SECTION 7 – UPDATE THE DEO AS NECESSARY

In consultation with the DEO, please revise and update this memorandum and *Attachment C - List of Recusals and Quick Reference Chart* whenever warranted by changed circumstances, including completion of your required divestitures and other changes to your financial interests, changes in your personal or business relationships, or any changes to the nature of your Department duties.

As a reminder, only a designated ethics official from the DEO can make ethics determinations on which DOI employees may authoritatively rely upon. Therefore, throughout the duration of your appointment, please contact the DEO with any questions about your recusal obligations discussed above or for further ethics guidance.

Attachment A – Guidance for Recusal Analysis

Attachment B – 2021 List of Prohibited Investments

(Department of the Interior and Bureau of Land Management)

Attachment C – List of Recusals and Quick Reference Chart

Attachment D – Ethics Pledge (signed March 1, 2021)



United States Department of the Interior

DATE, 2021

MEMORANDUM

To: Heather C. Gottry, Director, Departmental Ethics Office
& Designated Agency Ethics Official

From: Nada L. Culver, Deputy Director of Policy and Programs,
Bureau of Land Management

Subject: Ethics Recusals & Screening Arrangement

This memorandum serves to document my ethics recusals and the steps that I will take in order to ensure that I comply with all recusal and other ethics obligations required by law. Additionally, this memorandum fulfills the requirement established in Section 4(a)(iii) of Executive Order 13989 entitled, "Executive Order on Ethics Commitments by Executive Branch Personnel" (Jan. 20, 2021) (Ethics Pledge).

I have consulted with the Departmental Ethics Office (DEO) and have been advised about my recusal obligations while serving as an appointee of the U.S. Department of the Interior (DOI). As reflected in my Ethics Guidance on Recusal Obligations memorandum, dated **[DATE]**, 2021, which provides ethics guidance based on my certified New Entrant Public Financial Disclosure Report (OGE Form 278e) and information that I have provided to the DEO, I understand that I have a continuing obligation to limit my personal and substantial participation in certain matters in which I have either direct or imputed financial interests, or personal or business relationship(s), pursuant to ethics laws, regulations, and the Ethics Pledge, which I signed on March 1, 2021.

SECTION 1 – SCREENING ARRANGEMENT

OPTION 1 – USING A SCREENER

In order to help ensure that I do not participate in matters relating to any of the individuals or entities discussed in my Ethics Guidance on Recusal Obligations memorandum, and as summarized and listed on the attached List of Recusals and Quick Reference Chart, I have taken the following steps to implement a screening arrangement:

1. In coordination with the DEO, I have established the screening process below to assist in screening DOI matters directed to my attention or that require my participation which also involve the individuals or entities on the attached List of Recusals and Quick Reference Chart.
2. I have instructed my Screener to review DOI matters directed to my attention or that require my participation which involve the individuals or entities on the attached List of Recusals and Quick Reference Chart in order to determine whether I am recused from participating in the matter in question. [NAME & TITLE] serves as my Screener.
3. All matters involving the individuals or entities listed on the attached List of Recusals and Quick Reference Chart should be directed to my Screener without my knowledge or involvement until after the applicable recusal period ends.
4. If my Screener determines that a matter involves any of the individuals or entities listed on the attached List of Recusals and Quick Reference Chart and that I am recused from the matter, then they will refer the matter to [NAME & TITLE], for action or assignment, without my knowledge or involvement.
5. I will continue to personally take my calls and screen my e-mail communications. If a matter involving any of the individuals or entities listed on the attached List of Recusals and Quick Reference Chart is directed to my attention, I will not take any action, but immediately forward the matter to my Screener for review. If I am recused, then my Screener will refer the matter to [NAME & TITLE], for action or assignment, without my knowledge or involvement.
6. I will provide my Screener with a copy of this memorandum and attached List of Recusals and Quick Reference Chart, as well as my Ethics Guidance on Recusal Obligations memorandum, so that my Screener will fully understand the purpose and scope of my recusal obligations. In order to help ensure that I do not inadvertently participate in matters from which I should be recused, it is my expectation that my Screener will seek the assistance of the DEO if they are ever uncertain whether I may or may not participate in a matter.
7. I will also provide my principal subordinates with a copy of this this memorandum and attached List of Recusals and Quick Reference Chart. I will further instruct my principal subordinates that all inquiries involving my recusal obligations with respect to the individuals or entities listed on the attached List of Recusals and Quick Reference Chart should be directed to my Screener without my knowledge or involvement.

I understand that for the duration of this screening arrangement that I commit to working closely with my Screener and diligently reviewing issues, actions, and decisions that come

before me in order to determine whether any of the individuals or entities discussed in the Ethics Guidance on Recusal Obligations memorandum and listed on the attached List of Recusals and Quick Reference Chart are involved in the issues, actions, and decisions. I have been advised that the identification of party matters pending within the DOI in which the individuals or entities listed on the attached List of Recusals and Quick Reference Chart are parties or represent parties, may require my Screener, Bureau or Office staff members, Solicitor's Office staff assigned to the matters in question, and the DEO to carefully review my potential participation. Additionally, I understand that there may be times when there will be a delay in reviewing and potentially clearing my participation in matters as a result of screening for ethics compliance. I understand that, while efforts can and will be made to minimize any delays created by ethics recusal reviews, these delays may impact my ability to promptly participate in matters, including certain meetings and other communications.

OPTION 2 – SELF-SCREENING

After consultation with the DEO, I have elected to self-screen for recusals of all Department matters directed to my attention or that require my participation which involve the entities addressed in the Ethics Guidance Memorandum and listed on the attached List of Recusals and Quick Reference Chart in order to determine whether they involve any of the entities or organizations listed therein. In order to help ensure that I do not participate in matters from which I should be recused, I will take the following steps:

1. I will continue to personally take my calls and screen my e-mail communications, and will review all DOI matters directed to my attention or that require my participation which involve the individuals or entities on the attached List of Recusals and Quick Reference Chart in order to determine whether I am recused from participating in the matter in question.
2. If a particular matter involving any of the entities discussed in the Ethics Guidance Memorandum or listed on the attached List of Recusals and Quick Reference Chart is directed to my attention, I will not take any action, but immediately consult with the DEO, without my further involvement or knowledge of the particulars of the matter if I am uncertain whether or not I may participate in a particular matter.
3. If I determine that a matter involves any of the individuals or entities listed on the attached List of Recusals and Quick Reference Chart and that I am recused from the matter, then I will not take any action on the matter in questions and will refer the matter to [NAME & TITLE], for action or assignment, without my knowledge or involvement.
4. I will also inform my principal subordinates if I determine that a matter involves any of the individuals or entities listed on the attached List of Recusals and Quick Reference Chart and that I am recused from the matter. I will further instruct my principal subordinates that all inquiries and comments involving my recusal obligations should be

directed to the DEO without my involvement or knowledge of the particulars of the matter and will refer my principal subordinates to [NAME & TITLE], for any further action or assignment on the matter in question.

I understand that for the duration of this screening arrangement that I commit to diligently reviewing issues, actions, and decisions that come before me in order to determine whether any of the individuals or entities discussed in the Ethics Guidance on Recusal Obligations memorandum and listed on the attached List of Recusals and Quick Reference Chart are involved in the issues, actions, and decisions. I have been advised that the identification of party matters pending within the DOI in which the individuals or entities listed on the attached List of Recusals and Quick Reference Chart are parties or represent parties, may require Bureau or Office staff members, Solicitor's Office staff assigned to the matters in question, and the DEO to carefully review my potential participation. Additionally, I understand that there may be times when there will be a delay in reviewing and potentially clearing my participation in matters as a result of screening for ethics compliance. I understand that, while efforts can and will be made to minimize any delays created by ethics recusal reviews, these delays may impact my ability to promptly participate in matters, including certain meetings and other communications.

SECTION 2 – UPDATE THE DEO & SCREENING ARRANGMENT AS NECESSARY

In consultation with the DEO, I will revise and update this memorandum and attachment whenever warranted by changed circumstances, including changes to my financial interests, changes in my personal or business relationships, or any changes to the nature of my Department duties. Finally, I understand that ethics advice must come from the DEO, as only a designated ethics official can make ethics determinations on which Department employees may authoritatively rely upon and will consult with DEO as necessary and appropriate.

Attachment – List of Recusals and Quick Reference Chart

CC: Larry Roberts, Chief of Staff
Laura Daniel-Davis, Principal Deputy Assistant Secretary for Land and Mineral Management
[Add any additional parties to include]

From: [Garcia, Monica L](#)
To: [Derting, Elizabeth K](#)
Subject: Declined: Culver FD Report

Something came up and I'll need to speak with you tomorrow.



United States Department of the Interior

[DATE], 2021

MEMORANDUM

To: Heather C. Gottry, Director, Departmental Ethics Office
& Designated Agency Ethics Official

From: Alexx Diera, Special Assistant, Bureau of Land Management

Subject: Ethics Recusals & Screening Arrangement

This memorandum serves to document my ethics recusals and the steps that I will take in order to ensure that I comply with all recusal and other ethics obligations required by law. Additionally, this memorandum fulfills the requirement established in Section 4(a)(iii) of Executive Order 13989 entitled, “Executive Order on Ethics Commitments by Executive Branch Personnel” (Jan. 20, 2021) (Ethics Pledge).

I have consulted with the Departmental Ethics Office (DEO) and have been advised about my recusal obligations while serving as an appointee of the U.S. Department of the Interior (DOI). As reflected in my Ethics Guidance on Recusal Obligations memorandum, dated [DATE], 2021, which provides ethics guidance based on my certified New Entrant Public Financial Disclosure Report (OGE Form 278e) and information that I have provided to the DEO, I understand that I have a continuing obligation to limit my personal and substantial participation in certain matters in which I have either direct or imputed financial interests, or personal or business relationship(s), pursuant to ethics laws, regulations, and the Ethics Pledge, which I signed on January 25, 2021.

SECTION 1 – SCREENING ARRANGEMENT

After consultation with the DEO, I have elected to self-screen for recusals of all Department matters directed to my attention that involve any direct or imputed financial interests, or personal or business relationship(s), including the individuals and/or entities addressed in the Ethics Recusal Guidance Memorandum and listed on the attached List of Recusals and Quick Reference Chart in order to determine whether they involve any of the entities or organizations listed therein. In order to help ensure that I do not participate in matters from which I should be recused, I will take the following steps:

1. I will continue to personally take my calls and screen my e-mail communications, and will review all DOI matters directed to my attention or that require my participation which involve the individuals and/or entities on the attached List of Recusals and Quick Reference Chart in order to determine whether I am recused from participating in the matter in question.
2. If a particular matter involving any of my direct or imputed financial interests, or personal or business relationship(s), including the individuals and/or entities listed on the attached List of Recusals and Quick Reference Chart, is directed to my attention, I will not take any action, but immediately consult with the DEO, without my further involvement or knowledge of the particulars of the matter if I am uncertain whether or not I may participate in a particular matter.
3. If I determine that a matter involves any of my direct or imputed financial interests, or personal or business relationship(s), including the individuals and/or entities listed on the attached List of Recusals and Quick Reference Chart, and that I am recused from the matter, then I will not take any action on the matter in questions and will refer the matter to Nada Culver, Deputy Director of Policy and Programs, for action or assignment, without my knowledge or involvement.
4. I will also inform my colleagues if I determine that a matter involves any of my direct or imputed financial interests, or personal or business relationship(s), including any of the individuals and/or entities listed on the attached List of Recusals and Quick Reference Chart, and that I am recused from the matter. I will further instruct my colleagues that all inquiries and comments involving my recusal obligations should be directed to the DEO without my involvement or knowledge of the particulars of the matter and will refer them to Nada Culver, Deputy Director of Policy and Programs, for any further action or assignment on the matter in question.

I understand that for the duration of this screening arrangement that I commit to diligently reviewing issues, actions, and decisions that come before me in order to determine whether any of my direct or imputed financial interests, or personal or business relationship(s), including the individuals and/or entities listed on the attached List of Recusals and Quick Reference Chart, are involved in the issues, actions, and decisions. I have been advised that the identification of party matters pending within the DOI in which the individuals and/or entities listed on the attached List of Recusals and Quick Reference Chart are parties or represent parties, may require Bureau or Office staff members, Solicitor's Office staff assigned to the matters in question, and the DEO to carefully review my potential participation. Additionally, I understand that there may be times when there will be a delay in reviewing and potentially clearing my participation in matters as a result of screening for ethics compliance. I understand that, while efforts can and will be made to minimize any delays created by ethics recusal reviews, these

delays may impact my ability to promptly participate in matters, including certain meetings and other communications.

SECTION 2 – UPDATE THE DEO & SCREENING ARRANGMENT AS NECESSARY

In consultation with the DEO, I will revise and update this memorandum whenever warranted by changed circumstances, including changes to my financial interests, changes in my personal or business relationships, or any changes to the nature of my Department duties. Finally, I understand that ethics advice must come from the DEO, as only a designated ethics official can make ethics determinations on which Department employees may authoritatively rely upon and will consult with DEO as necessary and appropriate.

Attachment – List of Recusals and Quick Reference Chart

Cc: Nada Culver, Deputy Director of Policy and Programs

From: [Garcia, Monica L](#)
To: [Derting, Elizabeth K](#)
Subject: Discuss Culver Report

Microsoft Teams meeting

Join on your computer or mobile app

Click here to join the meeting (b)(5)

[REDACTED]

Or call in (audio only)

(b)(5)

United States, Washington DC

Phone Conference ID: (b)(5)

Find a local number <<https://dialin.teams.microsoft.com/4c997179-2249-4e53-b877-e71d83c10c7a?id=191786300>> | Reset PIN
<<https://mysettings.lync.com/pstnconferencing>>

Learn More <<https://aka.ms/JoinTeamsMeeting>> | Meeting options (b)(5)

[REDACTED]

From: [Gottry, Heather C](#)
To: [Culver, Nada L](#); [Garcia, Monica L](#)
Subject: Discuss Ethics Recusals

Microsoft Teams meeting

Join on your computer or mobile app

Click here to join the meeting (b)(5)

[REDACTED]

Or call in (audio only)

(b)(5) United States, Washington DC

Phone Conference ID: (b)(5)

Find a local number <<https://dialin.teams.microsoft.com/4c997179-2249-4e53-b877-e71d83c10c7a?id=867095143>> | Reset PIN
<<https://mysettings.lync.com/pstnconferencing>>

Learn More <<https://aka.ms/JoinTeamsMeeting>> | Meeting options (b)(5)

[REDACTED]

From: [Gottry, Heather C](#)
To: [Culver, Nada L](#); [Garcia, Monica L](#)
Subject: Discuss Sabinoso Wilderness

Microsoft Teams meeting

Join on your computer or mobile app

Click here to join the meeting (b)(5)

[REDACTED]

Or call in (audio only)

(b)(5) United States, Washington DC

Phone Conference ID: (b)(5)

Find a local number <<https://dialin.teams.microsoft.com/4c997179-2249-4e53-b877-e71d83c10c7a?id=546182285>> | Reset PIN
<<https://mysettings.lync.com/pstnconferencing>>

Learn More <<https://aka.ms/JoinTeamsMeeting>> | Meeting options (b)(5)

[REDACTED]

From: [Futrowsky, Steven G](#)
To: [Raviv, Deborah A](#); [Gottry, Heather C](#)
Subject: Discussion on Culver complaint

Microsoft Teams meeting
Join on your computer or mobile app
Click here to join the meeting (b)(5)

Or call in (audio only)

(b)(5) United States, Washington DC

Phone Conference ID: (b)(5)

Find a local number <<https://dialin.teams.microsoft.com/4c997179-2249-4e53-b877-e71d83c10c7a?id=685459216>> | Reset PIN
<<https://mysettings.lync.com/pstnconferencing>>

Learn More <<https://aka.ms/JoinTeamsMeeting>> | Meeting options (b)(5)

From: [Garcia, Monica L](#)
To: [Nada Culver](#); [Gottry, Heather C](#)
Subject: DOI Ethics Discussion

Microsoft Teams meeting

Join on your computer or mobile app

Click here to join the meeting [\(b\)\(5\)](#)

[REDACTED]

Learn More <<https://aka.ms/JoinTeamsMeeting>> | Meeting options [\(b\)\(5\)](#)

[REDACTED]

Nada and Mike – Hello! I wanted to share the attached 2021 Ethics Program Review Follow-Up Report completed by the U.S. Office of Government Ethics (OGE) on the Bureau of Land Management's ethics program with you. I am so pleased to highlight that all open recommendations have been successfully closed.

As background, OGE completed a review of the BLM ethics program and issued five recommendations in a June 2016 review report. OGE issues recommendations when they identify significant compliance and ethics program deficiencies, and conducts follow-up reviews to confirm that agencies have satisfactorily addressed any open recommendations.

Due to changes in the BLM ethics program, which involved significant structural and personnel changes, we twice requested that OGE postpone their initial follow up review to allow time to implement needed improvements to address the open recommendations. OGE conducted its initial follow-up review of the BLM ethics program in May 2020, but only closed three of the five open recommendations. In June 2021, OGE conducted a second follow-up review and closed the remaining two open recommendations. Specifically, as reported on the attached, OGE found that 80% of new entrant financial disclosure reports are filed by the established deadline and 92% of new employees receive initial ethics training within the 90 day deadline.

These two open recommendations were closed by OGE thanks to both the support of the ethics program by BLM leadership and the good and hard work of the members of the BLM ethics team. While the DEO, Ed Shin, and the other members of the BLM ethics team will continue to work to improve compliance percentages, I hope that you will join me in congratulating the BLM ethics team on their excellent work to bring the BLM ethics program into compliance with OGE's requirements.

Please let me know if it would be helpful to set up a time to discuss either the attached or the BLM ethics program further. Thank you.

These Due to the hard work

We look forward to speaking with you tomorrow morning about the 2020 Follow-Up Ethics Inspection Report for the Bureau of Land Management completed by the U.S. Office of Government Ethics, and our plans to address the open findings.

As you know, and in large part thanks to your support and the support of other Bureau/Office leadership, the Departmental Ethics Office (DEO) has recently taken a number of steps towards ensuring that ethical conduct is the hallmark of service at the Department. Specifically, the BLM ethics team has increased from one to five current ethics officials with plans to add more ethics officials to the team in the near future. With this additional staffing, the BLM ethics team will be even better positioned to address the open findings identified by OGE and to also continue to provide ethics services to BLM employees.

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Michelle, Roxanne, and I look forward to our meeting tomorrow and are confident that the BLM ethics team working with the DEO Leadership Team will be able to address the open findings in the 2020 Follow-Up Ethics Inspection Report. Thank you and hope you have a great evening!



United States Department of the Interior

OFFICE OF THE SOLICITOR

Washington, D.C. 20240

August 16, 2021

The Honorable Bruce Westerman
Ranking Member
U.S. House of Representatives Committee
on Natural Resources
United States House of Representatives
Washington, D.C. 20510

Dear Representative Westerman:

This letter provides a response by the Departmental Ethics Office (DEO) of the U.S. Department of the Interior to your letters, dated on June 3, 2021 and June 22, 2021, regarding ethics guidance provided to Nada Culver.

As an initial matter, I would like to take this opportunity to provide some background about the important work that the DEO undertakes to enhance ethics compliance and prevent conflicts of interest throughout the Department. The DEO provides ethics guidance to all of the Department employees through ethics training, the collection and review and financial disclosure reports, and the provision of advice and counsel.

Following her confirmation as Secretary, on March 19, 2021, Secretary Haaland sent a message to all Department employees highlighting that ethics officials serve as a valued resource and encouraging employees to consult with the DEO. In the past 24 months, the DOI has more than doubled the number of dedicated, full-time ethics officials providing ethics services. A more robust DEO is helping management across the DOI ensure their personnel, programs, and operations are in compliance with our critically important ethics laws and regulations. The DEO's goal is to build one of the finest ethics programs in the Federal government and to ensure the personnel, policies, and resources are firmly in place to maintain it for future generations of DOI employees.

On January 20, 2021, President Biden issued Executive Order No. 13989, titled "Executive Order on Ethics Commitments by Executive Branch Personnel." This Executive Order requires every "appointee" in each executive agency appointed on or after January 20, 2021, to sign the Ethics Pledge established therein. As a Biden Administration appointee, Ms. Culver signed the Ethics Pledge on March 1, 2021. A copy of her signed Ethics Pledge is enclosed.

All new administration appointees who onboarded on or after January 20, 2021, including Ms. Culver, receive comprehensive initial ethics training. Ms. Culver attended initial ethics training on March 1, 2021. The goal of the initial ethics briefing and training was to provide incoming administration appointees with a summary of applicable ethics laws and regulations and to provide a foundation for employees to use when assessing their obligations as well as highlighting when it would be helpful to engage with the DEO on specific questions about their personal compliance.

Additionally, the DEO provided Ms. Culver with a draft memorandum providing interim ethics guidance on her recusal obligations on March 2, 2021, and further updated draft memorandum on her interim ethics guidance on her recusal obligations on March 7, 2021. On March 11, 2021, the DEO issued a memorandum providing interim ethics guidance to Ms. Culver. In preparing these memoranda, the DEO relied up on Ms. Culver's resume and discussions with Ms. Culver. A copy of Ms. Culver's resume on file with the Department, copies of the above-reference draft memoranda, and a copy of the memorandum providing interim ethics guidance to Ms. Culver are enclosed.

Like all new administration appointees with such obligations, Ms. Culver's ethics training and ethics guidance memoranda advised her to diligently screen and decline meeting requests and other communications from a former employer or client, to disqualify herself from participation in party matters where a former employer or client is a party or represents a party to that matter, and to consult with the DEO on any questions. The goal of these memoranda was to provide specific and tailored guidance about recusal obligations based on information provided prior to the certification of Ms. Culver's New Entrant OGE Form 278e, Public Financial Disclosure Report (OGE Form 278e).

On April 12, 2021, Ms. Culver filed her New Entrant OGE Form 278e after receiving a fourteen (14) day filing extension. Her New Entrant OGE Form 278e was certified by the DEO on June 9, 2021. The review of the financial disclosure report is to confirm the information necessary to identify direct and imputed financial interests as well as identify any covered relationships with outside entities so that additional ethics guidance can be provided as necessary and appropriate. A copy of Ms. Culver's New Entrant OGE Form 278e is enclosed.

Based on this information, on July 27, 2021, the DEO issued an updated interim ethics guidance memorandum to Ms. Culver providing ethics guidance on her recusal obligations. This memorandum will be updated and finalized when divestiture of certain assets has been completed. On July 29, 2021, Ms. Culver signed and implemented an Ethics Recusals & Screening Arrangement, which documents the screening process that it is our understanding that Ms. Culver has been undertaking since March and serves to formally identify both staff and a process that will further assist her in meeting her ethics obligations. A copy of these materials is enclosed.

Please note that prior to 2019, when the DEO increased staffing to meet the ethics needs of Department employees, it was the practice of the DEO to provide comprehensive ethics recusals guidance memoranda and/or screening arrangements only to administration appointees in Senate-confirmed positions. Prior to this updated practice, all non-Senate confirmed administration appointees would fulfill their ethics obligations with the help of initial ethics training and ongoing advice from the DEO.

In 2019, with the support of the Department's previous leadership, the DEO established a practice to provide written ethics guidance to all onboarding administration appointees tailored to their specific circumstances and recusal obligations, and the Department's current leadership has supported continuation of this practice. In addition, it is also the practice of the DEO to provide each onboarding appointee with comprehensive support in completing their New Entrant OGE Form 278e reports and the reports were then carefully reviewed by the DEO prior to certification. Once an appointee's financial disclosure report is certified, it is the practice of the DEO to provide all onboarding administration appointees with comprehensive ethics recusals guidance memoranda and/or screening arrangements. Finally, please note that the time frame for the completion of Ms. Culver's final written ethics guidance is not unusual during a transition between administrations due to the increase in the number of onboarding staff and the need to prioritize ethics review and materials for nominees to the Department's many Senate-confirmed positions.

Our goal in the DEO is to ensure that all employees have the information and resources that they need to comply with all applicable ethics laws and regulations. The DEO, through its committed staff of career ethics professionals, stands ready to assist employees with questions about how to best meet their personal ethics obligations.

Thank you for contacting me and I appreciate your interest in the Department's Ethics Office. A similar has been provided to the cosigners of your letter.

Sincerely,

Heather C. Gottry
Director, Departmental Ethics Office
& Designated Agency Ethics Official

Enclosures

cc: The Honorable Raúl Grijalva, Chair, House Committee on Natural Resources
The Honorable Katie Porter, Chair, Subcommittee on Oversight and Investigations

From: [Garcia, Monica L](#)
To: [Culver, Nada L](#)
Cc: [Gottry, Heather C](#); [Genter, Constance G](#)
Subject: Ethics check-in
Date: Friday, April 23, 2021 6:34:16 AM
Importance: High

Nada,

With apologies for the short notice, we need to connect as early as possible today and get some additional information from you about your investments. We were asked to look at your travel to testify on BLM oil and gas leasing activity.

When we reviewed your disclosure as part of our ethics clearance process, we became aware that you possibly own DOI prohibited stock and likely own stock in oil and gas companies over the *de minimis* conflicts threshold. We need to connect and get detailed information on the holdings in your investment accounts (yours and your spouse's, as they are imputed to you) and have a discussion.

We can be available at your convenience.

-Monica

Please note: I will be teleworking until further notice

Monica L. Garcia
Deputy Director for Ethics Law & Policy
and Alternate Designated Agency Ethics Official
Departmental Ethics Office | Office of the Solicitor
U.S. Department of the Interior | MIB 5316
(O): (202) 208-0460
(C): (202) 880-4474
Email: monica.garcia@sol.doi.gov

Visit us online at www.doi.gov/ethics

Integrity is Our Mission.

From: [Garcia, Monica L](#)
To: (b)(6)
Cc: [Gottry, Heather C](#)
Subject: Ethics Preliminary Review
Date: Monday, January 4, 2021 12:47:55 PM
Attachments: [2020 Prohibited Holdings for OSSOL.pdf](#)

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

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

1. Do you hold any direct or indirect financial interest in Federal lands or resources administered or controlled by the Department?
 - a. If so, please describe.
 - b. Please also review the attached list which identifies certain financial holdings which are prohibited for certain Department employees to hold by statute or supplemental regulation. Please note that we will be updating this list shortly to add a few additional entries, but it will largely be the same for 2021.
 - c. Please note that if you will be working on matters for U.S. Geological Survey, Office of Surface Mining Reclamation and Enforcement, U.S. Bureau of Land Management, Bureau of Ocean Energy Management, Bureau of Safety and Environmental Enforcement, and the Office of Natural Resources Revenue, there may be additional prohibitions that you will need to comply with after appointment, if appointed.
2. Do you, your spouse and/or minor children retain any claim, permit, lease, small tract entries, or other rights that are granted by the Department in Federal lands?
 - a. If so, please describe.
3. Do you currently serve as an officer, director, trustee, or general partner of any entity not listed on your resume?
 - a. If so, please identify and describe your role and position(s), including whether you plan to continue your position(s) after appointment, if appointed.
4. Please identify your spouse's current employer(s), if applicable.
5. Are all of your employers for the preceding two calendar years listed on your resume?
 - a. If not, please provide the name of any employers not on your resume and identify your position with the employer.
6. If you provided other personal services to clients (including through your employer), please list all of your clients for the preceding two calendar years, if not already listed on your resume.
 - a. Please note that personal services can include legal services, consulting services,

lobbying services, pro bono, or other uncompensated volunteer activities, *etc.*

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

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

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

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

-Monica

Please note: I will be teleworking until further notice

Monica L. Garcia
Acting Deputy Director for Ethics Law & Policy
and Acting Alternate Designated Agency Ethics Official
Departmental Ethics Office | Office of the Solicitor
U.S. Department of the Interior | MIB 5316
(O): (202) 208-0460
(C): (202) 880-4474
Email: monica.garcia@sol.doi.gov

Visit us online at www.doi.gov/ethics

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From: [Garcia, Monica L](#)
To: [Culver, Nada L](#); [Gottry, Heather C](#)
Subject: Ethics Questions check-in

Microsoft Teams meeting

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[REDACTED]

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[REDACTED]

From: [Derting, Elizabeth K](#)
To: [Culver, Nada L](#)
Cc: [Garcia, Monica L](#)
Subject: Final Review and Questions on your New Entrant Financial Disclosure Report
Date: Tuesday, June 8, 2021 12:10:33 PM
Attachments: [Culver New Entrant Report \(Technical Updates 06.08.21\).pdf](#)

Hello, Nada,

I hope you are doing well!

We apologize for the delay in getting back to you to wrap up the review of your New Entrant report but wanted to follow up with some final questions and also find a time to meet to discuss divestiture options for the remaining stock that needs to be divested.

Below are our final questions about the information in your report. I've also highlighted them in the attached, updated report so that you can easily find them.

- Section 5, line 4.25 - What is the income amount for New Perspective Fund?
- Section 5, line 5.8 - (b)(5) [REDACTED]
- Section 5, line 5.12 - (b)(6) [REDACTED]
- Section 5, line 5.17 - What was the income amount in interest?
- Section 6, line 1 - In what city and state is the condo located? Is it residential or commercial? Finally, is there a mortgage on it? If so, we may need to add the mortgage entry in Section 8.
- Please see how we added some description/notes to the names of Joint Accounts 1-3 in Section 6. These are just considered technical updates.
- Section 6, line 3.5 - What is the interest income amount?
- Section 6, line 3.6 - What was the income amount (and type, if applicable)?
- Section 6, line 4 - (b)(6) [REDACTED]

Finally, are you available this evening or tomorrow for a call to finalize this report and discuss the other prohibited assets and divestiture options? It looks like these times are available, so please let me know if you have a preference.

- Today at 5:30-6pm (Eastern)
- Tomorrow at 3:30-4:00 pm (Eastern)
- Tomorrow at 4:00 - 4:30 pm (Eastern)

Thanks again! We look forward to talking with you.

Libby

Libby Derting

Supervisory Attorney-Advisor, Financial Disclosure Branch

Departmental Ethics Office | Office of the Solicitor

U.S. Department of the Interior | MIB 5320

Email: elizabeth.derting@sol.doi.gov

Please note: I am teleworking until further notice. You can also reach me on MS Teams.

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From: [Garcia, Monica L](#)
To: [Culver, Nada L](#)
Cc: [Derting, Elizabeth K](#)
Subject: Financial Disclosure Meeting
Date: Tuesday, April 27, 2021 9:07:06 AM

Hello, Nada,

Thank you again for filing your New Entrant Public Financial Disclosure Report, OGE Form 278e. As we discussed last week, we would like to schedule a time to follow up on our phone conversation and work with you to review the assets, income, and retirement accounts you reported and, where necessary, address any potential conflicts of interest or prohibited assets through recusals or divestiture. We will also work with you to update the interim recusal memo currently in place and provide updated ethics guidance based on the information in your New Entrant Report. I'll be joined by Libby Derting, who will help me with the technical review and any necessary revisions to your report.

I would like to propose that we meet to review your New Entrant Report late this week or early next week, if possible, so that we can give you timely guidance on any additional recusals or other remedial actions that may be needed. It looks like the following times (all are Eastern time) may work for your schedule:

- Friday, 4/30
 - 9:00 – 9:30 am
 - 10:30 – 11:00 am
- Monday, 5/3
 - 5:00 – 5:30 pm

Please let me know if any of these will work for you, or if you would like me to look for a time later next week.

Thank you!

Monica

Please note: I will be teleworking until further notice

Monica L. Garcia
Deputy Director for Ethics Law & Policy
and Alternate Designated Agency Ethics Official
Departmental Ethics Office | Office of the Solicitor
U.S. Department of the Interior | MIB 5316
(O): (202) 208-0460
(C): (202) 880-4474
Email: monica.garcia@sol.doi.gov

Visit us online at www.doi.gov/ethics

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From: [Gottry, Heather C](#)
To: [Raviv, Deborah A](#); [Futrowsky, Steven G](#)
Subject: Follow Up on Request for Culver Materials
Date: Tuesday, July 27, 2021 8:56:37 AM
Attachments: [Culver, Nada - Ethics Pledge \[signed 3.1.2021\].pdf](#)
[Culver New Entrant OGE Form 278 .pdf.pdf](#)
[Culver OGE Form 278-T \(05.19.21\).pdf.pdf](#)
[Culver OGE Form 278-T \(06.20.21\).pdf.pdf](#)
[Interim Ethics Recusal Memo - Culver \(3.11.21\).pdf](#)

Deborah and Steve – Good morning! As discussed, attached please find Nada Culver’s signed Ethics Pledge, filed Financial Disclosure reports, and interim ethics recusal guidance. I will also shortly forward on an email which include a copy of the ethics training she received. I have asked my team to let me know whether anyone provided guidance to Nada with respect to her involvement in meetings, events, decisions, or actions about BLM’s recent determinations with respect to Public Land Orders (PLOs) for mineral development in Alaska, and will report back once I have their responses. Finally, once it is signed, I will send on her final ethics guidance. Please do not hesitate to reach out in the interim if we can be of any additional assistance. Thank you.

- Heather

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

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

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From: [Gottry, Heather C](#)
To: [Culver, Nada L](#)
Cc: [Garcia, Monica L](#)
Subject: Follow Up: Updated Interim Ethics Guidance and Draft Recusal/Screening Arrangement
Date: Wednesday, June 23, 2021 9:51:29 AM
Attachments: [Culver Nada - Ethics Recusal Guidance Memorandum \(Draft for Review 06.21.21\).docx](#)
[Attachment A - Ethics Recusal Guidance Memorandum.pdf](#)
[Culver, Nada - Attachment B.pdf](#)
[Culver, Nada - Recusal Attachment C - Quick Guide Recusal Chart \(Draft for Review 6.19.21\).docx](#)
[Culver, Nada - Attachment D Ethics Pledge.pdf](#)

Nada – Hello again! I hope that you are having a good week. I wanted to reach out to see if it would be helpful to schedule a time to touch base to discuss the attached materials. If so, please let me know if you would like me to look for an open time on your calendar or if you would like me to work with a member of your team. Many thanks.

- Heather

From: Gottry, Heather C
Sent: Monday, June 21, 2021 10:35 AM
To: Culver, Nada L <nculver@blm.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: Updated Interim Ethics Guidance and Draft Recusal/Screening Arrangement

Nada – Hello! Now that we have completed our review of your New Entrant OGE Form 278e and recusal obligations, we are ready to issue updated interim ethics guidance. Please note that your guidance remains interim pending completion of required divestitures. For your review and discussion, please see the attached materials that will serve to document your ethics obligations, including your recusals:

- A draft memorandum from the DEO providing Updated Interim Ethics Guidance on Recusal Obligations, describing your ethics obligations, including those implemented through the Biden Administration’s Ethics Pledge (and the below attachments)
 - *Attachment A* – Guidance for Recusal Analysis
 - *Attachment B* – 2021 Department of the Interior and 2021 Bureau of Land Management List of Prohibited Investments
 - *Attachment C* – List of Recusals and Quick Reference Chart (this document summarizes your identified recusals, scope of the recusals, and applicable time periods)
 - *Attachment D* – Ethics Pledge (signed March 1, 2021)
- A draft Ethics Recusals & Screening Arrangement, a document for your signature which includes two potential options for a step-by-step process for implementing your recusal obligations through a screening arrangement. We have drafted this document with two potential options, either that you select a screener to assist with your recusal obligations and avoid any inadvertent participation in a matter which would otherwise require your recusal or you can elect to self-screen. We are happy to discuss the pros/cons of either approach and assist you in determining the best path forward. Please note that the attachment referenced in the document will be the same as Attachment C to the Ethics Guidance on

Recusal Obligations.

I am happy to schedule a time to walk you through the attached documents to ensure that the facts are complete and correct and to discuss any questions. Please let me know your availability. Thank you and have a great evening!

- Heather

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

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

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From: [Derting, Elizabeth K](#)
To: [Culver, Nada L](#); [Garcia, Monica L](#)
Subject: Follow-up on New Entrant Report

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[REDACTED]

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<<https://mysettings.lync.com/pstnconferencing>>

Learn More <<https://aka.ms/JoinTeamsMeeting>> | Meeting options (b)(5)

[REDACTED]

From: [Derting, Elizabeth K](#)
To: [Culver, Nada L](#)
Cc: [Garcia, Monica L](#)
Subject: Follow-up on Remaining Assets that Require Divestiture
Date: Friday, June 11, 2021 3:54:16 PM
Attachments: [IRS Tax Code on Certificates of Divestiture.docx](#)
[Sale of property to comply with conflict-of-interest requirements \(26 USC 1043\).pdf](#)
[Rollover into permitted property \(5 CFR 2634.106\).pdf](#)
[Office of Gov't Ethics - Certificate of Divestiture Fact Sheet.pdf](#)

Hello, Nada,

Thanks again for talking with me on Wednesday. We were able to finalize and certify your New Entrant financial disclosure report, and we really appreciate all of your time and commitment to working with us on the financial disclosure.

As a follow-up to our conversations, I've indicated below the assets and investments which we discussed as being on the prohibited lists for the Office of the Secretary and for BLM. Since you have already divested of and submitted the period transaction report for the Berkshire Hathaway and Enbridge stock, I have only included the remaining ones which still require action.

Please remember that all of them are subject to immediate recusal requirements. You must not participate personally and substantially in any particular matter in which you know that the financial interests of the companies are directly and predictably affected by the matter.

- Section 5 - Spouse's Employment Assets & Income and Retirement Accounts
 - (b)(6) [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - Since these are in your spouse's portfolio, if you choose to keep them, you would remain subject to recusals from matters that would impact their willingness or ability to honor or repay these bonds (liabilities).
- Section 6 - Other Assets and Income
 - (b)(6) [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]

Your full range of options for action on the prohibited interests are below.

Deadline for Action. Within 30 days of this email, but no later than July 30, 2021, you must take one of the following actions.

1. Provide written confirmation to the Departmental Ethics Office (DEO) that you no longer own this asset.
 - You may transfer your ownership interest in the assets to another person, and

provide written confirmation to the DEO that you no longer personally retain any ownership interest in them. However, you will remain subject to continued ethics restrictions and recusals, if you transfer ownership of these assets to your spouse, dependent child, general partner, or certain other individuals.

- You may sell the assets and provide written confirmation of sale to the DEO.
 - *What about capital gains tax?* If you will incur capital gains tax as a result of a sale of these assets to comply with ethics requirements, you may request a certificate of divestiture from the Office of Government Ethics **before** you divest your ownership interests. A certificate of divestiture may defer your payment of capital gains tax, but you must be granted a written certificate **before you sell!** Please let us know if you are considering requesting a certificate of divestiture. Below is more information about this option.
2. Request and Receive a Waiver. You may request that the DOI's Designated Agency Ethics Official (DAEO) waive the prohibition on holding a direct or indirect financial interest in Federal lands or resources administered by DOI, based on compelling factual and legal circumstances. A waiver must be accompanied by appropriate conditions, such as a written statement of your disqualification from participation in government matters that could create a real or apparent conflict of interest. Please reach out to the DEO if you are considering requesting a waiver from the DAEO.
 3. Reassignment. Provide written confirmation of a personnel action reassigning you to a position that is not subject to this ethics prohibition.

Enforcement. If you fail to take one of the remedial actions discussed above, then pursuant to 43 C.F.R. § 20.602(d) you will be in violation of DOI ethics regulations and potentially subject to disciplinary action. Also, as ethics officials, we are required by 43 C.F.R. § 20.103(b) to report violations of ethics laws or regulations to the Office of Inspector General or other appropriate authority.

Since you have expressed interest in obtaining a Certificate of Divestiture (CD) for the investments that you are required to divest, I am also providing general background on Certificate of Divestitures and the Certificate of Divestiture request process. This email is informational only and is not intended as financial advice. If you need financial advice you are encouraged to contact a tax professional.

A Certificate of Divestiture, if granted, permits you to sell a prohibited asset(s) and defer paying capital gains taxes on the sale so long as the following conditions are met:

1. OGE grants the Certificate of Divestiture **before you sell** the property. Sales made before the Certificate of Divestiture is issued cannot obtain the tax relief;
2. The asset is subject to capital gains tax if you sell;
3. You agree to sell your total investment in the prohibited asset whether or not OGE grants the Certificate of Divestiture; and
4. You must agree to re-invest the proceeds of the sale into "permitted property" as defined by

5 C.F.R. § 2634.1003, within sixty (60) days from the date of the sale. Permitted property includes diversified mutual funds, diversified exchange traded funds (ETFs), and U.S. government obligations (i.e. treasury bonds).

Attached are OGE's Certificate of Divestiture fact sheet and the U.S. Tax code applicable to Certificate of Divestitures, as well as other resources. If you'd like to learn more and are interested in determining your eligibility for a Certificate of Divestiture, please let me know and I will send you the template for initiating a request for a Certificate of Divestiture.

Thanks again! Please let me know if you have any questions or if we can assist in any way.

Libby

Libby Derting
Supervisory Attorney-Advisor, Financial Disclosure Branch
Departmental Ethics Office | Office of the Solicitor
U.S. Department of the Interior | MIB 5320
Email: elizabeth.derting@sol.doi.gov

Please note: I am teleworking until further notice. You can also reach me on MS Teams.

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From: [Garcia, Monica L](#)
To: [Culver, Nada L](#)
Cc: [Gottry, Heather C](#); [Derting, Elizabeth K](#)
Subject: FW: [EXTERNAL] Certificate of Divestiture - Nada Culver - [Message and attachment(s) contain CUI]
Date: Thursday, August 5, 2021 2:25:20 PM
Attachments: [Culver, Nada FINAL CD.pdf](#)
[CUI Cover Sheet2.pdf](#)
[Rollover into permitted property \(5 CFR 2634.106\).pdf](#)

Dear Nada,

Thank you for working with us to provide the information to process your request for a certificate of divestiture (CD). OGE granted the CD request this afternoon. I have attached the CD itself, as well as the regulation on reinvestment of proceeds. Your next steps and relevant deadlines are:

As soon as possible: sell 100% of the interests in the assets listed in your CD. If you have a managed account or financial manager, please make sure to inform your financial manager that you are prohibited from investing in the interests on the 2021 Prohibited Holdings list for the Department and for the BLM.

Within 60 days of sale: re-invest the proceeds of the stock sales into permitted property. As stated in the attached regulation, permitted property is any obligation of the United States of a diversified investment fund. If you have any questions about what property meets the definition of "permitted property," please let me know and I'd be happy to provide you with additional guidance.

Thank you for your responsiveness and working with me so closely on this matter. After you have completed the sale, we can move forward and finalize your ethics recusals memorandum.

Please let me know if you'd like to discuss or have any questions. Thank you!

-Monica

From: CD <cd@oge.gov>
Sent: Thursday, August 5, 2021 12:32 PM
To: Garcia, Monica L <monica.garcia@sol.doi.gov>
Cc: Suzanne L. Meyer <slmeyer@oge.gov>; Elaine Newton <enewton@oge.gov>
Subject: [EXTERNAL] Certificate of Divestiture - Nada Culver - [Message and attachment(s) contain CUI]

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

Good Afternoon:

In response to your request of 07/15/2021, attached is Certificate of Divestiture, OGE-2021-150 for Nada Culver, Department of The Interior. Please forward the certificate to Mrs. Culver.

If there are any questions, you may contact Suzanne Meyer at 202-482-9249.

Please confirm receipt of this email by replying to all.

Thank you.

CONTROLLED

Email and attachment(s) contain CUI.

Gwendolyn Cannon-Jenkins
US Office of Government Ethics
Administrative Operations Branch
1201 New York Avenue NW
Suite 500
Washington, DC 20005

(e) gcannon@oge.gov <<mailto:gcannon@oge.gov>>

(p)(202) 482-9219

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From: [Gottry, Heather C](#)
To: [Deluca, Mary E](#); [Siemer, Heather L](#)
Subject: FW: [EXTERNAL] Re: Preliminary ethics review
Date: Thursday, September 2, 2021 3:09:46 PM

As promised. Thank you.

From: Nada Culver <(b)(6)>
Sent: Monday, January 4, 2021 10:25 PM
To: Garcia, Monica L <monica.garcia@sol.doi.gov>
Cc: Gottry, Heather C <heather.gottry@sol.doi.gov>
Subject: [EXTERNAL] Re: Preliminary ethics review

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I've re-pasted the list of questions and put answers next to them. Hopefully this is what you had in mind for answering. If I need to clarify further, please let me know. I wasn't really sure how to address #7 since that is really the entire focus of a public lands program at a non-profit - i.e., engaging with the Department - but we don't have any monetary or ownership interests at stake.

1.
Do you hold any direct or indirect financial interest in Federal lands or resources administered or controlled by the Department? **NO**
 - a. If so, please describe.
 - b. Please also review the attached list which identifies certain financial holdings which are prohibited for certain Department employees to hold by statute or supplemental regulation.
 - c. Please note that if you will be working on matters for U.S. Geological Survey, Office of Surface Mining Reclamation and Enforcement, U.S. Bureau of Land Management, Bureau of Ocean Energy Management, Bureau of Safety and Environmental Enforcement, and the Office of Natural Resources Revenue, there may be additional prohibitions that you will need to comply with after appointment, if appointed.
2. Do you, your spouse and/or minor children retain any claim, permit, lease, small tract entries, or other rights that are granted by the Department in Federal lands? **NO**
 - a. If so, please describe.
3. Do you currently serve as an officer, director, trustee, or general partner of any entity not

- listed on your resume? **NO**
- a. If so, please identify and describe your role and position(s), including whether you plan to continue your position(s) after appointment, if appointed.
4. Please identify your spouse's current employer(s), if applicable. **Benezra and Culver, PC, located in Denver, Colorado.**
-
5. Are all of your employers for the preceding two calendar years listed on your resume? **YES**
- a. If not, please provide the name of any employers not on your resume and identify your position with the employer.
6. If you provided other personal services to clients (including through your employer), please list all of your clients for the preceding two calendar years, if not already listed on your resume. **I DID NOT**
- a. Please note that personal services can include legal services, consulting services, lobbying services, pro bono, or other uncompensated volunteer activities, etc.
7. Did you, your employer, or your clients engage with the Department, including any Bureaus or Offices, on matters pending before the Department in the preceding two calendar years? **YES**
- a. If so, please describe the matters if not already described in your resume **The National Audubon Society regularly comments on projects, plans and regulations issued by the Department. In the context of the Bureau of Land Management, for instance, we have also been part of administrative protests of oil and gas lease sales and land use plans. We do not have any monetary investments or ownership interests at stake.**

On Mon, Jan 4, 2021 at 4:05 PM Garcia, Monica L <monica.garcia@sol.doi.gov> wrote:

Nada – Hello there! Thank you very much for the voice message and updated email address.

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

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

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

are prohibited for certain Department employees to hold by statute or supplemental regulation.

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

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

onboarding process, if appointed.

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

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

-Monica

Please note: I will be teleworking until further notice

Monica L. Garcia
Acting Deputy Director for Ethics Law & Policy
and Acting Alternate Designated Agency Ethics Official
Departmental Ethics Office | Office of the Solicitor
U.S. Department of the Interior | MIB 5316
(O): (202) 208-0460
(C): (202) 880-4474
Email: monica.garcia@sol.doi.gov

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From: [Gottry, Heather C](#)
To: [Garcia, Monica L](#)
Subject: FW: [EXTERNAL] Request for Comment: Watchdog Complaint About Director Nada Culver
Date: Monday, June 14, 2021 1:44:42 PM
Attachments: [Interim Ethics Recusal Memo - Culver \(3.11.21\).pdf](#)

FYSA.

From: Gottry, Heather C
Sent: Monday, June 14, 2021 1:43 PM
To: Roberts, Lawrence S <lawrence_s_roberts@ios.doi.gov>; Anderson, Robert T <Robert.Anderson@sol.doi.gov>
Subject: RE: [EXTERNAL] Request for Comment: Watchdog Complaint About Director Nada Culver

Thanks for flagging. As quick background, Nada has been working under the attached guidance which includes a recusal from the National Audubon Society.

From: Roberts, Lawrence S <lawrence_s_roberts@ios.doi.gov>
Sent: Monday, June 14, 2021 12:23 PM
To: Anderson, Robert T <Robert.Anderson@sol.doi.gov>; Gottry, Heather C <heather.gottry@sol.doi.gov>
Subject: FW: [EXTERNAL] Request for Comment: Watchdog Complaint About Director Nada Culver

FYI

From: Schwartz, Melissa A <melissa_schwartz@ios.doi.gov>
Sent: Monday, June 14, 2021 9:59 AM
To: Roberts, Lawrence S <lawrence_s_roberts@ios.doi.gov>; Kelly, Katherine P <Kate_Kelly@ios.doi.gov>
Subject: Fwd: [EXTERNAL] Request for Comment: Watchdog Complaint About Director Nada Culver

Melissa Schwartz (she/her)
Communications Director
Office of the Secretary
Department of the Interior
Cell: [\(202\) 538-2214](tel:(202)538-2214)

From: Matthew Foldi <foldi@freebeacon.com>
Sent: Monday, June 14, 2021 9:49:44 AM
To: Interior Press <interior_press@ios.doi.gov>
Subject: [EXTERNAL] Request for Comment: Watchdog Complaint About Director Nada Culver

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Good morning,

I am a reporter at the *Washington Free Beacon*. I have a complaint from an ethics watchdog that is being sent to the Interior Department's inspector general later today about interim director Nada Culver.

Specifically, the group alleges that Director Culver acting as a point person on the Biden administration's Alaska PLOs represents a conflict of interest given her previous employment at the National Audubon Society, whose Alaska chapter is leading the way to oppose the Trump administration's plans to open up BLM lands in Alaska to Vietnam veterans and mineral exploration.

Are there plans to scale back Director Culver's involvement in matters her former employer is involved in?

My deadline is 2pm today, and I would appreciate hearing from you for the story, even on background.

Best,

Matthew Foldi

From: [Roberts, Lawrence S](#)
To: [Anderson, Robert T](#); [Gottry, Heather C](#)
Subject: FW: [EXTERNAL] Request for Comment: Watchdog Complaint About Director Nada Culver
Date: Monday, June 14, 2021 12:23:20 PM

FYI

From: Schwartz, Melissa A <melissa_schwartz@ios.doi.gov>
Sent: Monday, June 14, 2021 9:59 AM
To: Roberts, Lawrence S <lawrence_s_roberts@ios.doi.gov>; Kelly, Katherine P <Kate_Kelly@ios.doi.gov>
Subject: Fwd: [EXTERNAL] Request for Comment: Watchdog Complaint About Director Nada Culver

Melissa Schwartz (she/her)
Communications Director
Office of the Secretary
Department of the Interior
Cell: [\(202\) 538-2214](tel:(202)538-2214)

From: Matthew Foldi <foldi@freebeacon.com>
Sent: Monday, June 14, 2021 9:49:44 AM
To: Interior Press <interior_press@ios.doi.gov>
Subject: [EXTERNAL] Request for Comment: Watchdog Complaint About Director Nada Culver

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

Good morning,

I am a reporter at the *Washington Free Beacon*. I have a complaint from an ethics watchdog that is being sent to the Interior Department's inspector general later today about interim director Nada Culver.

Specifically, the group alleges that Director Culver acting as a point person on the Biden administration's Alaska PLOs represents a conflict of interest given her previous employment at the National Audubon Society, whose Alaska chapter is leading the way to oppose the Trump administration's plans to open up BLM lands in Alaska to Vietnam veterans and mineral exploration.

Are there plans to scale back Director Culver's involvement in matters her former employer is

involved in?

My deadline is 2pm today, and I would appreciate hearing from you for the story, even on background.

Best,

Matthew Foldi

From: [Gottry, Heather C](#)
To: [Deluca, Mary E](#); [Siemer, Heather L](#)
Subject: FW: Follow Up: Updated Interim Ethics Guidance and Draft Recusal/Screening Arrangement
Date: Thursday, September 2, 2021 3:08:08 PM
Attachments: [Culver Nada - Ethics Recusal Guidance Memorandum \(Draft for Review 06.21.21\).docx](#)
[Attachment A - Ethics Recusal Guidance Memorandum.pdf](#)
[Culver, Nada - Attachment B.pdf](#)
[Culver, Nada - Recusal Attachment C - Quick Guide Recusal Chart \(Draft for Review 6.19.21\).docx](#)
[Culver, Nada - Attachment D Ethics Pledge.pdf](#)

As promised. Thank you.

From: Gottry, Heather C
Sent: Wednesday, June 23, 2021 9:51 AM
To: Culver, Nada L <nculver@blm.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: Follow Up: Updated Interim Ethics Guidance and Draft Recusal/Screening Arrangement

Nada – Hello again! I hope that you are having a good week. I wanted to reach out to see if it would be helpful to schedule a time to touch base to discuss the attached materials. If so, please let me know if you would like me to look for an open time on your calendar or if you would like me to work with a member of your team. Many thanks.

- Heather

From: Gottry, Heather C
Sent: Monday, June 21, 2021 10:35 AM
To: Culver, Nada L <nculver@blm.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: Updated Interim Ethics Guidance and Draft Recusal/Screening Arrangement

Nada – Hello! Now that we have completed our review of your New Entrant OGE Form 278e and recusal obligations, we are ready to issue updated interim ethics guidance. Please note that your guidance remains interim pending completion of required divestitures. For your review and discussion, please see the attached materials that will serve to document your ethics obligations, including your recusals:

- A draft memorandum from the DEO providing Updated Interim Ethics Guidance on Recusal Obligations, describing your ethics obligations, including those implemented through the Biden Administration’s Ethics Pledge (and the below attachments)
 - *Attachment A* – Guidance for Recusal Analysis
 - *Attachment B* – 2021 Department of the Interior and 2021 Bureau of Land Management List of Prohibited Investments
 - *Attachment C* – List of Recusals and Quick Reference Chart (this document summarizes your identified recusals, scope of the recusals, and applicable time periods)

Attachment D – Ethics Pledge (signed March 1, 2021)

- A draft Ethics Recusals & Screening Arrangement, a document for your signature which includes two potential options for a step-by-step process for implementing your recusal obligations through a screening arrangement. We have drafted this document with two potential options, either that you select a screener to assist with your recusal obligations and avoid any inadvertent participation in a matter which would otherwise require your recusal or you can elect to self-screen. We are happy to discuss the pros/cons of either approach and assist you in determining the best path forward. Please note that the attachment referenced in the document will be the same as Attachment C to the Ethics Guidance on Recusal Obligations.

I am happy to schedule a time to walk you through the attached documents to ensure that the facts are complete and correct and to discuss any questions. Please let me know your availability. Thank you and have a great evening!

- Heather

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

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

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From: [Cornberg, Simon T](#)
To: [Culver, Nada L](#)
Cc: [Gottry, Heather C](#); [Garcia, Monica L](#); [Housen, Barbara E](#)
Subject: FW: quick turnaround approval - help please!
Date: Tuesday, October 19, 2021 8:49:37 AM

Nada,

Thank you for speaking with me yesterday. After reviewing the information provided to the Departmental Ethics Office (DEO) and supporting materials, we have identified no legal objection under the ethics statutes and regulations, or the Administration's Ethics Pledge (Ethics Pledge), to you virtually speaking at the University of Montana Alexander Blewett III's School of Law (UMSL) Public Lands class on October 20, 2021, at the invitation of Professor Monte Mills, UMSL.

UMSL is a law school at the University of Montana in Missoula. It was established in 1911 and remains Montana's only law school.

Per the House of Representatives database, UMSL is not currently identified as a registered lobbying organization. Furthermore, per the same database, Professor Mills is not currently identified as a registered lobbyist.

It is our understanding that you will be speaking in your official capacity and that you will present information via Zoom at this event on behalf of the U.S. Department of the Interior (DOI) and the U.S. Government. We understand that there is no registration fee associated with this speaking engagement and you will not be receiving any compensation from UMSL including, a speaking fee. **If the scope of your attendance and participation at this event changes, or if any non-Federal source offers you any item of monetary value in connection with this event (e.g. a token of appreciation, for example), we should be contacted immediately so we can analyze.**

Official Presentation and Nexus to DOI Mission – It is our understanding that you have reasonably determined that participation at this event is part of your official duties and that this is an appropriate forum to present information on behalf of the DOI and the Government. We further understand that you will discuss the legal framework for managing oil and gas on public lands and the ongoing issues currently facing the Bureau of Land Management. Your presentation at this speaking engagement will further agency programs and operations as your participation will provide an opportunity to present DOI's mission and policies.

Financial Disclosure Report Review – Review of your Nominee and New Entrant Public Financial Disclosure Reports (OGE Forms 278e) and your Ethics Recusals and Screening Arrangement, dated September 3, 2021, did not reveal any information that would prevent you from attending and participating at this event under 18 U.S.C. § 208, 5 C.F.R. § 2635.502, or the Ethics Pledge.

We remind you of the following standard guidance for attending and/or participating at events in an official capacity:

1. **Official Title** – Use of your official title is permitted as you will be participating in this event in your official capacity. 5 C.F.R. § 2635.702.

2. **Endorsement** – We remind you that you may not use your official Government position or title or any authority associated with your public office to endorse any product, service, or enterprise, including non-profit and charitable organizations that may have some affiliation with DOI. 5 C.F.R. § 2635.702(c).
3. **No Preferential Treatment** – Department officials must act impartially and not give preferential treatment to any private organization or individual and must avoid creating even the appearance that they are violating this requirement. 5 C.F.R. § 2635.101(b)(8) and 5 C.F.R. § 2635.101(b)(14).
4. **Gifts** – Per the Ethics Pledge’s lobbyist gift ban, you cannot accept gifts from registered lobbyists or lobbying organizations for the duration of your service as an appointee. If you are offered a gift in connection with this, please immediately contact our office for analysis. Gifts offered from outside sources may only be accepted under limited circumstances, and such gifts will be reviewed under the applicable ethics regulations. 5 C.F.R. §§ 2635.201-2635.206.
5. **Nonpublic Information** – You may not discuss at this event any nonpublic information that you have gained by reason of your Federal position. 5 C.F.R. § 2635.703.
6. **No Partisan Political Activity** – While you may discuss DOI’s policy priorities and ideological approach to laws and regulations at this event, you must strictly avoid partisan political activity in order to remain in compliance with the Hatch Act. Partisan political activity is any activity directed towards the success or failure of a political party, candidate for a partisan political office, or partisan political group and can include verbal remarks and speech.

Please do not hesitate to contact us if you have any questions or concerns, or if we can be of any additional assistance.

Simon

Simon T. Cornberg
Attorney-Advisor | Advice and Counsel
Departmental Ethics Office | Office of the Solicitor
U.S. Department of the Interior | MIB 5325
(O) (202) 208-5972
simon.cornberg@sol.doi.gov

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From: Culver, Nada L <nculver@blm.gov>
Sent: Sunday, October 17, 2021 4:45 PM
To: Housen, Barbara E <barbara.housen@sol.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>; Gottry, Heather C <heather.gottry@sol.doi.gov>; Cornberg, Simon T <simon.cornberg@sol.doi.gov>

Subject: RE: quick turnaround approval - help please!

Thanks, Simon.

Nada Wolff Culver
Deputy Director, Policy and Programs
Bureau of Land Management
nculver@blm.gov
202-255-6979

From: Housen, Barbara E <barbara.housen@sol.doi.gov>
Sent: Sunday, October 17, 2021 12:21 PM
To: Culver, Nada L <nculver@blm.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>; Gottry, Heather C <heather.gottry@sol.doi.gov>; Cornberg, Simon T <simon.cornberg@sol.doi.gov>
Subject: Re: quick turnaround approval - help please!

Hello Nada,

Confirming that Simon Cornberg will give you a call tomorrow at 1pm. Thank you.

Regards,
Barbara

Barbara. E. Housen
Supervisory Attorney-Advisor, Advice and Counsel Branch
Departmental Ethics Office | Office of the Solicitor
U.S. Department of the Interior
email: barbara.housen@sol.doi.gov

Please note, I am teleworking until further notice and so it's best to reach me by email.

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From: Culver, Nada L <nculver@blm.gov>
Sent: Sunday, October 17, 2021 1:17 PM
To: Garcia, Monica L <monica.garcia@sol.doi.gov>; Gottry, Heather C <heather.gottry@sol.doi.gov>
Cc: Housen, Barbara E <barbara.housen@sol.doi.gov>

Subject: Re: quick turnaround approval - help please!

I assumed I'd be speaking for myself - as do disclaimers at law conferences - but my current job would be known.

This is by video that will not be recorded and there is no compensation.

For times tomorrow - realizing that all our calendars are horrid and apologies again for last minute asks - I can talk before 9 or at 1 eastern. Anything workable for you?

Nada

P.S. And thanks for responding on a weekend.

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

Sent: Sunday, October 17, 2021 10:28:23 AM

To: Culver, Nada L <nculver@blm.gov>; Gottry, Heather C <heather.gottry@sol.doi.gov>

Cc: Housen, Barbara E <barbara.housen@sol.doi.gov>

Subject: RE: quick turnaround approval - help please!

Nada – Good morning and I'm glad to hear from you. Do you have any particular times Monday that work best for you? Heather and I are blocked off for big chunks of the day, but adding in Barbara Housen, the Supervisory Attorney for Advice & Counsel so she might be able to assist as well.

A few preliminary questions:

1. Will the speaking engagement be in your official or personal capacity/
2. Will University of Montana pay for any travel expenses, accommodations or is it via video?
3. Will you be compensated or paid an honorarium for the speaking engagement?

-Monica

From: Culver, Nada L <nculver@blm.gov>

Sent: Saturday, October 16, 2021 8:38 PM

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

Subject: quick turnaround approval - help please!

Hi Heather and Monica – I was just presented with an opportunity to speak to a Public Lands class at University of Montana Law School on October 20th (this coming Wednesday). I understand that I would give the usual disclaimer about speaking from my own perspective/not providing official administration positions and also that this will not be open to the public/press so the discussion will

not be made available beyond the class. We would talk generally about the legal framework for managing oil and gas on public lands and the ongoing issues around the review, pause, court case, current work. Phil Lowe from SOL just joined a panel about 10 days ago where he went over a number of similar points and did Q&A at the University of Wyoming Energy in the Rockies conference, so I don't think there will be much different here – other than it not being recorded and made available to the public.

Thanks in advance for your help here. I'd be happy to hop on the phone on Monday if that's helpful and apologies for emailing on a Saturday night – this all just came up.

Nada Wolff Culver
Deputy Director, Policy and Programs
Bureau of Land Management
nculver@blm.gov
202-255-6979

From: [Housen, Barbara E](#)
To: [Cornberg, Simon T](#)
Subject: Fw: quick turnaround approval - help please!
Date: Sunday, October 17, 2021 2:16:36 PM

Simon,

To you for action please- pl. give Nada a call at 1pm EST- event is this Wed 10/20. I'll let Nada know you'll be in touch tomorrow. Thank you.

Barbara

Barbara. E. Housen
Supervisory Attorney-Advisor, Advice and Counsel Branch
Departmental Ethics Office | Office of the Solicitor
U.S. Department of the Interior
email: barbara.housen@sol.doi.gov

Please note, I am teleworking until further notice and so it's best to reach me by email.

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From: Culver, Nada L <nculver@blm.gov>
Sent: Sunday, October 17, 2021 1:17 PM
To: Garcia, Monica L <monica.garcia@sol.doi.gov>; Gottry, Heather C <heather.gottry@sol.doi.gov>
Cc: Housen, Barbara E <barbara.housen@sol.doi.gov>
Subject: Re: quick turnaround approval - help please!

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Nada

P.S. And thanks for responding on a weekend.

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

Sent: Sunday, October 17, 2021 10:28:23 AM

To: Culver, Nada L <nculver@blm.gov>; Gottry, Heather C <heather.gottry@sol.doi.gov>

Cc: Housen, Barbara E <barbara.housen@sol.doi.gov>

Subject: RE: quick turnaround approval - help please!

Nada – Good morning and I'm glad to hear from you. Do you have any particular times Monday that work best for you? Heather and I are blocked off for big chunks of the day, but adding in Barbara Housen, the Supervisory Attorney for Advice & Counsel so she might be able to assist as well.

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1. Will the speaking engagement be in your official or personal capacity/
2. Will University of Montana pay for any travel expenses, accommodations or is it via video?
3. Will you be compensated or paid an honorarium for the speaking engagement?

-Monica

From: Culver, Nada L <nculver@blm.gov>

Sent: Saturday, October 16, 2021 8:38 PM

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

Subject: quick turnaround approval - help please!

Hi Heather and Monica – I was just presented with an opportunity to speak to a Public Lands class at University of Montana Law School on October 20th (this coming Wednesday). I understand that I would give the usual disclaimer about speaking from my own perspective/not providing official administration positions and also that this will not be open to the public/press so the discussion will not be made available beyond the class. We would talk generally about the legal framework for managing oil and gas on public lands and the ongoing issues around the review, pause, court case, current work. Phil Lowe from SOL just joined a panel about 10 days ago where he went over a number of similar points and did Q&A at the University of Wyoming Energy in the Rockies conference, so I don't think there will be much different here – other than it not being recorded and made available to the public.

Thanks in advance for your help here. I'd be happy to hop on the phone on Monday if that's helpful and apologies for emailing on a Saturday night – this all just came up.

Nada Wolff Culver

Deputy Director, Policy and Programs

Bureau of Land Management

nculver@blm.gov

202-255-6979

From: [Gottry, Heather C](#)
To: [Raviv, Deborah A](#); [Futrowsky, Steven G](#)
Subject: FW: Thank You for Attending Initial Ethics Training!
Date: Tuesday, July 27, 2021 8:58:02 AM
Attachments: [2021 IET for Political Appointees \(Update 1 - 02.22.21\).pdf](#)
[Code of Ethics - 14 General Principles of Ethical Conduct.pdf](#)
[2021 List of Prohibited Financial Interests - DOI Office of the Secretary Office of the Solicitor.pdf](#)
[DEO Ethics Team Directory \(1.26.21\).pdf](#)

Deborah and Steve – As promised, attached please find a copy of the ethics training that we provided to Nada when she started at the Department in March. Please do not hesitate to reach out with any questions of if I can be of any additional assistance. Thank you.

- Heather

From: Gottry, Heather C
Sent: Wednesday, March 3, 2021 4:34 PM
To: Culver, Nada L <nada_culver@ios.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>; Sharrow, Michelle P <michelle.sharrow@sol.doi.gov>; Hammer, Christine A <christine.hammer@sol.doi.gov>
Subject: Thank You for Attending Initial Ethics Training!

Nada - Hello again! Thank you all for attending our Initial Ethics Training session on Monday, March 1, 2021. As promised during the training, we are providing you with the following ethics materials for your reference:

- 2021 Initial Ethics Training for Political Appointees;
- Code of Ethics - 14 General Principles of Ethical Conduct;
- 2021 List of Prohibited Financial Interests; and
- DEO Ethics Team Directory.

We hope that the training provided a helpful overview of federal ethics rules and regulations on conflicts of interest, impartiality, the Ethics Pledge, gifts, misuse of position, and the Hatch Act. Please do not hesitate to reach out to us if we can be of any assistance on ethics matters. We are excited to be working with you. Thanks!

--Heather

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

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

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From: [Garcia, Monica L](#)
To: [Gottry, Heather C](#)
Cc: [Genter, Constance G](#)
Subject: FW: Updated Ethics Recusal Materials
Date: Wednesday, September 8, 2021 8:45:39 AM
Attachments: [Culver Nada - Recusal and Screening Agreement \(9.3.21\) - signed.pdf](#)
[Culver Nada - Updated Ethics Recusal Guidance Memorandum & Attachments \(Signed 9.3.21\).pdf](#)

Heather - Please see attached final signed ethics guidance and ERSA for Nada.

CC'ing Constance so these can be added to the S drive.

Thanks!

-Monica

From: Culver, Nada L <nculver@blm.gov>
Sent: Tuesday, September 7, 2021 1:24 AM
To: Garcia, Monica L <monica.garcia@sol.doi.gov>
Cc: Gottry, Heather C <heather.gottry@sol.doi.gov>
Subject: RE: Updated Ethics Recusal Materials

I've attached the updated, signed memo. So your direction from here is that I should share the updated chart with Danna Jackson so she also has it?

Nada Wolff Culver
Deputy Director, Policy and Programs
Bureau of Land Management
nculver@blm.gov
202-255-6979

From: Garcia, Monica L <monica.garcia@sol.doi.gov>
Sent: Friday, September 3, 2021 1:40 PM
To: Culver, Nada L <nculver@blm.gov>
Cc: Gottry, Heather C <heather.gottry@sol.doi.gov>
Subject: RE: Updated Ethics Recusal Materials

Nada – Please accept my apologies, but I found a typo after we send the guidance memo earlier this morning and wanted to correct it. We have corrected it in the attached version.

For the Recusal and Screening Arrangement, please let us know your preference as to whether you'd like to re-sign or just circulate your updated recusal chart.

Thanks and have a great holiday weekend.

Monica

From: Garcia, Monica L
Sent: Friday, September 3, 2021 8:44 AM
To: Culver, Nada L <nculver@blm.gov>
Cc: Heather Gottry <heather.gottry@sol.doi.gov>
Subject: Updated Ethics Recusal Materials

Nada – Good morning! As promised, I have attached your updated Ethics Recusal Guidance Memorandum reflecting the prohibited stock and bond sales.

We defer to your preference on whether you'd like to re-sign your Recusal and Screening Arrangement document or circulate the updated Quick Recusal Chart Attachment. For ease of dealing with the logistics of re-signing, I have attached a copy of the Recusal and Screening Arrangement with today's date (and the updated chart) if you'd like to re-sign in addition to the updated Quick Recusal Chart if you'd prefer to simply circulate that document.

Please let us know your preference. If you elect to re-sign, please provide us with a copy of the Recusal and Screening Arrangement for our files.

Thanks so much,

-Monica

Please note: I will be teleworking until further notice

Monica L. Garcia
Deputy Director for Ethics Law & Policy
and Alternate Designated Agency Ethics Official
Departmental Ethics Office | Office of the Solicitor
U.S. Department of the Interior | MIB 5316
(O): (202) 208-0460
(C): (202) 880-4474
Email: monica.garcia@sol.doi.gov

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From: [Gottry, Heather C](#)
To: [Deluca, Mary E](#); [Siemer, Heather L](#)
Subject: FW: Updated Interim Ethics Guidance and Draft Recusal/Screening Arrangement
Date: Thursday, September 2, 2021 3:10:42 PM
Attachments: [Culver Nada - Ethics Recusal Guidance Memorandum \(Draft for Review 06.21.21\).docx](#)
[Attachment A - Ethics Recusal Guidance Memorandum.pdf](#)
[Culver, Nada - Attachment B.pdf](#)
[Culver, Nada - Recusal Attachment C - Quick Guide Recusal Chart \(Draft for Review 6.19.21\).docx](#)
[Culver, Nada - Attachment D Ethics Pledge.pdf](#)
[Culver, Nada - Draft Recusal and Screening Agreement \(Draft for Review 7.6.21\).docx](#)

As promised. Thank you.

From: Garcia, Monica L <monica.garcia@sol.doi.gov>
Sent: Tuesday, July 6, 2021 6:46 AM
To: Culver, Nada L <nculver@blm.gov>
Cc: Gottry, Heather C <heather.gottry@sol.doi.gov>
Subject: FW: Updated Interim Ethics Guidance and Draft Recusal/Screening Arrangement

Good morning, Nada! Following up on our meeting last week, I'm re-sending the ethics recusal materials for your review and also including a draft recusal and screening arrangement for your review and consideration. We would be happy to schedule a follow up discussion with you to address any open questions or concerns you may have and get these documents finalized.

Please let us know if it would be helpful to schedule a time to connect this week and I'll work to schedule.

Thank you so much and have a great day!

Monica

From: Gottry, Heather C <heather.gottry@sol.doi.gov>
Sent: Monday, June 21, 2021 10:35 AM
To: Culver, Nada L <nculver@blm.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: Updated Interim Ethics Guidance and Draft Recusal/Screening Arrangement

Nada – Hello! Now that we have completed our review of your New Entrant OGE Form 278e and recusal obligations, we are ready to issue updated interim ethics guidance. Please note that your guidance remains interim pending completion of required divestitures. For your review and discussion, please see the attached materials that will serve to document your ethics obligations, including your recusals:

- A draft memorandum from the DEO providing [Updated Interim Ethics Guidance on Recusal Obligations](#), describing your ethics obligations, including those implemented through the Biden Administration's Ethics Pledge (and the below attachments)

- *Attachment A* – Guidance for Recusal Analysis
- *Attachment B* – 2021 Department of the Interior and 2021 Bureau of Land Management List of Prohibited Investments
- *Attachment C* – List of Recusals and Quick Reference Chart (this document summarizes your identified recusals, scope of the recusals, and applicable time periods)
- *Attachment D* – Ethics Pledge (signed March 1, 2021)
- A draft Ethics Recusals & Screening Arrangement, a document for your signature which includes two potential options for a step-by-step process for implementing your recusal obligations through a screening arrangement. We have drafted this document with two potential options, either that you select a screener to assist with your recusal obligations and avoid any inadvertent participation in a matter which would otherwise require your recusal or you can elect to self-screen. We are happy to discuss the pros/cons of either approach and assist you in determining the best path forward. Please note that the attachment referenced in the document will be the same as Attachment C to the Ethics Guidance on Recusal Obligations.

I am happy to schedule a time to walk you through the attached documents to ensure that the facts are complete and correct and to discuss any questions. Please let me know your availability. Thank you and have a great evening!

- Heather

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

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From: [Garcia, Monica L](#)
To: [Culver, Nada L](#)
Cc: [Gottry, Heather C](#)
Subject: FW: Updated Interim Ethics Guidance and Draft Recusal/Screening Arrangement
Date: Tuesday, July 6, 2021 6:46:09 AM
Attachments: [Culver Nada - Ethics Recusal Guidance Memorandum \(Draft for Review 06.21.21\).docx](#)
[Attachment A - Ethics Recusal Guidance Memorandum.pdf](#)
[Culver, Nada - Attachment B.pdf](#)
[Culver, Nada - Recusal Attachment C - Quick Guide Recusal Chart \(Draft for Review 6.19.21\).docx](#)
[Culver, Nada - Attachment D Ethics Pledge.pdf](#)
[Culver, Nada - Draft Recusal and Screening Agreement \(Draft for Review 7.6.21\).docx](#)

Good morning, Nada! Following up on our meeting last week, I'm re-sending the ethics recusal materials for your review and also including a draft recusal and screening arrangement for your review and consideration. We would be happy to schedule a follow up discussion with you to address any open questions or concerns you may have and get these documents finalized.

Please let us know if it would be helpful to schedule a time to connect this week and I'll work to schedule.

Thank you so much and have a great day!

Monica

From: Gottry, Heather C <heather.gottry@sol.doi.gov>
Sent: Monday, June 21, 2021 10:35 AM
To: Culver, Nada L <nculver@blm.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: Updated Interim Ethics Guidance and Draft Recusal/Screening Arrangement

Nada – Hello! Now that we have completed our review of your New Entrant OGE Form 278e and recusal obligations, we are ready to issue updated interim ethics guidance. Please note that your guidance remains interim pending completion of required divestitures. For your review and discussion, please see the attached materials that will serve to document your ethics obligations, including your recusals:

- A draft memorandum from the DEO providing Updated Interim Ethics Guidance on Recusal Obligations, describing your ethics obligations, including those implemented through the Biden Administration's Ethics Pledge (and the below attachments)
 - *Attachment A* – Guidance for Recusal Analysis
 - *Attachment B* – 2021 Department of the Interior and 2021 Bureau of Land Management List of Prohibited Investments
 - *Attachment C* – List of Recusals and Quick Reference Chart (this document summarizes your identified recusals, scope of the recusals, and applicable time periods)
 - *Attachment D* – Ethics Pledge (signed March 1, 2021)
- A draft Ethics Recusals & Screening Arrangement, a document for your signature which

includes two potential options for a step-by-step process for implementing your recusal obligations through a screening arrangement. We have drafted this document with two potential options, either that you select a screener to assist with your recusal obligations and avoid any inadvertent participation in a matter which would otherwise require your recusal or you can elect to self-screen. We are happy to discuss the pros/cons of either approach and assist you in determining the best path forward. Please note that the attachment referenced in the document will be the same as Attachment C to the [Ethics Guidance on Recusal Obligations](#).

I am happy to schedule a time to walk you through the attached documents to ensure that the facts are complete and correct and to discuss any questions. Please let me know your availability. Thank you and have a great evening!

- Heather

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

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

Integrity is our mission.

From: [Gottry, Heather C](#)
To: [Deluca, Mary E](#); [Siemer, Heather L](#)
Subject: FW: Updated Interim Ethics Guidance and Draft Recusal/Screening Arrangement
Date: Thursday, September 2, 2021 3:07:41 PM
Attachments: [Culver Nada - Ethics Recusal Guidance Memorandum \(Draft for Review 06.21.21\).docx](#)
[Attachment A - Ethics Recusal Guidance Memorandum.pdf](#)
[Culver, Nada - Attachment B.pdf](#)
[Culver, Nada - Recusal Attachment C - Quick Guide Recusal Chart \(Draft for Review 6.19.21\).docx](#)
[Culver, Nada - Attachment D Ethics Pledge.pdf](#)

As promised. Thank you.

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Sent: Monday, June 21, 2021 10:35 AM
To: Culver, Nada L <nculver@blm.gov>
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From: [Gottry, Heather C](#)
To: [Deluca, Mary E](#); [Siemer, Heather L](#)
Subject: FW: Welcome and Next Ethics Steps
Date: Thursday, September 2, 2021 3:23:24 PM

One more, as promised. Thank you.

From: Culver, Nada L <nada_culver@ios.doi.gov>
Sent: Tuesday, March 9, 2021 12:26 AM
To: Garcia, Monica L <monica.garcia@sol.doi.gov>; Gottry, Heather C <heather.gottry@sol.doi.gov>
Cc: Hammer, Christine A <christine.hammer@sol.doi.gov>
Subject: RE: Welcome and Next Ethics Steps

Thank you, Monica. This looks good to me.

Also, on the financial form, I did get a link to Integrity stating I'd been assigned a report. You had mentioned that I should wait to dive into that until speaking with someone from your team but wasn't sure how that would work and wanted to follow-up so I can get that moving forward, too.

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To: Culver, Nada L <nada_culver@ios.doi.gov>; Gottry, Heather C <heather.gottry@sol.doi.gov>
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We greatly appreciate your time and attention and hope that the draft memorandum provides helpful guidance on your recusals. Thank you.

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From: Garcia, Monica L

Sent: Tuesday, March 2, 2021 9:59 AM

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Cc: Hammer, Christine A <christine.hammer@sol.doi.gov>

Subject: RE: Welcome and Next Ethics Steps

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In the meantime, does 11:30 a.m. Eastern tomorrow work to have a discussion on your two open questions? If so, I'll send a calendar invite ASAP.

-Monica

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Sent: Tuesday, March 2, 2021 9:56 AM

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

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

Subject: RE: Welcome and Next Ethics Steps

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Sent: Tuesday, March 2, 2021 5:36 AM
To: Culver, Nada L <nada_culver@ios.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>; Hammer, Christine A <christine.hammer@sol.doi.gov>
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- **General Ethics Reminders:**
 - **Financial Conflicts of Interest:** Under 18 U.S.C. § 208(a), you may not participate personally and substantially in any particular matter in which you know that you have a financial interest directly and predictably affected by the matter, or in which you know that a person whose interests are imputed to you has a financial interest directly and predictably affected by the matter, unless you first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption, pursuant to 18 U.S.C. §

208(b)(2).

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

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

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From: [Gottry, Heather C](#)
To: [Whaley, Lashanda R](#); [Steuber, Curtis J](#)
Cc: [Garcia, Monica L](#)
Subject: FW: Welcome and Next Ethics Steps
Date: Tuesday, March 9, 2021 7:11:39 AM

LaShanda and Curtis – Good morning! As you may know, Monica will unexpectedly be out of the office today. If possible, can one of you please assign Nada's report in *Integrity*? If you assign her report, please let me know and I will follow up with Nada although she will also receive the system generated message. If you are not able to assign her report, then we will let her know that we will assign as soon as possible this week. Many thanks!

- Heather

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From: [Gottry, Heather C](#)
To: [Raviv, Deborah A](#); [Futrowsky, Steven G](#)
Subject: FW: Welcome and Next Ethics Steps
Date: Tuesday, July 27, 2021 9:01:13 AM

Deborah and Steve – Hello once again! Here is a message that we sent to Nada setting out next ethics steps and providing general ethics guidance. It is our practice to send a message like this to all new staff in the first days and the Department. As we discussed yesterday, we have also provided Nada with specific guidance on request. Please do not hesitate to reach out with any questions. Thanks!

- Heather

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Sent: Tuesday, March 2, 2021 7:36 AM
To: Culver, Nada L <nada_culver@ios.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>; Hammer, Christine A <christine.hammer@sol.doi.gov>
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Heather C. Gottry
Director & DAEO
Departmental Ethics Office | Office of the Solicitor

U.S. Department of the Interior | MIB 5308
(O) (202) 208-4472
(C) (202) 740-0417
Email: heather.gottry@sol.doi.gov

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

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From: [Gottry, Heather C](#)
To: [Deluca, Mary E](#); [Siemer, Heather L](#)
Subject: FW: Welcome and Next Ethics Steps
Date: Thursday, September 2, 2021 3:11:08 PM
Attachments: [Interim Ethics Recusal Memo - Culver \(Draft for Review 3.7.21\).docx](#)

As promised. Thank you.

From: Garcia, Monica L <monica.garcia@sol.doi.gov>
Sent: Sunday, March 7, 2021 3:21 PM
To: Culver, Nada L <nada_culver@ios.doi.gov>; Gottry, Heather C <heather.gottry@sol.doi.gov>
Cc: Hammer, Christine A <christine.hammer@sol.doi.gov>
Subject: RE: Welcome and Next Ethics Steps

Nada – Thank you for making time to meet with me and review your draft Interim Recusal last week. As we discussed, I have attached a revised draft with redline changes to reflect your recusals with respect to your spouse’s law firm and clients.

If you have any questions or concerns, please let me know and we can schedule a time to discuss. If you are comfortable with the attached draft, please let me know and we can finalize it and issue to you ASAP.

Thanks!

-Monica

From: Garcia, Monica L
Sent: Tuesday, March 2, 2021 3:37 PM
To: Culver, Nada L <nada_culver@ios.doi.gov>; Gottry, Heather C <heather.gottry@sol.doi.gov>
Cc: Hammer, Christine A <christine.hammer@sol.doi.gov>
Subject: RE: Welcome and Next Ethics Steps

Nada – I’ll send a meeting invitation for tomorrow at 11:30 a.m. Eastern to discuss your pending questions, but we can move it to a different day or time if you prefer.

We have drafted the attached memorandum for your consideration that provides interim ethics guidance on your recusals and will work with you to answer any questions you may have and issue the memorandum. The draft memorandum was developed using information included on your resume, your responses to our preliminary questions, and our notes from our discussion before you onboarded. As a result, we recognize that it will need to be updated further before it is finalized.

At your convenience, can you please review the draft memorandum? If you would like, we can walk through the recusals discussed in the attached memorandum tomorrow or schedule a separate time to review. You are in the best position to know and identify your personal and imputed financial interests, your “covered relationships,” and your former employers and clients as defined in the

Ethics Pledge, and we want to make sure that we have captured all relevant information.

We greatly appreciate your time and attention and hope that the draft memorandum provides helpful guidance on your recusals. Thank you.

-Monica

From: Garcia, Monica L
Sent: Tuesday, March 2, 2021 9:59 AM
To: Culver, Nada L <nada_culver@ios.doi.gov>; Gottry, Heather C <heather.gottry@sol.doi.gov>
Cc: Hammer, Christine A <christine.hammer@sol.doi.gov>
Subject: RE: Welcome and Next Ethics Steps

Nada – Thank you for the update! We are reviewing your questions and working on a draft interim recusal document for your review and will send to you as soon as possible.

In the meantime, does 11:30 a.m. Eastern tomorrow work to have a discussion on your two open questions? If so, I'll send a calendar invite ASAP.

-Monica

From: Culver, Nada L <nada_culver@ios.doi.gov>
Sent: Tuesday, March 2, 2021 9:56 AM
To: Gottry, Heather C <heather.gottry@sol.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>; Hammer, Christine A <christine.hammer@sol.doi.gov>
Subject: RE: Welcome and Next Ethics Steps

Thank you, Heather. I sent the signed pledge to Christine yesterday.

Nada

From: Gottry, Heather C <heather.gottry@sol.doi.gov>
Sent: Tuesday, March 2, 2021 5:36 AM
To: Culver, Nada L <nada_culver@ios.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>; Hammer, Christine A <christine.hammer@sol.doi.gov>
Subject: Welcome and Next Ethics Steps

Nada – Hello again and welcome to the Department of the Interior! We are looking forward to working with you. As part of your onboarding process, there are several important steps you will

need to take in order to fulfill your ethics obligations. For your convenience, these next steps are summarized below:

- **Ethics Pledge:** On his first day in office, President Biden issued Executive Order 13989, [Ethics Commitments by Executive Branch Personnel](#). This Executive Order requires all appointees in each executive agency appointed on or after January 20, 2021, to sign an **Ethics Pledge**. An ethics official sent you a message yesterday with a copy of the Ethics Pledge with instructions on signing and returning. If you have not already done so, **please sign and return the Ethics Pledge to us at your earliest convenience but by no later than COB today March 2, 2021.**
- **Financial Disclosure Reporting:** In the next few days, you will receive an email from the *Integrity* system notifying you that you have been assigned a New Entrant OGE Form 278e, Public Financial Disclosure Report. A member of the Departmental Ethics Office will also reach out to schedule a time to complete an initial financial disclosure interview and to make sure that you can access and use the *Integrity* system. Your New Entrant OGE Form 278e is due on or before **Wednesday, March 31, 2021**, 30 days after your date of appointment.
- **Interim Guidance on Recusals:** Even while you are working on completing your New Entrant OGE Form 278e, we will issue you interim guidance on your recusals or disqualifications from certain work at the Department. We will provide you with a draft Interim Recusal document and meet with you to discuss any additional circumstances and provide guidance on how to manage your recusal obligations. In the meantime, if your former employer or former client requests a meeting or has a contract, license, permit, litigation, or other matter that you are asked to review, then please reach out for ethics guidance before accepting the meeting or participating in the matter.
- **Final Guidance on Recusals:** Once your New Entrant OGE Form 278e is completed, reviewed, and certified, we will provide you with cautionary guidance, a recusal memorandum for you to sign, or a recusal and screening arrangement for you to sign and implement. We can assist you with any questions you might have regarding managing and implementing your recusals going forward.
- **General Ethics Reminders:**
 - **Financial Conflicts of Interest:** Under 18 U.S.C. § 208(a), you may not participate personally and substantially in any particular matter in which you know that you have a financial interest directly and predictably affected by the matter, or in which you know that a person whose interests are imputed to you has a financial interest directly and predictably affected by the matter, unless you first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2).

The interests of the following persons are imputed to you: any spouse or minor child; any general partner of a partnership in which you are a limited or general partner; any organization in which you serve as officer, director, trustee, general partner or employee; and any person or organization with which you are negotiating or have an arrangement concerning prospective employment.
 - **Impartiality:** As required by 5 C.F.R. § 2635.502(a), if you know that a particular matter involving specific parties is likely to have a direct and predictable effect on the financial interest of a member of your household, or know that a person with whom you have a “covered relationship” is or represents a party to such matter, and where you determine that the circumstances would cause a reasonable person with knowledge of the relevant facts to question your impartiality in the matter, you may not participate in the matter unless you have informed the DEO of the appearance problem and received written authorization from the DEO to participate in the matter.

You have a “covered relationship” with any person for whom you have, within the last year, served as officer, director, trustee, general partner, agent, attorney,

consultant, contractor or employee. Additionally, you have a “covered relationship” with members of your household and close friends and family.

- **Biden Administration Ethics Pledge:** By signing the **Ethics Pledge**, you are committing to:
 - Not accepting any salary or other cash payment from a former employer to the extent that the eligibility for and payment of such payment is limited to individuals accepting a position in the U.S. Government;
 - For two (2) years, not participating in any particular matter involving specific parties (including meetings or other communication) that is directly and substantially related to your former employer(s) or former client(s) within two years prior to the date of your appointment, including regulations and contracts;
 - Not accepting gifts from registered lobbyists or lobbying organizations for the duration of your service as an appointee;
 - Making hiring or other employment decisions based on the candidate’s qualifications, competence, and experience;
 - Additional restrictions if you were a lobbyist registered under the Lobbying Disclosure Act (LDA) or the Foreign Agents Registration Act (FARA) within the two years prior to your date of appointment; and
 - Additional post-employment restrictions for certain employees.

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

- Heather

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

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

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From: [Garcia, Monica L](#)
To: [Culver, Nada L](#)
Cc: [Gottry, Heather C](#)
Subject: Interim Ethics Memo
Date: Thursday, March 11, 2021 6:59:18 PM
Attachments: [Interim Ethics Recusal Memo - Culver \(3.11.21\).pdf](#)

Nada - Hello! Thank you for taking the time to work with us as we reviewed your ethics recusal obligations. As promised, attached please find a memorandum that provides our interim ethics guidance. We will update it once we have reviewed and certified your New Entrant OGE Form 278e, Public Financial Disclosure Report. In the interim, please do not hesitate to reach out with any question or if we can be of any assistance. Thank you.

-Monica

Please note: I will be teleworking until further notice

Monica L. Garcia
Deputy Director for Ethics Law & Policy
and Alternate Designated Agency Ethics Official
Departmental Ethics Office | Office of the Solicitor
U.S. Department of the Interior | MIB 5316
(O): (202) 208-0460
(C): (202) 880-4474
Email: monica.garcia@sol.doi.gov

Visit us online at www.doi.gov/ethics

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From: [Derting, Elizabeth K](#)
To: [Culver, Nada L](#); [Garcia, Monica L](#)
Subject: New Entrant Report Review

Microsoft Teams meeting

Join on your computer or mobile app

Click here to join the meeting (b)(5)

[REDACTED]

Or call in (audio only)

(b)(5)

United States, Washington DC

Phone Conference ID: (b)(5)

Find a local number <<https://dialin.teams.microsoft.com/4c997179-2249-4e53-b877-e71d83c10c7a?id=27444952>> | Reset PIN

<<https://mysettings.lync.com/pstnconferencing>>

Learn More <<https://aka.ms/JoinTeamsMeeting>> | Meeting options (b)(5)

[REDACTED]

From: [Derting, Elizabeth K](#)
To: [Culver, Nada L](#); [Garcia, Monica L](#)
Subject: New Entrant Report Review

From: [Culver, Nada L](#)
To: [Derting, Elizabeth K](#)
Subject: New Time Proposed: New Entrant Report Review

From: [Derting, Elizabeth K](#)
To: [Culver, Nada L](#); [Garcia, Monica L](#)
Subject: OGE 278 New Entrant Report Review

Good afternoon, Nada,

Thank you for letting us know a good time for you to meet. I'm sending the calendar appointment on Monica's behalf. We look forward to talking with you on Monday.

Best regards,
Libby

Microsoft Teams meeting
Join on your computer or mobile app
Click here to join the meeting (b)(5)

[REDACTED]

Or call in (audio only)

(b)(5) United States, Washington DC

Phone Conference ID: (b)(5)

Find a local number <<https://dialin.teams.microsoft.com/4c997179-2249-4e53-b877-e71d83c10c7a?id=224863573>> | Reset PIN

<<https://mysettings.lync.com/pstnconferencing>>

Learn More <<https://aka.ms/JoinTeamsMeeting>> | Meeting options (b)(5)

[REDACTED]

From: [Lee, Eric S](#)
To: [Culver, Nada L](#)
Cc: [Nada Culver](#); [Schasberger, Paula I](#); [Garcia, Monica L](#); [Gottry, Heather C](#)
Subject: Outside teaching/speaking: University of Wyoming College of Law
Date: Wednesday, March 3, 2021 4:21:40 PM
Attachments: [Attachment- Outside Activities List of Statutes and Regulations - Career Employees - 2019-06-04 final \(1\).pdf](#)

Nada,

We have determined that there is no legal objection under the ethics statutes and regulations, or the Administration's Ethics Pledge (Pledge) to you teaching a one-time class at the University of Wyoming College of Law on March 8, 2021.

Based on the information provided, we understand that you will be teaching a class at the University of Wyoming College of Law on BLM's conservation process of the sage-grouse. You were invited to speak at the University of Wyoming College of Law before you joined the Department of the Interior due to your professional expertise, and not because of your official government position. This lecture will be delivered in your personal capacity and you will not be compensated for this lecture.

The University of Wyoming (the law school is a college within the university) is a prohibited source under 5 C.F.R. § 3501.105 as a search on USASpending.gov indicates that there is a history of financial agreements (contracts, grants, etc.) between DOI and the University of Wyoming as recent as 2020.

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

While there are no legal objections to your unpaid outside teaching/speaking activity, please be advised of the following restrictions:

-

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

Reference to Official Position: You may not use or permit the use of your official title or position to identify you in connection with your outside activity. However, as you will be engaged in teaching/speaking as an outside activity, you may include or permit the inclusion of your title or position as one of several biographical details when such information is given no more prominence than other significant biographical details. 5 C.F.R. § 2635.807(b)(1)-(2).

No Endorsement: You may not permit the use of your Government position or title or any authority

associated with your public office to endorse any product, service, or enterprise, including your teaching/speaking engagement. 5 C.F.R. § 2635.702(c).

Gifts from a Prohibited Source: Because the University of Wyoming is a prohibited source, please contact our office if you are offered a gift from the University of Wyoming College of Law for further ethics guidance and review. 5 C.F.R. §§ 2635.202, 2635.204.

No Use of Official Time or Government Property: While engaging in outside activities, Federal employees are not permitted to use official time or Government property. 5 C.F.R. §§ 2635.101(b) (9), 704, and 705.

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

I have attached a summary of the statutes and regulations addressing outside activities as a reference. Please feel free to call or email me if you have any other questions or concerns.

Thanks,
Eric

Eric S. Lee
Attorney Advisor | Advice and Counsel Branch
Departmental Ethics Office | Office of the Solicitor
U.S. Department of the Interior
E-mail: eric.lee@sol.doi.gov

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From: [Garcia, Monica L](#)
To: [mthompson](#)
Cc: [Gottry, Heather C](#)
Subject: Preliminary Ethics Review - Nada Culver - PERSONAL AND CONFIDENTIAL
Date: Monday, January 11, 2021 11:41:39 AM

Maggie,

Good morning! As requested by the incoming Biden Administration Agency Review Team, the Departmental Ethics Office (DEO) reviewed the resume of Nada Wolff Culver, a candidate being considered for the political appointee position of Deputy Director for Policy and Programs, Bureau of Land Management for the U.S. Department of the Interior (DOI). This preliminary ethics review was requested in order to determine whether, if she is selected, Ms. Culver would have either conflicts of interest or required recusals or disqualifications to such an extent that they would materially impact her ability to fulfill the duties of her position and maintain full compliance with all applicable ethics laws and regulations.

Based on the information provided and as discussed further below, we did not identify any conflicts of interest or required recusals or disqualifications that would preclude Ms. Culver from serving in the identified position, if appointed. Please note that she will be recused from matters involving National Audubon Society at the DOI for a period of time. She will also be recused from matters involving her spouse's law firm and clients.

In addition to reviewing Ms. Culver's resume and responses to our initial screening questions, DEO officials conducted a limited-scope interview with the candidate and determined that Ms. Culver will be required to:

- Take no further action with respect to compliance with the Department's statutory restrictions and supplemental ethics regulations as she did not self-identify any interests on the Department's 2020 prohibited interest list or any other prohibited interests or rights.
- Divest or recuse from participation in particular matters affecting her personal or imputed financial interests (including stock ownership) as required by 18 U.S.C. § 208(a). The candidate has agreed to do so, if selected.
- Recuse from participation in particular matters involving specific parties with whom the candidate has a covered relationship, including her former employers or clients for whom she served within the last year and her spouse's current non-Federal employer or clients as required by 5 C.F.R. § 2635.502.
 - If selected, Ms. Culver will resign her employment from National Audubon Society and will have a covered relationship with this entity for one year under the applicable impartiality regulations.
 - Ms. Culver informed the DEO that her spouse is employed at Benezra and Culver, PC, an employment law firm where he represents individuals. Ms. Culver will be required to recuse from particular matters involving specific parties involving her spouse's employer, his clients, or anyone with whom her spouse is "seeking to serve" as an agent, consultant, contractor, or employee.
- Agree to comply with any requirements contained in any Biden-Harris Administration Ethics Pledge and/or other applicable Executive Orders.

Ms. Culver's required recusals or disqualifications, as summarized above, will remain in place absent a waiver or authorization from the DEO and she should exercise caution and closely coordinate with the DEO on matters affecting Earthjustice.

We recommend that Ms. Culver follow the standard ethics onboarding process, including promptly completing required initial ethics training and completing a new entrant financial disclosure report. Please be advised that the DEO will make final conflicts of interest and recusal determinations based on information reported on signed financial disclosure reports. The DEO anticipates that the nature and scope of the candidate's recusals and limitations on participation will be subject to refinement, update, and revision as part of the formal onboarding process once the candidate completes her financial disclosure report.

Please do not hesitate to reach out with any questions about this preliminary ethics review or if we can be of additional assistance. Thank you.

-Monica

Please note: I will be teleworking until further notice

Monica L. Garcia
Acting Deputy Director for Ethics Law & Policy
and Acting Alternate Designated Agency Ethics Official
Departmental Ethics Office | Office of the Solicitor
U.S. Department of the Interior | MIB 5316
(O): (202) 208-0460
(C): (202) 880-4474
Email: monica.garcia@sol.doi.gov

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From: [Garcia, Monica L](#)
To: (b)(6)
Cc: [Gottry, Heather C](#)
Subject: Preliminary ethics review
Date: Monday, January 4, 2021 6:05:21 PM
Attachments: [2021 Prohibited Interests List - DOI Office of the Secretary & Office of the Solicitor.pdf](#)

Nada – Hello there! Thank you very much for the voice message and updated email address.

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

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

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

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

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

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

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

-Monica

Please note: I will be teleworking until further notice

Monica L. Garcia
Acting Deputy Director for Ethics Law & Policy
and Acting Alternate Designated Agency Ethics Official
Departmental Ethics Office | Office of the Solicitor
U.S. Department of the Interior | MIB 5316
(O): (202) 208-0460
(C): (202) 880-4474
Email: monica.garcia@sol.doi.gov

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From: [Derting, Elizabeth K](#)
To: [Culver, Nada L](#)
Subject: Question on Periodic Transaction Report Filed 9.26.21
Date: Thursday, October 21, 2021 5:07:53 PM
Attachments: [Culver, Nada - Periodic Transaction Report \(09.26.21\).pdf](#)

Hello, Nada,

I hope you are doing well!

Thank you for filing the Periodic Transaction Report on September 26. It looks like this one covers the sale of the assets from the certificate of divestiture and the purchase of permitted property after the sale of those assets, as well as some other transactions. Were you able to reinvest all of the proceeds from the divestiture into permitted property?

The report looks good and correct, but I do need one piece of information before I certify it. In Line 20 for the fund SMCWX, the type of transaction was omitted from the report. Could you confirm whether it was a sale or a purchase? I've attached the report for your reference. If you will permit me, I will add that detail to the report on your behalf, then certify it.

Please don't hesitate to let me know if you have any questions or need anything.

Best,
Libby

Libby Derting
Supervisory Attorney-Advisor, Financial Disclosure Branch
Departmental Ethics Office | Office of the Solicitor
U.S. Department of the Interior | MIB 5320
Email: elizabeth.derting@sol.doi.gov

Please note: I am teleworking until further notice. I can also be reached on MS Teams.

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Executive Branch Personnel

Public Financial Disclosure Report:

Periodic Transaction Report (OGE Form 278-T)

Filer's Information

Culver, Nada

Deputy Director, Policy and Programs, Bureau of Land Management, Department of the Interior

Electronic Signature - I certify that the statements I have made in this form are true, complete and correct to the best of my knowledge.

/s/ Culver, Nada [electronically signed on 09/26/2021 by Culver, Nada in Integrity.gov]

Agency Ethics Official's Opinion - On the basis of information contained in this report, I conclude that the filer is in compliance with applicable laws and regulations (subject to any comments below).

Other review conducted by

/s/ Barner, Tia Y, Ethics Official [electronically signed on 10/08/2021 by Barner, Tia Y in Integrity.gov]

U.S. Office of Government Ethics Certification

Transactions

#	DESCRIPTION	TYPE	DATE	NOTIFICATION RECEIVED OVER 30 DAYS AGO	AMOUNT
1	(b)(6)	Sale	08/16/2021	No	(b)(6)
2		Sale	08/16/2021	No	
3		Sale	08/16/2021	No	
4		Sale	08/16/2021	No	
5		Sale	08/16/2021	No	
6		Sale	08/16/2021	No	
7		Sale	08/16/2021	No	
8		See Endnote Sale	08/16/2021	No	
9		Sale	08/10/2021	Yes	
10		Sale	08/10/2021	Yes	
11		Sale	08/10/2021	Yes	
12		Sale	08/10/2021	Yes	
13		Sale	08/10/2021	Yes	
14		See Endnote Sale	08/10/2021	Yes	
15		Purchase	08/17/2021	No	
16		Purchase	09/15/2021	No	
17		Sale	09/01/2021	No	
18		Purchase	09/01/2021	No	

#	DESCRIPTION	TYPE	DATE	NOTIFICATION RECEIVED OVER 30 DAYS AGO	AMOUNT
19	(b)(6)	Purchase	09/01/2021	No	(b)(6)
20			08/17/2021	No	
21		Purchase	08/17/2021	No	

Endnotes

PART	#	ENDNOTE
Transactions	8	Last value of this was under \$1,000 but it does not give me an option for that.
Transactions	14	Last balance showed as under \$1,001 but there is not an option for that in the dropdown menu.

Summary of Contents

The 278-T discloses purchases, sales, or exchanges of securities in excess of \$1,000 made on behalf of the filer, the filer's spouse, or dependent child. Transactions are required to be disclosed within 30 days of receiving notification of a transaction but not later than 45 days after the transaction. Filers need not disclose (1) mutual funds and other excepted investment funds; (2) certificates of deposit, savings or checking accounts, and money market accounts; (3) U.S. Treasury bills, notes, and bonds; (4) Thrift Savings Plan accounts; (5) real property; and (6) transactions that are solely by and between the filer, the filer's spouse, and the filer's dependent children.

Privacy Act Statement

Title I of the Ethics in Government Act of 1978, as amended (the Act), 5 U.S.C. app. § 101 et seq., as amended by the Stop Trading on Congressional Knowledge Act of 2012 (Pub. L. 112-105) (STOCK Act), and 5 C.F.R. Part 2634 of the U. S. Office of Government Ethics regulations require the reporting of this information. Failure to provide the requested information may result in separation, disciplinary action, or civil action. The primary use of the information on this report is for review by Government officials to determine compliance with applicable Federal laws and regulations. This report may also be disclosed upon request to any requesting person in accordance with sections 105 and 402(b)(1) of the Act or as otherwise authorized by law. You may inspect applications for public access of your own form upon request. Additional disclosures of the information on this report may be made: (1) to any requesting person, subject to the limitation contained in section 208(d)(1) of title 18, any determination granting an exemption pursuant to sections 208(b)(1) and 208(b)(3) of title 18; (2) to a Federal, State, or local law enforcement agency if the disclosing agency becomes aware of violations or potential violations of law or regulation; (3) to a source when necessary to obtain information relevant to a conflict of interest investigation or determination; (4) to the National Archives and Records Administration or the General Services Administration in records management inspections; (5) to the Office of Management and Budget during legislative coordination on private relief legislation; (6) when the disclosing agency determines that the records are arguably relevant to a proceeding before a court, grand jury, or administrative or adjudicative body, or in a proceeding before an administrative or adjudicative body when the adjudicator determines the records to be relevant

to the proceeding; (7) to reviewing officials in a new office, department or agency when an employee transfers or is detailed from one covered position to another, a public financial disclosure report and any accompanying documents, including statements notifying an employee's supervising ethics office of the commencement of negotiations for future employment or compensation or of an agreement for future employment or compensation; (8) to a Member of Congress or a congressional office in response to an inquiry made on behalf of and at the request of an individual who is the subject of the record; (9) to contractors and other non-Government employees working on a contract, service or assignment for the Federal Government when necessary to accomplish a function related to this system of records; (10) on the OGE Website and to any person, department or agency, any written ethics agreement, including certifications of ethics agreement compliance, filed with OGE by an individual nominated by the President to a position requiring Senate confirmation; (11) on the OGE Website and to any person, department or agency, any certificate of divestiture issued by OGE; (12) on the OGE Website and to any person, department or agency, any waiver of the restrictions contained in Executive Order 13770 or any superseding executive order; (13) to appropriate agencies, entities and persons when there has been a suspected or confirmed breach of the system of records, the agency maintaining the records has determined that there is a risk of harm to individuals, the agency, the Federal Government, or national security, and the disclosure is reasonably necessary to assist in connection with the agency's efforts to respond to the suspected or confirmed breach or to prevent, minimize, or remedy such harm; and (14) to another Federal agency or Federal entity, when the agency maintaining the record determines that information from this system of records is reasonably necessary to assist the recipient agency or entity in responding to a suspected or confirmed breach or in preventing, minimizing, or remedying the risk of harm to individuals, the recipient agency or entity, the Federal Government, or national security. See also the OGE/GOVT-1 executive branch-wide Privacy Act system of records.

From: [Culver, Nada L](#)
To: [Gottry, Heather C](#); [Garcia, Monica L](#)
Subject: quick turnaround approval - help please!
Date: Saturday, October 16, 2021 8:38:01 PM

Hi Heather and Monica – I was just presented with an opportunity to speak to a Public Lands class at University of Montana Law School on October 20th (this coming Wednesday). I understand that I would give the usual disclaimer about speaking from my own perspective/not providing official administration positions and also that this will not be open to the public/press so the discussion will not be made available beyond the class. We would talk generally about the legal framework for managing oil and gas on public lands and the ongoing issues around the review, pause, court case, current work. Phil Lowe from SOL just joined a panel about 10 days ago where he went over a number of similar points and did Q&A at the University of Wyoming Energy in the Rockies conference, so I don't think there will be much different here – other than it not being recorded and made available to the public.

Thanks in advance for your help here. I'd be happy to hop on the phone on Monday if that's helpful and apologies for emailing on a Saturday night – this all just came up.

Nada Wolff Culver
Deputy Director, Policy and Programs
Bureau of Land Management
nculver@blm.gov
202-255-6979

From: [Garcia, Monica L](#)
To: [Nada Culver](#); [Gottry, Heather C](#)
Subject: RE: [EXTERNAL] additional questions
Date: Wednesday, February 24, 2021 5:34:02 PM

Nada – Thank you for your questions! We'd be happy to set up a time to meet and discuss your options if you want to move forward with these two events.

Our schedules this week are pretty tight but we can clear some time if you need to discuss tomorrow or Friday. If not, we would be happy to speak with you when you are onboard.

We are looking forward to working with you on this and seeing you soon.

-Monica

From: Nada Culver <(b)(6)>
Sent: Tuesday, February 23, 2021 1:32 AM
To: Garcia, Monica L <monica.garcia@sol.doi.gov>; Gottry, Heather C <heather.gottry@sol.doi.gov>
Subject: [EXTERNAL] additional questions

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Hi Monica and Heather - Prior to finding out I'd be working in the Department of the Interior, I'd agreed to do a couple of public-ish events that I wanted to run by you.

1. Teaching a class at the University of Wyoming Law School. This would be for 75 minutes or so on March 8th and I was asked to give an overview of the sage-grouse planning process that the BLM has conducted since 2010 and is still going on today due to ongoing litigation. I would be presenting to a class of law students and could do that as an individual, not on behalf of the Department. However, since this is such a key issue for the BLM and Department right now, i wasn't sure if it would be appropriate.

2. Participating in a panel on "Public Lands in the Biden Era" at a conference the Wyoming Bar is putting on for federal judges on March 11th. I've attached the brochure in case that's helpful for context. I can certainly indicate I'm only participating on my own behalf and could either present on wildlife issues or limit my role to being a moderator. Again, this seemed a bit touchy so I can also bow out.

Your advice would be appreciated. Thank you so much.

Nada Culver

From: [Garcia, Monica L](#)
To: [Culver, Nada L](#)
Cc: [Gottry, Heather C](#); [Derting, Elizabeth K](#)
Subject: RE: [EXTERNAL] Certificate of Divestiture - Nada Culver
Date: Friday, August 13, 2021 6:50:10 AM

Good morning, Nada! I hope you are doing well.

I just wanted to check in to see if you wanted to connect or have any questions about the CD process. If you have already sold, we can move forward and finalize your recusal documents with these assets removed from your recusal list.

Thanks so much!

-Monica

From: Garcia, Monica L
Sent: Thursday, August 5, 2021 2:25 PM
To: Culver, Nada L <nculver@blm.gov>
Cc: Heather Gottry <heather.gottry@sol.doi.gov>; Derting, Elizabeth K <elizabeth.derting@sol.doi.gov>
Subject: FW: [EXTERNAL] Certificate of Divestiture - Nada Culver - [Message and attachment(s) contain CUI]

Dear Nada,

Thank you for working with us to provide the information to process your request for a certificate of divestiture (CD). OGE granted the CD request this afternoon. I have attached the CD itself, as well as the regulation on reinvestment of proceeds. Your next steps and relevant deadlines are:

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Thank you for your responsiveness and working with me so closely on this matter. After you have completed the sale, we can move forward and finalize your ethics recusals memorandum.

Please let me know if you'd like to discuss or have any questions. Thank you!

-Monica

From: CD <cd@oge.gov>

Sent: Thursday, August 5, 2021 12:32 PM

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

Cc: Suzanne L. Meyer <slmeyer@oge.gov>; Elaine Newton <enewton@oge.gov>

Subject: [EXTERNAL] Certificate of Divestiture - Nada Culver - [Message and attachment(s) contain CUI]

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Good Afternoon:

In response to your request of 07/15/2021, attached is Certificate of Divestiture, OGE-2021-150 for Nada Culver, Department of The Interior. Please forward the certificate to Mrs. Culver.

If there are any questions, you may contact Suzanne Meyer at 202-482-9249.

Please confirm receipt of this email by replying to all.

Thank you.

CONTROLLED

Email and attachment(s) contain CUI.

Gwendolyn Cannon-Jenkins
US Office of Government Ethics
Administrative Operations Branch
1201 New York Avenue NW
Suite 500
Washington, DC 20005

(e) gcannon@oge.gov <<mailto:gcannon@oge.gov>>
(p)(202) 482-9219

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From: [Culver, Nada L](#)
To: [Garcia, Monica L](#)
Cc: [Gottry, Heather C](#); [Derting, Elizabeth K](#)
Subject: RE: [EXTERNAL] Certificate of Divestiture - Nada Culver
Date: Thursday, September 2, 2021 12:18:52 AM

These look right to me. The only question I had was on the Attachment C, p. 1 if the addition on The Wilderness Society should be clarified to state that the relationship ended on May 31, 2019 v. "in May."

Nada Wolff Culver
Deputy Director, Policy and Programs
Bureau of Land Management
nculver@blm.gov
202-255-6979

From: Garcia, Monica L <monica.garcia@sol.doi.gov>
Sent: Wednesday, September 1, 2021 7:34 AM
To: Culver, Nada L <nculver@blm.gov>
Cc: Gottry, Heather C <heather.gottry@sol.doi.gov>; Derting, Elizabeth K <elizabeth.derting@sol.doi.gov>
Subject: RE: [EXTERNAL] Certificate of Divestiture - Nada Culver

Nada – Hi there! I hope your week is going well.

To follow up after your sale of the 8 prohibited assets, I have updated your ethics guidance materials and recusals summary chart. Both updated drafts are attached with the changes marked in redline. If these look good to you, we will sign and issue to you ASAP.

In addition, please let us know if we can provide any assistance with submitting your 278-T report disclosing the sales in *Integrity*.

We can be available if it would be helpful to find a time to discuss or answer any follow-up questions. Thanks so much.

-Monica

From: Culver, Nada L <nculver@blm.gov>
Sent: Friday, August 20, 2021 10:23 AM
To: Garcia, Monica L <monica.garcia@sol.doi.gov>
Cc: Gottry, Heather C <heather.gottry@sol.doi.gov>; Derting, Elizabeth K <elizabeth.derting@sol.doi.gov>
Subject: RE: [EXTERNAL] Certificate of Divestiture - Nada Culver - [Message and attachment(s) contain CUI]

Hi Monica – We have divested of all the remaining stocks and bonds identified. I'll be sure to file the paperwork on reinvestments in the required timeframe. Thanks again for your help.

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Deputy Director, Policy and Programs
Bureau of Land Management
nculver@blm.gov
202-255-6979

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Subject: FW: [EXTERNAL] Certificate of Divestiture - Nada Culver - [Message and attachment(s) contain CUI]

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Cc: Suzanne L. Meyer <slmeyer@oge.gov>; Elaine Newton <enewton@oge.gov>

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Please confirm receipt of this email by replying to all.

Thank you.

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Washington, DC 20005

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From: [Culver, Nada L](#)
To: [Garcia, Monica L](#)
Cc: [Gottry, Heather C](#); [Derting, Elizabeth K](#)
Subject: RE: [EXTERNAL] Certificate of Divestiture - Nada Culver
Date: Friday, August 13, 2021 10:38:57 AM

Oh shoot I was on travel and missed this one. I will see about moving the sale forward today or Monday if that's okay.

Nada Wolff Culver
Deputy Director, Policy and Programs
Bureau of Land Management
Cell: 202-255-6979
nculver@blm.gov

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Sent: Friday, August 13, 2021 4:50 AM
To: Culver, Nada L <nculver@blm.gov>
Cc: Gottry, Heather C <heather.gottry@sol.doi.gov>; Derting, Elizabeth K <elizabeth.derting@sol.doi.gov>
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From: [Garcia, Monica L](#)
To: [Culver, Nada L](#)
Cc: [Gottry, Heather C](#); [Derting, Elizabeth K](#)
Subject: RE: [EXTERNAL] Certificate of Divestiture - Nada Culver
Date: Friday, September 3, 2021 6:45:35 AM

Thanks, Nada. I appreciate the edit and will make the change and send you a signed updated memo ASAP.

Monica

From: Culver, Nada L <nculver@blm.gov>
Sent: Thursday, September 2, 2021 12:19 AM
To: Garcia, Monica L <monica.garcia@sol.doi.gov>
Cc: Gottry, Heather C <heather.gottry@sol.doi.gov>; Derting, Elizabeth K <elizabeth.derting@sol.doi.gov>
Subject: RE: [EXTERNAL] Certificate of Divestiture - Nada Culver

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Nada Wolff Culver
Deputy Director, Policy and Programs
Bureau of Land Management
nculver@blm.gov
202-255-6979

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Subject: RE: [EXTERNAL] Certificate of Divestiture - Nada Culver - [Message and attachment(s) contain CUI]

Hi Monica – We have divested of all the remaining stocks and bonds identified. I'll be sure to file the paperwork on reinvestments in the required timeframe. Thanks again for your help.

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

Cc: Suzanne L. Meyer <slmeyer@oge.gov>; Elaine Newton <enewton@oge.gov>

Subject: [EXTERNAL] Certificate of Divestiture - Nada Culver - [Message and attachment(s) contain CUI]

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From: [Garcia, Monica L](#)
To: [Culver, Nada L](#)
Cc: [Gottry, Heather C](#); [Derting, Elizabeth K](#)
Subject: RE: [EXTERNAL] Certificate of Divestiture - Nada Culver
Date: Friday, August 13, 2021 10:48:30 AM

That would be great, Nada. I hope your travels went well!

Monica

From: Culver, Nada L <nculver@blm.gov>
Sent: Friday, August 13, 2021 10:39 AM
To: Garcia, Monica L <monica.garcia@sol.doi.gov>
Cc: Gottry, Heather C <heather.gottry@sol.doi.gov>; Derting, Elizabeth K <elizabeth.derting@sol.doi.gov>
Subject: RE: [EXTERNAL] Certificate of Divestiture - Nada Culver

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Nada Wolff Culver
Deputy Director, Policy and Programs
Bureau of Land Management
Cell: 202-255-6979
nculver@blm.gov

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Sent: Friday, August 13, 2021 4:50 AM
To: Culver, Nada L <nculver@blm.gov>
Cc: Gottry, Heather C <heather.gottry@sol.doi.gov>; Derting, Elizabeth K <elizabeth.derting@sol.doi.gov>
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From: CD <cd@oge.gov>

Sent: Thursday, August 5, 2021 12:32 PM

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

Cc: Suzanne L. Meyer <slmeyer@oge.gov>; Elaine Newton <enewton@oge.gov>

Subject: [EXTERNAL] Certificate of Divestiture - Nada Culver - [Message and attachment(s) contain CUI]

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

Good Afternoon:

In response to your request of 07/15/2021, attached is Certificate of Divestiture, OGE-2021-150 for Nada Culver, Department of The Interior. Please forward the certificate to Mrs. Culver.

If there are any questions, you may contact Suzanne Meyer at 202-482-9249.

Please confirm receipt of this email by replying to all.

Thank you.

CONTROLLED

Email and attachment(s) contain CUI.

Gwendolyn Cannon-Jenkins
US Office of Government Ethics
Administrative Operations Branch
1201 New York Avenue NW
Suite 500
Washington, DC 20005

(e) gcannon@oge.gov <<mailto:gcannon@oge.gov>>
(p)(202) 482-9219

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From: [Culver, Nada L](#)
To: [Garcia, Monica L](#)
Cc: [Gottry, Heather C](#); [Derting, Elizabeth K](#)
Subject: RE: [EXTERNAL] Certificate of Divestiture - Nada Culver
Date: Thursday, September 23, 2021 1:04:05 PM

Hi Monica – I don't seem to have the final version of these memos and was hoping to get them so I can share them with Danna Jackson, as we've discussed.

Nada Wolff Culver
Deputy Director, Policy and Programs
Bureau of Land Management
nculver@blm.gov
202-255-6979

From: Garcia, Monica L <monica.garcia@sol.doi.gov>
Sent: Friday, September 3, 2021 4:46 AM
To: Culver, Nada L <nculver@blm.gov>
Cc: Gottry, Heather C <heather.gottry@sol.doi.gov>; Derting, Elizabeth K <elizabeth.derting@sol.doi.gov>
Subject: RE: [EXTERNAL] Certificate of Divestiture - Nada Culver

Thanks, Nada. I appreciate the edit and will make the change and send you a signed updated memo ASAP.

Monica

From: Culver, Nada L <nculver@blm.gov>
Sent: Thursday, September 2, 2021 12:19 AM
To: Garcia, Monica L <monica.garcia@sol.doi.gov>
Cc: Gottry, Heather C <heather.gottry@sol.doi.gov>; Derting, Elizabeth K <elizabeth.derting@sol.doi.gov>
Subject: RE: [EXTERNAL] Certificate of Divestiture - Nada Culver

These look right to me. The only question I had was on the Attachment C, p. 1 if the addition on The Wilderness Society should be clarified to state that the relationship ended on May 31, 2019 v. "in May."

Nada Wolff Culver
Deputy Director, Policy and Programs
Bureau of Land Management
nculver@blm.gov
202-255-6979

From: Garcia, Monica L <monica.garcia@sol.doi.gov>
Sent: Wednesday, September 1, 2021 7:34 AM

To: Culver, Nada L <nculver@blm.gov>
Cc: Gottry, Heather C <heather.gottry@sol.doi.gov>; Derting, Elizabeth K <elizabeth.derting@sol.doi.gov>
Subject: RE: [EXTERNAL] Certificate of Divestiture - Nada Culver

Nada – Hi there! I hope your week is going well.

To follow up after your sale of the 8 prohibited assets, I have updated your ethics guidance materials and recusals summary chart. Both updated drafts are attached with the changes marked in redline. If these look good to you, we will sign and issue to you ASAP.

In addition, please let us know if we can provide any assistance with submitting your 278-T report disclosing the sales in *Integrity*.

We can be available if it would be helpful to find a time to discuss or answer any follow-up questions. Thanks so much.

-Monica

From: Culver, Nada L <nculver@blm.gov>
Sent: Friday, August 20, 2021 10:23 AM
To: Garcia, Monica L <monica.garcia@sol.doi.gov>
Cc: Gottry, Heather C <heather.gottry@sol.doi.gov>; Derting, Elizabeth K <elizabeth.derting@sol.doi.gov>
Subject: RE: [EXTERNAL] Certificate of Divestiture - Nada Culver - [Message and attachment(s) contain CUI]

Hi Monica – We have divested of all the remaining stocks and bonds identified. I'll be sure to file the paperwork on reinvestments in the required timeframe. Thanks again for your help.

Nada Wolff Culver
Deputy Director, Policy and Programs
Bureau of Land Management
nculver@blm.gov
202-255-6979

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Sent: Thursday, August 5, 2021 12:25 PM
To: Culver, Nada L <nculver@blm.gov>
Cc: Gottry, Heather C <heather.gottry@sol.doi.gov>; Derting, Elizabeth K <elizabeth.derting@sol.doi.gov>
Subject: FW: [EXTERNAL] Certificate of Divestiture - Nada Culver - [Message and attachment(s) contain CUI]

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As soon as possible: sell 100% of the interests in the assets listed in your CD. If you have a managed account or financial manager, please make sure to inform your financial manager that you are prohibited from investing in the interests on the 2021 Prohibited Holdings list for the Department and for the BLM.

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Thank you for your responsiveness and working with me so closely on this matter. After you have completed the sale, we can move forward and finalize your ethics recusals memorandum.

Please let me know if you'd like to discuss or have any questions. Thank you!

-Monica

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Sent: Thursday, August 5, 2021 12:32 PM

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

Cc: Suzanne L. Meyer <slmeyer@oge.gov>; Elaine Newton <enewton@oge.gov>

Subject: [EXTERNAL] Certificate of Divestiture - Nada Culver - [Message and attachment(s) contain CUI]

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From: [Culver, Nada L](#)
To: [Garcia, Monica L](#)
Cc: [Gottry, Heather C](#); [Derting, Elizabeth K](#)
Subject: RE: [EXTERNAL] Certificate of Divestiture - Nada Culver
Date: Friday, August 13, 2021 10:50:34 AM

Oh good. Thanks, Monica.

Nada Wolff Culver
Deputy Director, Policy and Programs
Bureau of Land Management
Cell: 202-255-6979
nculver@blm.gov

From: Garcia, Monica L <monica.garcia@sol.doi.gov>
Sent: Friday, August 13, 2021 8:49 AM
To: Culver, Nada L <nculver@blm.gov>
Cc: Gottry, Heather C <heather.gottry@sol.doi.gov>; Derting, Elizabeth K <elizabeth.derting@sol.doi.gov>
Subject: RE: [EXTERNAL] Certificate of Divestiture - Nada Culver

That would be great, Nada. I hope your travels went well!

Monica

From: Culver, Nada L <nculver@blm.gov>
Sent: Friday, August 13, 2021 10:39 AM
To: Garcia, Monica L <monica.garcia@sol.doi.gov>
Cc: Gottry, Heather C <heather.gottry@sol.doi.gov>; Derting, Elizabeth K <elizabeth.derting@sol.doi.gov>
Subject: RE: [EXTERNAL] Certificate of Divestiture - Nada Culver

Oh shoot I was on travel and missed this one. I will see about moving the sale forward today or Monday if that's okay.

Nada Wolff Culver
Deputy Director, Policy and Programs
Bureau of Land Management
Cell: 202-255-6979
nculver@blm.gov

From: Garcia, Monica L <monica.garcia@sol.doi.gov>
Sent: Friday, August 13, 2021 4:50 AM
To: Culver, Nada L <nculver@blm.gov>
Cc: Gottry, Heather C <heather.gottry@sol.doi.gov>; Derting, Elizabeth K

<elizabeth.derting@sol.doi.gov>

Subject: RE: [EXTERNAL] Certificate of Divestiture - Nada Culver

Good morning, Nada! I hope you are doing well.

I just wanted to check in to see if you wanted to connect or have any questions about the CD process. If you have already sold, we can move forward and finalize your recusal documents with these assets removed from your recusal list.

Thanks so much!

-Monica

From: Garcia, Monica L

Sent: Thursday, August 5, 2021 2:25 PM

To: Culver, Nada L <nculver@blm.gov>

Cc: Heather Gottry <heather.gottry@sol.doi.gov>; Derting, Elizabeth K <elizabeth.derting@sol.doi.gov>

Subject: FW: [EXTERNAL] Certificate of Divestiture - Nada Culver - [Message and attachment(s) contain CUI]

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-Monica

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Cc: Suzanne L. Meyer <slmeyer@oge.gov>; Elaine Newton <enewton@oge.gov>

Subject: [EXTERNAL] Certificate of Divestiture - Nada Culver - [Message and attachment(s) contain CUI]

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From: [Garcia, Monica L](#)
To: [Culver, Nada L](#)
Cc: [Gottry, Heather C](#); [Derting, Elizabeth K](#)
Subject: RE: [EXTERNAL] Certificate of Divestiture - Nada Culver
Date: Thursday, September 23, 2021 2:13:17 PM
Attachments: [Culver Nada - Recusal and Screening Agreement \(9.3.21\) - signed.pdf](#)
[Culver Nada - Updated Ethics Recusal Guidance Memorandum & Attachments \(Signed 9.3.21\).pdf](#)

Nada – Of course! Please see the attached signed updated ethics guidance as well as your updated signed Recusal and Screening Arrangement. We recommend that you share the Recusal and Screening Arrangement with your Screener and anyone else you deem appropriate.

-Monica

From: Culver, Nada L <nculver@blm.gov>
Sent: Thursday, September 23, 2021 1:04 PM
To: Garcia, Monica L <monica.garcia@sol.doi.gov>
Cc: Gottry, Heather C <heather.gottry@sol.doi.gov>; Derting, Elizabeth K <elizabeth.derting@sol.doi.gov>
Subject: RE: [EXTERNAL] Certificate of Divestiture - Nada Culver

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nculver@blm.gov
202-255-6979

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Cc: Gottry, Heather C <heather.gottry@sol.doi.gov>; Derting, Elizabeth K <elizabeth.derting@sol.doi.gov>
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Cc: Gottry, Heather C <heather.gottry@sol.doi.gov>; Derting, Elizabeth K <elizabeth.derting@sol.doi.gov>

Subject: RE: [EXTERNAL] Certificate of Divestiture - Nada Culver - [Message and attachment(s) contain CUI]

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From: [Culver, Nada L](#)
To: [Garcia, Monica L](#)
Cc: [Gottry, Heather C](#); [Derting, Elizabeth K](#)
Subject: RE: [EXTERNAL] Certificate of Divestiture - Nada Culver - [Message and attachment(s) contain CUI]
Date: Friday, August 20, 2021 10:23:29 AM

Hi Monica – We have divested of all the remaining stocks and bonds identified. I'll be sure to file the paperwork on reinvestments in the required timeframe. Thanks again for your help.

Nada Wolff Culver
Deputy Director, Policy and Programs
Bureau of Land Management
nculver@blm.gov
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Sent: Thursday, August 5, 2021 12:25 PM
To: Culver, Nada L <nculver@blm.gov>
Cc: Gottry, Heather C <heather.gottry@sol.doi.gov>; Derting, Elizabeth K <elizabeth.derting@sol.doi.gov>
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From: [Gottry, Heather C](#)
To: [Culver, Nada L](#)
Cc: [Derting, Elizabeth K](#); [Garcia, Monica L](#)
Subject: RE: [EXTERNAL] Certificate of Divestiture - Nada Culver - [Message and attachment(s) contain CUI]
Date: Saturday, August 21, 2021 7:46:34 AM

Nada – Thank you for letting us know. We will send you a final ethics guidance memorandum that reflects your divestiture next week as well as an updated attachment for your Ethics Recusal and Screening Arrangement. Please let us know if we can be of any assistance with your Transaction Report. Many thanks and hope you have a great weekend!

- Heather

From: Culver, Nada L <nculver@blm.gov>
Sent: Friday, August 20, 2021 10:23 AM
To: Garcia, Monica L <monica.garcia@sol.doi.gov>
Cc: Gottry, Heather C <heather.gottry@sol.doi.gov>; Derting, Elizabeth K <elizabeth.derting@sol.doi.gov>
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--

Good Afternoon:

In response to your request of 07/15/2021, attached is Certificate of Divestiture, OGE-2021-150 for Nada Culver, Department of The Interior. Please forward the certificate to Mrs. Culver.

If there are any questions, you may contact Suzanne Meyer at 202-482-9249.

Please confirm receipt of this email by replying to all.

Thank you.

CONTROLLED

Email and attachment(s) contain CUI.

Gwendolyn Cannon-Jenkins
US Office of Government Ethics
Administrative Operations Branch
1201 New York Avenue NW
Suite 500
Washington, DC 20005

(e) gcannon@oge.gov <<mailto:gcannon@oge.gov>>
(p)(202) 482-9219

Visit OGE's website: www.oge.gov <<http://www.oge.gov>>
Follow OGE on Twitter: @OfficeGovEthics

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From: [Garcia, Monica L](#)
To: [Culver, Nada L](#)
Cc: [Gottry, Heather C](#); [Derting, Elizabeth K](#)
Subject: RE: [EXTERNAL] Certificate of Divestiture - Nada Culver
Date: Wednesday, September 1, 2021 9:34:19 AM
Attachments: [Culver Nada - Ethics Recusal Guidance Memorandum \(Draft 9.1.21\).docx](#)
[Culver, Nada Attachment C \(Draft 9.1.21\).docx](#)

Nada – Hi there! I hope your week is going well.

To follow up after your sale of the 8 prohibited assets, I have updated your ethics guidance materials and recusals summary chart. Both updated drafts are attached with the changes marked in redline. If these look good to you, we will sign and issue to you ASAP.

In addition, please let us know if we can provide any assistance with submitting your 278-T report disclosing the sales in *Integrity*.

We can be available if it would be helpful to find a time to discuss or answer any follow-up questions. Thanks so much.

-Monica

From: Culver, Nada L <nculver@blm.gov>
Sent: Friday, August 20, 2021 10:23 AM
To: Garcia, Monica L <monica.garcia@sol.doi.gov>
Cc: Gottry, Heather C <heather.gottry@sol.doi.gov>; Derting, Elizabeth K <elizabeth.derting@sol.doi.gov>
Subject: RE: [EXTERNAL] Certificate of Divestiture - Nada Culver - [Message and attachment(s) contain CUI]

Hi Monica – We have divested of all the remaining stocks and bonds identified. I'll be sure to file the paperwork on reinvestments in the required timeframe. Thanks again for your help.

Nada Wolff Culver
Deputy Director, Policy and Programs
Bureau of Land Management
nculver@blm.gov
202-255-6979

From: Garcia, Monica L <monica.garcia@sol.doi.gov>
Sent: Thursday, August 5, 2021 12:25 PM
To: Culver, Nada L <nculver@blm.gov>
Cc: Gottry, Heather C <heather.gottry@sol.doi.gov>; Derting, Elizabeth K <elizabeth.derting@sol.doi.gov>
Subject: FW: [EXTERNAL] Certificate of Divestiture - Nada Culver - [Message and attachment(s) contain CUI]

Dear Nada,

Thank you for working with us to provide the information to process your request for a certificate of divestiture (CD). OGE granted the CD request this afternoon. I have attached the CD itself, as well as the regulation on reinvestment of proceeds. Your next steps and relevant deadlines are:

As soon as possible: sell 100% of the interests in the assets listed in your CD. If you have a managed account or financial manager, please make sure to inform your financial manager that you are prohibited from investing in the interests on the 2021 Prohibited Holdings list for the Department and for the BLM.

Within 60 days of sale: re-invest the proceeds of the stock sales into permitted property. As stated in the attached regulation, permitted property is any obligation of the United States of a diversified investment fund. If you have any questions about what property meets the definition of "permitted property," please let me know and I'd be happy to provide you with additional guidance.

Thank you for your responsiveness and working with me so closely on this matter. After you have completed the sale, we can move forward and finalize your ethics recusals memorandum.

Please let me know if you'd like to discuss or have any questions. Thank you!

-Monica

From: CD <cd@oge.gov>

Sent: Thursday, August 5, 2021 12:32 PM

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

Cc: Suzanne L. Meyer <slmeyer@oge.gov>; Elaine Newton <enewton@oge.gov>

Subject: [EXTERNAL] Certificate of Divestiture - Nada Culver - [Message and attachment(s) contain CUI]

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Good Afternoon:

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From: [Garcia, Monica L](#)
To: [Nada Culver](#)
Cc: [Gottry, Heather C](#)
Subject: RE: [EXTERNAL] Re: Audubon Meeting with FWS
Date: Monday, February 22, 2021 11:26:07 AM

Nada – Thank you very much for the response and clarification. We look forward to seeing you soon!

-Monica

From: Nada Culver <(b)(6)>
Sent: Monday, February 22, 2021 10:03 AM
To: Garcia, Monica L <monica.garcia@sol.doi.gov>
Cc: Gottry, Heather C <heather.gottry@sol.doi.gov>
Subject: [EXTERNAL] Re: Audubon Meeting with FWS

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Hi Monica- I was not intending to attend the meeting. That meeting request started before I was officially coming on board. It seemed like that would be very awkward.

I look forward to talking with you when I'm on board.

Nada

On Mon, Feb 22, 2021 at 4:38 AM Garcia, Monica L <monica.garcia@sol.doi.gov> wrote:

Nada,

Good morning and I hope this message finds you doing well! We have been working with our HR officials on the onboarding actions and are looking forward to your arrival as a Biden Administration appointee next month.

In the meantime, we noticed that you were listed as a representative of the National Audubon Society on a meeting request with Martha Williams, Principal Deputy Director for the U.S. Fish & Wildlife Service. While there is no ethics prohibition that limits your ability to take meetings and interface with DOI employees before you begin your federal employment, we wanted to connect and offer a quick meeting or phone call in the event that you have any questions or concerns.

We are available to chat this week if it would be helpful.

-Monica

Please note: I will be teleworking until further notice

Monica L. Garcia
Deputy Director for Ethics Law & Policy
and Alternate Designated Agency Ethics Official
Departmental Ethics Office | Office of the Solicitor
U.S. Department of the Interior | MIB 5316
(O): (202) 208-0460
(C): (202) 880-4474
Email: monica.garcia@sol.doi.gov

Visit us online at www.doi.gov/ethics

Integrity is Our Mission.

From: [Garcia, Monica L](#)
To: [Nada Culver](#); [Gottry, Heather C](#)
Subject: RE: [EXTERNAL] Re: Preliminary ethics review
Date: Wednesday, January 6, 2021 4:46:06 PM

Nada,

Thank you so much for your response and your flexibility. Unfortunately, something came up at that time that I can't move. Could you possibly meet at 3:00 p.m. or 4:30 p.m. Eastern on Friday? Again, my apologies for the scheduling movement.

Monica

From: Nada Culver <(b)(6)>
Sent: Wednesday, January 6, 2021 1:11 PM
To: Garcia, Monica L <monica.garcia@sol.doi.gov>; Gottry, Heather C <heather.gottry@sol.doi.gov>
Subject: Re: [EXTERNAL] Re: Preliminary ethics review

Hi again - I can do Friday at 2 eastern for a video meeting.

Nada

On Tue, Jan 5, 2021 at 8:22 PM Nada Culver <(b)(6)> wrote:

I hope to be able to make that work but need to see if I can move some other work meetings around. I will confirm tomorrow.

Nada

On Tue, Jan 5, 2021 at 6:37 PM Garcia, Monica L <monica.garcia@sol.doi.gov> wrote:

Nada,

Thank you very much for your quick response! Are you free for a video meeting Friday, January 8 at 2:00 p.m. Eastern? If so, I'm happy to schedule.

Thanks!

-Monica

From: Nada Culver <(b)(6)>
Sent: Monday, January 4, 2021 10:25 PM
To: Garcia, Monica L <monica.garcia@sol.doi.gov>
Cc: Gottry, Heather C <heather.gottry@sol.doi.gov>
Subject: [EXTERNAL] Re: Preliminary ethics review

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I've re-pasted the list of questions and put answers next to them. Hopefully this is what you had in mind for answering. If I need to clarify further, please let me know. I wasn't really sure how to address #7 since that is really the entire focus of a public lands program at a non-profit - i.e., engaging with the Department - but we don't have any monetary or ownership interests at stake.

1.

Do you hold any direct or indirect financial interest in Federal lands or resources administered or controlled by the Department? **NO**

- a. If so, please describe.
- b. Please also review the attached list which identifies certain financial holdings which are prohibited for certain Department employees to hold by statute or supplemental regulation.
- c. Please note that if you will be working on matters for U.S. Geological Survey, Office of Surface Mining Reclamation and Enforcement, U.S. Bureau of Land Management, Bureau of Ocean Energy Management, Bureau of Safety and Environmental Enforcement, and the Office of Natural Resources Revenue, there may be additional prohibitions that you will need to comply with after appointment, if appointed.

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

NO

- a. If so, please describe.

3. Do you currently serve as an officer, director, trustee, or general partner of any entity not listed on your resume? **NO**

- a. If so, please identify and describe your role and position(s), including whether you plan to continue your position(s) after appointment, if appointed.

4. Please identify your spouse's current employer(s), if applicable. **Benezra and Culver, PC, located in Denver, Colorado.**

5. Are all of your employers for the preceding two calendar years listed on your resume? **YES**

- a. If not, please provide the name of any employers not on your resume and identify your position with the employer.
6. If you provided other personal services to clients (including through your employer), please list all of your clients for the preceding two calendar years, if not already listed on your resume. **I DID NOT**
- a. Please note that personal services can include legal services, consulting services, lobbying services, pro bono, or other uncompensated volunteer activities, *etc.*
7. Did you, your employer, or your clients engage with the Department, including any Bureaus or Offices, on matters pending before the Department in the preceding two calendar years? **YES**
- a. If so, please describe the matters if not already described in your resume **The National Audubon Society regularly comments on projects, plans and regulations issued by the Department. In the context of the Bureau of Land Management, for instance, we have also been part of administrative protests of oil and gas lease sales and land use plans. We do not have any monetary investments or ownership interests at stake.**

On Mon, Jan 4, 2021 at 4:05 PM Garcia, Monica L <monica.garcia@sol.doi.gov> wrote:

Nada – Hello there! Thank you very much for the voice message and updated email address.

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

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

1. Do you hold any direct or indirect financial interest in Federal lands or resources administered or controlled by the Department?
 - a. If so, please describe.
 - b. Please also review the attached list which identifies certain financial holdings which are prohibited for certain Department employees to hold by statute or supplemental regulation.
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Additionally, once we have reviewed your responses to these questions, we would like to schedule a time to follow up and answer any questions that you might have regarding your ethics obligations should you be appointed to a position at the Department. To that end, please let us know which days and times are most convenient for a call.

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

-Monica

Please note: I will be teleworking until further notice

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From: [Nada Culver](#)
To: [Garcia, Monica L](#); [Gottry, Heather C](#)
Subject: Re: [EXTERNAL] Re: Preliminary ethics review
Date: Wednesday, January 6, 2021 1:11:28 PM

Hi again - I can do Friday at 2 eastern for a video meeting.

Nada

On Tue, Jan 5, 2021 at 8:22 PM Nada Culver <(b)(6)> wrote:

I hope to be able to make that work but need to see if I can move some other work meetings around. I will confirm tomorrow.

Nada

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Nada,

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Thanks!

-Monica

From: Nada Culver <(b)(6)>
Sent: Monday, January 4, 2021 10:25 PM
To: Garcia, Monica L <monica.garcia@sol.doi.gov>
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(O): (202) 208-0460

(C): (202) 880-4474

Email: monica.garcia@sol.doi.gov

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From: [Garcia, Monica L](#)
To: [Nada Culver](#); [Gottry, Heather C](#)
Subject: RE: [EXTERNAL] Re: Preliminary ethics review
Date: Friday, January 8, 2021 3:00:02 PM

Nada,

I'm so very sorry – I thought I sent you a link and realized I did not. Sending right now!

Monica

From: Nada Culver <(b)(6)>
Sent: Friday, January 8, 2021 2:58 PM
To: Garcia, Monica L <monica.garcia@sol.doi.gov>; Gottry, Heather C <heather.gottry@sol.doi.gov>
Subject: Re: [EXTERNAL] Re: Preliminary ethics review

Hi Monica - Are we talking at 3 eastern today? Since that's in 3 minutes and I don't have a formal call invite/video link I figured I'd ask.

Nada
303-807-6918

On Wed, Jan 6, 2021 at 3:22 PM Nada Culver <(b)(6)> wrote:

I can do 3:00 eastern

On Wed, Jan 6, 2021 at 2:46 PM Garcia, Monica L <monica.garcia@sol.doi.gov> wrote:

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Integrity is Our Mission.

From: [Nada Culver](#)
To: [Garcia, Monica L](#); [Gottry, Heather C](#)
Subject: Re: [EXTERNAL] Re: Preliminary ethics review
Date: Wednesday, January 6, 2021 5:22:54 PM

I can do 3:00 eastern

On Wed, Jan 6, 2021 at 2:46 PM Garcia, Monica L <monica.garcia@sol.doi.gov> wrote:

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Sent: Wednesday, January 6, 2021 1:11 PM
To: Garcia, Monica L <monica.garcia@sol.doi.gov>; Gottry, Heather C <heather.gottry@sol.doi.gov>
Subject: Re: [EXTERNAL] Re: Preliminary ethics review

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From: [Nada Culver](#)
To: [Garcia, Monica L](#); [Gottry, Heather C](#)
Subject: Re: [EXTERNAL] Re: Preliminary ethics review
Date: Friday, January 8, 2021 2:58:33 PM

Hi Monica - Are we talking at 3 eastern today? Since that's in 3 minutes and I don't have a formal call invite/video link I figured I'd ask.

Nada
303-807-6918

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From: [Garcia, Monica L](#)
To: [Nada Culver](#)
Cc: [Gottry, Heather C](#)
Subject: RE: [EXTERNAL] Re: Preliminary ethics review
Date: Tuesday, January 5, 2021 8:22:47 PM

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

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

-Monica

Please note: I will be teleworking until further notice

Monica L. Garcia

Acting Deputy Director for Ethics Law & Policy

and Acting Alternate Designated Agency Ethics Official

Departmental Ethics Office | Office of the Solicitor

U.S. Department of the Interior | MIB 5316

(O): (202) 208-0460

(C): (202) 880-4474

Email: monica.garcia@sol.doi.gov

Visit us online at www.doi.gov/ethics

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From: [Gottry, Heather C](#)
To: [Roberts, Lawrence S](#); [Anderson, Robert T](#)
Subject: RE: [EXTERNAL] Request for Comment: Watchdog Complaint About Director Nada Culver
Date: Monday, June 14, 2021 1:42:57 PM
Attachments: [Interim Ethics Recusal Memo - Culver \(3.11.21\).pdf](#)

Thanks for flagging. As quick background, Nada has been working under the attached guidance which includes a recusal from the National Audubon Society.

From: Roberts, Lawrence S <lawrence_s_roberts@ios.doi.gov>
Sent: Monday, June 14, 2021 12:23 PM
To: Anderson, Robert T <Robert.Anderson@sol.doi.gov>; Gottry, Heather C <heather.gottry@sol.doi.gov>
Subject: FW: [EXTERNAL] Request for Comment: Watchdog Complaint About Director Nada Culver

FYI

From: Schwartz, Melissa A <melissa_schwartz@ios.doi.gov>
Sent: Monday, June 14, 2021 9:59 AM
To: Roberts, Lawrence S <lawrence_s_roberts@ios.doi.gov>; Kelly, Katherine P <Kate_Kelly@ios.doi.gov>
Subject: Fwd: [EXTERNAL] Request for Comment: Watchdog Complaint About Director Nada Culver

Melissa Schwartz (she/her)
Communications Director
Office of the Secretary
Department of the Interior
Cell: [\(202\) 538-2214](tel:(202)538-2214)

From: Matthew Foldi <foldi@freebeacon.com>
Sent: Monday, June 14, 2021 9:49:44 AM
To: Interior Press <interior_press@ios.doi.gov>
Subject: [EXTERNAL] Request for Comment: Watchdog Complaint About Director Nada Culver

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

Good morning,

I am a reporter at the *Washington Free Beacon*. I have a complaint from an ethics watchdog that is

being sent to the Interior Department's inspector general later today about interim director Nada Culver.

Specifically, the group alleges that Director Culver acting as a point person on the Biden administration's Alaska PLOs represents a conflict of interest given her previous employment at the National Audubon Society, whose Alaska chapter is leading the way to oppose the Trump administration's plans to open up BLM lands in Alaska to Vietnam veterans and mineral exploration.

Are there plans to scale back Director Culver's involvement in matters her former employer is involved in?

My deadline is 2pm today, and I would appreciate hearing from you for the story, even on background.

Best,

Matthew Foldi

From: [Nada Culver](#)
To: [Garcia, Monica L](#)
Cc: [Gottry, Heather C](#)
Subject: Re: Audubon Meeting with FWS
Date: Monday, February 22, 2021 10:03:02 AM

Hi Monica- I was not intending to attend the meeting. That meeting request started before I was officially coming on board. It seemed like that would be very awkward.

I look forward to talking with you when I'm on board.

Nada

On Mon, Feb 22, 2021 at 4:38 AM Garcia, Monica L <monica.garcia@sol.doi.gov> wrote:

Nada,

Good morning and I hope this message finds you doing well! We have been working with our HR officials on the onboarding actions and are looking forward to your arrival as a Biden Administration appointee next month.

In the meantime, we noticed that you were listed as a representative of the National Audubon Society on a meeting request with Martha Williams, Principal Deputy Director for the U.S. Fish & Wildlife Service. While there is no ethics prohibition that limits your ability to take meetings and interface with DOI employees before you begin your federal employment, we wanted to connect and offer a quick meeting or phone call in the event that you have any questions or concerns.

We are available to chat this week if it would be helpful.

-Monica

Please note: I will be teleworking until further notice

Monica L. Garcia

Deputy Director for Ethics Law & Policy

and Alternate Designated Agency Ethics Official

Departmental Ethics Office | Office of the Solicitor

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(O): (202) 208-0460

(C): (202) 880-4474

Email: monica.garcia@sol.doi.gov

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From: [Deluca, Mary E](#)
To: [Gottry, Heather C](#)
Cc: [Siemer, Heather L](#)
Subject: RE: Culver Complaint
Date: Thursday, September 2, 2021 8:49:13 AM

Thanks for getting back to us. I will send a Teams invite for 2 pm. We will not take more than an hour of your time today.

From: Gottry, Heather C <heather.gottry@sol.doi.gov>
Sent: Thursday, September 2, 2021 8:43 AM
To: Deluca, Mary E <mary_deluca@doioig.gov>
Cc: Siemer, Heather L <heather_siemer@doioig.gov>
Subject: RE: Culver Complaint

Mary – Hello! Please accept my apologies of the delay in getting back to you. I was out for a week and have been buried with meetings and deadlines. I am happy to meet with you and Heather. I am free today between 2:00-4:00 pm and can also look for a time next week if more convenient. Thanks!

- Heather

From: Deluca, Mary E <mary_deluca@doioig.gov>
Sent: Tuesday, August 31, 2021 10:56 AM
To: Gottry, Heather C <heather.gottry@sol.doi.gov>
Cc: Siemer, Heather L <heather_siemer@doioig.gov>
Subject: Culver Complaint

Hello Heather.

I am an Investigative Counsel with the DOI OIG. We spoke a few months ago with Deb Raviv and Tom Davis regarding the Jackson matter.

My colleague, Special Agent Heather Siemer, and I have been assigned to investigate the complaint against Ms. Nada Culver. We would like to speak with you to get some background information on the complaint.

Would you be available this week? If so, could you provide us a few dates/times that would work for you? I am unavailable on Friday. We can also push our call into next week if that is better for you.

Thank you.

Mary Beth DeLuca
Investigative Counsel
Department of the Interior
Office of Inspector General

Special Investigations and Reviews
(202) 924-0835

From: [Gottry, Heather C](#)
To: [Deluca, Mary E](#)
Cc: [Siemer, Heather L](#)
Subject: RE: Culver Complaint
Date: Thursday, September 2, 2021 8:42:42 AM

Mary – Hello! Please accept my apologies of the delay in getting back to you. I was out for a week and have been buried with meetings and deadlines. I am happy to meet with you and Heather. I am free today between 2:00-4:00 pm and can also look for a time next week if more convenient. Thanks!

- Heather

From: Deluca, Mary E <mary_deluca@doioig.gov>
Sent: Tuesday, August 31, 2021 10:56 AM
To: Gottry, Heather C <heather.gottry@sol.doi.gov>
Cc: Siemer, Heather L <heather_siemer@doioig.gov>
Subject: Culver Complaint

Hello Heather.

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Would you be available this week? If so, could you provide us a few dates/times that would work for you? I am unavailable on Friday. We can also push our call into next week if that is better for you.

Thank you.

Mary Beth DeLuca
Investigative Counsel
Department of the Interior
Office of Inspector General
Special Investigations and Reviews
(202) 924-0835

From: [Culver, Nada L](#)
To: [Gottry, Heather C](#); [Garcia, Monica L](#)
Subject: Re: Discuss Sabinoso Wilderness
Date: Tuesday, July 13, 2021 9:28:23 AM

Running just 2 minutes behind but will join asap

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From: Gottry, Heather C <heather.gottry@sol.doi.gov>
Sent: Tuesday, July 13, 2021 6:19:48 AM
To: Culver, Nada L <nculver@blm.gov>; Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: Discuss Sabinoso Wilderness
When: Tuesday, July 13, 2021 7:30 AM-8:00 AM.
Where: Microsoft Teams Meeting

Microsoft Teams meeting

Join on your computer or mobile app
[Click here to join the meeting](#)

Or call in (audio only)

(b)(5) United States, Washington DC

Phone Conference ID: (b)(5)
[Find a local number](#) | [R](#)

[Learn More](#) | [Meeting options](#)

From: [Garcia, Monica L](#)
To: [Culver, Nada L](#)
Cc: [Gottry, Heather C](#); [Genter, Constance G](#)
Subject: RE: Ethics check-in
Date: Friday, April 23, 2021 9:29:46 AM

Nada – Thank you for your call just now. You have confirmed that you will call your broker this morning and execute a sale of you and your husband's entire position in the following, as reported on your financial disclosure:

(b)(6)
[Redacted]
[Redacted]
[Redacted]
[Redacted]
[Redacted]

As we discussed, you will not participate in any BLM issue, action, or decision that could affect your energy holdings (including meetings or preparation for the upcoming hearing on BLM's oil and gas leasing program) until you have divested these interests. You have informed us that you have spoken to your broker and he will execute the sale this morning and confirm the sale in writing. Please consult with us before re-investing so we can ensure that you are not re-investing in any prohibited asset.

As we discussed, we identified a few other holdings on the BLM prohibited list (such as AT&T, Union Pacific, and Verizon) and will follow up with you on those holdings as soon as possible. Finally, we are continuing our review of your New Entrant OGE Form 278e and will follow up with any questions or necessary guidance.

We appreciate your prompt attention to this inquiry. If you have any question, please let me know and feel free to call me to discussion.

-Monica

From: Culver, Nada L <nculver@blm.gov>
Sent: Friday, April 23, 2021 8:24 AM
To: Garcia, Monica L <monica.garcia@sol.doi.gov>
Cc: Gottry, Heather C <heather.gottry@sol.doi.gov>; Genter, Constance G <constance.genter@sol.doi.gov>
Subject: Re: Ethics check-in

On it!

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From: Garcia, Monica L <monica.garcia@sol.doi.gov>
Sent: Friday, April 23, 2021 5:53:00 AM
To: Culver, Nada L <nculver@blm.gov>
Cc: Gottry, Heather C <heather.gottry@sol.doi.gov>; Genter, Constance G <constance.genter@sol.doi.gov>
Subject: RE: Ethics check-in

Thank you, Nada. I really appreciate it.

Please call me at **(202) 880-4474** when you are driving at 9 a.m. Eastern.

-Monica

From: Culver, Nada L <nculver@blm.gov>
Sent: Friday, April 23, 2021 7:49 AM
To: Garcia, Monica L <monica.garcia@sol.doi.gov>
Cc: Gottry, Heather C <heather.gottry@sol.doi.gov>; Genter, Constance G <constance.genter@sol.doi.gov>
Subject: Re: Ethics check-in

I am booked all day but can call you while driving this morning at 9 eastern. Will that work?

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From: Garcia, Monica L <monica.garcia@sol.doi.gov>
Sent: Friday, April 23, 2021 4:34:15 AM
To: Culver, Nada L <nculver@blm.gov>
Cc: Gottry, Heather C <heather.gottry@sol.doi.gov>; Genter, Constance G <constance.genter@sol.doi.gov>
Subject: Ethics check-in

Nada,

With apologies for the short notice, we need to connect as early as possible today and get some additional information from you about your investments. We were asked to look at your travel to testify on BLM oil and gas leasing activity.

When we reviewed your disclosure as part of our ethics clearance process, we became aware that you possibly own DOI prohibited stock and likely own stock in oil and gas companies over the *de minimis* conflicts threshold. We need to connect and get detailed information on the holdings in your investment accounts (yours and your spouse's, as they are imputed to you) and have a discussion.

We can be available at your convenience.

-Monica

Please note: I will be teleworking until further notice

Monica L. Garcia
Deputy Director for Ethics Law & Policy
and Alternate Designated Agency Ethics Official
Departmental Ethics Office | Office of the Solicitor
U.S. Department of the Interior | MIB 5316
(O): (202) 208-0460
(C): (202) 880-4474
Email: monica.garcia@sol.doi.gov

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From: [Culver, Nada L](#)
To: [Garcia, Monica L](#)
Cc: [Gottry, Heather C](#); [Genter, Constance G](#)
Subject: Re: Ethics check-in
Date: Friday, April 23, 2021 8:23:56 AM

On it!

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From: [Culver, Nada L](#)
To: [Garcia, Monica L](#)
Cc: [Gottry, Heather C](#); [Genter, Constance G](#)
Subject: Re: Ethics check-in
Date: Friday, April 23, 2021 7:48:59 AM

I am booked all day but can call you while driving this morning at 9 eastern. Will that work?

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From: Garcia, Monica L <monica.garcia@sol.doi.gov>
Sent: Friday, April 23, 2021 4:34:15 AM
To: Culver, Nada L <nculver@blm.gov>
Cc: Gottry, Heather C <heather.gottry@sol.doi.gov>; Genter, Constance G <constance.genter@sol.doi.gov>
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From: [Culver, Nada L](#)
To: [Derting, Elizabeth K](#)
Cc: [Garcia, Monica L](#)
Subject: RE: Final Review and Questions on your New Entrant Financial Disclosure Report
Date: Tuesday, June 8, 2021 12:50:35 PM

Sorry – I can make 4 p.m. TOMORROW not today.

Nada Wolff Culver
Deputy Director, Policy and Programs
Bureau of Land Management
Cell: 202-255-6979
nculver@blm.gov

From: Derting, Elizabeth K <elizabeth.derting@sol.doi.gov>
Sent: Tuesday, June 8, 2021 10:46 AM
To: Culver, Nada L <nculver@blm.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: Re: Final Review and Questions on your New Entrant Financial Disclosure Report

Thank you so much, Nada! I'll send a calendar invitation for 4pm today, in case you can make it. If not, just let me know.

Best,
Libby

Libby Derting

Supervisory Attorney-Advisor, Financial Disclosure Branch

Departmental Ethics Office | Office of the Solicitor

U.S. Department of the Interior | MIB 5320

Email: elizabeth.derting@sol.doi.gov

Please note: I am teleworking until further notice. You can also reach me on MS Teams.

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From: Culver, Nada L <nculver@blm.gov>
Sent: Tuesday, June 8, 2021 12:40 PM
To: Derting, Elizabeth K <elizabeth.derting@sol.doi.gov>

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

Subject: RE: Final Review and Questions on your New Entrant Financial Disclosure Report

I'm actually on the road today and tomorrow but could probably do 4 eastern and can try to look through these questions before then.

Nada Wolff Culver

Deputy Director, Policy and Programs

Bureau of Land Management

Cell: 202-255-6979

nculver@blm.gov

From: Derting, Elizabeth K <elizabeth.derting@sol.doi.gov>

Sent: Tuesday, June 8, 2021 10:11 AM

To: Culver, Nada L <nculver@blm.gov>

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

Subject: Final Review and Questions on your New Entrant Financial Disclosure Report

Hello, Nada,

I hope you are doing well!

We apologize for the delay in getting back to you to wrap up the review of your New Entrant report but wanted to follow up with some final questions and also find a time to meet to discuss divestiture options for the remaining stock that needs to be divested.

Below are our final questions about the information in your report. I've also highlighted them in the attached, updated report so that you can easily find them.

- Section 5, line 4.25 - What is the income amount for New Perspective Fund?
- Section 5, line 5.8 - (b)(6)

(b)(6)

- Section 5, line 5.12 - (b)(6)
- Section 5, line 5.17 - What was the income amount in interest?
- Section 6, line 1 - In what city and state is the condo located? Is it residential or commercial? Finally, is there a mortgage on it? If so, we may need to add the mortgage entry in Section 8.
- Please see how we added some description/notes to the names of Joint Accounts 1-3 in Section 6. These are just considered technical updates.
- Section 6, line 3.5 - What is the interest income amount?
- Section 6, line 3.6 - What was the income amount (and type, if applicable)?
- Section 6, line 4 - (b)(6)

Finally, are you available this evening or tomorrow for a call to finalize this report and discuss the other prohibited assets and divestiture options? It looks like these times are available, so please let me know if you have a preference.

- Today at 5:30-6pm (Eastern)
- Tomorrow at 3:30-4:00 pm (Eastern)
- Tomorrow at 4:00 - 4:30 pm (Eastern)

Thanks again! We look forward to talking with you.

Libby

Libby Derting

Supervisory Attorney-Advisor, Financial Disclosure Branch

Departmental Ethics Office | Office of the Solicitor

U.S. Department of the Interior | MIB 5320

Email: elizabeth.derting@sol.doi.gov

Please note: I am teleworking until further notice. You can also reach me on MS Teams.

Integrity is our mission.

From: [Derting, Elizabeth K](#)
To: [Culver, Nada L](#)
Cc: [Garcia, Monica L](#)
Subject: Re: Final Review and Questions on your New Entrant Financial Disclosure Report
Date: Tuesday, June 8, 2021 12:52:10 PM

Thank you. I've updated and resent the invitation.

Libby

Libby Derting
Supervisory Attorney-Advisor, Financial Disclosure Branch
Departmental Ethics Office | Office of the Solicitor
U.S. Department of the Interior | MIB 5320
Email: elizabeth.derting@sol.doi.gov

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Integrity is our mission.

From: Culver, Nada L <nculver@blm.gov>
Sent: Tuesday, June 8, 2021 12:50 PM
To: Derting, Elizabeth K <elizabeth.derting@sol.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: RE: Final Review and Questions on your New Entrant Financial Disclosure Report

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Nada Wolff Culver
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To: Culver, Nada L <nculver@blm.gov>
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- Section 5, line 5.8 - (b)(6)

[REDACTED]

- Section 5, line 5.12 - (b)(6)
- Section 5, line 5.17 - What was the income amount in interest?
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- Section 6, line 3.6 - What was the income amount (and type, if applicable)?
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Thanks again! We look forward to talking with you.

Libby

Libby Derting
 Supervisory Attorney-Advisor, Financial Disclosure Branch
 Departmental Ethics Office | Office of the Solicitor
 U.S. Department of the Interior | MIB 5320
 Email: elizabeth.derting@sol.doi.gov

Please note: I am teleworking until further notice. You can also reach me on MS Teams.

Integrity is our mission.

From: [Culver, Nada L](#)
To: [Derting, Elizabeth K](#)
Cc: [Garcia, Monica L](#)
Subject: RE: Final Review and Questions on your New Entrant Financial Disclosure Report
Date: Tuesday, June 8, 2021 12:52:39 PM

Great. Sorry for the confusion – typing and thinking....

Nada Wolff Culver
Deputy Director, Policy and Programs
Bureau of Land Management
Cell: 202-255-6979
nculver@blm.gov

From: Derting, Elizabeth K <elizabeth.derting@sol.doi.gov>
Sent: Tuesday, June 8, 2021 10:52 AM
To: Culver, Nada L <nculver@blm.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: Re: Final Review and Questions on your New Entrant Financial Disclosure Report

Thank you. I've updated and resent the invitation.

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Sent: Tuesday, June 8, 2021 12:50 PM
To: Derting, Elizabeth K <elizabeth.derting@sol.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: RE: Final Review and Questions on your New Entrant Financial Disclosure Report

Sorry – I can make 4 p.m. TOMORROW not today.

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From: Derting, Elizabeth K <elizabeth.derting@sol.doi.gov>
Sent: Tuesday, June 8, 2021 10:46 AM
To: Culver, Nada L <nculver@blm.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: Re: Final Review and Questions on your New Entrant Financial Disclosure Report

Thank you so much, Nada! I'll send a calendar invitation for 4pm today, in case you can make it. If not, just let me know.

Best,
Libby

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To: Derting, Elizabeth K <elizabeth.derting@sol.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: RE: Final Review and Questions on your New Entrant Financial Disclosure Report

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- Section 5, line 5.12 - (b)(6)
[REDACTED]
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[REDACTED]

[REDACTED]

[REDACTED]

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- Tomorrow at 3:30-4:00 pm (Eastern)
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From: [Derting, Elizabeth K](#)
To: [Culver, Nada L](#)
Cc: [Garcia, Monica L](#)
Subject: Re: Final Review and Questions on your New Entrant Financial Disclosure Report
Date: Tuesday, June 8, 2021 1:45:32 PM

Thanks so much, Nada! We appreciate all the time you have taken to work with us on this, and look forward to talking again.

Safe travels!

Libby

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U.S. Department of the Interior | MIB 5320
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From: Culver, Nada L <nculver@blm.gov>
Sent: Tuesday, June 8, 2021 1:14 PM
To: Derting, Elizabeth K <elizabeth.derting@sol.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: RE: Final Review and Questions on your New Entrant Financial Disclosure Report

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Nada Wolff Culver
Deputy Director, Policy and Programs
Bureau of Land Management
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nculver@blm.gov

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To: Culver, Nada L <nculver@blm.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: Re: Final Review and Questions on your New Entrant Financial Disclosure Report

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- Section 5, line 5.12 - (b)(6)
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- Section 5, line 5.17 - What was the income amount in interest? **This was in the IRA so there is no income – I must have hit the wrong choice.**

- Section 6, line 1 - In what city and state is the condo located? Is it residential or commercial? Finally, is there a mortgage on it? If so, we may need to add the mortgage entry in Section 8. **Condo in is New York City, NY. It is residential. There is not a mortgage.**
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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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 U.S. Department of the Interior | MIB 5320
 Email: elizabeth.derting@sol.doi.gov

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From: [Culver, Nada L](#)
To: [Derting, Elizabeth K](#)
Cc: [Garcia, Monica L](#)
Subject: RE: Final Review and Questions on your New Entrant Financial Disclosure Report
Date: Tuesday, June 8, 2021 1:14:42 PM

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Deputy Director, Policy and Programs
Bureau of Land Management
Cell: 202-255-6979
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Sent: Tuesday, June 8, 2021 10:52 AM
To: Culver, Nada L <nculver@blm.gov>
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Subject: Re: Final Review and Questions on your New Entrant Financial Disclosure Report

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Libby Derting

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Sent: Tuesday, June 8, 2021 12:50 PM
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To: Derting, Elizabeth K <elizabeth.derting@sol.doi.gov>
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Bureau of Land Management

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From: [Culver, Nada L](#)
To: [Derting, Elizabeth K](#)
Cc: [Garcia, Monica L](#)
Subject: RE: Final Review and Questions on your New Entrant Financial Disclosure Report
Date: Tuesday, June 8, 2021 12:40:14 PM

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From: [Derting, Elizabeth K](#)
To: [Culver, Nada L](#)
Cc: [Garcia, Monica L](#)
Subject: Re: Final Review and Questions on your New Entrant Financial Disclosure Report
Date: Tuesday, June 8, 2021 12:46:10 PM

Thank you so much, Nada! I'll send a calendar invitation for 4pm today, in case you can make it. If not, just let me know.

Best,
Libby

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Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>
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From: [Culver, Nada L](#)
To: [Garcia, Monica L](#)
Cc: [Derting, Elizabeth K](#)
Subject: RE: Financial Disclosure Meeting
Date: Monday, May 3, 2021 3:27:59 PM

Thanks for letting me know, Monica. I am hoping to get clear today on how/when to do those updates and the form I need to reflect the transactions from 1 week ago in a timely manner.

I can do Wednesday at 1/11. Could we just move everything to that time so we only have one call?

Nada Wolff Culver
Deputy Director, Policy and Programs
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Cell: 202-255-6979
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From: Garcia, Monica L <monica.garcia@sol.doi.gov>
Sent: Monday, May 3, 2021 1:06 PM
To: Culver, Nada L <nculver@blm.gov>
Cc: Derting, Elizabeth K <elizabeth.derting@sol.doi.gov>
Subject: RE: Financial Disclosure Meeting

Nada – Please accept my apologies, but our new Chief of Staff has requested to meet at 5:00 p.m. Eastern today. I know you are incredibly busy, so I've asked Libby to cover the meeting with you to go over technical review of your financial disclosure and any questions or suggestions she has for how to report certain holdings.

If your schedule allows, I'd like to follow up with you and Libby later this week to discuss our conflicts and prohibited investment review after we've squared away the technical portions of the report.

Would either of these times work on Wednesday, May 5?

- 1:00 p.m. Eastern/11:00 a.m. Mountain; or
- 4:00 p.m. Eastern/2:00 p.m. Mountain.

I can look later in the week if these won't work.

Thank you,

Monica

From: Culver, Nada L <nculver@blm.gov>
Sent: Thursday, April 29, 2021 3:51 AM
To: Garcia, Monica L <monica.garcia@sol.doi.gov>
Cc: Derting, Elizabeth K <elizabeth.derting@sol.doi.gov>
Subject: RE: Financial Disclosure Meeting

I can do the time on Monday, Monica.

Nada Wolff Culver
Deputy Director, Policy and Programs
Bureau of Land Management
Cell: 202-255-6979
nculver@blm.gov

From: Garcia, Monica L <monica.garcia@sol.doi.gov>
Sent: Tuesday, April 27, 2021 7:07 AM
To: Culver, Nada L <nculver@blm.gov>
Cc: Derting, Elizabeth K <elizabeth.derting@sol.doi.gov>
Subject: Financial Disclosure Meeting

Hello, Nada,

Thank you again for filing your New Entrant Public Financial Disclosure Report, OGE Form 278e. As we discussed last week, we would like to schedule a time to follow up on our phone conversation and work with you to review the assets, income, and retirement accounts you reported and, where necessary, address any potential conflicts of interest or prohibited assets through recusals or divestiture. We will also work with you to update the interim recusal memo currently in place and provide updated ethics guidance based on the information in your New Entrant Report. I'll be joined by Libby Derting, who will help me with the technical review and any necessary revisions to your report.

I would like to propose that we meet to review your New Entrant Report late this week or early next week, if possible, so that we can give you timely guidance on any additional recusals or other remedial actions that may be needed. It looks like the following times (all are Eastern time) may work for your schedule:

- Friday, 4/30
 - 9:00 – 9:30 am
 - 10:30 – 11:00 am
- Monday, 5/3
 - 5:00 – 5:30 pm

Please let me know if any of these will work for you, or if you would like me to look for a time later next week.

Thank you!

Monica

Please note: I will be teleworking until further notice

Monica L. Garcia
Deputy Director for Ethics Law & Policy
and Alternate Designated Agency Ethics Official
Departmental Ethics Office | Office of the Solicitor
U.S. Department of the Interior | MIB 5316
(O): (202) 208-0460
(C): (202) 880-4474
Email: monica.garcia@sol.doi.gov

Visit us online at www.doi.gov/ethics

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From: [Garcia, Monica L](#)
To: [Culver, Nada L](#)
Cc: [Derting, Elizabeth K](#)
Subject: RE: Financial Disclosure Meeting
Date: Monday, May 3, 2021 3:36:19 PM

Nada – I completely understand. We can move everything to a Wednesday discussion but will very possibly go over 30 minutes. I'll send a calendar notice for Wednesday and we can reassess whether we'll need to follow up after we get as far as we can during the allotted time.

-Monica

From: Culver, Nada L <nculver@blm.gov>
Sent: Monday, May 3, 2021 3:28 PM
To: Garcia, Monica L <monica.garcia@sol.doi.gov>
Cc: Derting, Elizabeth K <elizabeth.derting@sol.doi.gov>
Subject: RE: Financial Disclosure Meeting

Thanks for letting me know, Monica. I am hoping to get clear today on how/when to do those updates and the form I need to reflect the transactions from 1 week ago in a timely manner.

I can do Wednesday at 1/11. Could we just move everything to that time so we only have one call?

Nada Wolff Culver
Deputy Director, Policy and Programs
Bureau of Land Management
Cell: 202-255-6979
nculver@blm.gov

From: Garcia, Monica L <monica.garcia@sol.doi.gov>
Sent: Monday, May 3, 2021 1:06 PM
To: Culver, Nada L <nculver@blm.gov>
Cc: Derting, Elizabeth K <elizabeth.derting@sol.doi.gov>
Subject: RE: Financial Disclosure Meeting

Nada – Please accept my apologies, but our new Chief of Staff has requested to meet at 5:00 p.m. Eastern today. I know you are incredibly busy, so I've asked Libby to cover the meeting with you to go over technical review of your financial disclosure and any questions or suggestions she has for how to report certain holdings.

If your schedule allows, I'd like to follow up with you and Libby later this week to discuss our conflicts and prohibited investment review after we've squared away the technical portions of the report.

Would either of these times work on Wednesday, May 5?

- 1:00 p.m. Eastern/11:00 a.m. Mountain; or
- 4:00 p.m. Eastern/2:00 p.m. Mountain.

I can look later in the week if these won't work.

Thank you,

Monica

From: Culver, Nada L <nculver@blm.gov>
Sent: Thursday, April 29, 2021 3:51 AM
To: Garcia, Monica L <monica.garcia@sol.doi.gov>
Cc: Derting, Elizabeth K <elizabeth.derting@sol.doi.gov>
Subject: RE: Financial Disclosure Meeting

I can do the time on Monday, Monica.

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Cell: 202-255-6979
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From: Garcia, Monica L <monica.garcia@sol.doi.gov>
Sent: Tuesday, April 27, 2021 7:07 AM
To: Culver, Nada L <nculver@blm.gov>
Cc: Derting, Elizabeth K <elizabeth.derting@sol.doi.gov>
Subject: Financial Disclosure Meeting

Hello, Nada,

Thank you again for filing your New Entrant Public Financial Disclosure Report, OGE Form 278e. As we discussed last week, we would like to schedule a time to follow up on our phone conversation and work with you to review the assets, income, and retirement accounts you reported and, where necessary, address any potential conflicts of interest or prohibited assets through recusals or divestiture. We will also work with you to update the interim recusal memo currently in place and provide updated ethics guidance based on the information in your New Entrant Report. I'll be joined by Libby Derting, who will help me with the technical review and any necessary revisions to your report.

I would like to propose that we meet to review your New Entrant Report late this week or early next week, if possible, so that we can give you timely guidance on any additional recusals or other remedial actions that may be needed. It looks like the following times (all are Eastern time) may work for your schedule:

- Friday, 4/30
 - 9:00 – 9:30 am
 - 10:30 – 11:00 am
- Monday, 5/3
 - 5:00 – 5:30 pm

Please let me know if any of these will work for you, or if you would like me to look for a time later next week.

Thank you!

Monica

Please note: I will be teleworking until further notice

Monica L. Garcia
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and Alternate Designated Agency Ethics Official
Departmental Ethics Office | Office of the Solicitor
U.S. Department of the Interior | MIB 5316
(O): (202) 208-0460
(C): (202) 880-4474
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From: [Culver, Nada L](#)
To: [Garcia, Monica L](#)
Cc: [Derting, Elizabeth K](#)
Subject: RE: Financial Disclosure Meeting
Date: Monday, May 3, 2021 3:37:40 PM

If it works for you both, then let's set it for 45 minutes on Wednesday? I'm really drowning in meetings today and would love to get those 30 minutes back. I now have dreams of food & water.

Nada Wolff Culver
Deputy Director, Policy and Programs
Bureau of Land Management
Cell: 202-255-6979
nculver@blm.gov

From: Garcia, Monica L <monica.garcia@sol.doi.gov>
Sent: Monday, May 3, 2021 1:36 PM
To: Culver, Nada L <nculver@blm.gov>
Cc: Derting, Elizabeth K <elizabeth.derting@sol.doi.gov>
Subject: RE: Financial Disclosure Meeting

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From: Culver, Nada L <nculver@blm.gov>
Sent: Thursday, April 29, 2021 3:51 AM
To: Garcia, Monica L <monica.garcia@sol.doi.gov>
Cc: Derting, Elizabeth K <elizabeth.derting@sol.doi.gov>
Subject: RE: Financial Disclosure Meeting

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To: Culver, Nada L <nculver@blm.gov>
Cc: Derting, Elizabeth K <elizabeth.derting@sol.doi.gov>
Subject: Financial Disclosure Meeting

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Thank you!

Monica

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From: [Culver, Nada L](#)
To: [Garcia, Monica L](#)
Cc: [Derting, Elizabeth K](#)
Subject: RE: Financial Disclosure Meeting
Date: Thursday, April 29, 2021 3:51:24 AM

I can do the time on Monday, Monica.

Nada Wolff Culver
Deputy Director, Policy and Programs
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To: Culver, Nada L <nculver@blm.gov>
Cc: Derting, Elizabeth K <elizabeth.derting@sol.doi.gov>
Subject: Financial Disclosure Meeting

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Monica

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From: [Gottry, Heather C](#)
To: [Culver, Nada L](#)
Cc: [Garcia, Monica L](#)
Subject: RE: Follow Up: Updated Interim Ethics Guidance and Draft Recusal/Screening Arrangement
Date: Friday, June 25, 2021 6:22:42 AM

Nada – Hello again! We can absolutely make next Tuesday at 9:30 work. I just sent an invite and look forward to speaking with you further. Many thanks!

- Heather

From: Culver, Nada L <nculver@blm.gov>
Sent: Wednesday, June 23, 2021 9:58 AM
To: Gottry, Heather C <heather.gottry@sol.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: RE: Follow Up: Updated Interim Ethics Guidance and Draft Recusal/Screening Arrangement

Thanks, Heather. That would be great. It's pretty confusing now what all of these stock-related ones mean, especially since I either have or am in the process of figuring out how to divest.

My calendar is kind of horrible. Could we possibly do 9:30 or 10 eastern next Tuesday of Wednesday?

Nada Wolff Culver
Deputy Director, Policy and Programs
Bureau of Land Management
Cell: 202-255-6979
nculver@blm.gov

From: Gottry, Heather C <heather.gottry@sol.doi.gov>
Sent: Wednesday, June 23, 2021 7:51 AM
To: Culver, Nada L <nculver@blm.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: Follow Up: Updated Interim Ethics Guidance and Draft Recusal/Screening Arrangement

Nada – Hello again! I hope that you are having a good week. I wanted to reach out to see if it would be helpful to schedule a time to touch base to discuss the attached materials. If so, please let me know if you would like me to look for an open time on your calendar or if you would like me to work with a member of your team. Many thanks.

- Heather

From: Gottry, Heather C
Sent: Monday, June 21, 2021 10:35 AM
To: Culver, Nada L <nculver@blm.gov>

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

Subject: Updated Interim Ethics Guidance and Draft Recusal/Screening Arrangement

Nada – Hello! Now that we have completed our review of your New Entrant OGE Form 278e and recusal obligations, we are ready to issue updated interim ethics guidance. Please note that your guidance remains interim pending completion of required divestitures. For your review and discussion, please see the attached materials that will serve to document your ethics obligations, including your recusals:

- A draft memorandum from the DEO providing Updated Interim Ethics Guidance on Recusal Obligations, describing your ethics obligations, including those implemented through the Biden Administration’s Ethics Pledge (and the below attachments)
 - *Attachment A* – Guidance for Recusal Analysis
 - *Attachment B* – 2021 Department of the Interior and 2021 Bureau of Land Management List of Prohibited Investments
 - *Attachment C* – List of Recusals and Quick Reference Chart (this document summarizes your identified recusals, scope of the recusals, and applicable time periods)
 - *Attachment D* – Ethics Pledge (signed March 1, 2021)
- A draft Ethics Recusals & Screening Arrangement, a document for your signature which includes two potential options for a step-by-step process for implementing your recusal obligations through a screening arrangement. We have drafted this document with two potential options, either that you select a screener to assist with your recusal obligations and avoid any inadvertent participation in a matter which would otherwise require your recusal or you can elect to self-screen. We are happy to discuss the pros/cons of either approach and assist you in determining the best path forward. Please note that the attachment referenced in the document will be the same as Attachment C to the Ethics Guidance on Recusal Obligations.

I am happy to schedule a time to walk you through the attached documents to ensure that the facts are complete and correct and to discuss any questions. Please let me know your availability. Thank you and have a great evening!

- Heather

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

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From: [Culver, Nada L](#)
To: [Gottry, Heather C](#)
Cc: [Garcia, Monica L](#)
Subject: RE: Follow Up: Updated Interim Ethics Guidance and Draft Recusal/Screening Arrangement
Date: Wednesday, June 23, 2021 9:57:44 AM

Thanks, Heather. That would be great. It's pretty confusing now what all of these stock-related ones mean, especially since I either have or am in the process of figuring out how to divest.

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Bureau of Land Management
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To: Culver, Nada L <nculver@blm.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: Follow Up: Updated Interim Ethics Guidance and Draft Recusal/Screening Arrangement

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From: [Culver, Nada L](#)
To: [Garcia, Monica L](#); [Derting, Elizabeth K](#)
Cc: [Gottry, Heather C](#)
Subject: RE: Follow-up on Remaining Assets that Require Divestiture
Date: Tuesday, June 29, 2021 10:36:12 AM

Thanks so much!

Nada Wolff Culver
Deputy Director, Policy and Programs
Bureau of Land Management
Cell: 202-255-6979
nculver@blm.gov

From: Garcia, Monica L <monica.garcia@sol.doi.gov>
Sent: Tuesday, June 29, 2021 8:11 AM
To: Derting, Elizabeth K <elizabeth.derting@sol.doi.gov>; Culver, Nada L <nculver@blm.gov>
Cc: Gottry, Heather C <heather.gottry@sol.doi.gov>
Subject: RE: Follow-up on Remaining Assets that Require Divestiture

Nada – Thank you very much for meeting with me and Heather this morning on your divestitures and recusals.

Following up on Libby's message below, your husband plans to sell the bonds held in his retirement account as soon as possible. We will work on getting you a draft request from you requesting a CD for the four stocks listed below and plan to get that to you by COB tomorrow for review. There will be a few places for you to add additional information on the exact number of shares you own, and the circumstances under which you obtained the assets and we can be available should you have any questions.

In the meantime, please let us know if you have any questions or follow up.

-Monica

From: Derting, Elizabeth K <elizabeth.derting@sol.doi.gov>
Sent: Friday, June 11, 2021 3:54 PM
To: Culver, Nada L <nculver@blm.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: Follow-up on Remaining Assets that Require Divestiture

Hello, Nada,

Thanks again for talking with me on Wednesday. We were able to finalize and certify your New Entrant financial disclosure report, and we really appreciate all of your time and commitment to working with us on the financial disclosure.

As a follow-up to our conversations, I've indicated below the assets and investments which we discussed as being on the prohibited lists for the Office of the Secretary and for BLM. Since you have already divested of and submitted the period transaction report for the Berkshire Hathaway and Enbridge stock, I have only included the remaining ones which still require action.

Please remember that all of them are subject to immediate recusal requirements. You must not participate personally and substantially in any particular matter in which you know that the financial interests of the companies are directly and predictably affected by the matter.

- Section 5 - Spouse's Employment Assets & Income and Retirement Accounts

- (b)(6)
-
-
-
-
-
-

- Section 6 - Other Assets and Income

- (b)(6)
-
-
-

Your full range of options for action on the prohibited interests are below.

Deadline for Action. Within 30 days of this email, but no later than July 30, 2021, you must take one of the following actions.

1. Provide written confirmation to the Departmental Ethics Office (DEO) that you no longer own this asset.
 - You may transfer your ownership interest in the assets to another person, and provide written confirmation to the DEO that you no longer personally retain any ownership interest in them. However, you will remain subject to continued ethics restrictions and recusals, if you transfer ownership of these assets to your spouse, dependent child, general partner, or certain other individuals.
 - You may sell the assets and provide written confirmation of sale to the DEO.
 - *What about capital gains tax?* If you will incur capital gains tax as a result of a sale of these assets to comply with ethics requirements, you may request a certificate of divestiture from the Office of Government Ethics **before** you divest your ownership interests. A certificate of divestiture may defer your payment of capital gains tax, but you must be granted a written certificate **before you sell!**

Please let us know if you are considering requesting a certificate of divestiture. Below is more information about this option.

2. Request and Receive a Waiver. You may request that the DOI's Designated Agency Ethics Official (DAEO) waive the prohibition on holding a direct or indirect financial interest in Federal lands or resources administered by DOI, based on compelling factual and legal circumstances. A waiver must be accompanied by appropriate conditions, such as a written statement of your disqualification from participation in government matters that could create a real or apparent conflict of interest. Please reach out to the DEO if you are considering requesting a waiver from the DAEO.
3. Reassignment. Provide written confirmation of a personnel action reassigning you to a position that is not subject to this ethics prohibition.

Enforcement. If you fail to take one of the remedial actions discussed above, then pursuant to 43 C.F.R. § 20.602(d) you will be in violation of DOI ethics regulations and potentially subject to disciplinary action. Also, as ethics officials, we are required by 43 C.F.R. § 20.103(b) to report violations of ethics laws or regulations to the Office of Inspector General or other appropriate authority.

Since you have expressed interest in obtaining a Certificate of Divestiture (CD) for the investments that you are required to divest, I am also providing general background on Certificate of Divestitures and the Certificate of Divestiture request process. This email is informational only and is not intended as financial advice. If you need financial advice you are encouraged to contact a tax professional.

A Certificate of Divestiture, if granted, permits you to sell a prohibited asset(s) and defer paying capital gains taxes on the sale so long as the following conditions are met:

1. OGE grants the Certificate of Divestiture **before you sell** the property. Sales made before the Certificate of Divestiture is issued cannot obtain the tax relief;
2. The asset is subject to capital gains tax if you sell;
3. You agree to sell your total investment in the prohibited asset whether or not OGE grants the Certificate of Divestiture; and
4. You must agree to re-invest the proceeds of the sale into "permitted property" as defined by 5 C.F.R. § 2634.1003, within sixty (60) days from the date of the sale. Permitted property includes diversified mutual funds, diversified exchange traded funds (ETFs), and U.S. government obligations (i.e. treasury bonds).

Attached are OGE's Certificate of Divestiture fact sheet and the U.S. Tax code applicable to Certificate of Divestitures, as well as other resources. If you'd like to learn more and are interested in determining your eligibility for a Certificate of Divestiture, please let me know and I will send you the template for initiating a request for a Certificate of Divestiture.

Thanks again! Please let me know if you have any questions or if we can assist in any way.

Libby

Libby Derting

Supervisory Attorney-Advisor, Financial Disclosure Branch

Departmental Ethics Office | Office of the Solicitor

U.S. Department of the Interior | MIB 5320

Email: elizabeth.derting@sol.doi.gov

Please note: I am teleworking until further notice. You can also reach me on MS Teams.

Integrity is our mission.

From: [Culver, Nada L](#)
To: [Garcia, Monica L](#); [Derting, Elizabeth K](#)
Cc: [Gottry, Heather C](#)
Subject: RE: Follow-up on Remaining Assets that Require Divestiture
Date: Monday, July 5, 2021 9:38:13 AM

Thanks so much for this. I'm out on vacation this week so will get to this as soon as I'm back in town next Sunday. Hopefully we can move this in a way that I can still divest by July 30!

Nada Wolff Culver
Deputy Director, Policy and Programs
Bureau of Land Management
Cell: 202-255-6979
nculver@blm.gov

From: Garcia, Monica L <monica.garcia@sol.doi.gov>
Sent: Sunday, July 4, 2021 4:21 AM
To: Culver, Nada L <nculver@blm.gov>; Derting, Elizabeth K <elizabeth.derting@sol.doi.gov>
Cc: Gottry, Heather C <heather.gottry@sol.doi.gov>
Subject: RE: Follow-up on Remaining Assets that Require Divestiture

Nada – Please see the attached draft for your review and input. Where noted in the document, please provide information on the number of shares, whether the investments are in a dividend reinvestment (or DRIP) account, and the circumstances under which you came to own the assets.

Please let me know if you have any questions or would like to discuss. Have a great day!

-Monica

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In the meantime, please let us know if you have any questions or follow up.

-Monica

From: Derting, Elizabeth K <elizabeth.derting@sol.doi.gov>
Sent: Friday, June 11, 2021 3:54 PM
To: Culver, Nada L <nculver@blm.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: Follow-up on Remaining Assets that Require Divestiture

Hello, Nada,

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As a follow-up to our conversations, I've indicated below the assets and investments which we discussed as being on the prohibited lists for the Office of the Secretary and for BLM. Since you have already divested of and submitted the period transaction report for the Berkshire Hathaway and Enbridge stock, I have only included the remaining ones which still require action.

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- Section 5 - Spouse's Employment Assets & Income and Retirement Accounts

- (b)(6) [REDACTED]
- [REDACTED]

(b)(6)

- o [REDACTED]
- o [REDACTED]
- [REDACTED]
- [REDACTED]

- Section 6 - Other Assets and Income

- o (b)(6)
- o [REDACTED]
- o [REDACTED]
- o [REDACTED]

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Thanks again! Please let me know if you have any questions or if we can assist in any way.

Libby

Libby Derting

Supervisory Attorney-Advisor, Financial Disclosure Branch

Departmental Ethics Office | Office of the Solicitor

U.S. Department of the Interior | MIB 5320

Email: elizabeth.derting@sol.doi.gov

Please note: I am teleworking until further notice. You can also reach me on MS Teams.

Integrity is our mission.

From: [Culver, Nada L](#)
To: [Garcia, Monica L](#); [Derting, Elizabeth K](#)
Cc: [Gottry, Heather C](#)
Subject: RE: Follow-up on Remaining Assets that Require Divestiture
Date: Wednesday, July 14, 2021 1:02:20 AM
Attachments: [Culver Nada - Request to DAEO for a CD \(Draft 7.3.21\) \(002\).docx](#)

Attached is the document with the information from our account. If this looks right we can finalize in the morning. Our plan was to sell all 8 of the investments in question once we have the CD for these 4 so we can better keep track of the needed records. Thanks for you help with this.

Nada Wolff Culver
Deputy Director, Policy and Programs
Bureau of Land Management
Cell: 202-255-6979
nculver@blm.gov

From: Garcia, Monica L <monica.garcia@sol.doi.gov>
Sent: Sunday, July 4, 2021 4:21 AM
To: Culver, Nada L <nculver@blm.gov>; Derting, Elizabeth K <elizabeth.derting@sol.doi.gov>
Cc: Gottry, Heather C <heather.gottry@sol.doi.gov>
Subject: RE: Follow-up on Remaining Assets that Require Divestiture

Nada – Please see the attached draft for your review and input. Where noted in the document, please provided information on the number of shares, whether the investments are in a dividend reinvestment (or DRIP) account, and the circumstances under which you came to own the assets.

Please let me know if you have any questions or would like to discuss. Have a great day!

-Monica

From: Culver, Nada L <nculver@blm.gov>
Sent: Tuesday, June 29, 2021 10:36 AM
To: Garcia, Monica L <monica.garcia@sol.doi.gov>; Derting, Elizabeth K <elizabeth.derting@sol.doi.gov>
Cc: Gottry, Heather C <heather.gottry@sol.doi.gov>
Subject: RE: Follow-up on Remaining Assets that Require Divestiture

Thanks so much!

Nada Wolff Culver
Deputy Director, Policy and Programs
Bureau of Land Management
Cell: 202-255-6979
nculver@blm.gov

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Cc: Gottry, Heather C <heather.gottry@sol.doi.gov>
Subject: RE: Follow-up on Remaining Assets that Require Divestiture

Nada – Thank you very much for meeting with me and Heather this morning on your divestitures and recusals.

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- Section 5 - Spouse's Employment Assets & Income and Retirement Accounts

- (b)(6)

- (b)(6)
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-
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- Section 6 - Other Assets and Income

- (b)(6)
-
-
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Thanks again! Please let me know if you have any questions or if we can assist in any way.

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Email: elizabeth.derting@sol.doi.gov

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From: [Garcia, Monica L](#)
To: [Derting, Elizabeth K](#); [Culver, Nada L](#)
Cc: [Gottry, Heather C](#)
Subject: RE: Follow-up on Remaining Assets that Require Divestiture
Date: Tuesday, June 29, 2021 10:11:07 AM

Nada – Thank you very much for meeting with me and Heather this morning on your divestitures and recusals.

Following up on Libby's message below, your husband plans to sell the bonds held in his retirement account as soon as possible. We will work on getting you a draft request from you requesting a CD for the four stocks listed below and plan to get that to you by COB tomorrow for review. There will be a few places for you to add additional information on the exact number of shares you own, and the circumstances under which you obtained the assets and we can be available should you have any questions.

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Sent: Friday, June 11, 2021 3:54 PM
To: Culver, Nada L <nculver@blm.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>
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- (b)(6) [REDACTED]
- [REDACTED]
- [REDACTED]

(b)(6)

o

- Section 6 - Other Assets and Income

o (b)(6)

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To: [Culver, Nada L](#); [Derting, Elizabeth K](#)
Cc: [Gottry, Heather C](#)
Subject: RE: Follow-up on Remaining Assets that Require Divestiture
Date: Sunday, July 4, 2021 6:20:53 AM
Attachments: [Culver Nada - Request to DAEO for a CD \(Draft 7.3.21\).docx](#)

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- (b)(6) [REDACTED]
- [REDACTED]
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- Section 6 - Other Assets and Income

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From: [Culver, Nada L](#)
To: [Garcia, Monica L](#)
Cc: [Gottry, Heather C](#)
Subject: RE: Interim Ethics Memo
Date: Thursday, March 11, 2021 7:10:39 PM

Thanks so much.

Nada

From: Garcia, Monica L <monica.garcia@sol.doi.gov>
Sent: Thursday, March 11, 2021 4:59 PM
To: Culver, Nada L <nada_culver@ios.doi.gov>
Cc: Gottry, Heather C <heather.gottry@sol.doi.gov>
Subject: Interim Ethics Memo

Nada - Hello! Thank you for taking the time to work with us as we reviewed your ethics recusal obligations. As promised, attached please find a memorandum that provides our interim ethics guidance. We will update it once we have reviewed and certified your New Entrant OGE Form 278e, Public Financial Disclosure Report. In the interim, please do not hesitate to reach out with any question or if we can be of any assistance. Thank you.

-Monica

Please note: I will be teleworking until further notice

Monica L. Garcia
Deputy Director for Ethics Law & Policy
and Alternate Designated Agency Ethics Official
Departmental Ethics Office | Office of the Solicitor
U.S. Department of the Interior | MIB 5316
(O): (202) 208-0460
(C): (202) 880-4474
Email: monica.garcia@sol.doi.gov

Visit us online at www.doi.gov/ethics

Integrity is Our Mission.

From: [Nada Culver](#)
To: [Lee, Eric S](#)
Cc: [Culver, Nada L](#); [Schasberger, Paula I](#); [Garcia, Monica L](#); [Gottry, Heather C](#)
Subject: Re: Outside teaching/speaking: University of Wyoming College of Law
Date: Wednesday, March 3, 2021 11:44:56 PM

Thank you so much, Eric and Team.

Nada

On Wed, Mar 3, 2021 at 2:21 PM Lee, Eric S <eric.lee@sol.doi.gov> wrote:

Nada,

We have determined that there is no legal objection under the ethics statutes and regulations, or the Administration's Ethics Pledge (Pledge) to you teaching a one-time class at the University of Wyoming College of Law on March 8, 2021.

Based on the information provided, we understand that you will be teaching a class at the University of Wyoming College of Law on BLM's conservation process of the sage-grouse. You were invited to speak at the University of Wyoming College of Law before you joined the Department of the Interior due to your professional expertise, and not because of your official government position. This lecture will be delivered in your personal capacity and you will not be compensated for this lecture.

The University of Wyoming (the law school is a college within the university) is a prohibited source under 5 C.F.R. § 3501.105 as a search on USASpending.gov indicates that there is a history of financial agreements (contracts, grants, etc.) between DOI and the University of Wyoming as recent as 2020.

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

While there are no legal objections to your unpaid outside teaching/speaking activity, please be advised of the following restrictions:

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

Reference to Official Position: You may not use or permit the use of your official title or position to identify you in connection with your outside activity. However, as you will be engaged in teaching/speaking as an outside activity, you may include or permit the inclusion of your title or position as one of several biographical details when such information is given no more prominence than other significant biographical details. 5 C.F.R. § 2635.807(b)(1)-(2).

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

Gifts from a Prohibited Source: Because the University of Wyoming is a prohibited source, please contact our office if you are offered a gift from the University of Wyoming College of Law for further ethics guidance and review. 5 C.F.R. §§ 2635.202, 2635.204.

No Use of Official Time or Government Property: While engaging in outside activities, Federal employees are not permitted to use official time or Government property. 5 C.F.R. §§ 2635.101(b)(9), 704, and 705.

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

I have attached a summary of the statutes and regulations addressing outside activities as a reference. Please feel free to call or email me if you have any other questions or concerns.

Thanks,

Eric

Eric S. Lee

Attorney Advisor | Advice and Counsel Branch

Departmental Ethics Office | Office of the Solicitor

U.S. Department of the Interior

E-mail: eric.lee@sol.doi.gov

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

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From: [Delaplaine, Bruce](#)
To: [Garcia, Monica L](#); [Dure, Jennifer E](#); [Hilton, Heather L](#)
Cc: [Luciano, Lorraine A](#); [Futrowsky, Steven G](#); [Gottry, Heather C](#)
Subject: Re: Potential Ethics Pledge Violation - Nada Culver
Date: Tuesday, July 27, 2021 10:38:31 AM

Thanks Monica,
And we will try to figure out why you are getting an error message when submitting this complaint.

Bruce

Bruce Delaplaine
General Counsel
Office of Inspector General
(202) 208-5726

From: Garcia, Monica L <monica.garcia@sol.doi.gov>
Sent: Tuesday, July 27, 2021 9:36 AM
To: Delaplaine, Bruce <Bruce_Delaplaine@doioig.gov>; Dure, Jennifer E <jennifer_dure@doioig.gov>
Cc: Luciano, Lorraine A <lorraine_luciano@doioig.gov>; Futrowsky, Steven G <Steven_Futrowsky@doioig.gov>; Gottry, Heather C <heather.gottry@sol.doi.gov>
Subject: Potential Ethics Pledge Violation - Nada Culver

Bruce, Jen, Rainee, and Steven – Hello to all. Please see the attached documents reflecting a potential Ethics Pledge violation self-disclosed by Ms. Nada Culver. As reflected in the attached, Ms. Culver indicated that she met with representatives from her former employer, The Wilderness Society, on June 1, 2021. I have attached a PDF of the OIG hotline webpage, which I attempted to submit multiple times and received a “Database Error” message.

We remain available to provide additional information or materials.

-Monica

Please note: I will be teleworking until further notice

Monica L. Garcia
Deputy Director for Ethics Law & Policy
and Alternate Designated Agency Ethics Official
Departmental Ethics Office | Office of the Solicitor
U.S. Department of the Interior | MIB 5316
(O): (202) 208-0460
(C): (202) 880-4474
Email: monica.garcia@sol.doi.gov

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From: [Nada Culver](#)
To: [Garcia, Monica L](#)
Cc: [Gottry, Heather C](#)
Subject: Re: Preliminary ethics review
Date: Monday, January 4, 2021 10:24:58 PM

I've re-pasted the list of questions and put answers next to them. Hopefully this is what you had in mind for answering. If I need to clarify further, please let me know. I wasn't really sure how to address #7 since that is really the entire focus of a public lands program at a non-profit - i.e., engaging with the Department - but we don't have any monetary or ownership interests at stake.

1.
Do you hold any direct or indirect financial interest in Federal lands or resources administered or controlled by the Department? **NO**
 - a. If so, please describe.
 - b. Please also review the attached list which identifies certain financial holdings which are prohibited for certain Department employees to hold by statute or supplemental regulation.
 - c. Please note that if you will be working on matters for U.S. Geological Survey, Office of Surface Mining Reclamation and Enforcement, U.S. Bureau of Land Management, Bureau of Ocean Energy Management, Bureau of Safety and Environmental Enforcement, and the Office of Natural Resources Revenue, there may be additional prohibitions that you will need to comply with after appointment, if appointed.
2. Do you, your spouse and/or minor children retain any claim, permit, lease, small tract entries, or other rights that are granted by the Department in Federal lands? **NO**
 - a. If so, please describe.
3. Do you currently serve as an officer, director, trustee, or general partner of any entity not listed on your resume? **NO**
 - a. If so, please identify and describe your role and position(s), including whether you plan to continue your position(s) after appointment, if appointed.
4. Please identify your spouse's current employer(s), if applicable. **Benezra and Culver, PC, located in Denver, Colorado.**
5. Are all of your employers for the preceding two calendar years listed on your resume? **YES**
 - a. If not, please provide the name of any employers not on your resume and identify your position with the employer.

6. If you provided other personal services to clients (including through your employer), please list all of your clients for the preceding two calendar years, if not already listed on your resume. **I DID NOT**
 - a. Please note that personal services can include legal services, consulting services, lobbying services, pro bono, or other uncompensated volunteer activities, *etc.*
7. Did you, your employer, or your clients engage with the Department, including any Bureaus or Offices, on matters pending before the Department in the preceding two calendar years? **YES**
 - a. If so, please describe the matters if not already described in your resume **The National Audubon Society regularly comments on projects, plans and regulations issued by the Department. In the context of the Bureau of Land Management, for instance, we have also been part of administrative protests of oil and gas lease sales and land use plans. We do not have any monetary investments or ownership interests at stake.**

On Mon, Jan 4, 2021 at 4:05 PM Garcia, Monica L <monica.garcia@sol.doi.gov> wrote:

Nada – Hello there! Thank you very much for the voice message and updated email address.

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

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

1. Do you hold any direct or indirect financial interest in Federal lands or resources administered or controlled by the Department?
 - a. If so, please describe.
 - b. Please also review the attached list which identifies certain financial holdings which are prohibited for certain Department employees to hold by statute or supplemental regulation.
 - c. Please note that if you will be working on matters for U.S. Geological Survey, Office of Surface Mining Reclamation and Enforcement, U.S. Bureau of Land Management, Bureau of Ocean Energy Management, Bureau of Safety and Environmental Enforcement, and the Office of Natural Resources Revenue, there may be additional prohibitions that you will need to comply with after

appointment, if appointed.

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

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

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

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

-Monica

Please note: I will be teleworking until further notice

Monica L. Garcia

Acting Deputy Director for Ethics Law & Policy

and Acting Alternate Designated Agency Ethics Official

Departmental Ethics Office | Office of the Solicitor

U.S. Department of the Interior | MIB 5316

(O): (202) 208-0460

(C): (202) 880-4474

Email: monica.garcia@sol.doi.gov

Visit us online at www.doi.gov/ethics

Integrity is Our Mission.

From: [Culver, Nada L](#)
To: [Derting, Elizabeth K](#)
Subject: RE: Question on Periodic Transaction Report Filed 9.26.21
Date: Friday, October 22, 2021 1:02:39 PM

Hi Libby – Thank you for helping me comply. Have a great weekend.

Nada Wolff Culver
Deputy Director, Policy and Programs
Bureau of Land Management
nculver@blm.gov
202-255-6979

From: Derting, Elizabeth K <elizabeth.derting@sol.doi.gov>
Sent: Friday, October 22, 2021 10:53 AM
To: Culver, Nada L <nculver@blm.gov>
Subject: Re: Question on Periodic Transaction Report Filed 9.26.21

Hello, Nada,

Thanks for confirming that it was a purchase. I thought that was probably the case but wanted to confirm. I'll make that change in your report and certify it. I'm glad it all worked out, and thank you very much for submitting the periodic transaction report and organizing it so well for us.

I hope all is well! Please let us know if we can be of any assistance.

Libby

Libby Derting
Supervisory Attorney-Advisor, Financial Disclosure Branch
Departmental Ethics Office | Office of the Solicitor
U.S. Department of the Interior | MIB 5320
Email: elizabeth.derting@sol.doi.gov

Please note: I am teleworking until further notice. I can also be reached on MS Teams.

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From: Culver, Nada L <nculver@blm.gov>
Sent: Friday, October 22, 2021 11:55 AM
To: Derting, Elizabeth K <elizabeth.derting@sol.doi.gov>
Subject: RE: Question on Periodic Transaction Report Filed 9.26.21

Hi Elizabeth – I can't believe I omitted that box! Anyway, that is one of the purchases – I grouped them all together so you could see all purchases were made of only permitted property. Thank you for offering to correct.

Yes, this report shows the divestment of all the flagged investments and the reinvestment into permitted property, as well as some additional sales/changes of status/purchases (which overlap the income from the sales and other investments). Trying to be organized and keeping up to date regularly.

Nada Wolff Culver
Deputy Director, Policy and Programs
Bureau of Land Management
nculver@blm.gov
202-255-6979

From: Derting, Elizabeth K <elizabeth.derting@sol.doi.gov>
Sent: Thursday, October 21, 2021 3:08 PM
To: Culver, Nada L <nculver@blm.gov>
Subject: Question on Periodic Transaction Report Filed 9.26.21

Hello, Nada,

I hope you are doing well!

Thank you for filing the Periodic Transaction Report on September 26. It looks like this one covers the sale of the assets from the certificate of divestiture and the purchase of permitted property after the sale of those assets, as well as some other transactions. Were you able to reinvest all of the proceeds from the divestiture into permitted property?

The report looks good and correct, but I do need one piece of information before I certify it. In Line 20 for the fund SMCWX, the type of transaction was omitted from the report. Could you confirm whether it was a sale or a purchase? I've attached the report for your reference. If you will permit me, I will add that detail to the report on your behalf, then certify it.

Please don't hesitate to let me know if you have any questions or need anything.

Best,
Libby

Libby Derting

Supervisory Attorney-Advisor, Financial Disclosure Branch

Departmental Ethics Office | Office of the Solicitor

U.S. Department of the Interior | MIB 5320

Email: elizabeth.derting@sol.doi.gov

Please note: I am teleworking until further notice. I can also be reached on MS Teams.

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From: [Culver, Nada L](#)
To: [Derting, Elizabeth K](#)
Subject: RE: Question on Periodic Transaction Report Filed 9.26.21
Date: Friday, October 22, 2021 11:55:06 AM

Hi Elizabeth – I can't believe I omitted that box! Anyway, that is one of the purchases – I grouped them all together so you could see all purchases were made of only permitted property. Thank you for offering to correct.

Yes, this report shows the divestment of all the flagged investments and the reinvestment into permitted property, as well as some additional sales/changes of status/purchases (which overlap the income from the sales and other investments). Trying to be organized and keeping up to date regularly.

Nada Wolff Culver
Deputy Director, Policy and Programs
Bureau of Land Management
nculver@blm.gov
202-255-6979

From: Derting, Elizabeth K <elizabeth.derting@sol.doi.gov>
Sent: Thursday, October 21, 2021 3:08 PM
To: Culver, Nada L <nculver@blm.gov>
Subject: Question on Periodic Transaction Report Filed 9.26.21

Hello, Nada,

I hope you are doing well!

Thank you for filing the Periodic Transaction Report on September 26. It looks like this one covers the sale of the assets from the certificate of divestiture and the purchase of permitted property after the sale of those assets, as well as some other transactions. Were you able to reinvest all of the proceeds from the divestiture into permitted property?

The report looks good and correct, but I do need one piece of information before I certify it. In Line 20 for the fund SMCWX, the type of transaction was omitted from the report. Could you confirm whether it was a sale or a purchase? I've attached the report for your reference. If you will permit me, I will add that detail to the report on your behalf, then certify it.

Please don't hesitate to let me know if you have any questions or need anything.

Best,
Libby

Libby Derting

Supervisory Attorney-Advisor, Financial Disclosure Branch

Departmental Ethics Office | Office of the Solicitor

U.S. Department of the Interior | MIB 5320

Email: elizabeth.derting@sol.doi.gov

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From: [Derting, Elizabeth K](#)
To: [Culver, Nada L](#)
Subject: Re: Question on Periodic Transaction Report Filed 9.26.21
Date: Friday, October 22, 2021 12:53:12 PM

Hello, Nada,

Thanks for confirming that it was a purchase. I thought that was probably the case but wanted to confirm. I'll make that change in your report and certify it. I'm glad it all worked out, and thank you very much for submitting the periodic transaction report and organizing it so well for us.

I hope all is well! Please let us know if we can be of any assistance.

Libby

Libby Derting
Supervisory Attorney-Advisor, Financial Disclosure Branch
Departmental Ethics Office | Office of the Solicitor
U.S. Department of the Interior | MIB 5320
Email: elizabeth.derting@sol.doi.gov

Please note: I am teleworking until further notice. I can also be reached on MS Teams.

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From: Culver, Nada L <nculver@blm.gov>
Sent: Friday, October 22, 2021 11:55 AM
To: Derting, Elizabeth K <elizabeth.derting@sol.doi.gov>
Subject: RE: Question on Periodic Transaction Report Filed 9.26.21

Hi Elizabeth – I can't believe I omitted that box! Anyway, that is one of the purchases – I grouped them all together so you could see all purchases were made of only permitted property. Thank you for offering to correct.

Yes, this report shows the divestment of all the flagged investments and the reinvestment into permitted property, as well as some additional sales/changes of status/purchases (which overlap the income from the sales and other investments). Trying to be organized and keeping up to date regularly.

Nada Wolff Culver
Deputy Director, Policy and Programs

Bureau of Land Management
nculver@blm.gov
202-255-6979

From: Derting, Elizabeth K <elizabeth.derting@sol.doi.gov>
Sent: Thursday, October 21, 2021 3:08 PM
To: Culver, Nada L <nculver@blm.gov>
Subject: Question on Periodic Transaction Report Filed 9.26.21

Hello, Nada,

I hope you are doing well!

Thank you for filing the Periodic Transaction Report on September 26. It looks like this one covers the sale of the assets from the certificate of divestiture and the purchase of permitted property after the sale of those assets, as well as some other transactions. Were you able to reinvest all of the proceeds from the divestiture into permitted property?

The report looks good and correct, but I do need one piece of information before I certify it. In Line 20 for the fund SMCWX, the type of transaction was omitted from the report. Could you confirm whether it was a sale or a purchase? I've attached the report for your reference. If you will permit me, I will add that detail to the report on your behalf, then certify it.

Please don't hesitate to let me know if you have any questions or need anything.

Best,
Libby

Libby Derting
Supervisory Attorney-Advisor, Financial Disclosure Branch
Departmental Ethics Office | Office of the Solicitor
U.S. Department of the Interior | MIB 5320
Email: elizabeth.derting@sol.doi.gov

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From: [Culver, Nada L](#)
To: [Housen, Barbara E](#)
Cc: [Garcia, Monica L](#); [Gottry, Heather C](#); [Cornberg, Simon T](#)
Subject: RE: quick turnaround approval - help please!
Date: Sunday, October 17, 2021 4:45:16 PM

Thanks, Simon.

Nada Wolff Culver
Deputy Director, Policy and Programs
Bureau of Land Management
nculver@blm.gov
202-255-6979

From: Housen, Barbara E <barbara.housen@sol.doi.gov>
Sent: Sunday, October 17, 2021 12:21 PM
To: Culver, Nada L <nculver@blm.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>; Gottry, Heather C <heather.gottry@sol.doi.gov>; Cornberg, Simon T <simon.cornberg@sol.doi.gov>
Subject: Re: quick turnaround approval - help please!

Hello Nada,

Confirming that Simon Cornberg will give you a call tomorrow at 1pm. Thank you.

Regards,
Barbara

Barbara. E. Housen
Supervisory Attorney-Advisor, Advice and Counsel Branch
Departmental Ethics Office | Office of the Solicitor
U.S. Department of the Interior
email: barbara.housen@sol.doi.gov

Please note, I am teleworking until further notice and so it's best to reach me by email.

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From: Culver, Nada L <nculver@blm.gov>

Sent: Sunday, October 17, 2021 1:17 PM

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

Cc: Housen, Barbara E <barbara.housen@sol.doi.gov>

Subject: Re: quick turnaround approval - help please!

I assumed I'd be speaking for myself - as do disclaimers at law conferences - but my current job would be known.

This is by video that will not be recorded and there is no compensation.

For times tomorrow - realizing that all our calendars are horrid and apologies again for last minute asks - I can talk before 9 or at 1 eastern. Anything workable for you?

Nada

P.S. And thanks for responding on a weekend.

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

Sent: Sunday, October 17, 2021 10:28:23 AM

To: Culver, Nada L <nculver@blm.gov>; Gottry, Heather C <heather.gottry@sol.doi.gov>

Cc: Housen, Barbara E <barbara.housen@sol.doi.gov>

Subject: RE: quick turnaround approval - help please!

Nada – Good morning and I'm glad to hear from you. Do you have any particular times Monday that work best for you? Heather and I are blocked off for big chunks of the day, but adding in Barbara Housen, the Supervisory Attorney for Advice & Counsel so she might be able to assist as well.

A few preliminary questions:

1. Will the speaking engagement be in your official or personal capacity/
2. Will University of Montana pay for any travel expenses, accommodations or is it via video?
3. Will you be compensated or paid an honorarium for the speaking engagement?

-Monica

From: Culver, Nada L <nculver@blm.gov>

Sent: Saturday, October 16, 2021 8:38 PM

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

Subject: quick turnaround approval - help please!

Hi Heather and Monica – I was just presented with an opportunity to speak to a Public Lands class at

University of Montana Law School on October 20th (this coming Wednesday). I understand that I would give the usual disclaimer about speaking from my own perspective/not providing official administration positions and also that this will not be open to the public/press so the discussion will not be made available beyond the class. We would talk generally about the legal framework for managing oil and gas on public lands and the ongoing issues around the review, pause, court case, current work. Phil Lowe from SOL just joined a panel about 10 days ago where he went over a number of similar points and did Q&A at the University of Wyoming Energy in the Rockies conference, so I don't think there will be much different here – other than it not being recorded and made available to the public.

Thanks in advance for your help here. I'd be happy to hop on the phone on Monday if that's helpful and apologies for emailing on a Saturday night – this all just came up.

Nada Wolff Culver
Deputy Director, Policy and Programs
Bureau of Land Management
nculver@blm.gov
202-255-6979

From: [Housen, Barbara E](#)
To: [Culver, Nada L](#)
Cc: [Garcia, Monica L](#); [Gottry, Heather C](#); [Cornberg, Simon T](#)
Subject: Re: quick turnaround approval - help please!
Date: Sunday, October 17, 2021 2:20:31 PM

Hello Nada,

Confirming that Simon Cornberg will give you a call tomorrow at 1pm. Thank you.

Regards,
Barbara

Barbara. E. Housen
Supervisory Attorney-Advisor, Advice and Counsel Branch
Departmental Ethics Office | Office of the Solicitor
U.S. Department of the Interior
email: barbara.housen@sol.doi.gov

Please note, I am teleworking until further notice and so it's best to reach me by email.

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From: Culver, Nada L <nculver@blm.gov>
Sent: Sunday, October 17, 2021 1:17 PM
To: Garcia, Monica L <monica.garcia@sol.doi.gov>; Gottry, Heather C <heather.gottry@sol.doi.gov>
Cc: Housen, Barbara E <barbara.housen@sol.doi.gov>
Subject: Re: quick turnaround approval - help please!

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For times tomorrow - realizing that all our calendars are horrid and apologies again for last minute asks - I can talk before 9 or at 1 eastern. Anything workable for you?

Nada

P.S. And thanks for responding on a weekend.

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

Sent: Sunday, October 17, 2021 10:28:23 AM

To: Culver, Nada L <nculver@blm.gov>; Gottry, Heather C <heather.gottry@sol.doi.gov>

Cc: Housen, Barbara E <barbara.housen@sol.doi.gov>

Subject: RE: quick turnaround approval - help please!

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1. Will the speaking engagement be in your official or personal capacity/
2. Will University of Montana pay for any travel expenses, accommodations or is it via video?
3. Will you be compensated or paid an honorarium for the speaking engagement?

-Monica

From: Culver, Nada L <nculver@blm.gov>

Sent: Saturday, October 16, 2021 8:38 PM

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

Subject: quick turnaround approval - help please!

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Nada Wolff Culver

Deputy Director, Policy and Programs

Bureau of Land Management

nculver@blm.gov

202-255-6979

From: [Culver, Nada L](#)
To: [Cornberg, Simon T](#)
Cc: [Gottry, Heather C](#); [Garcia, Monica L](#); [Housen, Barbara E](#)
Subject: RE: quick turnaround approval - help please!
Date: Tuesday, October 19, 2021 11:01:24 AM

Tank you, Simon.

Nada Wolff Culver
Deputy Director, Policy and Programs
Bureau of Land Management
nculver@blm.gov
202-255-6979

From: Cornberg, Simon T <simon.cornberg@sol.doi.gov>
Sent: Tuesday, October 19, 2021 6:50 AM
To: Culver, Nada L <nculver@blm.gov>
Cc: Gottry, Heather C <heather.gottry@sol.doi.gov>; Garcia, Monica L <monica.garcia@sol.doi.gov>; Housen, Barbara E <barbara.housen@sol.doi.gov>
Subject: FW: quick turnaround approval - help please!

Nada,

Thank you for speaking with me yesterday. After reviewing the information provided to the Departmental Ethics Office (DEO) and supporting materials, we have identified no legal objection under the ethics statutes and regulations, or the Administration's Ethics Pledge (Ethics Pledge), to you virtually speaking at the University of Montana Alexander Blewett III's School of Law (UMSL) Public Lands class on October 20, 2021, at the invitation of Professor Monte Mills, UMSL.

UMSL is a law school at the University of Montana in Missoula. It was established in 1911 and remains Montana's only law school.

Per the House of Representatives database, UMSL is not currently identified as a registered lobbying organization. Furthermore, per the same database, Professor Mills is not currently identified as a registered lobbyist.

It is our understanding that you will be speaking in your official capacity and that you will present information via Zoom at this event on behalf of the U.S. Department of the Interior (DOI) and the U.S. Government. We understand that there is no registration fee associated with this speaking engagement and you will not be receiving any compensation from UMSL including, a speaking fee. **If the scope of your attendance and participation at this event changes, or if any non-Federal source offers you any item of monetary value in connection with this event (e.g. a token of appreciation, for example), we should be contacted immediately so we can analyze.**

Official Presentation and Nexus to DOI Mission – It is our understanding that you have reasonably determined that participation at this event is part of your official duties and that this is an appropriate forum to present information on behalf of the DOI and the Government.

We further understand that you will discuss the legal framework for managing oil and gas on public lands and the ongoing issues currently facing the Bureau of Land Management. Your presentation at this speaking engagement will further agency programs and operations as your participation will provide an opportunity to present DOI's mission and policies.

Financial Disclosure Report Review – Review of your Nominee and New Entrant Public Financial Disclosure Reports (OGE Forms 278e) and your Ethics Recusals and Screening Arrangement, dated September 3, 2021, did not reveal any information that would prevent you from attending and participating at this event under 18 U.S.C. § 208, 5 C.F.R. § 2635.502, or the Ethics Pledge.

We remind you of the following standard guidance for attending and/or participating at events in an official capacity:

1. **Official Title** – Use of your official title is permitted as you will be participating in this event in your official capacity. 5 C.F.R. § 2635.702.
2. **Endorsement** – We remind you that you may not use your official Government position or title or any authority associated with your public office to endorse any product, service, or enterprise, including non-profit and charitable organizations that may have some affiliation with DOI. 5 C.F.R. § 2635.702(c).
3. **No Preferential Treatment** – Department officials must act impartially and not give preferential treatment to any private organization or individual and must avoid creating even the appearance that they are violating this requirement. 5 C.F.R. § 2635.101(b)(8) and 5 C.F.R. § 2635.101(b)(14).
4. **Gifts** – Per the Ethics Pledge's lobbyist gift ban, you cannot accept gifts from registered lobbyists or lobbying organizations for the duration of your service as an appointee. If you are offered a gift in connection with this, please immediately contact our office for analysis. Gifts offered from outside sources may only be accepted under limited circumstances, and such gifts will be reviewed under the applicable ethics regulations. 5 C.F.R. §§ 2635.201-2635.206.
5. **Nonpublic Information** – You may not discuss at this event any nonpublic information that you have gained by reason of your Federal position. 5 C.F.R. § 2635.703.
6. **No Partisan Political Activity** – While you may discuss DOI's policy priorities and ideological approach to laws and regulations at this event, you must strictly avoid partisan political activity in order to remain in compliance with the Hatch Act. Partisan political activity is any activity directed towards the success or failure of a political party, candidate for a partisan political office, or partisan political group and can include verbal remarks and speech.

Please do not hesitate to contact us if you have any questions or concerns, or if we can be of any additional assistance.

Simon

Simon T. Cornberg
Attorney-Advisor | Advice and Counsel

Departmental Ethics Office | Office of the Solicitor
U.S. Department of the Interior | MIB 5325
(O) (202) 208-5972
simon.cornberg@sol.doi.gov

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From: Culver, Nada L <nculver@blm.gov>
Sent: Sunday, October 17, 2021 4:45 PM
To: Housen, Barbara E <barbara.housen@sol.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>; Gottry, Heather C <heather.gottry@sol.doi.gov>;
Cornberg, Simon T <simon.cornberg@sol.doi.gov>
Subject: RE: quick turnaround approval - help please!

Thanks, Simon.

Nada Wolff Culver
Deputy Director, Policy and Programs
Bureau of Land Management
nculver@blm.gov
202-255-6979

From: Housen, Barbara E <barbara.housen@sol.doi.gov>
Sent: Sunday, October 17, 2021 12:21 PM
To: Culver, Nada L <nculver@blm.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>; Gottry, Heather C <heather.gottry@sol.doi.gov>;
Cornberg, Simon T <simon.cornberg@sol.doi.gov>
Subject: Re: quick turnaround approval - help please!

Hello Nada,

Confirming that Simon Cornberg will give you a call tomorrow at 1pm. Thank you.

Regards,
Barbara

Barbara. E. Housen
Supervisory Attorney-Advisor, Advice and Counsel Branch
Departmental Ethics Office | Office of the Solicitor
U.S. Department of the Interior

email: barbara.housen@sol.doi.gov

Please note, I am teleworking until further notice and so it's best to reach me by email.

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Sent: Sunday, October 17, 2021 1:17 PM
To: Garcia, Monica L <monica.garcia@sol.doi.gov>; Gottry, Heather C <heather.gottry@sol.doi.gov>
Cc: Housen, Barbara E <barbara.housen@sol.doi.gov>
Subject: Re: quick turnaround approval - help please!

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For times tomorrow - realizing that all our calendars are horrid and apologies again for last minute asks - I can talk before 9 or at 1 eastern. Anything workable for you?

Nada

P.S. And thanks for responding on a weekend.

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From: Garcia, Monica L <monica.garcia@sol.doi.gov>
Sent: Sunday, October 17, 2021 10:28:23 AM
To: Culver, Nada L <nculver@blm.gov>; Gottry, Heather C <heather.gottry@sol.doi.gov>
Cc: Housen, Barbara E <barbara.housen@sol.doi.gov>
Subject: RE: quick turnaround approval - help please!

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A few preliminary questions:

1. Will the speaking engagement be in your official or personal capacity/

2. Will University of Montana pay for any travel expenses, accommodations or is it via video?
3. Will you be compensated or paid an honorarium for the speaking engagement?

-Monica

From: Culver, Nada L <nculver@blm.gov>

Sent: Saturday, October 16, 2021 8:38 PM

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

Subject: quick turnaround approval - help please!

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Thanks in advance for your help here. I'd be happy to hop on the phone on Monday if that's helpful and apologies for emailing on a Saturday night – this all just came up.

Nada Wolff Culver
Deputy Director, Policy and Programs
Bureau of Land Management
nculver@blm.gov
202-255-6979

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To: [Culver, Nada L](#); [Gottry, Heather C](#)
Cc: [Housen, Barbara E](#)
Subject: RE: quick turnaround approval - help please!
Date: Sunday, October 17, 2021 10:28:23 AM

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nculver@blm.gov
202-255-6979

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To: [Garcia, Monica L](#); [Gottry, Heather C](#)
Cc: [Housen, Barbara E](#)
Subject: Re: quick turnaround approval - help please!
Date: Sunday, October 17, 2021 1:17:16 PM

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Bureau of Land Management
nculver@blm.gov
202-255-6979

From: [Garcia, Monica L](#)
To: [Gottry, Heather C](#); [Culver, Nada L](#)
Subject: RE: Sabinoso Trip Details
Date: Tuesday, July 13, 2021 6:16:11 PM

Nada – Good evening. I'm writing to provide a quick status update. We are awaiting an updated itinerary and additional information from scheduling about this event and can conduct further review at that time.

However, in the absence of additional information and as we discussed this morning, the event at the Sabinoso Wilderness Area appears to be a particular matter involving specific parties. Therefore, it would not qualify for the exception in the Ethics Pledge that would allow you to attend a meeting with at least 5 other interested parties about a particular matter of general applicability.

We will provide additional information as soon as possible, but look forward to speaking with you tomorrow morning.

-Monica

From: Gottry, Heather C <heather.gottry@sol.doi.gov>
Sent: Tuesday, July 13, 2021 8:19 AM
To: Culver, Nada L <nculver@blm.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: RE: Sabinoso Trip Details

Thank you. Let's plan to talk 9:30 am. As quick background, based on the information provided the event is focused on a land exchange that is likely a particular matter. This would limit the use of the exception. We look forward to discussing further this morning.

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Sent: Tuesday, July 13, 2021 8:17 AM
To: Gottry, Heather C <heather.gottry@sol.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: Re: Sabinoso Trip Details

Yes along with many many other groups - well over the amount and I understand the limits well. Happy to talk around 9:30/9:45 eastern if you'd like anyway.

Nada

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From: Gottry, Heather C <heather.gottry@sol.doi.gov>
Sent: Tuesday, July 13, 2021 6:02:26 AM

To: Culver, Nada L <nculver@blm.gov>

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

Subject: FW: Sabinoso Trip Details

Nada – Hello and Good Morning! We are working with Scheduling to review the Secretary's upcoming trip to the Sabinoso Wilderness Area and understand that you may be participating in the events. We note that The Wilderness Society is on the participant list and would like to find some time to discuss your Ethics Pledge recusal with the Society. Do you have any time before 2:00 pm EST today or after 5:00 pm EST? Thank you.

- Heather

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

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From: Kules, Amanda B <amanda_kules@ios.doi.gov>

Sent: Tuesday, July 6, 2021 9:52 AM

To: Gosar, Mili N <mili_gosar@ios.doi.gov>; Villa, Cristina M <cristina_villa@ios.doi.gov>; Gottry, Heather C <heather.gottry@sol.doi.gov>; Heindl, Jennifer A <Jennifer.Heindl@sol.doi.gov>; Garcia, Monica L <monica.garcia@sol.doi.gov>

Subject: Sabinoso Trip Details

Hello All!

Ahead of our meeting today, I wanted to send over a very draft itinerary for our 7/17 trip to Las Vegas, NM to the Sabinoso wilderness. A couple of items I wanted to point out:

1. We are tracking that all DOI employees will take DOI owned transportation (cars). We are not tracking any boat rides!
2. There is a sizeable list of folks that are possibly being invited to attend or participate in the speaking program. Is there a difference, ethics-wise if there are people in attendance vs. people speaking? The list of folks is below. Please let us know if you need any supplementary information. Anyone invited that's an elected officials, we will make sure they're not up for reelection or in an election year.
 - a. The Trust for Public Land (TPL)
 - b. NM Wildlife Federation
 - c. Wilderness Land Trust
 - d. NM Wild

- e. The Wilderness Society
 - f. Eight Northern Indian Pueblos Council, Inc. (representing Taos, Picuris, Santa Clara, Ohkay Owingeh, San Ildefonso, Nambé, Pojoaque, and Tesuque Pueblos).
 - g. Three Counties: San Miguel, Taos, and Santa Fe.
 - h. Taos City Officials
 - i. Las Vegas City Officials
 - j. Cattle people: either association or permittees around the land who highly favor this
 - k. NM Congressional delegation
 - l. Former Sen. Tom Udall
 - m. NM Governor Michelle Lujan Grisham
 - n. NM Dept of Tourism
 - o. NM Horsemen
 - p. Nuestra Tierra
 - q. New Mexico Conference of Churches or New Mexico Interfaith Power and Light
3. The Trust for Public Land (TPL) has offered to provide coffee and light refreshments for the attendees. We told them we'd run it by y'all before saying yes to that. Please let us know if that's an issue.
4. There is likely a hike scheduled which will be on public lands. If it rains, there could be a guided car tour, but each person would ride in their personal/work car and the guided portion would happen over radio.

Attached you'll find a very draft version of the itinerary. We will have a trip planning call tomorrow morning where hopefully more details will get fleshed out, so I'll send a more updated version ahead of our call on Thursday. Just wanted to send this over for our call today.

Thank you!

Amanda Kules
Deputy Director, Scheduling & Advance
Department of the Interior
(M) (202) 341-0257
She/hers

From: [Culver, Nada L](#)
To: [Garcia, Monica L](#); [Gottry, Heather C](#)
Subject: RE: Sabinoso Trip Details
Date: Wednesday, July 14, 2021 2:41:24 PM

Just to confirm – The Wilderness Society is actually not invited to the event out at the Wilderness Area so we can consider this issue resolved.

Nada Wolff Culver
Deputy Director, Policy and Programs
Bureau of Land Management
Cell: 202-255-6979
nculver@blm.gov

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To: Gottry, Heather C <heather.gottry@sol.doi.gov>; Culver, Nada L <nculver@blm.gov>
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From: [Gottry, Heather C](#)
To: [Culver, Nada L](#)
Cc: [Garcia, Monica L](#)
Subject: RE: Sabinoso Trip Details
Date: Friday, July 16, 2021 4:46:18 PM

Nada – Thank you for your message. We just completed a review of the final participant list for the event tomorrow and have confirmed that representatives of The Wilderness Society will not attend the events tomorrow in New Mexico, including meeting with external and tribal stakeholders, meeting with BLM employees, conducting site visits, and participating in an event to commemorate a donation of land to BLM's Sabinoso Wilderness. We have just sent our ethics review of the Secretary's attendance and we will be shortly sending our review for your participation in the events.

As we discussed, if representatives of The Wilderness Society did attend the events, as was originally reflected on itineraries and participant lists, then your ability to participate in the events may have been limited by the requirements of paragraph 2 of the Ethics Pledge. Pursuant to paragraph 2 of the Ethics Pledge, you may not participate personally and substantially, for two (2) years after the date of your appointment on May 3, 2021, in any particular matter involving specific parties that is directly and substantially related to your former employer or former clients, including regulations and contracts, unless you are first granted a waiver under the Ethics Pledge. The Wilderness Society is considered a former employer of yours for purposes of these restrictions.

Consistent with this, you may not participate in any particular matters involving specific parties that is directly and substantially related to The Wilderness Society. This restriction includes participating in any meeting or other communication with The Wilderness Society relating to the performance of your official duties, unless the communication concerns a particular matter of general applicability (a broader type of particular matter than a grant, contract, litigation, land donation, or other particular matter involving specific parties) and is made at a meeting or other event at which participation is open to all interested parties. OGE has advised the term "open to all interested parties" means that the meeting should include a multiplicity of parties representing a diversity of viewpoints. If a former employer or a former client is present, then, generally speaking, at least four other separate stakeholders should be present to ensure that a diversity of viewpoints is represented and not the same united perspective.

I hope that our further ethics guidance regarding the events and reception are helpful. Please do not hesitate to reach out with any questions or if we can be of any assistance. Thanks.

- Heather

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Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: RE: Sabinoso Trip Details

Thank you. Let’s plan to talk 9:30 am. As quick background, based on the information provided the event is focused on a land exchange that is likely a particular matter. This would limit the use of the exception. We look forward to discussing further this morning.

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Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: Re: Sabinoso Trip Details

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Nada

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

Sent: Tuesday, July 13, 2021 6:02:26 AM

To: Culver, Nada L <nculver@blm.gov>

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

Subject: FW: Sabinoso Trip Details

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Email: heather.gottry@sol.doi.gov

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From: Kules, Amanda B <amanda_kules@ios.doi.gov>

Sent: Tuesday, July 6, 2021 9:52 AM

To: Gosar, Mili N <mili_gosar@ios.doi.gov>; Villa, Cristina M <cristina_villa@ios.doi.gov>; Gottry, Heather C <heather.gottry@sol.doi.gov>; Heindl, Jennifer A <Jennifer.Heindl@sol.doi.gov>; Garcia, Monica L <monica.garcia@sol.doi.gov>

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Department of the Interior
(M) (202) 341-0257
She/hers

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She/hers

From: [Culver, Nada L](#)
To: [Gottry, Heather C](#)
Cc: [Garcia, Monica L](#)
Subject: Re: Sabinoso Trip Details
Date: Tuesday, July 13, 2021 8:16:38 AM

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From: [Culver, Nada L](#)
To: [Derting, Elizabeth K](#)
Cc: [Garcia, Monica L](#)
Subject: RE: Technical Revisions to Your New Entrant Financial Disclosure Report
Date: Tuesday, May 11, 2021 1:55:16 PM

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Nada Wolff Culver
Deputy Director, Policy and Programs
Bureau of Land Management
Cell: 202-255-6979
nculver@blm.gov

From: Derting, Elizabeth K <elizabeth.derting@sol.doi.gov>
Sent: Tuesday, May 11, 2021 11:51 AM
To: Culver, Nada L <nculver@blm.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: Re: Technical Revisions to Your New Entrant Financial Disclosure Report

Good afternoon, Nada,

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Thanks!
Libby

Libby Derting

Attorney-Advisor

Departmental Ethics Office | Office of the Solicitor

U.S. Department of the Interior | MIB 5320

Email: elizabeth.derting@sol.doi.gov

Please note: I am teleworking until further notice. You can also reach me on MS Teams.

Integrity is our mission.

From: Culver, Nada L <nculver@blm.gov>
Sent: Monday, May 10, 2021 11:17 PM
To: Derting, Elizabeth K <elizabeth.derting@sol.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>
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Bureau of Land Management

Cell: 202-255-6979

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From: Derting, Elizabeth K <elizabeth.derting@sol.doi.gov>
Sent: Thursday, May 6, 2021 1:20 PM
To: Culver, Nada L <nculver@blm.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>
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From: [Derting, Elizabeth K](#)
To: [Culver, Nada L](#)
Cc: [Garcia, Monica L](#)
Subject: Re: Technical Revisions to Your New Entrant Financial Disclosure Report
Date: Tuesday, May 11, 2021 2:00:46 PM

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To: [Derting, Elizabeth K](#)
Cc: [Garcia, Monica L](#)
Subject: RE: Technical Revisions to Your New Entrant Financial Disclosure Report
Date: Wednesday, May 12, 2021 3:54:35 PM

Got it. All looks great. Thanks a ton!

Nada Wolff Culver
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Bureau of Land Management
Cell: 202-255-6979
nculver@blm.gov

From: Derting, Elizabeth K <elizabeth.derting@sol.doi.gov>
Sent: Tuesday, May 11, 2021 12:01 PM
To: Culver, Nada L <nculver@blm.gov>
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To: [Culver, Nada L](#)
Cc: [Garcia, Monica L](#)
Subject: Re: Technical Revisions to Your New Entrant Financial Disclosure Report
Date: Thursday, May 13, 2021 1:15:56 PM

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- Friday, May 21 10:30-11:00 am (Eastern)

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Departmental Ethics Office | Office of the Solicitor
U.S. Department of the Interior | MIB 5320
Email: elizabeth.derting@sol.doi.gov

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

Subject: Re: Technical Revisions to Your New Entrant Financial Disclosure Report

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[REDACTED]
[REDACTED]
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To: Culver, Nada L <nculver@blm.gov>

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

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To: [Derting, Elizabeth K](#)
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Subject: RE: Technical Revisions to Your New Entrant Financial Disclosure Report
Date: Thursday, May 13, 2021 1:21:47 PM

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Bureau of Land Management

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To: [Culver, Nada L](#)
Cc: [Garcia, Monica L](#)
Subject: Re: Technical Revisions to Your New Entrant Financial Disclosure Report
Date: Thursday, May 13, 2021 1:24:22 PM

Thank you! I'll send an Outlook appointment.

Hope you have a good afternoon!
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[REDACTED]
[REDACTED]

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To: [Derting, Elizabeth K](#)
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Subject: RE: Technical Revisions to Your New Entrant Financial Disclosure Report
Date: Thursday, May 13, 2021 1:30:52 PM

You, too, Libby!

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Deputy Director, Policy and Programs
Bureau of Land Management
Cell: 202-255-6979
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From: Derting, Elizabeth K <elizabeth.derting@sol.doi.gov>
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Please note: I am teleworking until further notice. You can also reach me on MS Teams.

Integrity is our mission.

From: Culver, Nada L <nculver@blm.gov>

Sent: Monday, May 10, 2021 11:17 PM

To: Derting, Elizabeth K <elizabeth.derting@sol.doi.gov>

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

Subject: RE: Technical Revisions to Your New Entrant Financial Disclosure Report

Hi Libby – [REDACTED] (b) (6)

[REDACTED]

Do you know what happened there?

Nada Wolff Culver

Deputy Director, Policy and Programs

Bureau of Land Management

Cell: 202-255-6979

nculver@blm.gov

From: Derting, Elizabeth K <elizabeth.derting@sol.doi.gov>

Sent: Thursday, May 6, 2021 1:20 PM

To: Culver, Nada L <nculver@blm.gov>

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

Subject: Technical Revisions to Your New Entrant Financial Disclosure Report

Good afternoon, Nada,

Thanks again for taking the time to talk with us yesterday. As we discussed, I have made technical changes to your New Entrant Report, including the following:

- Adding your current position as BLM Deputy Director of Policy and Programs as your current position and moving the Senior Counselor to the Secretary to the section for Other Federal Government Positions Held During the Previous 12 Months;
- Adding the names of the mutual funds, stocks, and bonds included in your, your spouse's, and your jointly held assets;
- Changing the name of line item 2 in Section 6 from "Joint Account #1" to "Brokerage Account"; and
- Changing line item 4 in Section 6 from "Joint Account #3" to a mutual fund, ABALX, within the Brokerage Account listed in line item 3.

I have attached an updated copy of the report for your review. Please let me know if the updated information is accurate or if there are any other edits that we need to make, and don't hesitate to let us know if you have any questions. We will also look for another time to talk about the follow-up on your report.

Thank you,
Libby

Libby Derting

Attorney-Advisor

Departmental Ethics Office | Office of the Solicitor

U.S. Department of the Interior | MIB 5320

Email: elizabeth.derting@sol.doi.gov

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From: [Culver, Nada L](#)
To: [Derting, Elizabeth K](#)
Cc: [Garcia, Monica L](#)
Subject: RE: Technical Revisions to Your New Entrant Financial Disclosure Report
Date: Monday, May 10, 2021 11:17:29 PM

Hi Libby – [REDACTED] (b) [REDACTED] (6)

Do you know what happened there?

Nada Wolff Culver
Deputy Director, Policy and Programs
Bureau of Land Management
Cell: 202-255-6979
nculver@blm.gov

From: Derting, Elizabeth K <elizabeth.derting@sol.doi.gov>
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Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>
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From: [Derting, Elizabeth K](#)
To: [Culver, Nada L](#)
Cc: [Garcia, Monica L](#)
Subject: Re: Technical Revisions to Your New Entrant Financial Disclosure Report
Date: Tuesday, May 11, 2021 1:51:10 PM
Attachments: [Culver, Nada - New Entrant Report \(Updated 05.11.21\).pdf](#)

Good afternoon, Nada,

Thank you for reviewing the updated draft I sent last week and for clarifying where the ABALX should be listed in Section 6. My apologies - I misunderstood that it was in the joint brokerage account, not its own separate joint account, and I had moved it to that account. You will see that I moved it back to a Joint Account #3 and shown that it is the only holding in that account.

Please let me know if this and the other changes I made last week are correct. If so, we will look for a time to schedule our follow-up call.

Thanks!

Libby

Libby Derting
Attorney-Advisor
Departmental Ethics Office | Office of the Solicitor
U.S. Department of the Interior | MIB 5320
Email: elizabeth.derting@sol.doi.gov

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Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>
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Bureau of Land Management

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From: Derting, Elizabeth K <elizabeth.derting@sol.doi.gov>

Sent: Thursday, May 6, 2021 1:20 PM

To: Culver, Nada L <nculver@blm.gov>

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

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From: [Culver, Nada L](#)
To: [Garcia, Monica L](#)
Cc: [Gottry, Heather C](#)
Subject: RE: Updated Ethics Guidance Memo & Recusal for Review and Signature
Date: Thursday, July 29, 2021 11:18:41 AM
Attachments: [Culver Nada - Recusal and Screening Agreement \(7.29.21\)-signed.pdf](#)

Here it is. Does it get updated once we sell the other stock that we are waiting to sell pending receipt of the CD? Right now, we're waiting on selling all of it so we can do all of the items at once, so I don't know that we will make that July 30th date if we are still waiting on the CD.

I also have questions that maybe we can discuss soon about matters that are underway that I'm unclear on given the later addition of certain recusals, so I will follow up on that.

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From: Garcia, Monica L <monica.garcia@sol.doi.gov>
Sent: Thursday, July 29, 2021 7:31 AM
To: Culver, Nada L <nculver@blm.gov>
Cc: Gottry, Heather C <heather.gottry@sol.doi.gov>
Subject: RE: Updated Ethics Guidance Memo & Recusal for Review and Signature

Nada – Good morning! I hope your day is off to a great start. I have attached an updated draft Recusal and Screening document for your signature, with today's date. Please let me know if you have any questions or revisions. If you are comfortable with the materials, please sign and return via email.

I have not had an update on your CD request but plan to follow up with them today.

-Monica

From: Garcia, Monica L
Sent: Tuesday, July 27, 2021 1:18 PM
To: Culver, Nada L <nculver@blm.gov>
Cc: Heather Gottry <heather.gottry@sol.doi.gov>
Subject: Updated Ethics Guidance Memo & Recusal for Review and Signature

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If you are comfortable with the draft provided, please sign (either digitally or in ink) and return to us for our records. Finally, we have confirmed that we transmitted your CD request to OGE on the 15th and have answered follow up questions from your OGE reviewer using information from our records. We will let you know as soon as possible if there are any updates to that request.

Please let us know if it would be helpful for us to discuss. Many thanks!

- Monica

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Email: monica.garcia@sol.doi.gov

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From: [Garcia, Monica L](#)
To: [Culver, Nada L](#)
Cc: [Gottry, Heather C](#)
Subject: RE: Updated Ethics Guidance Memo & Recusal for Review and Signature
Date: Wednesday, August 4, 2021 12:03:47 PM

Nada – Thank you for the nudge. I’ve followed up with OGE again just now.

Yesterday, OGE reported out that they’re inundated with CD requests and are falling a behind but this has been with them for many weeks. I’ll try to get them un-stuck.

Monica

From: Culver, Nada L <nculver@blm.gov>
Sent: Wednesday, August 4, 2021 11:02 AM
To: Garcia, Monica L <monica.garcia@sol.doi.gov>
Cc: Gottry, Heather C <heather.gottry@sol.doi.gov>
Subject: RE: Updated Ethics Guidance Memo & Recusal for Review and Signature

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Sent: Thursday, July 29, 2021 4:42 PM
To: Culver, Nada L <nculver@blm.gov>
Cc: Gottry, Heather C <heather.gottry@sol.doi.gov>
Subject: RE: Updated Ethics Guidance Memo & Recusal for Review and Signature

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Sent: Thursday, July 29, 2021 7:31 AM
To: Culver, Nada L <nculver@blm.gov>
Cc: Gottry, Heather C <heather.gottry@sol.doi.gov>
Subject: RE: Updated Ethics Guidance Memo & Recusal for Review and Signature

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To: [Culver, Nada L](#)
Cc: [Gottry, Heather C](#)
Subject: RE: Updated Ethics Guidance Memo & Recusal for Review and Signature
Date: Thursday, July 29, 2021 6:41:42 PM

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Subject: RE: Updated Ethics Guidance Memo & Recusal for Review and Signature
Date: Wednesday, August 4, 2021 12:10:13 PM

Thanks, Monica. Just wanting to complete the recommended sales.

Nada Wolff Culver
Deputy Director, Policy and Programs
Bureau of Land Management
Cell: 202-255-6979
nculver@blm.gov

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To: [Garcia, Monica L](#)
Cc: [Gottry, Heather C](#)
Subject: RE: Updated Ethics Guidance Memo & Recusal for Review and Signature
Date: Thursday, July 29, 2021 6:47:21 PM

Thanks. I will stand by on the sales and appreciate you telling me not to panic on that deadline.

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Subject: Updated Ethics Guidance Memo & Recusal for Review and Signature

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We also have attached your Recusals and Screening document for your review and signature (as well as a word version for reference). Per our discussion, you have elected to self-screen and refer issues to Danna Jackson for action or assignment if you are recused from participation in any given matter. As you will see, we kept Larry Roberts and Laura Daniel-Davis as individuals who receive copy of the memo.

If you are comfortable with the draft provided, please sign (either digitally or in ink) and return to us for our records. Finally, we have confirmed that we transmitted your CD request to OGE on the 15th and have answered follow up questions from your OGE reviewer using information from our records. We will let you know as soon as possible if there are any updates to that request.

Please let us know if it would be helpful for us to discuss. Many thanks!

- Monica

Please note: I will be teleworking until further notice

Monica L. Garcia
Deputy Director for Ethics Law & Policy
and Alternate Designated Agency Ethics Official
Departmental Ethics Office | Office of the Solicitor
U.S. Department of the Interior | MIB 5316
(O): (202) 208-0460
(C): (202) 880-4474
Email: monica.garcia@sol.doi.gov

Visit us online at www.doi.gov/ethics

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From: [Garcia, Monica L](#)
To: [Culver, Nada L](#)
Cc: [Gottry, Heather C](#)
Subject: RE: Updated Ethics Guidance Memo & Recusal for Review and Signature
Date: Thursday, July 29, 2021 9:31:17 AM
Attachments: [Culver, Nada - Recusal and Screening Agreement \(7.29.21\).pdf](#)

Nada – Good morning! I hope your day is off to a great start. I have attached an updated draft Recusal and Screening document for your signature, with today's date. Please let me know if you have any questions or revisions. If you are comfortable with the materials, please sign and return via email.

I have not had an update on your CD request but plan to follow up with them today.

-Monica

From: Garcia, Monica L
Sent: Tuesday, July 27, 2021 1:18 PM
To: Culver, Nada L <nculver@blm.gov>
Cc: Heather Gottry <heather.gottry@sol.doi.gov>
Subject: Updated Ethics Guidance Memo & Recusal for Review and Signature

Nada – Hello! As promised during our last conversation, attached please find a signed Updated Interim Ethics Recusals & Screening Arrangement memorandum and attachments.

We also have attached your Recusals and Screening document for your review and signature (as well as a word version for reference). Per our discussion, you have elected to self-screen and refer issues to Danna Jackson for action or assignment if you are recused from participation in any given matter. As you will see, we kept Larry Roberts and Laura Daniel-Davis as individuals who receive copy of the memo.

If you are comfortable with the draft provided, please sign (either digitally or in ink) and return to us for our records. Finally, we have confirmed that we transmitted your CD request to OGE on the 15th and have answered follow up questions from your OGE reviewer using information from our records. We will let you know as soon as possible if there are any updates to that request.

Please let us know if it would be helpful for us to discuss. Many thanks!

- Monica

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From: [Culver, Nada L](#)
To: [Garcia, Monica L](#)
Cc: [Gottry, Heather C](#)
Subject: RE: Updated Ethics Guidance Memo & Recusal for Review and Signature
Date: Wednesday, August 4, 2021 11:02:06 AM

Just following up to see if you've heard any more on the CD? Thanks for any guidance. I'm nervous letting it sit out there, of course.

Nada Wolff Culver
Deputy Director, Policy and Programs
Bureau of Land Management
Cell: 202-255-6979
nculver@blm.gov

From: Garcia, Monica L <monica.garcia@sol.doi.gov>
Sent: Thursday, July 29, 2021 4:42 PM
To: Culver, Nada L <nculver@blm.gov>
Cc: Gottry, Heather C <heather.gottry@sol.doi.gov>
Subject: RE: Updated Ethics Guidance Memo & Recusal for Review and Signature

Nada – Thank you very much!

After we receive the CD from OGE and you sell the 8 items that are pending, we will update your ethics guidance memo and recusal chart into final format. Sending the request to OGE will stay the deadline for you to sell, so no need to take any action until we get a final decision from OGE.

We would also be happy to connect on your open questions. Should I look for time on your schedule or connect in with Fran to assist?

-Monica

From: Culver, Nada L <nculver@blm.gov>
Sent: Thursday, July 29, 2021 11:19 AM
To: Garcia, Monica L <monica.garcia@sol.doi.gov>
Cc: Gottry, Heather C <heather.gottry@sol.doi.gov>
Subject: RE: Updated Ethics Guidance Memo & Recusal for Review and Signature

Here it is. Does it get updated once we sell the other stock that we are waiting to sell pending receipt of the CD? Right now, we're waiting on selling all of it so we can do all of the items at once, so I don't know that we will make that July 30th date if we are still waiting on the CD.

I also have questions that maybe we can discuss soon about matters that are underway that I'm unclear on given the later addition of certain recusals, so I will follow up on that.

Nada Wolff Culver
Deputy Director, Policy and Programs
Bureau of Land Management
Cell: 202-255-6979
nculver@blm.gov

From: Garcia, Monica L <monica.garcia@sol.doi.gov>
Sent: Thursday, July 29, 2021 7:31 AM
To: Culver, Nada L <nculver@blm.gov>
Cc: Gottry, Heather C <heather.gottry@sol.doi.gov>
Subject: RE: Updated Ethics Guidance Memo & Recusal for Review and Signature

Nada – Good morning! I hope your day is off to a great start. I have attached an updated draft Recusal and Screening document for your signature, with today's date. Please let me know if you have any questions or revisions. If you are comfortable with the materials, please sign and return via email.

I have not had an update on your CD request but plan to follow up with them today.

-Monica

From: Garcia, Monica L
Sent: Tuesday, July 27, 2021 1:18 PM
To: Culver, Nada L <nculver@blm.gov>
Cc: Heather Gottry <heather.gottry@sol.doi.gov>
Subject: Updated Ethics Guidance Memo & Recusal for Review and Signature

Nada – Hello! As promised during our last conversation, attached please find a signed Updated Interim Ethics Recusals & Screening Arrangement memorandum and attachments.

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Please let us know if it would be helpful for us to discuss. Many thanks!

- Monica

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Email: monica.garcia@sol.doi.gov

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From: [Culver, Nada L](#)
To: [Garcia, Monica L](#)
Cc: [Gottry, Heather C](#)
Subject: RE: Updated Ethics Recusal Materials
Date: Tuesday, September 7, 2021 1:23:57 AM
Attachments: [Culver Nada - Recusal and Screening Agreement \(9.3.21\) - signed.pdf](#)

I've attached the updated, signed memo. So your direction from here is that I should share the updated chart with Danna Jackson so she also has it?

Nada Wolff Culver
Deputy Director, Policy and Programs
Bureau of Land Management
nculver@blm.gov
202-255-6979

From: Garcia, Monica L <monica.garcia@sol.doi.gov>
Sent: Friday, September 3, 2021 1:40 PM
To: Culver, Nada L <nculver@blm.gov>
Cc: Gottry, Heather C <heather.gottry@sol.doi.gov>
Subject: RE: Updated Ethics Recusal Materials

Nada – Please accept my apologies, but I found a typo after we send the guidance memo earlier this morning and wanted to correct it. We have corrected it in the attached version.

For the Recusal and Screening Arrangement, please let us know your preference as to whether you'd like to re-sign or just circulate your updated recusal chart.

Thanks and have a great holiday weekend.

Monica

From: Garcia, Monica L
Sent: Friday, September 3, 2021 8:44 AM
To: Culver, Nada L <nculver@blm.gov>
Cc: Heather Gottry <heather.gottry@sol.doi.gov>
Subject: Updated Ethics Recusal Materials

Nada – Good morning! As promised, I have attached your updated Ethics Recusal Guidance Memorandum reflecting the prohibited stock and bond sales.

We defer to your preference on whether you'd like to re-sign your Recusal and Screening Arrangement document or circulate the updated Quick Recusal Chart Attachment. For ease of dealing with the logistics of re-signing, I have attached a copy of the Recusal and Screening Arrangement with today's date (and the updated chart) if you'd like to re-sign in addition to the updated Quick Recusal Chart if you'd prefer to simply circulate that document.

Please let us know your preference. If you elect to re-sign, please provide us with a copy of the Recusal and Screening Arrangement for our files.

Thanks so much,

-Monica

Please note: I will be teleworking until further notice

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(O): (202) 208-0460
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From: [Garcia, Monica L](#)
To: [Culver, Nada L](#)
Cc: [Gottry, Heather C](#)
Subject: RE: Updated Ethics Recusal Materials
Date: Friday, September 3, 2021 3:40:02 PM
Attachments: [Culver Nada - Updated Ethics Recusal Guidance Memorandum & Attachments \(Signed 9.3.21\).pdf](#)
[Culver, Nada - Recusal and Screening Agreement \(9.3.21\).pdf](#)
[Culver, Nada - Quick Recusal Chart Attachment C \(9.3.21\).pdf](#)

Nada – Please accept my apologies, but I found a typo after we send the guidance memo earlier this morning and wanted to correct it. We have corrected it in the attached version.

For the Recusal and Screening Arrangement, please let us know your preference as to whether you'd like to re-sign or just circulate your updated recusal chart.

Thanks and have a great holiday weekend.

Monica

From: Garcia, Monica L
Sent: Friday, September 3, 2021 8:44 AM
To: Culver, Nada L <nculver@blm.gov>
Cc: Heather Gottry <heather.gottry@sol.doi.gov>
Subject: Updated Ethics Recusal Materials

Nada – Good morning! As promised, I have attached your updated Ethics Recusal Guidance Memorandum reflecting the prohibited stock and bond sales.

We defer to your preference on whether you'd like to re-sign your Recusal and Screening Arrangement document or circulate the updated Quick Recusal Chart Attachment. For ease of dealing with the logistics of re-signing, I have attached a copy of the Recusal and Screening Arrangement with today's date (and the updated chart) if you'd like to re-sign in addition to the updated Quick Recusal Chart if you'd prefer to simply circulate that document.

Please let us know your preference. If you elect to re-sign, please provide us with a copy of the Recusal and Screening Arrangement for our files.

Thanks so much,

-Monica

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Departmental Ethics Office | Office of the Solicitor

U.S. Department of the Interior | MIB 5316

(O): (202) 208-0460

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From: [Culver, Nada L](#)
To: [Garcia, Monica L](#); [Gottry, Heather C](#)
Subject: RE: Updated Interim Ethics Guidance and Draft Recusal/Screening Arrangement
Date: Thursday, July 15, 2021 4:30:08 PM

Hi Monica and Heather – In this latest draft of the recusal memo, we confirmed that my recusal will extend to certain particular matters that involve The Wilderness Society, in addition to the National Audubon Society. As we discussed, the initial direction from you was that the recusal only extended to the National Audubon Society, my most recent employer. In the interim, I did participate in one meeting on June 1st with The Wilderness Society along with 2 folks from the Department of the Interior (Elizabeth Klein and Alexandra Sanchez) to discuss oil and gas policy generally, in the context of Interior's ongoing review of the program, and policy aimed at reducing/offsetting climate change impacts more broadly. We did not touch on any particular matters at that meeting but it did not include the additional number of organizations I would now ensure were part of any such meeting. I will comply with the recusal requirements going forward, of course.

Nada Wolff Culver
Deputy Director, Policy and Programs
Bureau of Land Management
Cell: 202-255-6979
nculver@blm.gov

From: Garcia, Monica L <monica.garcia@sol.doi.gov>
Sent: Tuesday, July 6, 2021 4:46 AM
To: Culver, Nada L <nculver@blm.gov>
Cc: Gottry, Heather C <heather.gottry@sol.doi.gov>
Subject: FW: Updated Interim Ethics Guidance and Draft Recusal/Screening Arrangement

Good morning, Nada! Following up on our meeting last week, I'm re-sending the ethics recusal materials for your review and also including a draft recusal and screening arrangement for your review and consideration. We would be happy to schedule a follow up discussion with you to address any open questions or concerns you may have and get these documents finalized.

Please let us know if it would be helpful to schedule a time to connect this week and I'll work to schedule.

Thank you so much and have a great day!

Monica

From: Gottry, Heather C <heather.gottry@sol.doi.gov>
Sent: Monday, June 21, 2021 10:35 AM
To: Culver, Nada L <nculver@blm.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: Updated Interim Ethics Guidance and Draft Recusal/Screening Arrangement

Nada – Hello! Now that we have completed our review of your New Entrant OGE Form 278e and recusal obligations, we are ready to issue updated interim ethics guidance. Please note that your guidance remains interim pending completion of required divestitures. For your review and discussion, please see the attached materials that will serve to document your ethics obligations, including your recusals:

- A draft memorandum from the DEO providing Updated Interim Ethics Guidance on Recusal Obligations, describing your ethics obligations, including those implemented through the Biden Administration’s Ethics Pledge (and the below attachments)
 - *Attachment A* – Guidance for Recusal Analysis
 - *Attachment B* – 2021 Department of the Interior and 2021 Bureau of Land Management List of Prohibited Investments
 - *Attachment C* – List of Recusals and Quick Reference Chart (this document summarizes your identified recusals, scope of the recusals, and applicable time periods)
 - *Attachment D* – Ethics Pledge (signed March 1, 2021)
- A draft Ethics Recusals & Screening Arrangement, a document for your signature which includes two potential options for a step-by-step process for implementing your recusal obligations through a screening arrangement. We have drafted this document with two potential options, either that you select a screener to assist with your recusal obligations and avoid any inadvertent participation in a matter which would otherwise require your recusal or you can elect to self-screen. We are happy to discuss the pros/cons of either approach and assist you in determining the best path forward. Please note that the attachment referenced in the document will be the same as Attachment C to the Ethics Guidance on Recusal Obligations.

I am happy to schedule a time to walk you through the attached documents to ensure that the facts are complete and correct and to discuss any questions. Please let me know your availability. Thank you and have a great evening!

- Heather

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

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From: [Culver, Nada L](#)
To: [Garcia, Monica L](#)
Cc: [Gottry, Heather C](#)
Subject: RE: Updated Interim Ethics Guidance and Draft Recusal/Screening Arrangement
Date: Wednesday, July 14, 2021 12:38:35 AM

These look fine to me. The information that you flagged on dates of employment and my husband's firm/clients are accurate. We are divesting of the stocks we've discussed, so I'm not sure if there is more to highlight in this document about the divestments already made and those to be made, but we can hopefully clarify that in our discussion tomorrow.

Nada Wolff Culver
Deputy Director, Policy and Programs
Bureau of Land Management
Cell: 202-255-6979
nculver@blm.gov

From: Garcia, Monica L <monica.garcia@sol.doi.gov>
Sent: Tuesday, July 6, 2021 4:46 AM
To: Culver, Nada L <nculver@blm.gov>
Cc: Gottry, Heather C <heather.gottry@sol.doi.gov>
Subject: FW: Updated Interim Ethics Guidance and Draft Recusal/Screening Arrangement

Good morning, Nada! Following up on our meeting last week, I'm re-sending the ethics recusal materials for your review and also including a draft recusal and screening arrangement for your review and consideration. We would be happy to schedule a follow up discussion with you to address any open questions or concerns you may have and get these documents finalized.

Please let us know if it would be helpful to schedule a time to connect this week and I'll work to schedule.

Thank you so much and have a great day!

Monica

From: Gottry, Heather C <heather.gottry@sol.doi.gov>
Sent: Monday, June 21, 2021 10:35 AM
To: Culver, Nada L <nculver@blm.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: Updated Interim Ethics Guidance and Draft Recusal/Screening Arrangement

Nada – Hello! Now that we have completed our review of your New Entrant OGE Form 278e and recusal obligations, we are ready to issue updated interim ethics guidance. Please note that your guidance remains interim pending completion of required divestitures. For your review and discussion, please see the attached materials that will serve to document your ethics obligations, including your recusals:

- A draft memorandum from the DEO providing Updated Interim Ethics Guidance on Recusal Obligations, describing your ethics obligations, including those implemented through the Biden Administration's Ethics Pledge (and the below attachments)
 - *Attachment A* – Guidance for Recusal Analysis
 - *Attachment B* – 2021 Department of the Interior and 2021 Bureau of Land Management List of Prohibited Investments
 - *Attachment C* – List of Recusals and Quick Reference Chart (this document summarizes your identified recusals, scope of the recusals, and applicable time periods)
 - *Attachment D* – Ethics Pledge (signed March 1, 2021)
- A draft Ethics Recusals & Screening Arrangement, a document for your signature which includes two potential options for a step-by-step process for implementing your recusal obligations through a screening arrangement. We have drafted this document with two potential options, either that you select a screener to assist with your recusal obligations and avoid any inadvertent participation in a matter which would otherwise require your recusal or you can elect to self-screen. We are happy to discuss the pros/cons of either approach and assist you in determining the best path forward. Please note that the attachment referenced in the document will be the same as Attachment C to the Ethics Guidance on Recusal Obligations.

I am happy to schedule a time to walk you through the attached documents to ensure that the facts are complete and correct and to discuss any questions. Please let me know your availability. Thank you and have a great evening!

- Heather

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

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

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From: [Gottry, Heather C](#)
To: [Wallace, Andrew G](#); [Salotti, Christopher](#); [Rezaeerod, Paniz](#); [Murphy, Timothy E](#); [Mangum, Lara J](#)
Cc: [Garcia, Monica L](#)
Subject: RE: Updated Ltr Response WGC re Culver w/ Attachments
Date: Thursday, August 19, 2021 6:12:18 PM

Drew – Hello! I sent the Klein materials and will forward on to you shortly. Also, do you have a preference for ink or digital signatures? Thanks!

- Heather

From: Wallace, Andrew G <andrew_wallace@ios.doi.gov>
Sent: Thursday, August 19, 2021 5:49 PM
To: Gottry, Heather C <heather.gottry@sol.doi.gov>; Salotti, Christopher <Chris_Salotti@ios.doi.gov>; Rezaeerod, Paniz <paniz_rezaeerod@ios.doi.gov>; Murphy, Timothy E <Timothy.Murphy@sol.doi.gov>; Mangum, Lara J <lara.mangum@sol.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: RE: Updated Ltr Response WGC re Culver w/ Attachments

Thank you Heather and all who have helped

Let's plan to send tomorrow if that's ok to give time for heads ups

Can you send a similar one for the Klein letter and materials? (if others don't need, then just for me and my own notifications)

Thank you!

From: Gottry, Heather C <heather.gottry@sol.doi.gov>
Sent: Thursday, August 19, 2021 4:05 PM
To: Wallace, Andrew G <andrew_wallace@ios.doi.gov>; Salotti, Christopher <Chris_Salotti@ios.doi.gov>; Rezaeerod, Paniz <paniz_rezaeerod@ios.doi.gov>; Murphy, Timothy E <Timothy.Murphy@sol.doi.gov>; Mangum, Lara J <lara.mangum@sol.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: Updated Ltr Response WGC re Culver w/ Attachments

Hello! As requested, attached please find a clean version of the response letter to Representative Westerman regarding the questions asked about Nada Culver. Additionally, attached please find the proposed enclosures of the letter. Please let me know if it would be helpful to discuss further or if we can be of any additional assistance. Thank you.

- Heather

Heather C. Gottry
Director & DAEO
Departmental Ethics Office | Office of the Solicitor
U.S. Department of the Interior | MIB 5308

(O) (202) 208-4472

(C) (202) 740-0417

Email: heather.gottry@sol.doi.gov

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From: [Garcia, Monica L](#)
To: [Anderson, Robert T](#); [Gottry, Heather C](#)
Subject: RE: Urgent Ethics Matter
Date: Friday, April 23, 2021 9:39:50 AM

Bob – Good morning. I just had a phone conversation with Nada Culver. Nada agreed to sell 100% of her and her husband's holdings in all oil and gas investments, including Berkshire Hathaway and Enbridge, and has already spoken to her broker to give instructions on the sale. I explained to Nada that she must recuse from all BLM work affecting the oil and gas sector, including preparation for next week's hearing on the BLM Oil and Gas Leasing program, until the sale is fully executed and she and her husband no longer own the energy sector holdings.

Nada indicated that she understood the seriousness of this obligation and agreed to send our office written confirmation of the sale as soon as she receives it from her broker.

Please let me know if you would like to touch base or have further discussion on this matter.

-Monica

From: Anderson, Robert T <Robert.Anderson@sol.doi.gov>
Sent: Friday, April 23, 2021 8:40 AM
To: Gottry, Heather C <heather.gottry@sol.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: RE: Urgent Ethics Matter

I just got back from a run. Give me 25 minutes to get it together. I'll call you and we can add Monica.

Robert Anderson
Principal Deputy Solicitor
Department of the Interior
1849 C Street NW
Washington, D.C. 20240
(202) 208-4210

From: Gottry, Heather C <heather.gottry@sol.doi.gov>
Sent: Friday, April 23, 2021 7:01 AM
To: Anderson, Robert T <Robert.Anderson@sol.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: Urgent Ethics Matter

Bob – Hello! Monica and I would like to brief you on an urgent emerging ethics issue involving Nada Culver and her current directed and imputed ownership of prohibited and above de minimis holdings. We are available when convenient for you, but it would be helpful to touch base this

morning if at all possible. Thank you.

- Heather

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

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From: [Anderson, Robert T](#)
To: [Gottry, Heather C](#)
Cc: [Garcia, Monica L](#)
Subject: RE: Urgent Ethics Matter
Date: Friday, April 23, 2021 8:39:54 AM

I just got back from a run. Give me 25 minutes to get it together. I'll call you and we can add Monica.

Robert Anderson
Principal Deputy Solicitor
Department of the Interior
1849 C Street NW
Washington, D.C. 20240
(202) 208-4210

From: Gottry, Heather C <heather.gottry@sol.doi.gov>
Sent: Friday, April 23, 2021 7:01 AM
To: Anderson, Robert T <Robert.Anderson@sol.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: Urgent Ethics Matter

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- Heather

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U.S. Department of the Interior | MIB 5308
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(C) (202) 740-0417
Email: heather.gottry@sol.doi.gov

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From: [Anderson, Robert T](#)
To: [Garcia, Monica L](#)
Cc: [Gottry, Heather C](#)
Subject: Re: Urgent Ethics Matter
Date: Friday, April 23, 2021 9:56:18 AM

Great work by both of you. Thanks!

Robert Anderson
Principal Deputy Solicitor
Department of the Interior
[1849 C Street NW](#)
[Washington, D.C. 20240](#)
[\(202\) 208-4210](#)

On Apr 23, 2021, at 8:39 AM, Garcia, Monica L <monica.garcia@sol.doi.gov> wrote:

Bob – Good morning. I just had a phone conversation with Nada Culver. Nada agreed to sell 100% of her and her husband's holdings in all oil and gas investments, including Berkshire Hathaway and Enbridge, and has already spoken to her broker to give instructions on the sale. I explained to Nada that she must recuse from all BLM work affecting the oil and gas sector, including preparation for next week's hearing on the BLM Oil and Gas Leasing program, until the sale is fully executed and she and her husband no longer own the energy sector holdings.

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-Monica

From: Anderson, Robert T <Robert.Anderson@sol.doi.gov>
Sent: Friday, April 23, 2021 8:40 AM
To: Gottry, Heather C <heather.gottry@sol.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: RE: Urgent Ethics Matter

I just got back from a run. Give me 25 minutes to get it together. I'll call you and we can add Monica.

Robert Anderson
Principal Deputy Solicitor
Department of the Interior
1849 C Street NW
Washington, D.C. 20240
(202) 208-4210

From: Gottry, Heather C <heather.gottry@sol.doi.gov>
Sent: Friday, April 23, 2021 7:01 AM
To: Anderson, Robert T <Robert.Anderson@sol.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: Urgent Ethics Matter

Bob – Hello! Monica and I would like to brief you on an urgent emerging ethics issue involving Nada Culver and her current directed and imputed ownership of prohibited and above de minimis holdings. We are available when convenient for you, but it would be helpful to touch base this morning if at all possible. Thank you.

- Heather

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

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

Integrity is our mission.

From: [Garcia, Monica L](#)
To: [Culver, Nada L](#); [Gottry, Heather C](#)
Cc: [Hammer, Christine A](#)
Subject: RE: Welcome and Next Ethics Steps
Date: Tuesday, March 2, 2021 9:59:26 AM

Nada – Thank you for the update! We are reviewing your questions and working on a draft interim recusal document for your review and will send to you as soon as possible.

In the meantime, does 11:30 a.m. Eastern tomorrow work to have a discussion on your two open questions? If so, I'll send a calendar invite ASAP.

-Monica

From: Culver, Nada L <nada_culver@ios.doi.gov>
Sent: Tuesday, March 2, 2021 9:56 AM
To: Gottry, Heather C <heather.gottry@sol.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>; Hammer, Christine A <christine.hammer@sol.doi.gov>
Subject: RE: Welcome and Next Ethics Steps

Thank you, Heather. I sent the signed pledge to Christine yesterday.

Nada

From: Gottry, Heather C <heather.gottry@sol.doi.gov>
Sent: Tuesday, March 2, 2021 5:36 AM
To: Culver, Nada L <nada_culver@ios.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>; Hammer, Christine A <christine.hammer@sol.doi.gov>
Subject: Welcome and Next Ethics Steps

Nada – Hello again and welcome to the Department of the Interior! We are looking forward to working with you. As part of your onboarding process, there are several important steps you will need to take in order to fulfill your ethics obligations. For your convenience, these next steps are summarized below:

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From: [Gottry, Heather C](#)
To: [Futrowsky, Steven G](#); [Raviv, Deborah A](#)
Cc: [Garcia, Monica L](#)
Subject: RE: Welcome and Next Ethics Steps
Date: Tuesday, July 27, 2021 9:16:53 AM

Yes, of course. I am copying Monica, Deputy Director, who was taking the lead with the referral and will make sure it gets to you as well. Thanks!

From: Futrowsky, Steven G <Steven_Futrowsky@doioig.gov>
Sent: Tuesday, July 27, 2021 9:04 AM
To: Gottry, Heather C <heather.gottry@sol.doi.gov>; Raviv, Deborah A <deborah_raviv@doioig.gov>
Subject: RE: Welcome and Next Ethics Steps

Thank you! Also, can you copy me on the new referral you are going to send to our office. It should go through the normal process, but I want to get a heads up.

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Sent: Tuesday, July 27, 2021 9:01 AM
To: Raviv, Deborah A <deborah_raviv@doioig.gov>; Futrowsky, Steven G <Steven_Futrowsky@doioig.gov>
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From: [Garcia, Monica L](#)
To: [Culver, Nada L](#); [Gottry, Heather C](#)
Cc: [Hammer, Christine A](#)
Subject: RE: Welcome and Next Ethics Steps
Date: Tuesday, March 2, 2021 3:36:58 PM
Attachments: [Attachment A to Interim Ethics Guidance Memorandum.pdf](#)
[Attachment B to Interim Ethics Guidance Memorandum.pdf](#)
[Interim Ethics Recusal Memo - Culver \(Draft for Review 3.2.21\).docx](#)

Nada – I'll send a meeting invitation for tomorrow at 11:30 a.m. Eastern to discuss your pending questions, but we can move it to a different day or time if you prefer.

We have drafted the attached memorandum for your consideration that provides interim ethics guidance on your recusals and will work with you to answer any questions you may have and issue the memorandum. The draft memorandum was developed using information included on your resume, your responses to our preliminary questions, and our notes from our discussion before you onboarded. As a result, we recognize that it will need to be updated further before it is finalized.

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

We greatly appreciate your time and attention and hope that the draft memorandum provides helpful guidance on your recusals. Thank you.

-Monica

From: Garcia, Monica L
Sent: Tuesday, March 2, 2021 9:59 AM
To: Culver, Nada L <nada_culver@ios.doi.gov>; Gottry, Heather C <heather.gottry@sol.doi.gov>
Cc: Hammer, Christine A <christine.hammer@sol.doi.gov>
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To: [Gottry, Heather C](#); [Raviv, Deborah A](#)
Cc: [Garcia, Monica L](#)
Subject: RE: Welcome and Next Ethics Steps
Date: Tuesday, July 27, 2021 9:17:47 AM

Thank you again.

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Sent: Tuesday, July 27, 2021 9:17 AM
To: Futrowsky, Steven G <Steven_Futrowsky@doioig.gov>; Raviv, Deborah A <deborah_raviv@doioig.gov>
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Subject: RE: Welcome and Next Ethics Steps
Date: Sunday, March 7, 2021 3:20:45 PM
Attachments: [Interim Ethics Recusal Memo - Culver \(Draft for Review 3.7.21\).docx](#)

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Sent: Tuesday, March 2, 2021 3:37 PM
To: Culver, Nada L <nada_culver@ios.doi.gov>; Gottry, Heather C <heather.gottry@sol.doi.gov>
Cc: Hammer, Christine A <christine.hammer@sol.doi.gov>
Subject: RE: Welcome and Next Ethics Steps

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From: [Culver, Nada L](#)
To: [Garcia, Monica L](#); [Gottry, Heather C](#)
Cc: [Hammer, Christine A](#)
Subject: RE: Welcome and Next Ethics Steps
Date: Tuesday, March 9, 2021 12:25:41 AM

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Cc: [Garcia, Monica L](#); [Gottry, Heather C](#)
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Cc: [Garcia, Monica L](#); [Hammer, Christine A](#)
Subject: RE: Welcome and Next Ethics Steps
Date: Tuesday, March 9, 2021 8:18:32 AM

LaShanda and Curtis – Based on Christine’s message below, it looks like Nada’s request is covered so you do not need to take any further action at this point. Many thanks!

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We have drafted the attached memorandum for your consideration that provides interim ethics guidance on your recusals and will work with you to answer any questions you may have and issue the memorandum. The draft memorandum was developed using information included on your resume, your responses to our preliminary questions, and our notes from our discussion before you onboarded. As a result, we recognize that it will need to be updated further before it is finalized.

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

We greatly appreciate your time and attention and hope that the draft memorandum provides helpful guidance on your recusals. Thank you.

-Monica

From: Garcia, Monica L
Sent: Tuesday, March 2, 2021 9:59 AM
To: Culver, Nada L <nada_culver@ios.doi.gov>; Gottry, Heather C <heather.gottry@sol.doi.gov>
Cc: Hammer, Christine A <christine.hammer@sol.doi.gov>
Subject: RE: Welcome and Next Ethics Steps

Nada – Thank you for the update! We are reviewing your questions and working on a draft interim recusal document for your review and will send to you as soon as possible.

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To: Gottry, Heather C <heather.gottry@sol.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>; Hammer, Christine A <christine.hammer@sol.doi.gov>
Subject: RE: Welcome and Next Ethics Steps

Thank you, Heather. I sent the signed pledge to Christine yesterday.

Nada

From: Gottry, Heather C <heather.gottry@sol.doi.gov>
Sent: Tuesday, March 2, 2021 5:36 AM
To: Culver, Nada L <nada_culver@ios.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>; Hammer, Christine A <christine.hammer@sol.doi.gov>
Subject: Welcome and Next Ethics Steps

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U.S. Department of the Interior | MIB 5308
(O) (202) 208-4472
(C) (202) 740-0417
Email: heather.gottry@sol.doi.gov

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

Integrity is our mission.

From: [Culver, Nada L](#)
To: [Gottry, Heather C](#)
Cc: [Garcia, Monica L](#); [Hammer, Christine A](#)
Subject: RE: Welcome and Next Ethics Steps
Date: Tuesday, March 2, 2021 9:55:37 AM

Thank you, Heather. I sent the signed pledge to Christine yesterday.

Nada

From: Gottry, Heather C <heather.gottry@sol.doi.gov>
Sent: Tuesday, March 2, 2021 5:36 AM
To: Culver, Nada L <nada_culver@ios.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>; Hammer, Christine A <christine.hammer@sol.doi.gov>
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- Heather

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Integrity is our mission.

From: [Siemer, Heather L](#)
To: [Gottry, Heather C](#)
Cc: [Deluca, Mary E](#)
Subject: Re: Welcome and Next Ethics Steps
Date: Thursday, September 2, 2021 3:25:57 PM

Thank you for speaking with us today and sending the emails/documents.

Have a great holiday weekend!

Heather Siemer
Investigator
Special Investigations and Reviews
Office of the Inspector General
US Department of the Interior

From: Gottry, Heather C <heather.gottry@sol.doi.gov>
Sent: Thursday, September 2, 2021 3:23 PM
To: Deluca, Mary E <mary_deluca@doioig.gov>; Siemer, Heather L <heather_siemer@doioig.gov>
Subject: FW: Welcome and Next Ethics Steps

One more, as promised. Thank you.

From: Culver, Nada L <nada_culver@ios.doi.gov>
Sent: Tuesday, March 9, 2021 12:26 AM
To: Garcia, Monica L <monica.garcia@sol.doi.gov>; Gottry, Heather C <heather.gottry@sol.doi.gov>
Cc: Hammer, Christine A <christine.hammer@sol.doi.gov>
Subject: RE: Welcome and Next Ethics Steps

Thank you, Monica. This looks good to me.

Also, on the financial form, I did get a link to Integrity stating I'd been assigned a report. You had mentioned that I should wait to dive into that until speaking with someone from your team but wasn't sure how that would work and wanted to follow-up so I can get that moving forward, too.

Nada

From: Garcia, Monica L <monica.garcia@sol.doi.gov>
Sent: Sunday, March 7, 2021 1:21 PM
To: Culver, Nada L <nada_culver@ios.doi.gov>; Gottry, Heather C <heather.gottry@sol.doi.gov>
Cc: Hammer, Christine A <christine.hammer@sol.doi.gov>
Subject: RE: Welcome and Next Ethics Steps

Nada – Thank you for making time to meet with me and review your draft Interim Recusal last week. As we discussed, I have attached a revised draft with redline changes to reflect your recusals with respect to your spouse’s law firm and clients.

If you have any questions or concerns, please let me know and we can schedule a time to discuss. If you are comfortable with the attached draft, please let me know and we can finalize it and issue to you ASAP.

Thanks!

-Monica

From: Garcia, Monica L
Sent: Tuesday, March 2, 2021 3:37 PM
To: Culver, Nada L <nada_culver@ios.doi.gov>; Gottry, Heather C <heather.gottry@sol.doi.gov>
Cc: Hammer, Christine A <christine.hammer@sol.doi.gov>
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Sent: Tuesday, March 2, 2021 5:36 AM

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

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Email: heather.gottry@sol.doi.gov

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Integrity is our mission.

From: [Futrowsky, Steven G](#)
To: [Gottry, Heather C](#); [Raviv, Deborah A](#)
Subject: RE: Welcome and Next Ethics Steps
Date: Tuesday, July 27, 2021 9:03:57 AM

Thank you! Also, can you copy me on the new referral you are going to send to our office. It should go through the normal process, but I want to get a heads up.

From: Gottry, Heather C <heather.gottry@sol.doi.gov>
Sent: Tuesday, July 27, 2021 9:01 AM
To: Raviv, Deborah A <deborah_raviv@doioig.gov>; Futrowsky, Steven G <Steven_Futrowsky@doioig.gov>
Subject: FW: Welcome and Next Ethics Steps

Deborah and Steve – Hello once again! Here is a message that we sent to Nada setting out next ethics steps and providing general ethics guidance. It is our practice to send a message like this to all new staff in the first days and the Department. As we discussed yesterday, we have also provided Nada with specific guidance on request. Please do not hesitate to reach out with any questions. Thanks!

- Heather

From: Gottry, Heather C
Sent: Tuesday, March 2, 2021 7:36 AM
To: Culver, Nada L <nada_culver@ios.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>; Hammer, Christine A <christine.hammer@sol.doi.gov>
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From: [Blasing, Francesca M](#)
To: [Culver, Nada L](#); [Genter, Constance G](#)
Cc: [Lawyer, Mark G](#); [Housen, Barbara E](#); [Garcia, Monica L](#); [Gottry, Heather C](#)
Subject: RE: Western Governors' Association (WGA) "Working Lands, Working Communities" Workshop (10/7) - Nada Culver
Date: Thursday, October 7, 2021 11:38:01 AM
Attachments: [image001.png](#)

Constance, thank you for flagging this and moving it so quickly!

Regards,
Fran

*Fran Blasing
Executive Assistant
Office of the Director
Bureau of Land Management
970-256-4913 (desk)
970-697-7916 (mobile)*



From: Culver, Nada L <nculver@blm.gov>
Sent: Wednesday, October 6, 2021 4:47 PM
To: Genter, Constance G <constance.genter@sol.doi.gov>; Blasing, Francesca M <fblasing@blm.gov>
Cc: Lawyer, Mark G <mlawyer@blm.gov>; Housen, Barbara E <barbara.housen@sol.doi.gov>; Garcia, Monica L <monica.garcia@sol.doi.gov>; Gottry, Heather C <heather.gottry@sol.doi.gov>
Subject: RE: Western Governors' Association (WGA) "Working Lands, Working Communities" Workshop (10/7) - Nada Culver

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Nada Wolff Culver
Deputy Director, Policy and Programs
Bureau of Land Management
nculver@blm.gov
202-255-6979

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Sent: Wednesday, October 6, 2021 4:42 PM
To: Blasing, Francesca M <fblasing@blm.gov>

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Fran,

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Customer service matters to us. Please take our short survey, [click here](#).

From: [Genter, Constance G](#)
To: [Housen, Barbara E](#)
Subject: Re: Western Governors' Association (WGA) "Working Lands, Working Communities" Workshop (10/7) - Nada Culver
Date: Thursday, October 7, 2021 3:58:53 PM

Yes - put it on and it should be on the closed tracker already

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From: Housen, Barbara E <barbara.housen@sol.doi.gov>
Sent: Thursday, October 7, 2021 5:08 AM
To: Genter, Constance G <constance.genter@sol.doi.gov>
Subject: Fw: Western Governors' Association (WGA) "Working Lands, Working Communities" Workshop (10/7) - Nada Culver

Great work! Is this on the tracker-I didn't see it. Thanks.

Barbara. E. Housen
Supervisory Attorney-Advisor, Advice and Counsel Branch
Departmental Ethics Office | Office of the Solicitor
U.S. Department of the Interior
email: barbara.housen@sol.doi.gov

Please note, I am teleworking until further notice and so it's best to reach me by email.

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Date: Wednesday, October 6, 2021 6:47:18 PM

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From: [Genter, Constance G](#)
To: [Blasing, Francesca M](#); [Culver, Nada L](#)
Cc: [Lawyer, Mark G](#); [Housen, Barbara E](#); [Garcia, Monica L](#); [Gottry, Heather C](#)
Subject: Re: Western Governors' Association (WGA) "Working Lands, Working Communities" Workshop (10/7) - Nada Culver
Date: Thursday, October 7, 2021 12:21:47 PM
Attachments: [image001.png](#)

Thank you for your assistance, Fran! You were a key player here.

Constance G. Genter
Attorney-Advisor, Advice and Counsel Branch
Departmental Ethics Office | Office of the Solicitor
U.S. Department of the Interior | Phoenix Field Office
(O) (602) 364-7890
Email: constance.genter@sol.doi.gov

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

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From: Blasing, Francesca M <fblasing@blm.gov>
Sent: Thursday, October 7, 2021 8:38 AM
To: Culver, Nada L <nculver@blm.gov>; Genter, Constance G <constance.genter@sol.doi.gov>
Cc: Lawyer, Mark G <mlawyer@blm.gov>; Housen, Barbara E <barbara.housen@sol.doi.gov>; Garcia, Monica L <monica.garcia@sol.doi.gov>; Gottry, Heather C <heather.gottry@sol.doi.gov>
Subject: RE: Western Governors' Association (WGA) "Working Lands, Working Communities" Workshop (10/7) - Nada Culver

Constance, thank you for flagging this and moving it so quickly!

Regards,
Fran

*Fran Blasing
Executive Assistant
Office of the Director
Bureau of Land Management
970-256-4913 (desk)
970-697-7916 (mobile)*



From: Culver, Nada L <nculver@blm.gov>

Sent: Wednesday, October 6, 2021 4:47 PM

To: Genter, Constance G <constance.genter@sol.doi.gov>; Blasing, Francesca M <fblasing@blm.gov>

Cc: Lawyer, Mark G <mlawyer@blm.gov>; Housen, Barbara E <barbara.housen@sol.doi.gov>; Garcia, Monica L <monica.garcia@sol.doi.gov>; Gottry, Heather C <heather.gottry@sol.doi.gov>

Subject: RE: Western Governors' Association (WGA) "Working Lands, Working Communities" Workshop (10/7) - Nada Culver

Thank you, Constance, for the quick turnaround on this unexpected matter. I'm very grateful to you and Fran for working on this so quickly.

Nada Wolff Culver
Deputy Director, Policy and Programs
Bureau of Land Management
nculver@blm.gov
202-255-6979

From: Genter, Constance G <constance.genter@sol.doi.gov>

Sent: Wednesday, October 6, 2021 4:42 PM

To: Blasing, Francesca M <fblasing@blm.gov>

Cc: Lawyer, Mark G <mlawyer@blm.gov>; Housen, Barbara E <barbara.housen@sol.doi.gov>; Garcia, Monica L <monica.garcia@sol.doi.gov>; Gottry, Heather C <heather.gottry@sol.doi.gov>; Culver, Nada L <nculver@blm.gov>

Subject: Western Governors' Association (WGA) "Working Lands, Working Communities" Workshop (10/7) - Nada Culver

Fran,

After reviewing information provided to the Departmental Ethics Office (DEO), **subject to the cautionary guidance in the "Financial Disclosure Report Review" section and consistent with a consideration of the "catch all provision" by Ms. Culver as discussed below**, we have identified no legal objection under the ethics statutes and regulations, or the Administration's Ethics Pledge (Ethics Pledge), to Nada Culver, Deputy Director for Policy & Program, exercising the delegated authority of the Director of the Bureau of Land Management (BLM), attending and participating at the Western Governors' Association (WGA) "Working Lands, Working Communities" Workshop (Workshop), to be held in Denver, Colorado on October 7-8, 2021.

It is our understanding that Ms. Culver's attendance and participation at the Workshop will be in

her official capacity, and that she will present information at this event on behalf of the Department of the Interior (DOI) and the U.S. Government. In particular, it is our understanding that Ms. Culver's attendance and participation at the Workshop will be limited to a panel discussion on October 7, 2021, for approximately one hour addressing collaborative conservation with co-panelists Brad Crowell, Director, Nevada Department of Conservation and Natural Resources; Jonathan Asher, Senior Policy Advisor, Office of Governor Jared Polis; Sarah Greenberger, Associate Deputy Secretary, DOI; and Clint Evans, Colorado State Conservationist, Natural Resources Conservation Service, U.S. Department of Agriculture.

WGA is a non-partisan organization of the governors of the 22 States considered to be part of the Western region of the United States. WGA addresses important policy and governance issues in the West, advances the role of the Western states in the federal system, and strengthens the social and economic fabric of the region. According to the House of Representatives' and Senate databases, WGA currently is not identified as a registered lobbying organization.

The Workshop is one in a series conducted under Idaho Governor Brad Little's "Working Lands, Working Communities" initiative. This Workshop will examine the interdependent relationships between western communities and state and federal land and resource management entities, as well as the role that local communities play in successful land planning and management processes. Topics to be presented and discussed at the Workshop include post-fire restoration needs, community collaboration, and forest management infrastructure, among others. It is our understanding that WGA expects approximately 50 attendees and 32 speakers at this event, which is open to the public via livestream.

It is our understanding that WGA is not charging attendees a registration fee for this event and is offering all attendees (1) lunch and an evening reception on October 7; and (2) breakfast on October 8. It is our further understanding that Ms. Culver is only attending the Workshop on October 7 and that she will not partake of the lunch or reception that date. As such, no ethics form is required. If the scope of Ms. Culver's attendance and/or participation at this event changes, or if any non-Federal source offers her anything of monetary value in connection with this event (for example, any meal, a social event or a gift for her remarks), please contact us immediately so we may analyze further.

Official Capacity Attendance/Participation: Ms. Culver has reasonably determined that her attendance participation at the Workshop is part of her official duties and is an appropriate forum to present information on behalf of DOI and the Government. We understand Ms. Culver, with Ms. Greenberger, will provide remarks in a panel discussion regarding opportunities for state and federal collaboration on conservation activities, including efforts to improve habitat for western species. The nexus between the DOI mission and the aforementioned topics of discussion allows this to be categorized as an official speaking engagement for Ms. Culver.

Hatch Act Review: We note that the Honorable Jared Polis, Governor of Colorado State, will be speaking at the Workshop on October 7, 2021," and we have confirmed, based on our review of publicly-available information, that he is not a current candidate for partisan political office. Ms. Culver's participation at an official event with elected officials who are not a current candidate does

not typically raise Hatch Act concerns unless the nature of the verbal remarks and speech constitute partisan political activity.

As a reminder, Ms. Culver is prohibited by the Hatch Act from participating in partisan political activity during these events. Partisan political activity is any activity directed toward the success or failure of a political party, candidate for a partisan political office, or partisan political group and can include verbal remarks and speech. While conducting official business for the Department, Ms. Culver should avoid references to any candidacy or remarks directed towards the success or failure of a political party, candidate for partisan political office, or partisan political group.

Financial Disclosure Report Review: Review of Ms. Culver's New Entrant Public Financial Disclosure Report (OGE Form 278e), Periodic Transaction Reports (OGE Forms 278-T), and Ethics Recusal & Screening Arrangement dated September 3, 2021, did not reveal any information that would prevent her from attending and participating in the events taken place on September 18, 2021, under 18 U.S.C. § 208, 5 C.F.R. § 2635.502, or the Ethics Pledge, **subject to the cautionary guidance below.**

Catch All Provision: As described, we believe this event will involve discussions of particular matters of general applicability. The agenda for this event reflects that representatives of the National Audubon Society, Ms. Culver's former employer and with whom she has a "covered relationship" under the impartiality regulations, will be in attendance at this event. As such, we recommend that Ms. Culver consider the "catch all provision" prior to participating in the Workshop. Under the "catch all provision," Ms. Culver is asked to consider whether circumstances other than those specifically described in 5 C.F.R. § 2635.502(a) would raise a question regarding her impartiality in performing her official duties. In making this determination, she should consider the relevant facts about the particular matter in question and determine whether she believes that a reasonable person with knowledge of those facts would question her impartiality in performing her official duties in the particular matter. If she personally determines that the circumstances would not cause a reasonable person with knowledge of the relevant facts to question her impartiality in the matter, then she may participate in the particular matter as part of her official duties.

Ethics Pledge: Ms. Culver is covered by the revolving door ban in the Ethics Pledge stating that she will not, for a period of two years from the date of her appointment, participate in any particular matter involving specific parties that is directly and substantially related to her former employer or former clients, as defined in the Ethics Pledge, including regulations and contracts. Executive Order 13989, Sec. 1(2). This particular restriction also prohibits Ms. Culver from participating in communications or meetings with her former employers and/or former clients, as defined by the Ethics Pledge, relating to the performance of her official duties **unless** her communications (1) concern matters of general applicability or broad policy matters that do not constitute particular matters **and** (2) her communications are made at a meeting or other event at which at least 5 or more separate stakeholders are in attendance. See OGE Legal Advisories LA-21-03 and DO-09-011. The agenda for this event reflects that two representatives of the National Audubon Society, Ms. Culver's former employer, are scheduled to present information at the Workshop on October 8. Accordingly, representatives of NAS will potentially be attendance at this event on October 7 as well. We have reviewed the agenda and confirmed that there will be at least 5 separate stakeholders in attendance. **So long as Ms. Culver's discussions at this event remain focused on matters of general applicability or broad policy matters, her participation at the Workshop does**

not implicate any restriction under the Ethics Pledge. However, we remind Ms. Culver to be cautious and not engage in any discussion or questions regarding any specific party matters, such as agreements, leases, permits, litigation, contracts, etc. at the Workshop. We also recommend that Ms. Culver informs the organizers of the event and her co-panelists of this particular limitation in advance of her participation in order to help prevent an inadvertent violation of the Pledge requirements.

Lastly, we remind Ms. Culver of the following guidelines when attending and/or participating at events in an **official capacity**:

1. **Official Title** – Ms. Culver use of official title is permitted when attending events in an official capacity. 5 C.F.R. § 2635.702.
2. **Endorsement** – Ms. Culver may not use her official Government position or title or any authority associated with her public office to endorse any product, service, or enterprise, including non-profit and charitable organizations that may have some affiliation with DOI. 5 C.F.R. § 2635.702(c).
3. **Nonpublic Information** – Ms. Culver may not discuss at this event any nonpublic information she has gained by reason of her Federal position. 5 C.F.R. § 2635.703.
4. **Lobbyist Gift Ban** – Ms. Culver’s participation at this event in her official capacity does not violate the Biden Administration’s lobbyist gift ban under the circumstances presented. We nonetheless caution Ms. Culver and remind her not to accept any gifts from registered lobbyists and/or registered lobbying organizations.

Please let us know if you have any questions or concerns.

Thank you,

-Constance

Constance G. Genter
Attorney-Advisor, Advice and Counsel Branch
Departmental Ethics Office | Office of the Solicitor
U.S. Department of the Interior | Phoenix Field Office
(O) (602) 364-7890
Email: constance.genter@sol.doi.gov

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

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From: [Gottry, Heather C](#)
To: [Culver, Nada L](#); [Nedd, Michael D](#)
Cc: [Sharrow, Michelle P](#); [Garcia, Monica L](#); [Rofrano, Christian A](#); [Shin, Edwin H](#)
Subject: Result of OGE's Second Follow-Up Inspection of the BLM Ethics Program
Date: Thursday, September 30, 2021 8:48:40 AM
Attachments: [2021 BLM Second Follow Up Inspection Report 21-48IFpdf.pdf](#)

Nada and Mike – Hello! I wanted to share the attached 2021 Ethics Program Review Follow-Up Report completed by the U.S. Office of Government Ethics (OGE) on the Bureau of Land Management's ethics program with you. I am so pleased to highlight that all open recommendations have been successfully closed.

As background, OGE completed a review of the BLM ethics program and issued five recommendations in a June 2016 review report. OGE issues recommendations when they identify significant compliance and ethics program deficiencies, and conducts follow-up reviews to confirm that agencies have satisfactorily addressed any open recommendations.

Due to changes in the BLM ethics program, which involved significant structural and personnel changes, we twice requested that OGE postpone their initial follow-up inspection to allow time to implement needed improvements to address the open recommendations. OGE conducted its initial follow-up inspection of the BLM ethics program in May 2020, but only closed three of the five open recommendations. In June 2021, OGE conducted a second follow-up inspection and closed the remaining two open recommendations. Specifically, as reported on the attached, OGE found that 80% of new entrant financial disclosure reports are filed by the established deadline and 92% of new employees receive initial ethics training within the 90 day deadline.

These two open recommendations were closed by OGE thanks to both the continued support of the ethics program by BLM leadership and the good and hard work of the members of the BLM ethics team. While the DEO, Ed Shin, and the other members of the BLM ethics team will continue to work to improve compliance percentages, I hope that you will join me in congratulating the BLM ethics team on their excellent work to bring the BLM ethics program into compliance with OGE's requirements.

Please let me know if it would be helpful to set up a time for us to discuss either the attached or the BLM ethics program further. Thank you.

- Heather

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

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

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From: [Derting, Elizabeth K](#)
To: [Culver, Nada L](#)
Cc: [Garcia, Monica L](#)
Subject: Technical Revisions to Your New Entrant Financial Disclosure Report
Date: Thursday, May 6, 2021 3:19:40 PM
Attachments: [Culver, Nada - New Entrant Report \(Updated 05.06.21\).pdf](#)

Good afternoon, Nada,

Thanks again for taking the time to talk with us yesterday. As we discussed, I have made technical changes to your New Entrant Report, including the following:

- Adding your current position as BLM Deputy Director of Policy and Programs as your current position and moving the Senior Counselor to the Secretary to the section for Other Federal Government Positions Held During the Previous 12 Months;
- Adding the names of the mutual funds, stocks, and bonds included in your, your spouse's, and your jointly held assets;
- Changing the name of line item 2 in Section 6 from "Joint Account #1" to "Brokerage Account"; and
- Changing line item 4 in Section 6 from "Joint Account #3" to a mutual fund, ABALX, within the Brokerage Account listed in line item 3.

I have attached an updated copy of the report for your review. Please let me know if the updated information is accurate or if there are any other edits that we need to make, and don't hesitate to let us know if you have any questions. We will also look for another time to talk about the follow-up on your report.

Thank you,
Libby

Libby Derting
Attorney-Advisor
Departmental Ethics Office | Office of the Solicitor
U.S. Department of the Interior | MIB 5320
Email: elizabeth.derting@sol.doi.gov

Please note: I am teleworking until further notice. You can also reach me on MS Teams.

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From: [Gottry, Heather C](#)
To: [Culver, Nada L](#)
Cc: [Garcia, Monica L](#); [Sharrow, Michelle P](#); [Hammer, Christine A](#)
Subject: Thank You for Attending Initial Ethics Training!
Date: Wednesday, March 3, 2021 4:34:11 PM
Attachments: [2021 IET for Political Appointees \(Update 1 - 02.22.21\).pdf](#)
[Code of Ethics - 14 General Principles of Ethical Conduct.pdf](#)
[2021 List of Prohibited Financial Interests - DOI Office of the Secretary Office of the Solicitor.pdf](#)
[DEO Ethics Team Directory \(1.26.21\).pdf](#)

Nada - Hello again! Thank you all for attending our Initial Ethics Training session on Monday, March 1, 2021. As promised during the training, we are providing you with the following ethics materials for your reference:

- 2021 Initial Ethics Training for Political Appointees;
- Code of Ethics - 14 General Principles of Ethical Conduct;
- 2021 List of Prohibited Financial Interests; and
- DEO Ethics Team Directory.

We hope that the training provided a helpful overview of federal ethics rules and regulations on conflicts of interest, impartiality, the Ethics Pledge, gifts, misuse of position, and the Hatch Act. Please do not hesitate to reach out to us if we can be of any assistance on ethics matters. We are excited to be working with you. Thanks!

--Heather

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

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

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From: [Garcia, Monica L](#)
To: [Culver, Nada L](#)
Cc: [Gottry, Heather C](#)
Subject: Updated Ethics Guidance Memo & Recusal for Review and Signature
Date: Tuesday, July 27, 2021 1:17:45 PM
Attachments: [Culver Nada - Ethics Guidance on Recusals Memorandum \(07.27.21\).pdf](#)
[Culver, Nada - Recusal and Screening Agreement \(7.27.21\).pdf](#)
[Culver, Nada - Recusal and Screening Agreement \(7.27.21\).docx](#)

Nada – Hello! As promised during our last conversation, attached please find a signed Updated Interim Ethics Recusals & Screening Arrangement memorandum and attachments.

We also have attached your Recusals and Screening document for your review and signature (as well as a word version for reference). Per our discussion, you have elected to self-screen and refer issues to Danna Jackson for action or assignment if you are recused from participation in any given matter. As you will see, we kept Larry Roberts and Laura Daniel-Davis as individuals who receive copy of the memo.

If you are comfortable with the draft provided, please sign (either digitally or in ink) and return to us for our records. Finally, we have confirmed that we transmitted your CD request to OGE on the 15th and have answered follow up questions from your OGE reviewer using information from our records. We will let you know as soon as possible if there are any updates to that request.

Please let us know if it would be helpful for us to discuss. Many thanks!

- Monica

Please note: I will be teleworking until further notice

Monica L. Garcia
Deputy Director for Ethics Law & Policy
and Alternate Designated Agency Ethics Official
Departmental Ethics Office | Office of the Solicitor
U.S. Department of the Interior | MIB 5316
(O): (202) 208-0460
(C): (202) 880-4474
Email: monica.garcia@sol.doi.gov

Visit us online at www.doi.gov/ethics

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From: [Garcia, Monica L](#)
To: [Culver, Nada L](#)
Cc: [Gottry, Heather C](#)
Subject: Updated Ethics Recusal Materials
Date: Friday, September 3, 2021 8:44:20 AM
Attachments: [Culver Nada - Updated Ethics Recusal Guidance Memorandum & Attachments \(9.3.21\).pdf](#)
[Culver, Nada - Recusal and Screening Agreement \(9.3.21\).pdf](#)
[Culver, Nada - Quick Recusal Chart Attachment C \(9.3.21\).pdf](#)

Nada – Good morning! As promised, I have attached your updated Ethics Recusal Guidance Memorandum reflecting the prohibited stock and bond sales.

We defer to your preference on whether you'd like to re-sign your Recusal and Screening Arrangement document or circulate the updated Quick Recusal Chart Attachment. For ease of dealing with the logistics of re-signing, I have attached a copy of the Recusal and Screening Arrangement with today's date (and the updated chart) if you'd like to re-sign in addition to the updated Quick Recusal Chart if you'd prefer to simply circulate that document.

Please let us know your preference. If you elect to re-sign, please provide us with a copy of the Recusal and Screening Arrangement for our files.

Thanks so much,

-Monica

Please note: I will be teleworking until further notice

Monica L. Garcia
Deputy Director for Ethics Law & Policy
and Alternate Designated Agency Ethics Official
Departmental Ethics Office | Office of the Solicitor
U.S. Department of the Interior | MIB 5316
(O): (202) 208-0460
(C): (202) 880-4474
Email: monica.garcia@sol.doi.gov

Visit us online at www.doi.gov/ethics

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From: [Gottry, Heather C](#)
To: [Culver, Nada L](#)
Cc: [Garcia, Monica L](#)
Subject: Updated Interim Ethics Guidance and Draft Recusal/Screening Arrangement
Date: Monday, June 21, 2021 10:34:34 AM
Attachments: [Culver Nada - Ethics Recusal Guidance Memorandum \(Draft for Review 06.21.21\).docx](#)
[Attachment A - Ethics Recusal Guidance Memorandum.pdf](#)
[Culver, Nada - Attachment B.pdf](#)
[Culver, Nada - Recusal Attachment C - Quick Guide Recusal Chart \(Draft for Review 6.19.21\).docx](#)
[Culver, Nada - Attachment D Ethics Pledge.pdf](#)

Nada – Hello! Now that we have completed our review of your New Entrant OGE Form 278e and recusal obligations, we are ready to issue updated interim ethics guidance. Please note that your guidance remains interim pending completion of required divestitures. For your review and discussion, please see the attached materials that will serve to document your ethics obligations, including your recusals:

- A draft memorandum from the DEO providing Updated Interim Ethics Guidance on Recusal Obligations, describing your ethics obligations, including those implemented through the Biden Administration’s Ethics Pledge (and the below attachments)
 - *Attachment A* – Guidance for Recusal Analysis
 - *Attachment B* – 2021 Department of the Interior and 2021 Bureau of Land Management List of Prohibited Investments
 - *Attachment C* – List of Recusals and Quick Reference Chart (this document summarizes your identified recusals, scope of the recusals, and applicable time periods)
 - *Attachment D* – Ethics Pledge (signed March 1, 2021)
- A draft Ethics Recusals & Screening Arrangement, a document for your signature which includes two potential options for a step-by-step process for implementing your recusal obligations through a screening arrangement. We have drafted this document with two potential options, either that you select a screener to assist with your recusal obligations and avoid any inadvertent participation in a matter which would otherwise require your recusal or you can elect to self-screen. We are happy to discuss the pros/cons of either approach and assist you in determining the best path forward. Please note that the attachment referenced in the document will be the same as Attachment C to the Ethics Guidance on Recusal Obligations.

I am happy to schedule a time to walk you through the attached documents to ensure that the facts are complete and correct and to discuss any questions. Please let me know your availability. Thank you and have a great evening!

- Heather

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

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

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From: [Gottry, Heather C](#)
To: [Culver, Nada L](#)
Cc: [Garcia, Monica L](#); [Hammer, Christine A](#)
Subject: Welcome and Next Ethics Steps
Date: Tuesday, March 2, 2021 7:35:33 AM

Nada – Hello again and welcome to the Department of the Interior! We are looking forward to working with you. As part of your onboarding process, there are several important steps you will need to take in order to fulfill your ethics obligations. For your convenience, these next steps are summarized below:

- **Ethics Pledge:** On his first day in office, President Biden issued Executive Order 13989, [Ethics Commitments by Executive Branch Personnel](#). This Executive Order requires all appointees in each executive agency appointed on or after January 20, 2021, to sign an **Ethics Pledge**. An ethics official sent you a message yesterday with a copy of the Ethics Pledge with instructions on signing and returning. If you have not already done so, **please sign and return the Ethics Pledge to us at your earliest convenience but by no later than COB today March 2, 2021.**
- **Financial Disclosure Reporting:** In the next few days, you will receive an email from the *Integrity* system notifying you that you have been assigned a New Entrant OGE Form 278e, Public Financial Disclosure Report. A member of the Departmental Ethics Office will also reach out to schedule a time to complete an initial financial disclosure interview and to make sure that you can access and use the *Integrity* system. Your New Entrant OGE Form 278e is due on or before **Wednesday, March 31, 2021**, 30 days after your date of appointment.
- **Interim Guidance on Recusals:** Even while you are working on completing your New Entrant OGE Form 278e, we will issue you interim guidance on your recusals or disqualifications from certain work at the Department. We will provide you with a draft Interim Recusal document and meet with you to discuss any additional circumstances and provide guidance on how to manage your recusal obligations. In the meantime, if your former employer or former client requests a meeting or has a contract, license, permit, litigation, or other matter that you are asked to review, then please reach out for ethics guidance before accepting the meeting or participating in the matter.
- **Final Guidance on Recusals:** Once your New Entrant OGE Form 278e is completed, reviewed, and certified, we will provide you with cautionary guidance, a recusal memorandum for you to sign, or a recusal and screening arrangement for you to sign and implement. We can assist you with any questions you might have regarding managing and implementing your recusals going forward.
- **General Ethics Reminders:**
 - **Financial Conflicts of Interest:** Under 18 U.S.C. § 208(a), you may not participate personally and substantially in any particular matter in which you know that you have a financial interest directly and predictably affected by the matter, or in which you know that a person whose interests are imputed to you has a financial interest directly and predictably affected by the matter, unless you first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2).

The interests of the following persons are imputed to you: any spouse or minor child; any general partner of a partnership in which you are a limited or general partner; any organization in which you serve as officer, director, trustee,

general partner or employee; and any person or organization with which you are negotiating or have an arrangement concerning prospective employment.

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

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

- **Biden Administration Ethics Pledge:** By signing the **Ethics Pledge**, you are committing to:
 - Not accepting any salary or other cash payment from a former employer to the extent that the eligibility for and payment of such payment is limited to individuals accepting a position in the U.S. Government;
 - For two (2) years, not participating in any particular matter involving specific parties (including meetings or other communication) that is directly and substantially related to your former employer(s) or former client(s) within two years prior to the date of your appointment, including regulations and contracts;
 - Not accepting gifts from registered lobbyists or lobbying organizations for the duration of your service as an appointee;
 - Making hiring or other employment decisions based on the candidate’s qualifications, competence, and experience;
 - Additional restrictions if you were a lobbyist registered under the Lobbying Disclosure Act (LDA) or the Foreign Agents Registration Act (FARA) within the two years prior to your date of appointment; and
 - Additional post-employment restrictions for certain employees.

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

- Heather

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

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From: [Gottry, Heather C](#)
To: [Wallace, Andrew G](#)
Cc: [Garcia, Monica L](#)
Subject: Westerman/Gosar Request re Culver
Date: Wednesday, June 16, 2021 9:24:19 PM

Drew – Hello! I am hoping to have a draft response to share on the original request regarding Klein tomorrow, but was hoping we could touch base on this new request [document_gw_02.pdf](#) ([eenews.net](#)). Do you have any availability? Many thanks.

- Heather

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

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

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From: [Lee, Eric S](#)
To: [Lee, Eric S](#)
Subject: Fw: Outside teaching/speaking: University of Wyoming College of Law
Date: Friday, April 29, 2022 11:36:42 AM
Attachments: [Attachment- Outside Activities List of Statutes and Regulations - Career Employees - 2019-06-04 final \(1\).pdf](#)

From: Lee, Eric S
Sent: Wednesday, March 3, 2021 4:21 PM
To: Culver, Nada L <nada_culver@ios.doi.gov>
Cc: Nada Culver <nadawolffculver@gmail.com>; Schasberger, Paula I <paula.schasberger@sol.doi.gov>; Garcia, Monica L <monica.garcia@sol.doi.gov>; Gottry, Heather C <heather.gottry@sol.doi.gov>
Subject: Outside teaching/speaking: University of Wyoming College of Law

Nada,

We have determined that there is no legal objection under the ethics statutes and regulations, or the Administration's Ethics Pledge (Pledge) to you teaching a one-time class at the University of Wyoming College of Law on March 8, 2021.

Based on the information provided, we understand that you will be teaching a class at the University of Wyoming College of Law on BLM's conservation process of the sage-grouse. You were invited to speak at the University of Wyoming College of Law before you joined the Department of the Interior due to your professional expertise, and not because of your official government position. This lecture will be delivered in your personal capacity and you will not be compensated for this lecture.

The University of Wyoming (the law school is a college within the university) is a prohibited source under 5 C.F.R. § 3501.105 as a search on USASpending.gov indicates that there is a history of financial agreements (contracts, grants, etc.) between DOI and the University of Wyoming as recent as 2020.

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

While there are no legal objections to your unpaid outside teaching/speaking activity, please be advised of the following restrictions:

Nonpublic Information: You may not use or improperly disclose nonpublic information (e.g., matters in litigation) or otherwise protected information acquired as part of your official duties

which is not generally available to the public. 18 U.S.C. § 1905; 5 C.F.R. § 2635.703; 41 U.S.C. § 2102.

Reference to Official Position: You may not use or permit the use of your official title or position to identify you in connection with your outside activity. However, as you will be engaged in teaching/speaking as an outside activity, you may include or permit the inclusion of your title or position as one of several biographical details when such information is given no more prominence than other significant biographical details. 5 C.F.R. § 2635.807(b)(1)-(2).

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

Gifts from a Prohibited Source: Because the University of Wyoming is a prohibited source, please contact our office if you are offered a gift from the University of Wyoming College of Law for further ethics guidance and review. 5 C.F.R. §§ 2635.202, 2635.204.

No Use of Official Time or Government Property: While engaging in outside activities, Federal employees are not permitted to use official time or Government property. 5 C.F.R. §§ 2635.101(b)(9), 704, and 705.

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

I have attached a summary of the statutes and regulations addressing outside activities as a reference. Please feel free to call or email me if you have any other questions or concerns.

Thanks,
Eric

Eric S. Lee
Attorney Advisor | Advice and Counsel Branch
Departmental Ethics Office | Office of the Solicitor
U.S. Department of the Interior
E-mail: eric.lee@sol.doi.gov

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Selected Ethics Regulations and Statutes Related to Outside Employment/Activities **- Career Employees**

18 USC § 203, a criminal statute, prohibits you from receiving any compensation for representing others in relation to any proceeding, application, request for a ruling or other determination, contract, claim, controversy, charge, accusation, arrest, or other particular matter in which the United States is a party or has a direct and substantial interest, before any department, agency, court, court-martial, officer, or any civil, military, or naval commission.

The statute also prohibits you from sharing in compensation for representational services rendered by another. For example, you may not share in a consulting fee earned by someone else for representing a third party before a Federal agency in connection with a particular matter in which the United States is a party or has a direct and substantial interest.

Representing includes things such as applying for Federal grants, calling Federal agencies on their behalf, signing letters to Federal agencies for them, and even sitting in a meeting silently on their behalf with a Federal agency.

18 USC § 205, a criminal statute, prohibits you from:

- Acting as an agent or attorney (compensated or not) for prosecuting any claim against the United States, or receiving any gratuity, or any share of or interest in any such claim, in consideration of assistance in the prosecution of such claim, or

Acting as an agent or attorney (compensated or not) for anyone before any department, agency, court, court-martial, officer, or civil, military or naval commission in connection with any covered matter in which the United States is a party or has a direct and substantial interest.

Prohibited activities include things such as applying for Federal grants, calling Federal agencies on their behalf, signing letters to Federal agencies for them, and even sitting in a meeting silently on their behalf with a Federal agency.

18 USC § 208, a criminal statute, prohibits you from participating personally and substantially, in an official capacity, in any “particular matter” that would have a direct and predictable effect on your own financial interests or on the financial interests of:

- your spouse or minor child;
- a general partner of a partnership in which you are a limited or general partner;

- an organization in which you serve (compensated or uncompensated) as an officer, director, trustee, general partner, or employee; or
- a person with whom you are negotiating for or have an arrangement concerning prospective employment.

5 CFR 2635.402 and 5 CFR Part 2640 implement this statutory prohibition.

18 USC § 209, a criminal statute, prohibits you from receiving any salary or supplementation of salary from any person other than the Government, as compensation for services as a Government employee. Doesn't apply to special Government employees.

5 CFR § 2635.502 (the Impartiality Regulation) prohibits you from taking an official action in a particular matter when the circumstances would cause a reasonable person with knowledge of the relevant facts to question your impartiality in the matter, to include matters in which the entity with which you are engaged in this outside activity is or represents a party.

5 CFR Part 2635, Subpart F - Seeking Other Employment - prohibits you from participating in your official capacity in particular matters that have a direct and predictable effect on the financial interests of persons with whom you are “seeking employment” or with whom you have an arrangement concerning future employment. “Employment” means any form of non-Federal employment or business relationship involving the provision of personal services by you, whether compensated or uncompensated and whether to be undertaken at the same time as or subsequent to Federal employment. It includes but is not limited to personal services as an officer, director, employee, agent, attorney, consultant, contractor, general partner, or trustee.

5 CFR § 2635.702 prohibits you from using your Government position, title, or any authority associated with your public office to endorse another (e.g., the entity with which you are engaged), to induce or coerce another person to provide any benefit to another, or in a manner that could reasonably be construed to imply that DOI or the Government sanctions or endorses another.

5 CFR § 2635.703 prohibits you from using, or allowing the use of, nonpublic information to further your interests or those of another (e.g., the entity with which you are engaged).

5 CFR § 2635.704 prohibits you from using Government property for other than official purposes. DOI's limited personal use policy for Government office equipment does not permit the use of such equipment for commercial gain activities.

5 CFR § 2635.705 prohibits you from using official time (your own or a subordinate's) for other than official purposes.

5 CFR § 2635.802 prohibits you from engaging in outside activities that conflict with your official duties. An activity conflicts with your official duties:

- If it is prohibited by statute or by an agency supplemental regulation; or
- If, under the standards set forth in 5 CFR §§ 2635.402 (implementing 18 USC § 208) and 2635.502 (the Impartiality Regulation), it would require your disqualification from matters so central to your official duties that your ability to perform the duties of your position would be materially impaired.

5 C.F.R. § 2635.805 prohibits an executive branch employee from serving as an expert witness, for anyone except the United States, in a proceeding before a Federal court or agency in which the United States is a party or has a direct and substantial interest, unless the employee's participation is authorized by the Designated Agency Ethics Official (DAEO). Section 2635.805 does not prohibit an employee from serving as a fact witness when subpoenaed by an appropriate authority or as an expert witness when doing so under the Department's "Touhy" regulations. This section applies differently to special Government employees.

5 CFR § 2635.807 prohibits you from accepting compensation for outside teaching, speaking, or writing that relates to your official duties. For the purposes of 5 CFR § 2635.807, an employee's agency is determined by 5 CFR § 3501.102.¹

5 CFR § 2635.808 provides that, when fundraising in your personal capacity, you may not use or permit the use of your official title to further a fundraising effort, nor

¹ Note that your "agency" for the purposes of 5 CFR §§ 2635.807, 2635.808, and 3501.105 is determined by 5 CFR § 3501.102, which breaks the Department into separate components as follows:

- BIA/BIE
- BLM
- BOR
- BOEM
- BSEE
- NIGC
- NPS
- OSMRE
- OST
- USFWS
- USGS
- Remainder of the Department

If you are in a named component, the named component is your agency for the purposes of 5 CFR §§ 2635.807, 2635.808, and 3501.105.

If you are not in a named component but are, rather, in the "Remainder of the Department," then the entire Department is your agency for the purposes of 5 CFR §§ 2635.807, 2635.808, and 3501.105.

solicit funds from a subordinate or from a person whom you know to be a prohibited source. "Prohibited source" means any person or entity that:

- (1) Is seeking official action by your agency;
- (2) Does business or seeks to do business with your agency;
- (3) Conducts activities regulated by your agency;
- (4) Has interests that may be substantially affected by performance or nonperformance of your official duties; or
- (5) Is an organization a majority of whose members are described in paragraphs (1) through (4) above.

See footnote 1 regarding the definition of your agency for the purposes of determining prohibited sources.

5 CFR § 2635.101(b)(14) provides that employees must endeavor to avoid any actions creating the appearance that they are violating the ethics laws or regulations.

5 CFR § 3501.105 requires that all DOI employees, other than an employee of USGS or a special Government employee, obtain written approval from his or her ethics official before engaging in outside employment with a prohibited source. USGS employees, other than special Government employees, must obtain written approval from the USGS Deputy Ethics Counselor before engaging in any outside employment. Employment means any form of non-Federal business relationship involving the provision of personal services by the employee, with or without compensation. See footnote 1 regarding the definition of your agency for the purposes of determining prohibited sources.

The Hatch Act (See 5 CFR Parts 733 and 734) limits certain political activities of Federal employees to ensure that Federal programs are administered in a nonpartisan fashion, to protect Federal employees from political coercion in the workplace, and to ensure that Federal employees are advanced based on merit and not based on political affiliation. Political activity means an activity directed toward the success or failure of a political party, candidate for partisan political office, or partisan political group.

For example, under the Hatch Act, you may not:

- Use your official authority or influence to interfere with or affect the result of an election.
- Solicit, accept or receive a donation or contribution for a partisan political party, candidate for partisan political office, or partisan political group.
- Be a candidate for public office in partisan political elections.

- Knowingly solicit or discourage the participation in any political activity of anyone who has business pending before the Department.
- Engage in political activity while on duty, in any Federal room or building, while wearing a uniform or official insignia, or while using any Federally-owned or -leased vehicle. (This bullet does not apply to PAS appointees.)

From: [Rofrano, Christian A](#)
To: [Gottry, Heather C](#); [Garcia, Monica L](#); [Sharrow, Michelle P](#); [McDonnell, Edward F](#)
Subject: FW: [EXTERNAL] Alaska senator seeks ethics reviews of Interior officials
Date: Friday, December 10, 2021 3:37:48 PM

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chris

From: politicoemail@politicopro.com <alert@email.politicopro.com>
Sent: Friday, December 10, 2021 3:36 PM
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GREENWIRE

Alaska senator seeks ethics reviews of Interior officials

By Heather Richards with

12/10/2021 01:16 PM EST

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He said, “These actions raise dire conflicts of interest and questions as to these appointees’ impartiality.”

Nada Culver, for example, serves as deputy director of policy and programs at the Bureau of

Land Management. She previously worked at the Audubon Society as public lands and senior policy counsel.

Audubon raised opposition to the ANWR oil program and the expansion of oil drilling opportunities in the National Petroleum Reserve of Alaska, among other policies. Both decisions from the Trump era are now under review by the Biden administration.

Sullivan also asked for a review of Natalie Landreth, deputy solicitor for lands at Interior, who previously worked with the Native American Rights Fund, and solicitor Robert Anderson, who was an attorney at the Native American Rights Fund.

The senator said Laura Daniel-Davis, deputy assistant secretary for land and mineral management at DOI, should be investigated as well. Daniel-Davis was previously chief of policy and advocacy at the National Wildlife Federation.

Sullivan said energy projects that could be affected include the ConocoPhillips Willow oil project, the management plan for the National Petroleum Reserve of Alaska, the Ambler Road project and ANWR.

A spokesperson for Interior declined to comment on Sullivan's letter.

This is the second time Interior has been asked to review Culver's involvement in Alaska decisions.

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In addition to the request for an ethics investigation, Sullivan asked for the officials' ethics pledges, any waivers they've obtained and their lists of recusals.

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To view online:

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USA

From: [McDonnell, Edward F](#)
To: [Rofrano, Christian A](#)
Subject: RE: [EXTERNAL] Alaska senator seeks ethics reviews of Interior officials
Date: Friday, December 10, 2021 4:45:00 PM

Thank you

Ed McDonnell
Senior Ethics Advisor
Departmental Ethics Office | Office of the Solicitor
U.S. Department of the Interior | MIB 5313
(O) (202) 208-5916
(C) (202) 510-8427
edward.mcdonnell@sol.doi.gov

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Sent: Friday, December 10, 2021 4:45 PM
To: McDonnell, Edward F <Edward.McDonnell@sol.doi.gov>
Subject: RE: [EXTERNAL] Alaska senator seeks ethics reviews of Interior officials

You as well.

From: McDonnell, Edward F <Edward.McDonnell@sol.doi.gov>
Sent: Friday, December 10, 2021 4:32 PM
To: Rofrano, Christian A <christian.rofrano@sol.doi.gov>
Subject: RE: [EXTERNAL] Alaska senator seeks ethics reviews of Interior officials

Thanks very much, Chris. I did see that.

I hope you have a great weekend!

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He said, “These actions raise dire conflicts of interest and questions as to these appointees’ impartiality.”

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Audubon raised opposition to the ANWR oil program and the expansion of oil drilling opportunities in the National Petroleum Reserve of Alaska, among other policies. Both decisions from the Trump era are now under review by the Biden administration.

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The senator said Laura Daniel-Davis, deputy assistant secretary for land and mineral management at DOI, should be investigated as well. Daniel-Davis was previously chief of policy and advocacy at the National Wildlife Federation.

Sullivan said energy projects that could be affected include the ConocoPhillips Willow oil project, the management plan for the National Petroleum Reserve of Alaska, the Ambler Road project and ANWR.

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Senior Ethics Advisor
Departmental Ethics Office | Office of the Solicitor
U.S. Department of the Interior | MIB 5313
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Sullivan said energy projects that could be affected include the ConocoPhillips Willow oil project, the management plan for the National Petroleum Reserve of Alaska, the Ambler Road project and ANWR.

A spokesperson for Interior declined to comment on Sullivan's letter.

This is the second time Interior has been asked to review Culver's involvement in Alaska decisions.

The Office of Inspector General began a probe on Culver's involvement in the decision to pause several Alaska public lands orders this summer, when she was acting head of BLM, after a request from the group Protect the Public's Trust ([Greenwire](#), Sept. 2).

In addition to the request for an ethics investigation, Sullivan asked for the officials' ethics pledges, any waivers they've obtained and their lists of recusals.

He requested records of communications, including personal mobile phone messages and Microsoft Teams chats, regarding issues like reviewing the National Petroleum Reserve of Alaska's management plan.

The Republican also asked for all internal communication the four officials have had with their former employers since their appointments in the Biden administration.

To view online:

<https://subscriber.politicopro.com/article/eenews/2021/12/10/alaska-senator-seeks-ethics-reviews-of-interior-officials-284181>

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This email was sent to christian.rofrano@sol.doi.gov by:

POLITICO, LLC

1000 Wilson Blvd.

Arlington, VA 22209

USA

United States Senate

December 8, 2021

The Honorable Mark Lee Greenblatt
Inspector General
US Department of the Interior
1849 C Street NW – MS 4428
Washington, D.C. 20240

Inspector General Greenblatt:

I write to express my deep concern and to request relevant materials related to several Department of Interior (DOI) appointees that are utilizing their government positions to work on matters directly and substantially related to their previous clients or employers to the benefit of these entities. These actions raise dire conflicts of interest and questions as to these appointees' impartiality under Executive Order 13989 and related United States ethics laws. These individuals have made key decisions to overturn, review, and delay resource development projects and land management plans in Alaska that they and their former employers or clients were actively opposing prior to their appointments. I ask that you supply all relevant information requested below so we may have a full understanding of these appointees' apparent and likely conflicts of interest. I further ask that your office consider opening an ethics investigation into the work of these appointees, as required by law.

Executive Order 13989 requires all appointees to sign a pledge to “not for a period of 2 years from the date of [their] appointment participate in any particular matter involving specific parties that is directly and substantially related to [their] former employer or former clients, including regulations and contracts.”¹ Beyond the E.O., 5 CFR § 2635.502(a)(2) requires appointees to consult with ethics officials and receive approval prior to participating personally and substantially in a matter where a reasonable person with knowledge of the relevant facts would question their impartiality. It has come to my attention that such apparent conflicts of interest certainly exist for the political appointees discussed below and to the best of my knowledge, none have received the requisite approval as required by federal law and regulation.

Ms. Nada Culver currently serves as the Deputy Director of Policy and Programs at the Bureau of Land Management. Prior to her appointment, she worked as Vice President, Public Lands and Senior Policy Counsel at the National Audubon Society and served as the Senior Counsel and Senior Director of Policy and Planning at the Wilderness Society. The Audubon Society was engaged in petitions and lawsuits to halt five Public Land Orders affecting Alaska signed by the Secretary of Interior under the last administration, challenges to the National Petroleum Reserve Alaska (NPR-A) 2020 Integrated Activity Plan (IAP), Environmental Impact Statement (EIS) on the Willow project, challenges to the Arctic National Wildlife Refuge oil and gas leasing program, and the Ambler Road project. It has come to my attention that Ms. Culver has been personally and substantially involved in decisions at the DOI related to delaying PLOs, announcing reviews of the IAP, the Ambler Road project, and the 1002 Area

¹ Executive Order 13989, 86 Fed. Reg. 7029 <https://www.federalregister.gov/documents/2021/01/25/2021-01762/ethics-commitments-by-executive-branch-personnel>

leasing program. Ms. Culver's impartiality on these matters is plainly questionable, and again her involvement on these issues likely violates ethics laws and regulations.

Prior to her appointment, Ms. Natalie Landreth, presently Deputy Solicitor for Lands, worked for the Native American Rights Fund (NARF). In this position Ms. Landreth counseled and represented NARF in comments and petitions on various projects and management plans under consideration by DOI, including the EIS for the oil and gas leasing program in the 1002 Area and the Willow project. In addition, she counseled an Alaska Tribal organization as they sought to prevent the development of the Ambler Road project, which the Department of Justice, at DOI's behest, moved to stay for further review of the project, in line with petitions from this same organization. NARF's aggressive opposition towards, and request for further review of, a multitude of development projects now currently being reviewed by the DOI raises serious concerns now that their former staff attorney, Ms. Landreth, is a part of the team conducting those very reviews. Since her appointment, it has come to my attention that Ms. Landreth has been directly and substantially involved in the DOI's decisions concerning these projects, advancing NARF's agenda without approval from ethics officials.

Prior to her appointment as Deputy Assistant Secretary for Land and Mineral Management, Ms. Laura Daniel Davis worked for the National Wildlife Federation (NWF). As Chief of Policy and Advocacy, Ms. Davis oversaw NWF's campaign to reverse the 1002 Area lease sale order included in the 2017 Tax Cuts and Jobs Act. NWF also pursued a strategic campaign to invalidate the painstaking work of the DOI on the NPR-A 2020 IAP. Now in a position of public trust, Ms. Davis has advanced her former employer's goals—recalling and reviewing the IAP. Any reasonable person would at the very least perceive a conflict of interest if not outright malfeasance in Ms. Davis's role in invalidating the finalized 2020 IAP as her former employer has advocated for, especially in the absence of an ethics approval.

Finally, Mr. Robert L. Anderson, formerly Principal Deputy Solicitor for the Department of Interior, and now Solicitor of the Department of the Interior, was previously the director of the Native American Law Center at the University of Washington School of Law and a staff attorney for NARF. Mr. Anderson was instrumental in establishing the NARF Anchorage Office that now consistently opposes and challenges any and all resource development in Alaska. Mr. Anderson himself has authored a number of articles detailing his personal disdain for the Alaska Native Claims Settlement Act (ANCSA) and natural resource development. After consistently denouncing the DOI in its handling of tribal and Alaska Native issues, Mr. Anderson has now been appointed as the DOI's chief advocate. The DOI has numerous responsibilities under ANCSA and oversees resource development in much of Alaska. Any reasonable person who has read Mr. Anderson's works would certainly question his impartiality and ability to effectively represent the Department he has long decried.

With such direct and substantial conflicts of interests being ignored, the positions of their former employers and clients are being advanced through a subversion of unbiased analysis, constituting: arbitrary and capricious actions; waste, fraud, and abuse; and violations of federal ethics laws and regulations. To the best of my knowledge, none of these appointees have received a waiver from EO 13989 or 5 CFR § 2635.502(a)(2) making their violations not only unethical but clearly illegal. When such behavior rears its head there is a responsibility to the public to investigate and expose every improper action taken. The American people expect, and the law demands, impartial decision making by those privileged to serve in the U.S. government. None of these individuals—as relates to decisions made about Alaska—appear to be abiding by the law.

For these reasons, I am requesting the following documents within the next 30 days:

- Copies of the signed and dated ethics pledge for each of the above listed officials;
- Any and all communications and documentation concerning ethics consultations and waivers issued to the officials discussed above;
- Any and all recusals made by the above listed officials;
- All internal communications (including Microsoft Teams chats and texts from personal cell phones) concerning the re-opening of the NPRA IAP to, from, and amongst the above listed officials and the White House;
- Any and all communications between the above listed officials and their former employers and clients since their appointments (including Microsoft Teams chats and texts from communications devices);
- Any and all communications and opinions to and from the Solicitor's Office concerning the legal sufficiency of the NPR-A IAP and the grounds for re-opening it (including Microsoft Teams chats and texts from communications devices);
- A timeline of the conversations and decisions made at the Department of the Interior and among its officials that led to the review of the NPRA IAP, the 1002 leasing program, the Ambler Road project, and the delay of the five PLOs;
- A detailed explanation of the purpose and need for re-opening the NPRA IAP that pinpoints any perceived insufficiencies; and
- Any and all records of Tribal consultations done in connection with the decision to re-open the NPRA IAP (including Microsoft Teams chats and texts from communications devices).

Public service demands an objective duty to the nation above all else. Government officials have a duty to serve the people and uphold the law they have been entrusted to execute. An impartial administration of the law is essential to safeguarding our democratic values and must never concede to private agendas. I am deeply troubled by the disdain these officials have demonstrated for ethics rules and the institutional damage such disregard has caused. Moreover, I have raised these issues directly with Secretary Haaland and Solicitor Anderson, but have been ignored. Finally, almost all the likely unethical decisions at issue here are focused on shutting down responsible resource development in Alaska, hurting working families throughout my great state. For that reason, I will work tirelessly to bring the full extent of these unlawful improprieties to light.

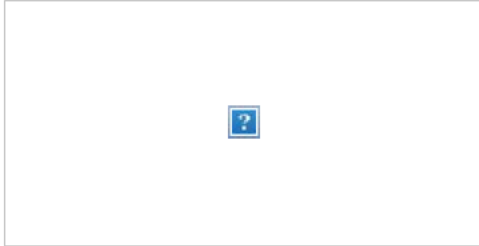
Sincerely,



Dan Sullivan
United States Senator

From: [Parsons, Matthew W](#)
To: [Genter, Constance G](#)
Subject: Nada Culver Ethics in EENews
Date: Wednesday, June 16, 2021 8:32:04 AM

FYI. https://www.eenews.net/eedaily/2021/06/16/stories/1063735099?utm_campaign=edition&utm_medium=email&utm_source=eenews%3AeedailyNada Culver



INTERIOR: GOP probes BLM leader's potential conflicts

Congressional Republicans are questioning whether Nada Culver, the Bureau of Land Management's acting director, has skirted ethics rules by taking actions at BLM that have benefited advocacy groups she worked for in the past decade.

www.eenews.net

Matthew W. Parsons
Attorney Advisor
Departmental Ethics Office Office of the Solicitor
U.S. Department of the Interior
Atlanta, GA
Office: (404) 331-5610
matthew.parsons@sol.doi.gov

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Public Service is a Public Trust

From: [Cornberg, Simon T](#)
To: [Culver, Nada L](#)
Cc: [Gottry, Heather C](#); [Garcia, Monica L](#); [Genter, Constance G](#)
Subject: Renewable Energy Meetings (9/9)
Date: Tuesday, August 31, 2021 2:07:50 PM

Nada,

After reviewing the information provided to the Departmental Ethics Office (DEO) and supporting materials, we have identified no legal objection under the ethics statutes and regulations, or the Administration's Ethics Pledge (Ethics Pledge), to you participating in a virtual meeting on September 9, 2021, with the leadership of the following companies from the onshore energy industry:

-

1. Avangrid Inc. (Avangrid);
2. First Solar/Intersect Power;
3. Berkshire Hathaway Energy (includes, NV Energy, MidAmerican, PacifiCorp, Rocky Mountain Power, etc.);
4. NextEra Energy, Inc (NextEra Energy);
5. Ormat Technologies Inc. (Ormat);
6. Recurrent Energy;
7. Pattern Energy Group LP (Pattern Energy);
8. *Southwestern Power Group (SWPG)*;
9. *Invenergy*;
10. *LS Power*;
11. Vestas Wind Systems A/S (Vestas); and
12. Anschutz Exploration Company (Anschutz).

Avangrid is an energy services and delivery company that operates throughout the state of New York and New England in the United States. **First Solar** is an American manufacturer of solar panels, and a provider of utility-scale PV power plants and supporting services that include finance, construction, maintenance and end-of-life panel recycling. **Intersect Power** is an infrastructure development company bringing utility-scale power to wholesale customers and markets. **Berkshire Hathaway Energy** is a holding company that is 90% owned by Berkshire Hathaway and includes the following energy companies: MidAmerican Energy, PacifiCorp, and Rocky Mountain Power. **NextEra Energy** is an American energy company that operates throughout the US and Canada. **Ormat** is an international company based in Reno, Nevada that supplies alternative and renewable geothermal energy technology.

Recurrent Energy is a leading North American utility-scale solar and energy storage project developer, delivering competitive, clean electricity to the grid. **Pattern Energy** is an American company that develops, owns and operates utility scale wind and solar power facilities in the United States, Canada, and Japan. **SWPG** is an independent developer of utility-scale generation and transmission assets. **Invenergy** is a leading privately held, global developer and operator of sustainable energy solutions. **LS Power** is a development, investment, and operating company focused on power generation, electric transmission and energy infrastructure. **Vestas** is a Danish manufacturer, seller, installer, and servicer of wind turbines that was founded in 1945. **Anschutz** is a private, independent oil and gas company with current projects located in Wyoming, Colorado and Utah.

Official Meeting and Nexus to DOI Mission – It is our understanding that the purpose of this meeting is to broadly discuss: (1) the Department's priorities to build a clean energy economy; and (2) allow Secretary Deb Haaland to engage with the leadership of the aforementioned

companies from the renewable energy industry on matters relating to the mission of the Department of the Interior (DOI). The nexus between DOI's mission and these topics allows this to be categorized as an official meeting for you. We understand that Secretary Haaland, Laura Daniel-Davis, Janea Scott, Larry Roberts (or Kate Kelly if Mr. Roberts is unable to attend), Shantha Ready Alonso, and Deputy Secretary Tommy Beaudreau may also participate for DOI.

Financial Disclosure Report Review – A review of your New Entrant Public Financial Disclosure Report (OGE Form 278e) and additional available information, including your resume, responses to preliminary questions, and ethics officials' notes from discussions, did not reveal any information that would prevent you from attending and participating at this meeting under 18 U.S.C. § 208, 5 C.F.R. § 2635.502, or the Ethics Pledge.

General Ethics Guidance on Meetings:

We remind you of the following standard guidance for participating in meetings:

1. **Other External Attendees** – If any additional parties external to the Department are added to the list of expected meeting attendees, please let DEO know sufficiently in advance so that we can review and make a determination with respect to the new expected attendee(s).
2. **Nonpublic Information and Party Matters** – Department officials must refrain from disclosing nonpublic information at meetings with external parties (5 C.F.R. § 2635.703) and should, to the extent possible, refrain from discussing and making any commitments about any particular matters involving specific parties, such as litigation, contracts, leases, permits, etc.
3. **No Endorsement** – Department officials may not use their official position or title, or any authority associated with their public office, to endorse any product, service, or enterprise. This includes nonprofit and charitable organizations. 5 C.F.R. § 2635.702(c).
4. **No Preferential Treatment** – Department officials must act impartially and not give preferential treatment to any private organization or individual and must avoid creating even the appearance that they are violating this requirement. 5 C.F.R. § 2635.101(b)(8), (14).
5. **Lobbyist Gift Ban** – We remind you to be cautious and avoid accepting any gifts from registered lobbyists and/or registered lobbying organizations. If any gift is provided to you in connection with your participation in any of these meetings, please consult with DEO for additional ethics review.
6. **No Partisan Political Activity** – While Department officials may discuss the Administration's policy priorities and ideological approach to proposed laws and regulations at this meeting, they must strictly avoid partisan political activity in order to remain in compliance with the Hatch Act. Partisan political activity is any activity directed toward the success or failure of a political party, candidate for a partisan political office, or partisan political group and can include verbal remarks and speech.

Please let us know if you have any questions or concerns.

Thank you,

Simon

Simon T. Cornberg
Attorney-Advisor | Advice and Counsel
Departmental Ethics Office | Office of the Solicitor
U.S. Department of the Interior | MIB 5325
(O) (202) 208-5972
simon.cornberg@sol.doi.gov

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From: [Garcia, Monica L](#)
To: [Genter, Constance G](#)
Subject: RE: Links
Date: Thursday, September 2, 2021 11:24:52 AM

Thanks!

From: Genter, Constance G <constance.genter@sol.doi.gov>
Sent: Thursday, September 2, 2021 11:08 AM
To: Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: Re: Links

Yes

Constance G. Genter
Supervisory Attorney-Advisor (Acting), Advice and Counsel Branch
Departmental Ethics Office | Office of the Solicitor
U.S. Department of the Interior | Phoenix Field Office
(O) (602) 364-7890
Email: constance.genter@sol.doi.gov

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From: Garcia, Monica L <monica.garcia@sol.doi.gov>
Sent: Thursday, September 2, 2021 5:05 AM
To: Genter, Constance G <constance.genter@sol.doi.gov>
Subject: FW: Links

Constance – see below from Nada. Does a week seem possible?

Monica

From: Culver, Nada L <nculver@blm.gov>
Sent: Wednesday, September 1, 2021 7:59 PM
To: Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: RE: Links

Well they were hoping I could film a statement as soon as this weekend but I'm assuming I can wait a week or so if that's doable?

Thanks so much.

Nada Wolff Culver
Deputy Director, Policy and Programs
Bureau of Land Management
nculver@blm.gov
202-255-6979

From: Garcia, Monica L <monica.garcia@sol.doi.gov>
Sent: Wednesday, September 1, 2021 3:46 PM
To: Culver, Nada L <nculver@blm.gov>
Subject: RE: Links

Thank you, Nada. I'll assign out and get someone started on this ASAP. Is there a deadline when you need a response?

-Monica

From: Culver, Nada L <nculver@blm.gov>
Sent: Wednesday, September 1, 2021 4:53 PM
To: Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: Links

Hi Monica – Here's one of the links: <https://www.wilderness.org/get-involved/see-more-ways-give>

And it also appears here if you scroll down <https://www.scholarshipy.com/more-info/www.wilderness.org?page=2>

Nada Wolff Culver
Deputy Director, Policy and Programs
Bureau of Land Management
nculver@blm.gov
202-255-6979

From: [Garcia, Monica L](#)
To: [Genter, Constance G](#); [Hammer, Christine A](#)
Subject: FW: Updated Ethics Recusal Materials
Date: Friday, September 3, 2021 9:18:18 AM
Attachments: [Culver Nada - Updated Ethics Recusal Guidance Memorandum & Attachments \(9.3.21\).pdf](#)
[Culver, Nada - Recusal and Screening Agreement \(9.3.21\).pdf](#)
[Culver, Nada - Quick Recusal Chart Attachment C \(9.3.21\).pdf](#)

FYSA

From: Garcia, Monica L
Sent: Friday, September 3, 2021 8:44 AM
To: Culver, Nada L <nculver@blm.gov>
Cc: Heather Gottry <heather.gottry@sol.doi.gov>
Subject: Updated Ethics Recusal Materials

Nada – Good morning! As promised, I have attached your updated Ethics Recusal Guidance Memorandum reflecting the prohibited stock and bond sales.

We defer to your preference on whether you'd like to re-sign your Recusal and Screening Arrangement document or circulate the updated Quick Recusal Chart Attachment. For ease of dealing with the logistics of re-signing, I have attached a copy of the Recusal and Screening Arrangement with today's date (and the updated chart) if you'd like to re-sign in addition to the updated Quick Recusal Chart if you'd prefer to simply circulate that document.

Please let us know your preference. If you elect to re-sign, please provide us with a copy of the Recusal and Screening Arrangement for our files.

Thanks so much,

-Monica

Please note: I will be teleworking until further notice

Monica L. Garcia
Deputy Director for Ethics Law & Policy
and Alternate Designated Agency Ethics Official
Departmental Ethics Office | Office of the Solicitor
U.S. Department of the Interior | MIB 5316
(O): (202) 208-0460
(C): (202) 880-4474
Email: monica.garcia@sol.doi.gov

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Attachment A
Guidance for Recusal Analysis

Guidance for Recusal Analysis

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

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

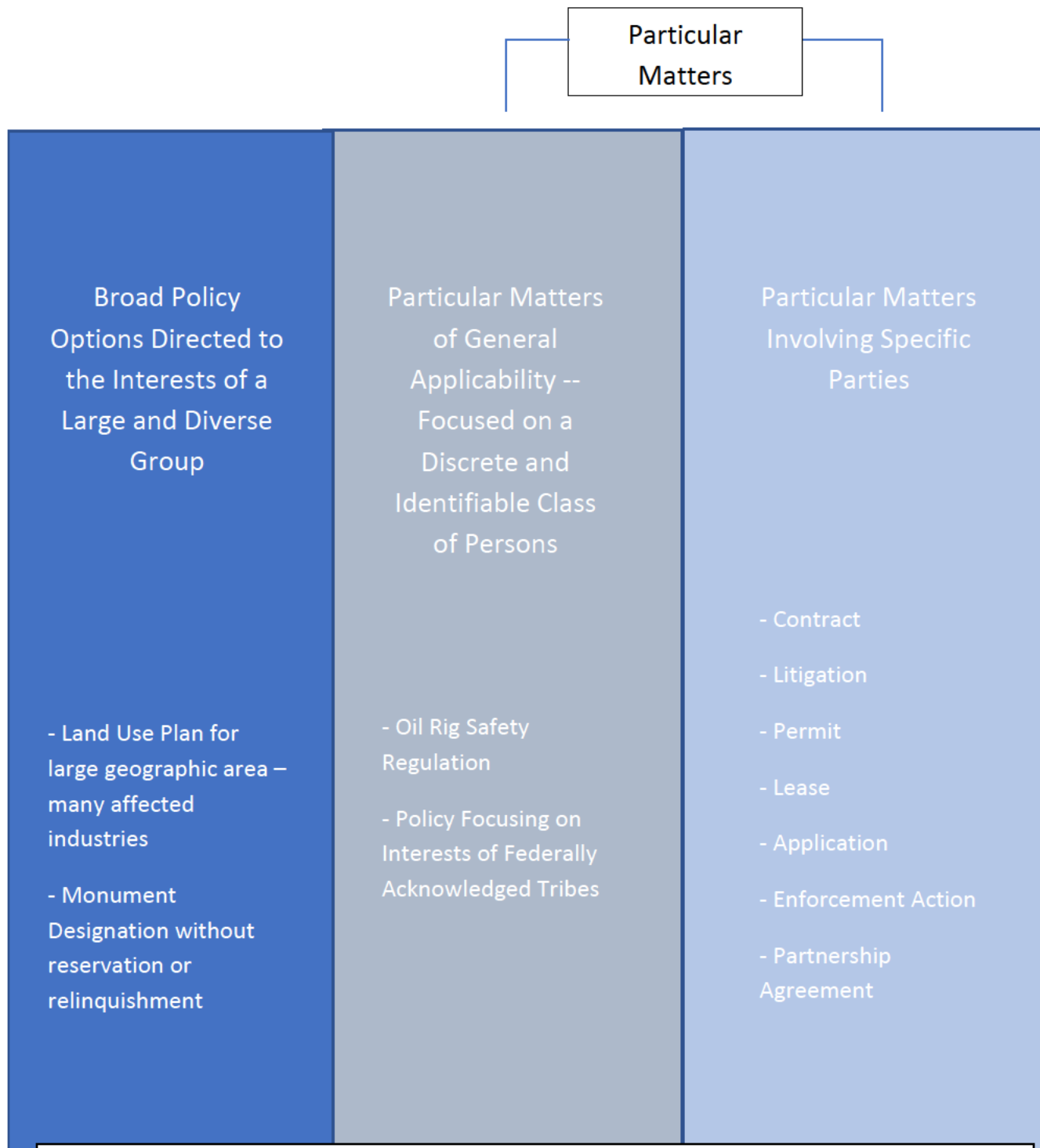
The term “particular matter” means only matters that involve deliberation, decision, or action that is focused on the interests of (1) specific persons or (2) a discrete and identifiable class of persons. These two types of particular matters are defined separately as “particular matters involving specific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

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

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

To assist you in complying with his ethics requirements, you and/or your screener must gather sufficient information regarding a matter before the DOI to determine whether the matter constitutes a particular matter involving specific parties or a particular matter of general applicability, or falls into the category of broad policy options that are directed to the interests of a large and diverse group of persons. Please do not hesitate to contact the DEO with any questions about your recusal obligations discussed above or for further ethics guidance.

Matters* – Three Types



*Please note that the examples provided above should be considered illustrative only. Please seek advice from the Departmental Ethics Office for an ethics determination on specific facts, issues, actions and decisions.

Attachment B

2021 List of Prohibited Investments

(Department of the Interior and Bureau of Land Management)



Departmental Ethics Office U.S. Department of the Interior

2021 List of Prohibited Financial Interests for

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

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

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

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

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

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

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

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

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

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

Parent Company	Ticker Symbol (NYSE or NASDAQ unless otherwise noted)
AES Corporation	AES
Albemarle Corporation	ALB
Apache Corporation	APA
Arch Resources Incorporated (formerly Arch Coal)	ARCH
Avangrid Incorporated	AGR
Barrick Gold Corporation	GOLD
Berkshire Hathaway Incorporated	BRK.A (Class A) & BRK.B (Class B); & PPWLM on OTC
BHP	BHP & BBL
BP	BP
Brookfield Asset Management Incorporated	BAM

Brookfield Renewable Partners Limited Partnership	BEP
Chesapeake Energy Corporation	CHKAQ on OTC
Chevron Corporation	CVX
Clearway Energy	CWEN
CNOOC Limited	CEO
ConocoPhillips	COP
Crystal Peak Minerals Incorporated	CPMMF on OTC
Devon Energy Corporation	DVN
Dominion Energy Incorporated	D
EDP Renewables SA	EDRVF on OTC
Enel S.p.A.	ENIA
Eni S.p.A.	E
EOG Resources Incorporated	EOG
Eolus Vind	EOLU-B on STO
Equinor ASA	EQNR
Eversource Energy	ES
Exxon Mobil Corporation	XOM
First Solar, Inc.	FSLR
Genesis Energy Limited Partnership	GEL
Grizzly Energy Limited Liability Company	GRZZU on OTC
Hess Corporation	HES
Iberdrola	IBDRY & IBDSF on OTC
Innergex Renewable Energy Incorporated	INGXF on OTC
Intrepid Potash Incorporated	IPI
Itafos	MBCFF on OTC
Kosmos Energy Limited	KOS
Marathon Oil Corporation	MRO
Mosaic Company	MOS
Murphy Oil Corporation	MUR
NextEra Energy Incorporated	NEE
NorthWestern Corporation	NWE
Occidental Petroleum Corporation	OXY
Ormat Technologies Incorporated	ORA
Ørsted AS	DOGEF & DNNGY on OTC
Ovintiv Incorporated (Formerly Encana Corporation)	OVV
Peabody Energy Company	BTU
Royal Dutch Shell	RDS.A (Class A) & RDS.B (Class B)

Solvay SA	SOLVY & SVYSF on OTC
Talos Energy Incorporated	TALO
Tata Chemicals Limited	TATACHEM on NSE
Total SE	TOT
W&T Offshore Incorporated	WTI
WPX Energy Incorporated	WPX

Questions? Please contact an ethics official for more information.

OS/SOL Financial Disclosure Team

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

ONRR Deputy Ethics Counselor

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

**Bureau of Land Management
2021 Prohibited Holding List**

	A	B
1	PARENT COMPANY	TICKER SYMBOL
2	American Tower Corporation	AMT
3	Apache Corporation	APA
4	Arch Resources Incorporated (formerly Arch Coal)	ARCH
5	Ares Management Corporation	ARES
6	AT&T Incorporated	T
7	Avangrid Incorporated	AGR
8	Avista Corporation	AVA
9	Barrick Gold Corporation	ABX
10	Barrick Gold Corporation	GOLD
11	Bayer AG	BAYRY
12	Bayer AG	BAYN
13	Bayer AG	BAYZF
14	Berkshire Hathaway Incorporated	BRK.A
15	Berkshire Hathaway Incorporated	BRK.B
16	Berkshire Hathaway Incorporated	PPWLM
17	BHP	BBL
18	BHP	BHP
19	Black Hills Corporation	BKH
20	Boise Cascade Corporation	BCC
21	BP	BP
22	California Resources Corporation	CRC
23	Chesapeake Energy Corporation	CHKAQ
24	Chesapeake Energy Corporation	CHKGQ
25	Chesapeake Energy Corporation	CHKHQ
26	Chesapeake Energy Corporation	CHKLQ
27	Chesapeake Energy Corporation	CHKPQ
28	Chesapeake Energy Corporation	CHKVQ
29	Chesapeake Energy Corporation	CKRGQ
30	Chevron Corporation	CVX
31	Cimarex Energy Company	XEC
32	Clearway Energy Incorporated	CWEN
33	CNOOC Limited	CEO
34	CNOOC Limited	CEOHF
35	CNOOC Limited	CNU
36	CNOOC Limited	883
37	Comstock Mining Incorporated	LODE
38	Concho Resources Incorporated	CXO
39	ConocoPhillips	COP
40	Continental Resources Incorporated	CLR
41	CorEnergy Infrastructure Trust Incorporated	CORR
42	Crown Castle International Corporation	CCI
43	Crystal Peak Minerals Incorporated	CPMMF
44	DCP Midstream Limited Partnership	DCP
45	Denbury Incorporated	DEN
46	Devon Energy Corporation	DVN

**Bureau of Land Management
2021 Prohibited Holding List**

	A	B
47	Dominion Energy Incorporated	D
48	E.W. Scripps Company	SSP
49	Edison International	EIX
50	Emera Incorporated	EMA
51	Enel S.p.A.	ENIA
52	Enel S.p.A.	ESOCF
53	Energy Transfer Limited Partnership	ET
54	Eni S.p.A.	E
55	Eni S.p.A.	ENI
56	EnLink Midstream Limited Liability Company	ENLC
57	Enterprise Products Partners Limited Partnership	EPD
58	Entravision Communications Corporation	EVC
59	EOG Resources Incorporated	EOG
60	EQT Corporation	EQT
61	Exxon Mobil Corporation	XOM
62	First Solar Incorporated	FSLR
63	Fortis Incorporated	FTS
64	Freeport-McMoRan Incorporated	FCX
65	Frontier Communications Corporation	FTRCQ
66	GCI Liberty Incorporated	GLIBA
67	GCI Liberty Incorporated	GLIBP
68	Genesis Energy Limited Partnership	GEL
69	Grizzly Energy Limited Liability Company	GRZZU
70	Hess Corporation	HES
71	HighPoint Resources Corporation	HPR
72	Holly Energy Partners Limited Partnership	HEP
73	HollyFrontier Corporation	HFC
74	Iberdrola	IBE
75	Iberdrola	IBDSF
76	Iberdrola	IBDRY
77	Icahn Enterprises Limited Partnership	IEP
78	Idacorp Incorporated	IDA
79	Innervex Renewable Energy Incorporated	INE
80	Intrepid Potash Incorporated	IPI
81	Itafos	MBCFF
82	Itafos	IFOS
83	Itochu Corporation	8001
84	Itochu Corporation	ITOCY
85	Itochu Corporation	ITOCF
86	Kinder Morgan Incorporated	KMI
87	Kosmos Energy Limited	KOS
88	Lumen Technologies Incorporated (formerly CenturyLink Incorporated)	LUMN
89	Marathon Oil Corporation	MRO
90	Marathon Petroleum Corporation	MPC
91	Matador Resources Company	MTDR

**Bureau of Land Management
2021 Prohibited Holding List**

	A	B
92	MDU Resources Group Incorporated	MDU
93	Meredith Corporation	MDP
94	Mid-Con Energy Partners Limited Partnership	MCEP
95	Montage Resources Corporation	MR
96	Mosaic Company	MOS
97	MP Materials Corporation	MP
98	MPLX Limited Partnership	MPLX
99	Murphy Oil Corporation	MUR
100	National Grid Public Limited Company	NGG
101	Newmont Corporation	NEM
102	Nexstar Media Group Incorporated	NXST
103	NGL Energy Partners Limited Partnership	NGL
104	Northwest Pipe Company	NWPX
105	NorthWestern Corporation	Nwe
106	NovaGold Resources Incorporated	NG
107	Oasis Petroleum Incorporated	OAS
108	Occidental Petroleum Corporation	OXY
109	Ormat Technologies Incorporated	ORA
110	Ovintiv Incorporated (Formerly Encana Corporation)	OVV
111	Pacific Gas and Electric (PG&E) Company	PCG
112	Peabody Energy Company	BTU
113	Phillips 66	PSX
114	Pinnacle West Capital Corporation	PNW
115	Pioneer Natural Resources Company	PXD
116	Pioneer Oil and Gas	POGS
117	Plains All American Pipeline Limited Partnership	PAA
118	PNM Resources Incorporated	PNM
119	Portland General Electric Company	POR
120	QEP Resources Incorporated	QEP
121	SandRidge Energy Incorporated	SD
122	Saratoga Investment Corporation	SAR
123	SBA Communications Corporation	SBAC
124	Sempra Energy	SRE
125	Sinclair Broadcast Group Incorporated	SBGI
126	Solvay SA	SBYSM
127	Solvay SA	SOLVY
128	Southwest Gas Holdings Incorporated	SWX
129	Summit Midstream Partners	SMLP
130	Talos Energy Incorporated	TALO
131	Tata Chemicals Limited	TATACHEM
132	TC Energy Corporation	TRP
133	TC Pipelines	TCP
134	Telephone and Data Systems Incorporated	TDS
135	Tesoro Resources Limited	TSO
136	Tetra Technologies	TTI

**Bureau of Land Management
2021 Prohibited Holding List**

	A	B
137	Texas Pacific Land Trust	TPL
138	T-Mobile US Incorporated	TMUS
139	Total SE	TOT
140	Total SE	FP
141	Total SE	TTFNF
142	Union Pacific Corporation	UNP
143	United States Cellular Corporation	USM
144	Verizon Wireless	VZ
145	Vermilion Energy Incorporated	VET
146	W&T Offshore Incorporated	WTI
147	Whiting Petroleum Corporation	WLL
148	Williams Company Incorporated	WMB
149	WPX Energy Incorporated	WPX
150	Xcel Energy Incorporated	XEL

Attachment D


Ethics Pledge (signed March 1, 2021)

ETHICS PLEDGE

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

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

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


Signature

31, 2021
Date

Name (Type or Print): Nada Colver



United States Department of the Interior

September 3, 2021

MEMORANDUM

To: Heather C. Gottry, Director, Departmental Ethics Office
& Designated Agency Ethics Official

From: Nada W. Culver, Deputy Director of Policy and Programs,
Bureau of Land Management

Subject: Ethics Recusals & Screening Arrangement

This memorandum serves to document my ethics recusals and the steps that I will take in order to ensure that I comply with all recusal and other ethics obligations required by law. Additionally, this memorandum fulfills the requirement established in Section 4(a)(iii) of Executive Order 13989 entitled, “Executive Order on Ethics Commitments by Executive Branch Personnel” (Jan. 20, 2021) (Ethics Pledge).

I have consulted with the Departmental Ethics Office (DEO) and have been advised about my recusal obligations while serving as an appointee of the U.S. Department of the Interior (DOI). As reflected in my Updated Interim Ethics Guidance on Recusal Obligations memorandum, dated July 27, 2021, which provides ethics guidance based on my certified New Entrant Public Financial Disclosure Report (OGE Form 278e) and information that I have provided to the DEO, I understand that I have a continuing obligation to limit my personal and substantial participation in certain matters in which I have either direct or imputed financial interests, or personal or business relationship(s), pursuant to ethics laws, regulations, and the Ethics Pledge, which I signed on March 1, 2021.

SECTION 1 – SCREENING ARRANGEMENT

After consultation with the DEO, I have elected to self-screen for recusals of all Department matters directed to my attention or that require my participation which involve the entities addressed in the Ethics Guidance Memorandum and listed on the attached List of Recusals and Quick Reference Chart in order to determine whether they involve any of the entities or organizations listed therein. In order to help ensure that I do not participate in matters from which I should be recused, I will take the following steps:

1. I will continue to personally take my calls and screen my e-mail communications, and will review all DOI matters directed to my attention or that require my participation which involve the individuals or entities on the attached List of Recusals and Quick Reference Chart in order to determine whether I am recused from participating in the matter in question.
2. If a particular matter involving any of the entities discussed in the Ethics Guidance Memorandum or listed on the attached List of Recusals and Quick Reference Chart is directed to my attention, I will not take any action, but immediately consult with the DEO, without my further involvement or knowledge of the particulars of the matter if I am uncertain whether or not I may participate in a particular matter.
3. If I determine that a matter involves any of the individuals or entities listed on the attached List of Recusals and Quick Reference Chart and that I am recused from the matter, then I will not take any action on the matter in questions and will refer the matter to Danna Jackson, Counselor to the BLM Director, for action or assignment, without my knowledge or involvement.
4. I will also inform my principal subordinates if I determine that a matter involves any of the individuals or entities listed on the attached List of Recusals and Quick Reference Chart and that I am recused from the matter. I will further instruct my principal subordinates that all inquiries and comments involving my recusal obligations should be directed to the DEO without my involvement or knowledge of the particulars of the matter and will refer my principal subordinates to Danna Jackson, Counselor to the BLM Director, for any further action or assignment on the matter in question.

I understand that for the duration of this screening arrangement that I commit to diligently reviewing issues, actions, and decisions that come before me in order to determine whether any of the individuals or entities discussed in the Ethics Guidance on Recusal Obligations memorandum and listed on the attached List of Recusals and Quick Reference Chart are involved in the issues, actions, and decisions. I have been advised that the identification of party matters pending within the DOI in which the individuals or entities listed on the attached List of Recusals and Quick Reference Chart are parties or represent parties, may require Bureau or Office staff members, Solicitor's Office staff assigned to the matters in question, and the DEO to carefully review my potential participation. Additionally, I understand that there may be times when there will be a delay in reviewing and potentially clearing my participation in matters as a result of screening for ethics compliance. I understand that, while efforts can and will be made to minimize any delays created by ethics recusal reviews, these delays may impact my ability to promptly participate in matters, including certain meetings and other communications.

SECTION 2 – UPDATE THE DEO & SCREENING ARRANGMENT AS NECESSARY

In consultation with the DEO, I will revise and update this memorandum and attachment whenever warranted by changed circumstances, including changes to my financial interests, changes in my personal or business relationships, or any changes to the nature of my Department duties. Finally, I understand that ethics advice must come from the DEO, as only a designated ethics official can make ethics determinations on which Department employees may authoritatively rely upon and will consult with DEO as necessary and appropriate.

Attachment – List of Recusals and Quick Reference Chart

CC: Larry Roberts, Chief of Staff
Laura Daniel-Davis, Principal Deputy Assistant Secretary for Land and Mineral Management
Danna Jackson, Counselor to the BLM Director

From: [Garcia, Monica L](#)
To: [Culver, Nada L](#)
Cc: [Genter, Constance G](#)
Subject: RE: Links
Date: Thursday, September 9, 2021 3:13:51 PM

Hi Nada! Constance is working with me on getting you an answer to your question and we had just a few follow up questions to discuss. That is the ethics discussion she requested on your calendar for tomorrow afternoon.

If you would prefer, we can work with Fran to find a different time on your schedule.

-Monica

From: Culver, Nada L <nculver@blm.gov>
Sent: Wednesday, September 1, 2021 7:59 PM
To: Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: RE: Links

Well they were hoping I could film a statement as soon as this weekend but I'm assuming I can wait a week or so if that's doable?

Thanks so much.

Nada Wolff Culver
Deputy Director, Policy and Programs
Bureau of Land Management
nculver@blm.gov
202-255-6979

From: Garcia, Monica L <monica.garcia@sol.doi.gov>
Sent: Wednesday, September 1, 2021 3:46 PM
To: Culver, Nada L <nculver@blm.gov>
Subject: RE: Links

Thank you, Nada. I'll assign out and get someone started on this ASAP. Is there a deadline when you need a response?

-Monica

From: Culver, Nada L <nculver@blm.gov>
Sent: Wednesday, September 1, 2021 4:53 PM
To: Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: Links

Hi Monica – Here's one of the links: <https://www.wilderness.org/get-involved/see-more-ways-give>

And it also appears here if you scroll down <https://www.scholarshipy.com/more-info/www.wilderness.org?page=2>

Nada Wolff Culver
Deputy Director, Policy and Programs
Bureau of Land Management
nculver@blm.gov
202-255-6979

From: [Culver, Nada L](#)
To: [Garcia, Monica L](#)
Cc: [Genter, Constance G](#)
Subject: RE: Links
Date: Thursday, September 9, 2021 4:29:06 PM

Thanks for explaining, Monica – I was hoping that was it. I have a call that could run a little over into that time but let's try to make it work and if I can't I'll let you know. Is that okay?

Nada Wolff Culver
Deputy Director, Policy and Programs
Bureau of Land Management
nculver@blm.gov
202-255-6979

From: Garcia, Monica L <monica.garcia@sol.doi.gov>
Sent: Thursday, September 9, 2021 1:14 PM
To: Culver, Nada L <nculver@blm.gov>
Cc: Genter, Constance G <constance.genter@sol.doi.gov>
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202-255-6979

From: [Garcia, Monica L](#)
To: [Culver, Nada L](#)
Cc: [Genter, Constance G](#)
Subject: RE: Links
Date: Thursday, September 9, 2021 4:32:50 PM

That would be great. Looking forward to connecting with you!

From: Culver, Nada L <nculver@blm.gov>
Sent: Thursday, September 9, 2021 4:29 PM
To: Garcia, Monica L <monica.garcia@sol.doi.gov>
Cc: Genter, Constance G <constance.genter@sol.doi.gov>
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Nada Wolff Culver
Deputy Director, Policy and Programs
Bureau of Land Management
nculver@blm.gov
202-255-6979

From: [Culver, Nada L](#)
To: [Genter, Constance G](#)
Cc: [Garcia, Monica L](#)
Subject: RE: Megan Dickie Wilderness Leadership Fund Tribute
Date: Saturday, September 11, 2021 12:07:36 PM

Thanks very much, Constance and Monica. I hope your weekends are off to an excellent and relaxing start.

Nada Wolff Culver
Deputy Director, Policy and Programs
Bureau of Land Management
nculver@blm.gov
202-255-6979

From: Genter, Constance G <constance.genter@sol.doi.gov>
Sent: Friday, September 10, 2021 5:20 PM
To: Culver, Nada L <nculver@blm.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: Megan Dickie Wilderness Leadership Fund Tribute

Ms. Culver:

We understand you have been invited to provide a pre-recorded tribute to be played at the Wilderness Chic, a virtual celebration to be held on the evening of October 9, 2021, benefitting the Megan Dickie Wilderness Leadership Endowment Fund (Endowment Fund) and The Wilderness Society, hosted by The Wilderness Society. You would like to participate in this activity and also potentially participate in fundraising related to this Endowment Fund. We further understand that the aforementioned proposed outside activities will be unpaid and conducted in your personal capacity. Based on the limited facts presented, there is no legal objection under the ethics statutes and regulations, or the Administration's Ethics Pledge (Ethics Pledge), to your participating in the aforementioned proposed outside activities **subject to the restrictions discussed below**.

Based on the limited information provided, we understand that:

1. The Wilderness Society, a former employer of yours from 2003 through mid-2019, is a 501(c)(3) nonprofit organization land conservation organization dedicated to protecting natural areas and federal public lands in the United States. Megan Dickie, who was a close colleague of yours at The Wilderness Society, passed away suddenly and at a young age in 2017. That same year, an Endowment Fund was established in her name, the Megan Dickie Wilderness Leadership Endowment Fund, honoring her legacy and commitment to expanding the community of public lands advocates by providing law students of diverse backgrounds paid summer clerkships with The Wilderness Society. Since its inception, the Endowment Fund has provided numerous law students committed to public interest with experience working in public land law and conservation.

2. As a former colleague of Ms. Dickie and member of the Advisory Committee for the Megan Dickie Wilderness Leadership Fund, The Wilderness Society has asked you to provide pre-recorded remarks to be played at the virtual celebration. In addition, you potentially may elect to participate in fundraising efforts for the Endowment Fund. These aforementioned activities would be unpaid and conducted on your own time (aka in a personal capacity). The target audience of the virtual celebration consists of close friends and family of the Dickies, contacts of the Wilderness Society Steering Committee members (also friends of the Dickie family), as well as supporters of The Wilderness Society from key cities, including Denver, Chicago, NYC, Vail, and San Francisco, to name a few.
3. You currently serve as the Deputy Director for Policy and Programs for the Bureau of Lands Management.

Based on the limited facts presented, although The Wilderness Society is a prohibited source, providing filmed remarks and participating in fundraising activities as proposed in an unpaid and personal capacity does not require prior ethics approval under the Department's supplemental ethics regulations, found at 5 C.F.R. § 3501.105(b)(1)(i), as these outside activities do not meet the definition of "employment." Additionally, we note that your proposed outside activities as stated do not constitute a prohibited direct or indirect interest in federal lands as defined in 43 C.F.R. § 20.401.

Moreover, based on the limited facts presented, your proposed outside activities as stated do not create a personal or imputed financial interest creating recusal obligations under 18 U.S.C. § 208. Further, your proposed outside activities as stated do not create a "covered relationship" triggering recusal requirements under 5 C.F.R. § 2635.502. Please be advised, however, that were you to spend a significant amount of time devoted to coordinating fundraising efforts for The Wilderness Society's fundraising activities for the Endowment Fund, such activities would create a covered relationship with The Wilderness Society, pursuant to 5 C.F.R. § 2635.502(b)(1)(v), triggering recusal requirements as to particular matters involving specific parties to which this organization is a party or represents a party pursuant to 5 C.F.R. § 2635.502(a).

While there is generally no legal objection to your proposed outside activities, specifically providing filmed remarks in support of the Endowment Fund and participating in fundraising efforts related to the Endowment Fund in an unpaid personal capacity, we remind you of the following restrictions which are applicable to these proposed outside activities:

1. **Reference to Official Position:** You may not use or permit the use of your official title or position to identify you in connection with your outside activities. 5 C.F.R. § 2635.702.
- 2.
3. Please ensure adequate communication with organizers in order to help prevent an inadvertent use of your official title in publications, marketing material, advertisements, and other materials related to your pre-recorded speaking engagement. To this end, you may want to consider providing The Wilderness Society the following statement:
- 4.
5. *While I agree to provide you pre-recorded statements to be presented at the Wilderness Chic*

celebration event, I do not grant you permission to use my official title or position with the Department of the Interior (DOI). Specifically, I do not consent to the use of my DOI position, title or authority associated with my public office to endorse any product, service or enterprise, to include the Wilderness Chic virtual event, The Wilderness Society, and the Endowment Fund. Furthermore, I do not consent to the use of my DOI position, title or authority associated with my public office for any charitable fundraising purposes, to include stating or implying that DOI or its employees engaged in the solicitation of funds or sale of items except as authorized by law.

2. **No Endorsement:** You may not permit the use of your Government position or title or any authority associated with your public office to endorse any product, service, or enterprise, including the Wilderness Chic, The Wilderness Society or the Endowment Fund. 5 C.F.R. § 2635.702(c).
3. **No Use of Official Time or Government Property:** While engaging in outside activities, Federal employees are not permitted to use official time or Government property. 5 C.F.R. § 2635.101(b)(9), 704, and 705.
4. **No Use of Public Office for Private Gain:** Pursuant to 5 C.F.R. § 2635.702, you may not use your public office (authority or title) for your own private gain or the private gain of others, to include the Wilderness Chic, The Wilderness Society or the Endowment Fund.
5. **Nonpublic Information:** You may not use or improperly disclose nonpublic information or otherwise protected information acquired as part of your official duties which is not generally available to the public. 18 U.S.C. § 1905; 5 C.F.R. § 2635.703; 41 U.S.C. § 2102.
6. **Lobbyist Gift Ban:** As a reminder, we caution you not to accept gifts from registered lobbying organizations and registered lobbyists.
7. **Fundraising:** When fundraising in a personal capacity, you may not use or permit the use of your official title to further a fundraising effort. Additionally, you are prohibited from “personally soliciting” funds or other support from (a) a subordinate or (b) **any person whom you know to be a prohibited source within the meaning of 5 C.F.R. § 2635.203(d).** 5 C.F.R. § 2635.808.
- 8.
9. Please be advised that the term “personally solicit” means to request or otherwise encourage donations or other support either through person-to-person contact **or through the use of your name or identity in correspondence or by permitting its use by others.** It does not, however, include the solicitation of funds through the media or through either oral remarks, or the contemporaneous dispatch of like items of mass-produced correspondence, if such remarks or correspondence are addressed to a group consisting of many persons, **unless it is known to you that the solicitation is targeted at subordinates or at persons who are prohibited sources.** It also does not include behind-the-scenes assistance in the solicitation of funds (e.g., drafting correspondence, stuffing envelopes, or accounting for contributions). 5 C.F.R. § 2635.808(a)(4).

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

Regards,

-Constance

Constance G. Genter
Supervisory Attorney-Advisor (Acting), Advice and Counsel Branch
Departmental Ethics Office | Office of the Solicitor
U.S. Department of the Interior | Phoenix Field Office
(O) (602) 364-7890
Email: constance.genter@sol.doi.gov

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

Integrity is our mission

Customer service matters to us. Please take our short survey, [click here](#).

From: [Gottry, Heather C](#)
To: [Garcia, Monica L](#)
Subject: RE: House ethics letters
Date: Sunday, August 1, 2021 6:21:47 PM

Thank you. I appreciate your effort and proposed edits. However, I am concerned about both the tone and expansive nature of certain added language. I am reworking and will send to Drew this evening.

From: Garcia, Monica L <monica.garcia@sol.doi.gov>
Sent: Sunday, August 1, 2021 4:02 PM
To: Gottry, Heather C <heather.gottry@sol.doi.gov>
Subject: RE: House ethics letters

Heather – I have made additional edits in redline for consideration and discussion.

Monica

From: Gottry, Heather C <heather.gottry@sol.doi.gov>
Sent: Saturday, July 31, 2021 2:44 PM
To: Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: FW: House ethics letters

Monica – Attached for consideration please find my redline of the clean copy version that Drew shared with us. Please let me know if you have any further proposed edits. I will take our agreed upon final version and modify Nada's letter so I can send both to Drew on Monday. Many thanks!

- Heather

From: Wallace, Andrew G <andrew_wallace@ios.doi.gov>
Sent: Thursday, July 29, 2021 9:06 AM
To: Gottry, Heather C <heather.gottry@sol.doi.gov>; Garcia, Monica L <monica.garcia@sol.doi.gov>
Cc: Salotti, Christopher <Chris_Salotti@ios.doi.gov>; Rezaeerod, Paniz <paniz_rezaeerod@ios.doi.gov>
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Subject: Re: House ethics letters

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Cc: Salotti, Christopher <Chris_Salotti@ios.doi.gov>

Subject: RE: House ethics letters

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To: [Wallace, Andrew G](#); [Garcia, Monica L](#); [Gottry, Heather C](#); [Murphy, Timothy E](#); [Irish, Tony C](#)
Cc: [Rezaeero, Paniz](#); [Barkin, Pamela](#)
Subject: Re: House ethics letters
Date: Thursday, August 5, 2021 11:17:07 AM

Great - we need SOL there too because there are (b)(5) dpp

Tim/Tony - what is your availability?

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Cc: Rezaeero, Paniz <paniz_rezaeero@ios.doi.gov>; Barkin, Pamela <Pamela_Barkin@ios.doi.gov>
Subject: RE: House ethics letters

I am flexible from 2-330pm. Let's get something on the books

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Sent: Thursday, August 5, 2021 10:03 AM
To: Salotti, Christopher <Chris_Salotti@ios.doi.gov>; Gottry, Heather C <heather.gottry@sol.doi.gov>; Wallace, Andrew G <andrew_wallace@ios.doi.gov>; Murphy, Timothy E <Timothy.Murphy@sol.doi.gov>; Irish, Tony C <Tony.Irish@sol.doi.gov>
Cc: Rezaeero, Paniz <paniz_rezaeero@ios.doi.gov>; Barkin, Pamela <Pamela_Barkin@ios.doi.gov>
Subject: RE: House ethics letters

Chris – I'm available this afternoon if you'd like to touch base. I can do 2:00 p.m. or later.

Monica

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Subject: Re: House ethics letters

Thanks, Heather. I am adding Tim and Tony - Drew and I spoke about this last night and think it would be good to do a short discussion.

If people have availability today - early afternoon? - or tomorrow that would work best.

Tim/Tony - does anyone else need to participate in such a discussion? (b)(5) dpp

[REDACTED]

[REDACTED]

[REDACTED]

Thanks, Chris

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Subject: FW: House ethics letters

Drew – Hello again! I hope all is well with you. I am back from the beach and able to digitally sign letters either today or tomorrow. I wanted to circle back to see if the attached version is good to go. If so, should we make conforming edits to Nada's letter? Also, please let me know if it would be helpful to quickly touch base on attachments. I will have intermittent availability, but can certainly work to find an open time. Many thanks!

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Date: Sunday, August 1, 2021 6:37:03 PM
Attachments: [DRAFT Response WGB re Klein OCL edits 7.28 clean dw3 \(Clean Copy DEO proposed edits 08.01.21\).docx](#)
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Date: Thursday, August 5, 2021 11:18:05 AM

3:00 is preferred for me, I can try to move my 2-3 meetings if needed.

Tony Irish
Assistant Solicitor - General Legal Services
Division of General Law
P: 202-208-5065
C: 202-809-4796

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To: [Gottry, Heather C](#); [Wallace, Andrew G](#)
Cc: [Salotti, Christopher](#); [Garcia, Monica L](#)
Subject: RE: House ethics letters
Date: Tuesday, August 3, 2021 12:37:45 PM

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Date: Thursday, August 5, 2021 11:18:56 AM

Thanks, let's do 3 pm? That seems to work for all. I'll send out an invite.

Chris

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3:00 is preferred for me, I can try to move my 2-3 meetings if needed.

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C: 202-809-4796

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Cc: [Rezaeero, Paniz](#); [Barkin, Pamela](#)
Subject: RE: House ethics letters
Date: Thursday, August 5, 2021 10:02:30 AM

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Cc: [Rezaeero, Paniz](#); [Barkin, Pamela](#)
Subject: Re: House ethics letters
Date: Monday, August 9, 2021 11:37:55 AM

This may be a bit like herding cats, but following up to see if there is a time when we can all get together again to have a final discussion before we produce docs to the Ranking Member.

Ideally we can find a time this afternoon or tomorrow before 12 - are there times that will absolutely not work for people?

Tony/Tim - I defer to you guys for a contact to best represent the (b)(5) to explain from that perspective what is the latest on these type of docs. Let me know your thoughts on this.

Chris

From: Wallace, Andrew G <andrew_wallace@ios.doi.gov>
Sent: Friday, August 6, 2021 7:37 PM
To: Garcia, Monica L <monica.garcia@sol.doi.gov>; Irish, Tony C <Tony.Irish@sol.doi.gov>; Salotti, Christopher <Chris_Salotti@ios.doi.gov>; Gottry, Heather C <heather.gottry@sol.doi.gov>; Murphy, Timothy E <Timothy.Murphy@sol.doi.gov>
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Thanks all – let's get together early next week with whoever at (b)(5) we need to hear from to understand how these new kinds of documents are being viewed on that side of things

(b)(5) dpp

[REDACTED]

From: Garcia, Monica L <monica.garcia@sol.doi.gov>
Sent: Friday, August 6, 2021 3:11 PM
To: Irish, Tony C <Tony.Irish@sol.doi.gov>; Salotti, Christopher <Chris_Salotti@ios.doi.gov>; Wallace, Andrew G <andrew_wallace@ios.doi.gov>; Gottry, Heather C <heather.gottry@sol.doi.gov>; Murphy, Timothy E <Timothy.Murphy@sol.doi.gov>
Cc: Rezaeero, Paniz <paniz_rezaeero@ios.doi.gov>; Barkin, Pamela <Pamela_Barkin@ios.doi.gov>
Subject: RE: House ethics letters

Hello all!

Following up on our call yesterday, I am sharing examples of draft and final materials provided to Nada Culver as she onboarded.

(b)(5)

As you can see, Ms. Culver had a few drafts for review and follow up and several executed guidance documents. Please let me know if you cannot access the documents on SharePoint or if you have any questions. Thanks!

-Monica

From: Irish, Tony C <Tony.Irish@sol.doi.gov>

Sent: Thursday, August 5, 2021 11:18 AM

To: Salotti, Christopher <Chris_Salotti@ios.doi.gov>; Wallace, Andrew G <andrew_wallace@ios.doi.gov>; Garcia, Monica L <monica.garcia@sol.doi.gov>; Gottry, Heather C <heather.gottry@sol.doi.gov>; Murphy, Timothy E <Timothy.Murphy@sol.doi.gov>

Cc: Rezaeero, Paniz <paniz_rezaeero@ios.doi.gov>; Barkin, Pamela <Pamela_Barkin@ios.doi.gov>

Subject: Re: House ethics letters

3:00 is preferred for me, I can try to move my 2-3 meetings if needed.

Tony Irish

Assistant Solicitor - General Legal Services

Division of General Law

P: 202-208-5065

C: 202-809-4796

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I am flexible from 2-330pm. Let's get something on the books

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Drew – Good morning! Thank you for reaching out and for your patience. We have been slammed, but I will make sure that you have drafts to review before we discuss next week. I am happy to look for an open time on the calendar. I hope your travels go well!

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Hi Heather,

Know you are busy and thanks for all you do. Checking in on status of responding to the Klein/Culver/Beaudreau and now Cordalis House letters and looping Paniz and Chris.

I'm on official travel starting today and we have a Senate budget hearing next Tuesday, but can we schedule some time next Wed (Aug 4?) to huddle? If there were some draft responses to look at then (or before) that would be awesome.

Thanks!

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Director of the Office of Congressional and Legislative Affairs

U.S. Department of the Interior

1849 C Street, NW

Washington, DC 20240

andrew_wallace@ios.doi.gov

From: [Wallace, Andrew G](#)
To: [Garcia, Monica L](#); [Salotti, Christopher](#); [Gottry, Heather C](#); [Murphy, Timothy E](#); [Irish, Tony C](#)
Cc: [Rezaeerood, Paniz](#); [Barkin, Pamela](#)
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Date: Thursday, August 5, 2021 11:06:48 AM

I am flexible from 2-330pm. Let's get something on the books

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Chris – I'm available this afternoon if you'd like to touch base. I can do 2:00 p.m. or later.

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If people have availability today - early afternoon? - or tomorrow that would work best.

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Cc: [Rezaeero, Paniz](#); [Barkin, Pamela](#)
Subject: Re: House ethics letters
Date: Monday, August 9, 2021 3:52:10 PM

Not much of a response on this, other than Drew, so checking back with an eye toward a meeting tomorrow - let me know.

From: Wallace, Andrew G <andrew_wallace@ios.doi.gov>
Sent: Monday, August 9, 2021 11:43 AM
To: Salotti, Christopher <Chris_Salotti@ios.doi.gov>; Garcia, Monica L <monica.garcia@sol.doi.gov>; Irish, Tony C <Tony.Irish@sol.doi.gov>; Gottry, Heather C <heather.gottry@sol.doi.gov>; Murphy, Timothy E <Timothy.Murphy@sol.doi.gov>
Cc: Rezaeero, Paniz <paniz_rezaeero@ios.doi.gov>; Barkin, Pamela <Pamela_Barkin@ios.doi.gov>
Subject: RE: House ethics letters

Thanks Chris, I am flexible except 1-2pm today and tomorrow AM except for 10-1030.

I think I am very close to a decision on an approach that we can execute and get responsive letters out this week (which we need to do) but before we do that we need to (b)(5)

[REDACTED]

[REDACTED]

From: Salotti, Christopher <Chris_Salotti@ios.doi.gov>
Sent: Monday, August 9, 2021 11:38 AM
To: Wallace, Andrew G <andrew_wallace@ios.doi.gov>; Garcia, Monica L <monica.garcia@sol.doi.gov>; Irish, Tony C <Tony.Irish@sol.doi.gov>; Gottry, Heather C <heather.gottry@sol.doi.gov>; Murphy, Timothy E <Timothy.Murphy@sol.doi.gov>
Cc: Rezaeero, Paniz <paniz_rezaeero@ios.doi.gov>; Barkin, Pamela <Pamela_Barkin@ios.doi.gov>
Subject: Re: House ethics letters

This may be a bit like herding cats, but following up to see if there is a time when we can all get together again to have a final discussion before we produce docs to the Ranking Member.

Ideally we can find a time this afternoon or tomorrow before 12 - are there times that will absolutely not work for people?

Tony/Tim - I defer to you guys for a contact to best represent the (b)(5) to explain from that perspective what is the latest on these type of docs. Let me know your thoughts on this.

Chris

From: Wallace, Andrew G <andrew_wallace@ios.doi.gov>

Sent: Friday, August 6, 2021 7:37 PM

To: Garcia, Monica L <monica.garcia@sol.doi.gov>; Irish, Tony C <Tony.Irish@sol.doi.gov>; Salotti, Christopher <Chris_Salotti@ios.doi.gov>; Gottry, Heather C <heather.gottry@sol.doi.gov>; Murphy, Timothy E <Timothy.Murphy@sol.doi.gov>

Cc: Rezaeero, Paniz <paniz_rezaeero@ios.doi.gov>; Barkin, Pamela <Pamela_Barkin@ios.doi.gov>

Subject: RE: House ethics letters

Thanks all – let's get together early next week with whoever at (b)(5) we need to hear from to understand how these new kinds of documents are being viewed on that side of things

(b)(5) dpp

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Cc: Rezaeero, Paniz <paniz_rezaeero@ios.doi.gov>; Barkin, Pamela <Pamela_Barkin@ios.doi.gov>

Subject: RE: House ethics letters

Hello all!

Following up on our call yesterday, I am sharing examples of draft and final materials provided to Nada Culver as she onboarded.

(b)(5)

As you can see, Ms. Culver had a few drafts for review and follow up and several executed guidance documents. Please let me know if you cannot access the documents on SharePoint or if you have any questions. Thanks!

-Monica

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Sent: Thursday, August 5, 2021 11:18 AM

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Subject: Re: House ethics letters

3:00 is preferred for me, I can try to move my 2-3 meetings if needed.

Tony Irish
Assistant Solicitor - General Legal Services
Division of General Law
P: 202-208-5065
C: 202-809-4796

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Cc: Rezaeerod, Paniz <paniz_rezaeerod@ios.doi.gov>; Salotti, Christopher <Chris_Salotti@ios.doi.gov>
Subject: House ethics letters

Hi Heather,

Know you are busy and thanks for all you do. Checking in on status of responding to the Klein/Culver/Beaudreau and now Cordalis House letters and looping Paniz and Chris.

I'm on official travel starting today and we have a Senate budget hearing next Tuesday, but can we schedule some time next Wed (Aug 4?) to huddle? If there were some draft responses to look at then (or before) that would be awesome.

Thanks!

-Drew

Andrew G. Wallace
Director of the Office of Congressional and Legislative Affairs
U.S. Department of the Interior
1849 C Street, NW
Washington, DC 20240
andrew_wallace@ios.doi.gov

From: [Garcia, Monica L](#)
To: [Irish, Tony C](#); [Salotti, Christopher](#); [Wallace, Andrew G](#); [Gottry, Heather C](#); [Murphy, Timothy E](#)
Cc: [Rezaeero, Paniz](#); [Barkin, Pamela](#)
Subject: RE: House ethics letters
Date: Friday, August 6, 2021 3:11:08 PM

Hello all!

Following up on our call yesterday, I am sharing examples of draft and final materials provided to Nada Culver as she onboarded.

(b)(5)

A large rectangular area of the document is redacted with a solid black box. The redaction covers several lines of text, likely containing sensitive information as indicated by the (b)(5) notation.

As you can see, Ms. Culver had a few drafts for review and follow up and several executed guidance documents. Please let me know if you cannot access the documents on SharePoint or if you have any questions. Thanks!

-Monica

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Cc: Rezaeero, Paniz <paniz_rezaeero@ios.doi.gov>; Barkin, Pamela <Pamela_Barkin@ios.doi.gov>
Subject: Re: House ethics letters

3:00 is preferred for me, I can try to move my 2-3 meetings if needed.

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Great - we need SOL there too because there are (b)(5) dpp

Tim/Tony - what is your availability?

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Cc: Rezaeero, Paniz <paniz_rezaeero@ios.doi.gov>; Barkin, Pamela <Pamela_Barkin@ios.doi.gov>

Subject: RE: House ethics letters

I am flexible from 2-330pm. Let's get something on the books

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Chris – I'm available this afternoon if you'd like to touch base. I can do 2:00 p.m. or later.

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Subject: Re: House ethics letters

Thanks, Heather. I am adding Tim and Tony - Drew and I spoke about this last night and think it would be good to do a short discussion.

If people have availability today - early afternoon? - or tomorrow that would work best.

Tim/Tony - does anyone else need to participate in such a discussion? (b)(5) dpp

implications, etc.

Thanks, Chris

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Subject: FW: House ethics letters

Drew – Hello again! I hope all is well with you. I am back from the beach and able to digitally sign letters either today or tomorrow. I wanted to circle back to see if the attached version is good to go. If so, should we make conforming edits to Nada's letter? Also, please let me know if it would be helpful to quickly touch base on attachments. I will have intermittent availability, but can certainly work to find an open time. Many thanks!

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Drew – Hello from the beach! Attached please find our edits in both redline and clean copy for review. If these look good, please let us know and we will make conforming edits to Nada's letter. I am travelling with family, but will be able to check in intermittently this week and can digitally sign letters on Thursday. Please let us know if it would be helpful to touch base further in the interim. Many thanks!

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Yes and let's work with a firm goal of getting back to the committee next week both a) the Klein response (which may or may not have attachments) and b) the Culver response (which will have attachments) at the same time.

Then we can turn to Beaudreau and Cordalis

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Drew – Thanks! We will review and provide any further edits for consideration. Will getting those to you on Monday work?

- Heather

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Hi Heather and Monica –

Attached are 2 things on the same Klein letter. The first is Chris' edits. He is also looking further into what the Department has provided in re: ethics requests in the past. Decisions have not been made, but looking to that info before they are.

(b)(5) dpp [REDACTED]
[REDACTED]
(b)(5) dpp [REDACTED]
[REDACTED]

I think we'd so similar things to the Nada letter, again, pending decisions.

Thanks!

From: Salotti, Christopher <Chris_Salotti@ios.doi.gov>
Sent: Wednesday, July 28, 2021 4:51 PM
To: Wallace, Andrew G <andrew_wallace@ios.doi.gov>; Rezaeerod, Paniz <paniz_rezaeerod@ios.doi.gov>
Subject: Re: House ethics letters

Here are some edits. Mostly to streamline the response. I didn't reconcile Drew's

note/comment. But take a look.

I need a bit more time to sort out the (b)(5)

Chris

From: Wallace, Andrew G <andrew_wallace@ios.doi.gov>
Sent: Wednesday, July 28, 2021 9:50 AM
To: Gottry, Heather C <heather.gottry@sol.doi.gov>; Rezaeero, Paniz <paniz_rezaeero@ios.doi.gov>
Cc: Salotti, Christopher <Chris_Salotti@ios.doi.gov>; Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: RE: House ethics letters

From: Gottry, Heather C <heather.gottry@sol.doi.gov>
Sent: Wednesday, July 28, 2021 8:19 AM
To: Rezaeero, Paniz <paniz_rezaeero@ios.doi.gov>; Wallace, Andrew G <andrew_wallace@ios.doi.gov>
Cc: Salotti, Christopher <Chris_Salotti@ios.doi.gov>; Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: RE: House ethics letters

Good morning! Attached for review and discussion please find draft response letters for the requests on Klein and Culver. I look forward to meeting with you shortly. Many thanks!

- Heather

From: Rezaeero, Paniz <paniz_rezaeero@ios.doi.gov>
Sent: Monday, July 26, 2021 10:52 AM
To: Wallace, Andrew G <andrew_wallace@ios.doi.gov>; Gottry, Heather C <heather.gottry@sol.doi.gov>
Cc: Salotti, Christopher <Chris_Salotti@ios.doi.gov>
Subject: RE: House ethics letters

Yes, I just scheduled 9 to 10 for Wednesday. Happy to shorten it to 30 mins if you think necessary but wanted to give us an hour just in case.

Paniz Rezaeero
Deputy Director of Congressional Affairs - House
Department of the Interior
1849 C Street, NW
Washington, DC 20240

paniz_rezaeerod@ios.doi.gov

NOTE: Every email I send or receive is subject to release under the Freedom of Information Act.

From: Wallace, Andrew G <andrew_wallace@ios.doi.gov>
Sent: Monday, July 26, 2021 10:49 AM
To: Rezaeerod, Paniz <paniz_rezaeerod@ios.doi.gov>; Gottry, Heather C <heather.gottry@sol.doi.gov>
Cc: Salotti, Christopher <Chris_Salotti@ios.doi.gov>
Subject: RE: House ethics letters

Paniz can you schedule something on wed – you can see my calendar I believe

From: Rezaeerod, Paniz <paniz_rezaeerod@ios.doi.gov>
Sent: Monday, July 26, 2021 10:48 AM
To: Gottry, Heather C <heather.gottry@sol.doi.gov>; Wallace, Andrew G <andrew_wallace@ios.doi.gov>
Cc: Salotti, Christopher <Chris_Salotti@ios.doi.gov>
Subject: RE: House ethics letters

I'll make myself available for whatever time is best for y'all this week. The only time I cannot move is Thursday from 2 to 3pm.

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Deputy Director of Congressional Affairs - House
Department of the Interior
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Washington, DC 20240
paniz_rezaeerod@ios.doi.gov

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From: Gottry, Heather C <heather.gottry@sol.doi.gov>
Sent: Thursday, July 22, 2021 6:28 AM
To: Wallace, Andrew G <andrew_wallace@ios.doi.gov>
Cc: Rezaeerod, Paniz <paniz_rezaeerod@ios.doi.gov>; Salotti, Christopher <Chris_Salotti@ios.doi.gov>
Subject: RE: House ethics letters

Drew – Good morning! Thank you for reaching out and for your patience. We have been slammed, but I will make sure that you have drafts to review before we discuss next week. I am happy to look for an open time on the calendar. I hope your travels go well!

- Heather

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Hi Heather,

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Thanks!

-Drew

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From: [Murphy, Timothy E](#)
To: [Gottry, Heather C](#); [Salotti, Christopher](#); [Wallace, Andrew G](#); [Garcia, Monica L](#); [Irish, Tony C](#)
Cc: [Rezaeero, Paniz](#); [Barkin, Pamela](#)
Subject: Re: House ethics letters
Date: Monday, August 9, 2021 5:22:54 PM

Lara and I are free at 10:30, can we shoot for then?

From: Gottry, Heather C <heather.gottry@sol.doi.gov>
Sent: Monday, August 9, 2021 4:00 PM
To: Salotti, Christopher <Chris_Salotti@ios.doi.gov>; Wallace, Andrew G <andrew_wallace@ios.doi.gov>; Garcia, Monica L <monica.garcia@sol.doi.gov>; Irish, Tony C <Tony.Irish@sol.doi.gov>; Murphy, Timothy E <Timothy.Murphy@sol.doi.gov>
Cc: Rezaeero, Paniz <paniz_rezaeero@ios.doi.gov>; Barkin, Pamela <Pamela_Barkin@ios.doi.gov>
Subject: RE: House ethics letters

Chris – Hello! Monica is in training this week, but I can be available this afternoon or tomorrow from 10:30-12:00 or 3:00-5:00. Many thanks!

- Heather

From: Salotti, Christopher <Chris_Salotti@ios.doi.gov>
Sent: Monday, August 9, 2021 3:52 PM
To: Wallace, Andrew G <andrew_wallace@ios.doi.gov>; Garcia, Monica L <monica.garcia@sol.doi.gov>; Irish, Tony C <Tony.Irish@sol.doi.gov>; Gottry, Heather C <heather.gottry@sol.doi.gov>; Murphy, Timothy E <Timothy.Murphy@sol.doi.gov>
Cc: Rezaeero, Paniz <paniz_rezaeero@ios.doi.gov>; Barkin, Pamela <Pamela_Barkin@ios.doi.gov>
Subject: Re: House ethics letters

Not much of a response on this, other than Drew, so checking back with an eye toward a meeting tomorrow - let me know.

From: Wallace, Andrew G <andrew_wallace@ios.doi.gov>
Sent: Monday, August 9, 2021 11:43 AM
To: Salotti, Christopher <Chris_Salotti@ios.doi.gov>; Garcia, Monica L <monica.garcia@sol.doi.gov>; Irish, Tony C <Tony.Irish@sol.doi.gov>; Gottry, Heather C <heather.gottry@sol.doi.gov>; Murphy, Timothy E <Timothy.Murphy@sol.doi.gov>
Cc: Rezaeero, Paniz <paniz_rezaeero@ios.doi.gov>; Barkin, Pamela <Pamela_Barkin@ios.doi.gov>
Subject: RE: House ethics letters

Thanks Chris, I am flexible except 1-2pm today and tomorrow AM except for 10-1030.

I think I am very close to a decision on an approach that we can execute and get responsive letters out this week (which we need to do) but before we do that we need to (b)(5)

(b)(5)

From: Salotti, Christopher <Chris_Salotti@ios.doi.gov>
Sent: Monday, August 9, 2021 11:38 AM
To: Wallace, Andrew G <andrew_wallace@ios.doi.gov>; Garcia, Monica L <monica.garcia@sol.doi.gov>; Irish, Tony C <Tony.Irish@sol.doi.gov>; Gottry, Heather C <heather.gottry@sol.doi.gov>; Murphy, Timothy E <Timothy.Murphy@sol.doi.gov>
Cc: Rezaeero, Paniz <paniz_rezaeero@ios.doi.gov>; Barkin, Pamela <Pamela_Barkin@ios.doi.gov>
Subject: Re: House ethics letters

This may be a bit like herding cats, but following up to see if there is a time when we can all get together again to have a final discussion before we produce docs to the Ranking Member.

Ideally we can find a time this afternoon or tomorrow before 12 - are there times that will absolutely not work for people?

Tony/Tim - I defer to you guys for a contact to best represent the (b)(5) to explain from that perspective what is the latest on these type of docs. Let me know your thoughts on this.

Chris

From: Wallace, Andrew G <andrew_wallace@ios.doi.gov>
Sent: Friday, August 6, 2021 7:37 PM
To: Garcia, Monica L <monica.garcia@sol.doi.gov>; Irish, Tony C <Tony.Irish@sol.doi.gov>; Salotti, Christopher <Chris_Salotti@ios.doi.gov>; Gottry, Heather C <heather.gottry@sol.doi.gov>; Murphy, Timothy E <Timothy.Murphy@sol.doi.gov>
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Subject: RE: House ethics letters

Thanks all – let's get together early next week with whoever at (b)(5) we need to hear from to understand how these new kinds of documents are being viewed on that side of things

(b)(5) dpp

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As you can see, Ms. Culver had a few drafts for review and follow up and several executed guidance documents. Please let me know if you cannot access the documents on SharePoint or if you have any questions. Thanks!

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Cc: [Rezaeero, Paniz](#); [Barkin, Pamela](#)
Subject: RE: House ethics letters
Date: Friday, August 6, 2021 7:37:38 PM

Thanks all – let's get together early next week with whoever at (b)(5) we need to hear from to understand how these new kinds of documents are being viewed on that side of things

(b)(5) dpp
[Redacted]

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(b)(5) dpp

A large black rectangular redaction box covers the bottom portion of the email body, starting below the text "(b)(5) dpp" and extending across most of the page width.

(b)(5) dpp

I think we'd so similar things to the Nada letter, again, pending decisions.

Thanks!

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Sent: Wednesday, July 28, 2021 4:51 PM
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Here are some edits. Mostly to streamline the response. I didn't reconcile Drew's note/comment. But take a look.

I need a bit more time to sort out the (b)(5)

Chris

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To: [Garcia, Monica L](#); [Gottry, Heather C](#)
Cc: [Mangum, Lara J](#)
Subject: Re: House ethics letters
Date: Monday, August 9, 2021 5:23:46 PM

We are in...thanks!!

From: Garcia, Monica L <monica.garcia@sol.doi.gov>
Sent: Monday, August 9, 2021 5:13 PM
To: Murphy, Timothy E <Timothy.Murphy@sol.doi.gov>; Gottry, Heather C <heather.gottry@sol.doi.gov>
Cc: Mangum, Lara J <lara.mangum@sol.doi.gov>
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My apologies, Tim. Confirming that I have given access to Lara via SharePoint and it looks like a link was directly shared with her.

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(b)(5) dpp [REDACTED]

I think we'd so similar things to the Nada letter, again, pending decisions.

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From: Salotti, Christopher <Chris_Salotti@ios.doi.gov>

Sent: Wednesday, July 28, 2021 4:51 PM

To: Wallace, Andrew G <andrew_wallace@ios.doi.gov>; Rezaeerod, Paniz

<paniz_rezaeerod@ios.doi.gov>

Subject: Re: House ethics letters

Here are some edits. Mostly to streamline the response. I didn't reconcile Drew's note/comment. But take a look.

I need a bit more time to sort out the (b)(5) [REDACTED]

Chris

From: Wallace, Andrew G <andrew_wallace@ios.doi.gov>
Sent: Wednesday, July 28, 2021 9:50 AM
To: Gottry, Heather C <heather.gottry@sol.doi.gov>; Rezaeero, Paniz <paniz_rezaeero@ios.doi.gov>
Cc: Salotti, Christopher <Chris_Salotti@ios.doi.gov>; Garcia, Monica L <monica.garcia@sol.doi.gov>
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Cc: Salotti, Christopher <Chris_Salotti@ios.doi.gov>; Garcia, Monica L <monica.garcia@sol.doi.gov>
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Good morning! Attached for review and discussion please find draft response letters for the requests on Klein and Culver. I look forward to meeting with you shortly. Many thanks!

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Cc: Salotti, Christopher <Chris_Salotti@ios.doi.gov>
Subject: RE: House ethics letters

Yes, I just scheduled 9 to 10 for Wednesday. Happy to shorten it to 30 mins if you think necessary but wanted to give us an hour just in case.

Paniz Rezaeero
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Department of the Interior
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Paniz can you schedule something on wed – you can see my calendar I believe

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I'll make myself available for whatever time is best for y'all this week. The only time I cannot move is Thursday from 2 to 3pm.

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Drew – Good morning! Thank you for reaching out and for your patience. We have been slammed, but I will make sure that you have drafts to review before we discuss next week. I am happy to look for an open time on the calendar. I hope your travels go well!

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Cc: Rezaeero, Paniz <paniz_rezaeero@ios.doi.gov>; Salotti, Christopher <Chris_Salotti@ios.doi.gov>
Subject: House ethics letters

Hi Heather,

Know you are busy and thanks for all you do. Checking in on status of responding to the Klein/Culver/Beaudreau and now Cordalis House letters and looping Paniz and Chris.

I'm on official travel starting today and we have a Senate budget hearing next Tuesday, but can we schedule some time next Wed (Aug 4?) to huddle? If there were some draft responses to look at then (or before) that would be awesome.

Thanks!

-Drew

Andrew G. Wallace

Director of the Office of Congressional and Legislative Affairs

U.S. Department of the Interior

1849 C Street, NW

Washington, DC 20240

andrew_wallace@ios.doi.gov

From: [Wallace, Andrew G](#)
To: [Salotti, Christopher](#); [Garcia, Monica L](#); [Irish, Tony C](#); [Gottry, Heather C](#); [Murphy, Timothy E](#)
Cc: [Rezaeero, Paniz](#); [Barkin, Pamela](#)
Subject: RE: House ethics letters
Date: Monday, August 9, 2021 11:43:50 AM

Thanks Chris, I am flexible except 1-2pm today and tomorrow AM except for 10-1030.

I think I am very close to a decision on an approach that we can execute and get responsive letters out this week (which we need to do) but before we do that we need to (b)(5)

[REDACTED]

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Ideally we can find a time this afternoon or tomorrow before 12 - are there times that will absolutely not work for people?

Tony/Tim - I defer to you guys for a contact to best represent the (b)(5) to explain from that perspective what is the latest on these type of docs. Let me know your thoughts on this.

Chris

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Cc: Rezaeero, Paniz <paniz_rezaeero@ios.doi.gov>; Barkin, Pamela <Pamela_Barkin@ios.doi.gov>
Subject: RE: House ethics letters

Thanks all – let's get together early next week with whoever at (b)(5) we need to hear from to understand how these new kinds of documents are being viewed on that side of things

The HNR folks continue to inquire and I would like the Department to be able to be responsive on

Klein and Culver inquiries by the end of next week

From: Garcia, Monica L <monica.garcia@sol.doi.gov>
Sent: Friday, August 6, 2021 3:11 PM
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Cc: Rezaeero, Paniz <paniz_rezaeero@ios.doi.gov>; Barkin, Pamela <Pamela_Barkin@ios.doi.gov>
Subject: RE: House ethics letters

Hello all!

Following up on our call yesterday, I am sharing examples of draft and final materials provided to Nada Culver as she onboarded.

(b)(5)

A large rectangular area of the document is redacted with black bars. The redaction covers several lines of text, including what appears to be a list or set of documents. The text "(b)(5)" is visible at the top left of the redacted area.

As you can see, Ms. Culver had a few drafts for review and follow up and several executed guidance documents. Please let me know if you cannot access the documents on SharePoint or if you have any questions. Thanks!

-Monica

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To: Salotti, Christopher <Chris_Salotti@ios.doi.gov>; Wallace, Andrew G <andrew_wallace@ios.doi.gov>; Garcia, Monica L <monica.garcia@sol.doi.gov>; Gottry, Heather C <heather.gottry@sol.doi.gov>; Murphy, Timothy E <Timothy.Murphy@sol.doi.gov>
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3:00 is preferred for me, I can try to move my 2-3 meetings if needed.

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Division of General Law
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C: 202-809-4796

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Cc: Rezaeerod, Paniz <paniz_rezaeerod@ios.doi.gov>; Barkin, Pamela <Pamela_Barkin@ios.doi.gov>
Subject: Re: House ethics letters

Great - we need SOL there too because there are (b)(5) dpp
Tim/Tony - what is your availability?

From: Wallace, Andrew G <andrew_wallace@ios.doi.gov>
Sent: Thursday, August 5, 2021 11:06 AM
To: Garcia, Monica L <monica.garcia@sol.doi.gov>; Salotti, Christopher <Chris_Salotti@ios.doi.gov>; Gottry, Heather C <heather.gottry@sol.doi.gov>; Murphy, Timothy E <Timothy.Murphy@sol.doi.gov>; Irish, Tony C <Tony.Irish@sol.doi.gov>
Cc: Rezaeerod, Paniz <paniz_rezaeerod@ios.doi.gov>; Barkin, Pamela <Pamela_Barkin@ios.doi.gov>
Subject: RE: House ethics letters

I am flexible from 2-330pm. Let's get something on the books

From: Garcia, Monica L <monica.garcia@sol.doi.gov>
Sent: Thursday, August 5, 2021 10:03 AM
To: Salotti, Christopher <Chris_Salotti@ios.doi.gov>; Gottry, Heather C <heather.gottry@sol.doi.gov>; Wallace, Andrew G <andrew_wallace@ios.doi.gov>; Murphy, Timothy E <Timothy.Murphy@sol.doi.gov>; Irish, Tony C <Tony.Irish@sol.doi.gov>
Cc: Rezaeerod, Paniz <paniz_rezaeerod@ios.doi.gov>; Barkin, Pamela <Pamela_Barkin@ios.doi.gov>
Subject: RE: House ethics letters

Chris – I'm available this afternoon if you'd like to touch base. I can do 2:00 p.m. or later.

Monica

From: Salotti, Christopher <Chris_Salotti@ios.doi.gov>
Sent: Thursday, August 5, 2021 9:53 AM
To: Gottry, Heather C <heather.gottry@sol.doi.gov>; Wallace, Andrew G <andrew_wallace@ios.doi.gov>; Murphy, Timothy E <Timothy.Murphy@sol.doi.gov>; Irish, Tony C <Tony.Irish@sol.doi.gov>
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Subject: Re: House ethics letters

Thanks, Heather. I am adding Tim and Tony - Drew and I spoke about this last night and think it would be good to do a short discussion.

If people have availability today - early afternoon? - or tomorrow that would work best.

Tim/Tony - does anyone else need to participate in such a discussion? (b)(5) dpp

[REDACTED]

[REDACTED]

[REDACTED]

Thanks, Chris

From: Gottry, Heather C <heather.gottry@sol.doi.gov>
Sent: Thursday, August 5, 2021 9:39 AM
To: Wallace, Andrew G <andrew_wallace@ios.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>; Salotti, Christopher <Chris_Salotti@ios.doi.gov>; Rezaeerod, Paniz <paniz_rezaeerod@ios.doi.gov>
Subject: FW: House ethics letters

Drew – Hello again! I hope all is well with you. I am back from the beach and able to digitally sign letters either today or tomorrow. I wanted to circle back to see if the attached version is good to go. If so, should we make conforming edits to Nada's letter? Also, please let me know if it would be helpful to quickly touch base on attachments. I will have intermittent availability, but can certainly work to find an open time. Many thanks!

- Heather

From: Gottry, Heather C
Sent: Sunday, August 1, 2021 6:37 PM
To: Wallace, Andrew G <andrew_wallace@ios.doi.gov>
Cc: Salotti, Christopher <Chris_Salotti@ios.doi.gov>; Rezaeerod, Paniz <paniz_rezaeerod@ios.doi.gov>; Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: RE: House ethics letters

Drew – Hello from the beach! Attached please find our edits in both redline and clean copy for review. If these look good, please let us know and we will make conforming edits to Nada's letter. I am travelling with family, but will be able to check in intermittently this week and can digitally sign letters on Thursday. Please let us know if it would be helpful to touch base further in the interim. Many thanks!

- Heather

From: Wallace, Andrew G <andrew_wallace@ios.doi.gov>
Sent: Friday, July 30, 2021 9:13 AM
To: Gottry, Heather C <heather.gottry@sol.doi.gov>; Garcia, Monica L <monica.garcia@sol.doi.gov>
Cc: Salotti, Christopher <Chris_Salotti@ios.doi.gov>; Rezaeerod, Paniz <paniz_rezaeerod@ios.doi.gov>

Subject: RE: House ethics letters

Yes and let's work with a firm goal of getting back to the committee next week both a) the Klein response (which may or may not have attachments) and b) the Culver response (which will have attachments) at the same time.

Then we can turn to Beaudreau and Cordalis

From: Gottry, Heather C <heather.gottry@sol.doi.gov>
Sent: Friday, July 30, 2021 7:09 AM
To: Wallace, Andrew G <andrew_wallace@ios.doi.gov>; Garcia, Monica L <monica.garcia@sol.doi.gov>
Cc: Salotti, Christopher <Chris_Salotti@ios.doi.gov>; Rezaeerood, Paniz <paniz_rezaeerood@ios.doi.gov>
Subject: RE: House ethics letters

Drew – Thanks! We will review and provide any further edits for consideration. Will getting those to you on Monday work?

- Heather

From: Wallace, Andrew G <andrew_wallace@ios.doi.gov>
Sent: Thursday, July 29, 2021 9:06 AM
To: Gottry, Heather C <heather.gottry@sol.doi.gov>; Garcia, Monica L <monica.garcia@sol.doi.gov>
Cc: Salotti, Christopher <Chris_Salotti@ios.doi.gov>; Rezaeerood, Paniz <paniz_rezaeerood@ios.doi.gov>
Subject: FW: House ethics letters

Hi Heather and Monica –

Attached are 2 things on the same Klein letter. The first is Chris' edits. He is also looking further into what the Department has provided in re: ethics requests in the past. Decisions have not been made, but looking to that info before they are.

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[REDACTED]
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I think we'd so similar things to the Nada letter, again, pending decisions.

Thanks!

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I need a bit more time to sort out the (b)(5)

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Subject: RE: House ethics letters

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Cc: [Rezaeero, Paniz](#); [Barkin, Pamela](#)
Subject: RE: House ethics letters
Date: Monday, August 9, 2021 4:00:50 PM

Chris – Hello! Monica is in training this week, but I can be available this afternoon or tomorrow from 10:30-12:00 or 3:00-5:00. Many thanks!

- Heather

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Subject: Re: House ethics letters

Not much of a response on this, other than Drew, so checking back with an eye toward a meeting tomorrow - let me know.

From: Wallace, Andrew G <andrew_wallace@ios.doi.gov>
Sent: Monday, August 9, 2021 11:43 AM
To: Salotti, Christopher <Chris_Salotti@ios.doi.gov>; Garcia, Monica L <monica.garcia@sol.doi.gov>; Irish, Tony C <Tony.Irish@sol.doi.gov>; Gottry, Heather C <heather.gottry@sol.doi.gov>; Murphy, Timothy E <Timothy.Murphy@sol.doi.gov>
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To: Garcia, Monica L <monica.garcia@sol.doi.gov>; Salotti, Christopher <Chris_Salotti@ios.doi.gov>; Gottry, Heather C <heather.gottry@sol.doi.gov>; Murphy, Timothy E <Timothy.Murphy@sol.doi.gov>; Irish, Tony C <Tony.Irish@sol.doi.gov>
Cc: Rezaeero, Paniz <paniz_rezaeero@ios.doi.gov>; Barkin, Pamela <Pamela_Barkin@ios.doi.gov>
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Cc: Salotti, Christopher <Chris_Salotti@ios.doi.gov>

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I'll make myself available for whatever time is best for y'all this week. The only time I cannot move is Thursday from 2 to 3pm.

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Drew – Good morning! Thank you for reaching out and for your patience. We have been slammed, but I will make sure that you have drafts to review before we discuss next week. I am happy to look for an open time on the calendar. I hope your travels go well!

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Subject: House ethics letters

Hi Heather,

Know you are busy and thanks for all you do. Checking in on status of responding to the Klein/Culver/Beaudreau and now Cordalis House letters and looping Paniz and Chris.

I'm on official travel starting today and we have a Senate budget hearing next Tuesday, but can we schedule some time next Wed (Aug 4?) to huddle? If there were some draft responses to look at then (or before) that would be awesome.

Thanks!

-Drew

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U.S. Department of the Interior

1849 C Street, NW

Washington, DC 20240

andrew_wallace@ios.doi.gov

From: [Garcia, Monica L](#)
To: [Murphy, Timothy E](#); [Gottry, Heather C](#)
Cc: [Mangum, Lara J](#)
Subject: RE: House ethics letters
Date: Monday, August 9, 2021 5:13:07 PM

My apologies, Tim. Confirming that I have given access to Lara via SharePoint and it looks like a link was directly shared with her.

Monica

From: Murphy, Timothy E <Timothy.Murphy@sol.doi.gov>
Sent: Monday, August 9, 2021 5:10 PM
To: Gottry, Heather C <heather.gottry@sol.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>; Mangum, Lara J <lara.mangum@sol.doi.gov>
Subject: Fw: House ethics letters

Hi Heather,

It looks like this was not shared with Lara. Knowing that Lara is out, would you mind sharing the link?

Hope all is well!

Tim

From: Garcia, Monica L <monica.garcia@sol.doi.gov>
Sent: Friday, August 6, 2021 3:11 PM
To: Irish, Tony C <Tony.Irish@sol.doi.gov>; Salotti, Christopher <Chris_Salotti@ios.doi.gov>; Wallace, Andrew G <andrew_wallace@ios.doi.gov>; Gottry, Heather C <heather.gottry@sol.doi.gov>; Murphy, Timothy E <Timothy.Murphy@sol.doi.gov>
Cc: Rezaeero, Paniz <paniz_rezaeero@ios.doi.gov>; Barkin, Pamela <Pamela_Barkin@ios.doi.gov>
Subject: RE: House ethics letters

Hello all!

Following up on our call yesterday, I am sharing examples of draft and final materials provided to Nada Culver as she onboarded.

(b)(5)

[Redacted content]

As you can see, Ms. Culver had a few drafts for review and follow up and several executed guidance documents. Please let me know if you cannot access the documents on SharePoint or if you have any questions. Thanks!

-Monica

From: Irish, Tony C <Tony.Irish@sol.doi.gov>
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Subject: Re: House ethics letters

3:00 is preferred for me, I can try to move my 2-3 meetings if needed.

Tony Irish
Assistant Solicitor - General Legal Services
Division of General Law
P: 202-208-5065
C: 202-809-4796

From: Salotti, Christopher <Chris_Salotti@ios.doi.gov>
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Great - we need SOL there too because there are (b)(5) dpp

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Cc: [Rezaeero, Paniz](#); [Barkin, Pamela](#)
Subject: RE: House ethics letters
Date: Monday, August 9, 2021 5:44:47 PM

Yes let's do 1030 – (b)(5) dpp

From: Murphy, Timothy E <Timothy.Murphy@sol.doi.gov>
Sent: Monday, August 9, 2021 5:23 PM
To: Gottry, Heather C <heather.gottry@sol.doi.gov>; Salotti, Christopher <Chris_Salotti@ios.doi.gov>; Wallace, Andrew G <andrew_wallace@ios.doi.gov>; Garcia, Monica L <monica.garcia@sol.doi.gov>; Irish, Tony C <Tony.Irish@sol.doi.gov>
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Subject: Re: House ethics letters

Lara and I are free at 10:30, can we shoot for then?

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Chris – Hello! Monica is in training this week, but I can be available this afternoon or tomorrow from 10:30-12:00 or 3:00-5:00. Many thanks!

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Subject: Re: House ethics letters

Not much of a response on this, other than Drew, so checking back with an eye toward a meeting tomorrow - let me know.

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Sent: Monday, August 9, 2021 11:43 AM
To: Salotti, Christopher <Chris_Salotti@ios.doi.gov>; Garcia, Monica L <monica.garcia@sol.doi.gov>;

Irish, Tony C <Tony.Irish@sol.doi.gov>; Gottry, Heather C <heather.gottry@sol.doi.gov>; Murphy, Timothy E <Timothy.Murphy@sol.doi.gov>
Cc: Rezaeerod, Paniz <paniz_rezaeerod@ios.doi.gov>; Barkin, Pamela <Pamela_Barkin@ios.doi.gov>
Subject: RE: House ethics letters

Thanks Chris, I am flexible except 1-2pm today and tomorrow AM except for 10-1030.

I think I am very close to a decision on an approach that we can execute and get responsive letters out this week (which we need to do) but before we do that we need to (b)(5)

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Thanks all – let's get together early next week with whoever at (b)(5) we need to hear from to understand how these new kinds of documents are being viewed on that side of things

The HNR folks continue to inquire and I would like the Department to be able to be responsive on

Klein and Culver inquiries by the end of next week

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Subject: RE: House ethics letters

Hello all!

Following up on our call yesterday, I am sharing examples of draft and final materials provided to Nada Culver as she onboarded.

(b)(5)

A large rectangular area of the document is redacted with black bars. The redaction covers several lines of text, including what appears to be a list or set of documents. The text "(b)(5)" is visible at the top left of the redacted area.

As you can see, Ms. Culver had a few drafts for review and follow up and several executed guidance documents. Please let me know if you cannot access the documents on SharePoint or if you have any questions. Thanks!

-Monica

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Great - we need SOL there too because there are (b)(5) dpp
Tim/Tony - what is your availability?

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I am flexible from 2-330pm. Let's get something on the books

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Chris – I'm available this afternoon if you'd like to touch base. I can do 2:00 p.m. or later.

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Thanks, Heather. I am adding Tim and Tony - Drew and I spoke about this last night and think it would be good to do a short discussion.

If people have availability today - early afternoon? - or tomorrow that would work best.

Tim/Tony - does anyone else need to participate in such a discussion? (b)(5) dpp

Thanks, Chris

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Subject: FW: House ethics letters

Drew – Hello again! I hope all is well with you. I am back from the beach and able to digitally sign letters either today or tomorrow. I wanted to circle back to see if the attached version is good to go. If so, should we make conforming edits to Nada's letter? Also, please let me know if it would be helpful to quickly touch base on attachments. I will have intermittent availability, but can certainly work to find an open time. Many thanks!

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Subject: RE: House ethics letters

Drew – Hello from the beach! Attached please find our edits in both redline and clean copy for review. If these look good, please let us know and we will make conforming edits to Nada's letter. I am travelling with family, but will be able to check in intermittently this week and can digitally sign letters on Thursday. Please let us know if it would be helpful to touch base further in the interim. Many thanks!

- Heather

From: Wallace, Andrew G <andrew_wallace@ios.doi.gov>
Sent: Friday, July 30, 2021 9:13 AM
To: Gottry, Heather C <heather.gottry@sol.doi.gov>; Garcia, Monica L <monica.garcia@sol.doi.gov>
Cc: Salotti, Christopher <Chris_Salotti@ios.doi.gov>; Rezaeerod, Paniz <paniz_rezaeerod@ios.doi.gov>

Subject: RE: House ethics letters

Yes and let's work with a firm goal of getting back to the committee next week both a) the Klein response (which may or may not have attachments) and b) the Culver response (which will have attachments) at the same time.

Then we can turn to Beaudreau and Cordalis

From: Gottry, Heather C <heather.gottry@sol.doi.gov>
Sent: Friday, July 30, 2021 7:09 AM
To: Wallace, Andrew G <andrew_wallace@ios.doi.gov>; Garcia, Monica L <monica.garcia@sol.doi.gov>
Cc: Salotti, Christopher <Chris_Salotti@ios.doi.gov>; Rezaeerood, Paniz <paniz_rezaeerood@ios.doi.gov>
Subject: RE: House ethics letters

Drew – Thanks! We will review and provide any further edits for consideration. Will getting those to you on Monday work?

- Heather

From: Wallace, Andrew G <andrew_wallace@ios.doi.gov>
Sent: Thursday, July 29, 2021 9:06 AM
To: Gottry, Heather C <heather.gottry@sol.doi.gov>; Garcia, Monica L <monica.garcia@sol.doi.gov>
Cc: Salotti, Christopher <Chris_Salotti@ios.doi.gov>; Rezaeerood, Paniz <paniz_rezaeerood@ios.doi.gov>
Subject: FW: House ethics letters

Hi Heather and Monica –

Attached are 2 things on the same Klein letter. The first is Chris' edits. He is also looking further into what the Department has provided in re: ethics requests in the past. Decisions have not been made, but looking to that info before they are.

(b)(5) dpp [REDACTED]
[REDACTED]
(b)(5) dpp [REDACTED]
[REDACTED]

I think we'd so similar things to the Nada letter, again, pending decisions.

Thanks!

From: Salotti, Christopher <Chris_Salotti@ios.doi.gov>

Sent: Wednesday, July 28, 2021 4:51 PM

To: Wallace, Andrew G <andrew_wallace@ios.doi.gov>; Rezaeerod, Paniz <paniz_rezaeerod@ios.doi.gov>

Subject: Re: House ethics letters

Here are some edits. Mostly to streamline the response. I didn't reconcile Drew's note/comment. But take a look.

I need a bit more time to sort out the (b)(5)

Chris

From: Wallace, Andrew G <andrew_wallace@ios.doi.gov>

Sent: Wednesday, July 28, 2021 9:50 AM

To: Gottry, Heather C <heather.gottry@sol.doi.gov>; Rezaeerod, Paniz <paniz_rezaeerod@ios.doi.gov>

Cc: Salotti, Christopher <Chris_Salotti@ios.doi.gov>; Garcia, Monica L <monica.garcia@sol.doi.gov>

Subject: RE: House ethics letters

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

Sent: Wednesday, July 28, 2021 8:19 AM

To: Rezaeerod, Paniz <paniz_rezaeerod@ios.doi.gov>; Wallace, Andrew G <andrew_wallace@ios.doi.gov>

Cc: Salotti, Christopher <Chris_Salotti@ios.doi.gov>; Garcia, Monica L <monica.garcia@sol.doi.gov>

Subject: RE: House ethics letters

Good morning! Attached for review and discussion please find draft response letters for the requests on Klein and Culver. I look forward to meeting with you shortly. Many thanks!

- Heather

From: Rezaeerod, Paniz <paniz_rezaeerod@ios.doi.gov>

Sent: Monday, July 26, 2021 10:52 AM

To: Wallace, Andrew G <andrew_wallace@ios.doi.gov>; Gottry, Heather C <heather.gottry@sol.doi.gov>

Cc: Salotti, Christopher <Chris_Salotti@ios.doi.gov>

Subject: RE: House ethics letters

Yes, I just scheduled 9 to 10 for Wednesday. Happy to shorten it to 30 mins if you think necessary but wanted to give us an hour just in case.

Paniz Rezaeero
Deputy Director of Congressional Affairs - House
Department of the Interior
1849 C Street, NW
Washington, DC 20240
paniz_rezaeero@ios.doi.gov

NOTE: Every email I send or receive is subject to release under the Freedom of Information Act.

From: Wallace, Andrew G <andrew_wallace@ios.doi.gov>
Sent: Monday, July 26, 2021 10:49 AM
To: Rezaeero, Paniz <paniz_rezaeero@ios.doi.gov>; Gottry, Heather C <heather.gottry@sol.doi.gov>
Cc: Salotti, Christopher <Chris_Salotti@ios.doi.gov>
Subject: RE: House ethics letters

Paniz can you schedule something on wed – you can see my calendar I believe

From: Rezaeero, Paniz <paniz_rezaeero@ios.doi.gov>
Sent: Monday, July 26, 2021 10:48 AM
To: Gottry, Heather C <heather.gottry@sol.doi.gov>; Wallace, Andrew G <andrew_wallace@ios.doi.gov>
Cc: Salotti, Christopher <Chris_Salotti@ios.doi.gov>
Subject: RE: House ethics letters

I'll make myself available for whatever time is best for y'all this week. The only time I cannot move is Thursday from 2 to 3pm.

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Department of the Interior
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Washington, DC 20240
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From: Gottry, Heather C <heather.gottry@sol.doi.gov>
Sent: Thursday, July 22, 2021 6:28 AM
To: Wallace, Andrew G <andrew_wallace@ios.doi.gov>
Cc: Rezaeero, Paniz <paniz_rezaeero@ios.doi.gov>; Salotti, Christopher <Chris_Salotti@ios.doi.gov>
Subject: RE: House ethics letters

Drew – Good morning! Thank you for reaching out and for your patience. We have been slammed, but I will make sure that you have drafts to review before we discuss next week. I am happy to look for an open time on the calendar. I hope your travels go well!

- Heather

From: Wallace, Andrew G <andrew_wallace@ios.doi.gov>
Sent: Wednesday, July 21, 2021 10:58 AM
To: Gottry, Heather C <heather.gottry@sol.doi.gov>
Cc: Rezaeero, Paniz <paniz_rezaeero@ios.doi.gov>; Salotti, Christopher <Chris_Salotti@ios.doi.gov>
Subject: House ethics letters

Hi Heather,

Know you are busy and thanks for all you do. Checking in on status of responding to the Klein/Culver/Beaudreau and now Cordalis House letters and looping Paniz and Chris.

I'm on official travel starting today and we have a Senate budget hearing next Tuesday, but can we schedule some time next Wed (Aug 4?) to huddle? If there were some draft responses to look at then (or before) that would be awesome.

Thanks!

-Drew

Andrew G. Wallace
Director of the Office of Congressional and Legislative Affairs
U.S. Department of the Interior
1849 C Street, NW
Washington, DC 20240
andrew_wallace@ios.doi.gov

From: [Gottry, Heather C](#)
To: [Wallace, Andrew G](#); [Murphy, Timothy E](#); [Salotti, Christopher](#); [Garcia, Monica L](#); [Irish, Tony C](#)
Cc: [Rezaeero, Paniz](#); [Barkin, Pamela](#)
Subject: RE: House ethics letters
Date: Monday, August 9, 2021 6:27:37 PM

I can make it then, but Monica will be in training. Thanks!

From: Wallace, Andrew G <andrew_wallace@ios.doi.gov>
Sent: Monday, August 9, 2021 5:45 PM
To: Murphy, Timothy E <Timothy.Murphy@sol.doi.gov>; Gottry, Heather C <heather.gottry@sol.doi.gov>; Salotti, Christopher <Chris_Salotti@ios.doi.gov>; Garcia, Monica L <monica.garcia@sol.doi.gov>; Irish, Tony C <Tony.Irish@sol.doi.gov>
Cc: Rezaeero, Paniz <paniz_rezaeero@ios.doi.gov>; Barkin, Pamela <Pamela_Barkin@ios.doi.gov>
Subject: RE: House ethics letters

Yes let's do 1030 – (b)(5) dpp

From: Murphy, Timothy E <Timothy.Murphy@sol.doi.gov>
Sent: Monday, August 9, 2021 5:23 PM
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Cc: Rezaeero, Paniz <paniz_rezaeero@ios.doi.gov>; Barkin, Pamela <Pamela_Barkin@ios.doi.gov>
Subject: Re: House ethics letters

Lara and I are free at 10:30, can we shoot for then?

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Subject: RE: House ethics letters

Chris – Hello! Monica is in training this week, but I can be available this afternoon or tomorrow from 10:30-12:00 or 3:00-5:00. Many thanks!

- Heather

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[REDACTED]

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Sent: Sunday, August 1, 2021 6:37 PM

To: Wallace, Andrew G <andrew_wallace@ios.doi.gov>

Cc: Salotti, Christopher <Chris_Salotti@ios.doi.gov>; Rezaeero, Paniz <paniz_rezaeero@ios.doi.gov>; Garcia, Monica L <monica.garcia@sol.doi.gov>

Subject: RE: House ethics letters

Drew – Hello from the beach! Attached please find our edits in both redline and clean copy for review. If these look good, please let us know and we will make conforming edits to Nada's letter. I am travelling with family, but will be able to check in intermittently this week and can digitally sign letters on Thursday. Please let us know if it would be helpful to touch base further in the interim.

Many thanks!

- Heather

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Sent: Friday, July 30, 2021 9:13 AM
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Cc: Salotti, Christopher <Chris_Salotti@ios.doi.gov>; Rezaeerod, Paniz <paniz_rezaeerod@ios.doi.gov>
Subject: RE: House ethics letters

Yes and let's work with a firm goal of getting back to the committee next week both a) the Klein response (which may or may not have attachments) and b) the Culver response (which will have attachments) at the same time.

Then we can turn to Beaudreau and Cordalis

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Drew – Thanks! We will review and provide any further edits for consideration. Will getting those to you on Monday work?

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Hi Heather and Monica –

Attached are 2 things on the same Klein letter. The first is Chris' edits. He is also looking further into what the Department has provided in re: ethics requests in the past. Decisions have not been made, but looking to that info before they are.

(b)(5) dpp

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I think we'd do similar things to the Nada letter, again, pending decisions.

Thanks!

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Sent: Wednesday, July 28, 2021 4:51 PM

To: Wallace, Andrew G <andrew_wallace@ios.doi.gov>; Rezaeero, Paniz
<paniz_rezaeero@ios.doi.gov>

Subject: Re: House ethics letters

Here are some edits. Mostly to streamline the response. I didn't reconcile Drew's note/comment. But take a look.

I need a bit more time to sort out the (b)(5)

Chris

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Subject: RE: House ethics letters

Good morning! Attached for review and discussion please find draft response letters for the requests on Klein and Culver. I look forward to meeting with you shortly. Many thanks!

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Cc: Salotti, Christopher <Chris_Salotti@ios.doi.gov>
Subject: RE: House ethics letters

Yes, I just scheduled 9 to 10 for Wednesday. Happy to shorten it to 30 mins if you think necessary but wanted to give us an hour just in case.

Paniz Rezaeero
Deputy Director of Congressional Affairs - House
Department of the Interior
1849 C Street, NW
Washington, DC 20240
paniz_rezaeero@ios.doi.gov

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Paniz can you schedule something on wed – you can see my calendar I believe

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I'll make myself available for whatever time is best for y'all this week. The only time I cannot move is Thursday from 2 to 3pm.

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Drew – Good morning! Thank you for reaching out and for your patience. We have been slammed, but I will make sure that you have drafts to review before we discuss next week. I am happy to look for an open time on the calendar. I hope your travels go well!

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Cc: Rezaeerod, Paniz <paniz_rezaeerod@ios.doi.gov>; Salotti, Christopher <Chris_Salotti@ios.doi.gov>
Subject: House ethics letters

Hi Heather,

Know you are busy and thanks for all you do. Checking in on status of responding to the Klein/Culver/Beaudreau and now Cordalis House letters and looping Paniz and Chris.

I'm on official travel starting today and we have a Senate budget hearing next Tuesday, but can we schedule some time next Wed (Aug 4?) to huddle? If there were some draft responses to look at then (or before) that would be awesome.

Thanks!

-Drew

Andrew G. Wallace
Director of the Office of Congressional and Legislative Affairs
U.S. Department of the Interior
1849 C Street, NW
Washington, DC 20240
andrew_wallace@ios.doi.gov

From: [Wallace, Andrew G](#)
To: [Murphy, Timothy E](#); [Gottry, Heather C](#); [Salotti, Christopher](#); [Garcia, Monica L](#); [Irish, Tony C](#)
Cc: [Rezaeero, Paniz](#); [Barkin, Pamela](#)
Subject: RE: House ethics letters
Date: Tuesday, August 10, 2021 8:41:33 AM

I'm going to send around a teams for 1030 but someone needs to make sure the SOL FOIA attorney and office are then included

From: Murphy, Timothy E <Timothy.Murphy@sol.doi.gov>
Sent: Monday, August 9, 2021 5:23 PM
To: Gottry, Heather C <heather.gottry@sol.doi.gov>; Salotti, Christopher <Chris_Salotti@ios.doi.gov>; Wallace, Andrew G <andrew_wallace@ios.doi.gov>; Garcia, Monica L <monica.garcia@sol.doi.gov>; Irish, Tony C <Tony.Irish@sol.doi.gov>
Cc: Rezaeero, Paniz <paniz_rezaeero@ios.doi.gov>; Barkin, Pamela <Pamela_Barkin@ios.doi.gov>
Subject: Re: House ethics letters

Lara and I are free at 10:30, can we shoot for then?

From: Gottry, Heather C <heather.gottry@sol.doi.gov>
Sent: Monday, August 9, 2021 4:00 PM
To: Salotti, Christopher <Chris_Salotti@ios.doi.gov>; Wallace, Andrew G <andrew_wallace@ios.doi.gov>; Garcia, Monica L <monica.garcia@sol.doi.gov>; Irish, Tony C <Tony.Irish@sol.doi.gov>; Murphy, Timothy E <Timothy.Murphy@sol.doi.gov>
Cc: Rezaeero, Paniz <paniz_rezaeero@ios.doi.gov>; Barkin, Pamela <Pamela_Barkin@ios.doi.gov>
Subject: RE: House ethics letters

Chris – Hello! Monica is in training this week, but I can be available this afternoon or tomorrow from 10:30-12:00 or 3:00-5:00. Many thanks!

- Heather

From: Salotti, Christopher <Chris_Salotti@ios.doi.gov>
Sent: Monday, August 9, 2021 3:52 PM
To: Wallace, Andrew G <andrew_wallace@ios.doi.gov>; Garcia, Monica L <monica.garcia@sol.doi.gov>; Irish, Tony C <Tony.Irish@sol.doi.gov>; Gottry, Heather C <heather.gottry@sol.doi.gov>; Murphy, Timothy E <Timothy.Murphy@sol.doi.gov>
Cc: Rezaeero, Paniz <paniz_rezaeero@ios.doi.gov>; Barkin, Pamela <Pamela_Barkin@ios.doi.gov>
Subject: Re: House ethics letters

Not much of a response on this, other than Drew, so checking back with an eye toward a meeting tomorrow - let me know.

From: Wallace, Andrew G <andrew_wallace@ios.doi.gov>
Sent: Monday, August 9, 2021 11:43 AM

To: Salotti, Christopher <Chris_Salotti@ios.doi.gov>; Garcia, Monica L <monica.garcia@sol.doi.gov>; Irish, Tony C <Tony.Irish@sol.doi.gov>; Gottry, Heather C <heather.gottry@sol.doi.gov>; Murphy, Timothy E <Timothy.Murphy@sol.doi.gov>
Cc: Rezaeerod, Paniz <paniz_rezaeerod@ios.doi.gov>; Barkin, Pamela <Pamela_Barkin@ios.doi.gov>
Subject: RE: House ethics letters

Thanks Chris, I am flexible except 1-2pm today and tomorrow AM except for 10-1030.

I think I am very close to a decision on an approach that we can execute and get responsive letters out this week (which we need to do) but before we do that we need to (b)(5)

From: Salotti, Christopher <Chris_Salotti@ios.doi.gov>
Sent: Monday, August 9, 2021 11:38 AM
To: Wallace, Andrew G <andrew_wallace@ios.doi.gov>; Garcia, Monica L <monica.garcia@sol.doi.gov>; Irish, Tony C <Tony.Irish@sol.doi.gov>; Gottry, Heather C <heather.gottry@sol.doi.gov>; Murphy, Timothy E <Timothy.Murphy@sol.doi.gov>
Cc: Rezaeerod, Paniz <paniz_rezaeerod@ios.doi.gov>; Barkin, Pamela <Pamela_Barkin@ios.doi.gov>
Subject: Re: House ethics letters

This may be a bit like herding cats, but following up to see if there is a time when we can all get together again to have a final discussion before we produce docs to the Ranking Member.

Ideally we can find a time this afternoon or tomorrow before 12 - are there times that will absolutely not work for people?

Tony/Tim - I defer to you guys for a contact to best represent the (b)(5) to explain from that perspective what is the latest on these type of docs. Let me know your thoughts on this.

Chris

From: Wallace, Andrew G <andrew_wallace@ios.doi.gov>
Sent: Friday, August 6, 2021 7:37 PM
To: Garcia, Monica L <monica.garcia@sol.doi.gov>; Irish, Tony C <Tony.Irish@sol.doi.gov>; Salotti, Christopher <Chris_Salotti@ios.doi.gov>; Gottry, Heather C <heather.gottry@sol.doi.gov>; Murphy, Timothy E <Timothy.Murphy@sol.doi.gov>
Cc: Rezaeerod, Paniz <paniz_rezaeerod@ios.doi.gov>; Barkin, Pamela <Pamela_Barkin@ios.doi.gov>
Subject: RE: House ethics letters

Thanks all – let's get together early next week with whoever at (b)(5) office we need to hear from to understand how these new kinds of documents are being viewed on that side of things

(b)(5) dpp

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

Sent: Friday, August 6, 2021 3:11 PM

To: Irish, Tony C <Tony.Irish@sol.doi.gov>; Salotti, Christopher <Chris_Salotti@ios.doi.gov>; Wallace, Andrew G <andrew_wallace@ios.doi.gov>; Gottry, Heather C <heather.gottry@sol.doi.gov>; Murphy, Timothy E <Timothy.Murphy@sol.doi.gov>

Cc: Rezaeerod, Paniz <paniz_rezaeerod@ios.doi.gov>; Barkin, Pamela <Pamela_Barkin@ios.doi.gov>

Subject: RE: House ethics letters

Hello all!

Following up on our call yesterday, I am sharing examples of draft and final materials provided to Nada Culver as she onboarded.

(b)(5)

As you can see, Ms. Culver had a few drafts for review and follow up and several executed guidance documents. Please let me know if you cannot access the documents on SharePoint or if you have any questions. Thanks!

-Monica

From: Irish, Tony C <Tony.Irish@sol.doi.gov>

Sent: Thursday, August 5, 2021 11:18 AM

To: Salotti, Christopher <Chris_Salotti@ios.doi.gov>; Wallace, Andrew G <andrew_wallace@ios.doi.gov>; Garcia, Monica L <monica.garcia@sol.doi.gov>; Gottry, Heather C <heather.gottry@sol.doi.gov>; Murphy, Timothy E <Timothy.Murphy@sol.doi.gov>

Cc: Rezaeerod, Paniz <paniz_rezaeerod@ios.doi.gov>; Barkin, Pamela <Pamela_Barkin@ios.doi.gov>

Subject: Re: House ethics letters

3:00 is preferred for me, I can try to move my 2-3 meetings if needed.

Tony Irish

Assistant Solicitor - General Legal Services

Division of General Law

P: 202-208-5065

C: 202-809-4796

From: Salotti, Christopher <Chris_Salotti@ios.doi.gov>

Sent: Thursday, August 5, 2021 11:17 AM

To: Wallace, Andrew G <andrew_wallace@ios.doi.gov>; Garcia, Monica L <monica.garcia@sol.doi.gov>; Gottry, Heather C <heather.gottry@sol.doi.gov>; Murphy, Timothy E <Timothy.Murphy@sol.doi.gov>; Irish, Tony C <Tony.Irish@sol.doi.gov>
Cc: Rezaeero, Paniz <paniz_rezaeero@ios.doi.gov>; Barkin, Pamela <Pamela_Barkin@ios.doi.gov>
Subject: Re: House ethics letters

Great - we need SOL there too because there are (b)(5) dpp
Tim/Tony - what is your availability?

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Cc: Rezaeero, Paniz <paniz_rezaeero@ios.doi.gov>; Barkin, Pamela <Pamela_Barkin@ios.doi.gov>
Subject: RE: House ethics letters

I am flexible from 2-330pm. Let's get something on the books

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

Sent: Thursday, August 5, 2021 10:03 AM

To: Salotti, Christopher <Chris_Salotti@ios.doi.gov>; Gottry, Heather C <heather.gottry@sol.doi.gov>; Wallace, Andrew G <andrew_wallace@ios.doi.gov>; Murphy, Timothy E <Timothy.Murphy@sol.doi.gov>; Irish, Tony C <Tony.Irish@sol.doi.gov>
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Subject: RE: House ethics letters

Chris – I'm available this afternoon if you'd like to touch base. I can do 2:00 p.m. or later.

Monica

From: Salotti, Christopher <Chris_Salotti@ios.doi.gov>

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Thanks, Heather. I am adding Tim and Tony - Drew and I spoke about this last night and think it would be good to do a short discussion.

If people have availability today - early afternoon? - or tomorrow that would work best.

Tim/Tony - does anyone else need to participate in such a discussion? (b)(5) dpp

[REDACTED]

Thanks, Chris

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Drew – Hello again! I hope all is well with you. I am back from the beach and able to digitally sign letters either today or tomorrow. I wanted to circle back to see if the attached version is good to go. If so, should we make conforming edits to Nada's letter? Also, please let me know if it would be helpful to quickly touch base on attachments. I will have intermittent availability, but can certainly work to find an open time. Many thanks!

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Director of the Office of Congressional and Legislative Affairs
U.S. Department of the Interior
1849 C Street, NW
Washington, DC 20240
andrew_wallace@ios.doi.gov

From: [Garcia, Monica L](#)
To: [Gottry, Heather C](#)
Subject: RE: House ethics letters
Date: Sunday, August 1, 2021 4:02:11 PM
Attachments: [DRAFT Response WGB re Klein OCL edits 7.28 clean dw3 \(DEO proposed edits mlg\).docx](#)

Heather – I have made additional edits in redline for consideration and discussion.

Monica

From: Gottry, Heather C <heather.gottry@sol.doi.gov>
Sent: Saturday, July 31, 2021 2:44 PM
To: Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: FW: House ethics letters

Monica – Attached for consideration please find my redline of the clean copy version that Drew shared with us. Please let me know if you have any further proposed edits. I will take our agreed upon final version and modify Nada's letter so I can send both to Drew on Monday. Many thanks!

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[REDACTED]
(b)(5) dpp [REDACTED]
[REDACTED]

I think we'd so similar things to the Nada letter, again, pending decisions.

Thanks!

From: Salotti, Christopher <Chris_Salotti@ios.doi.gov>

Sent: Wednesday, July 28, 2021 4:51 PM

To: Wallace, Andrew G <andrew_wallace@ios.doi.gov>; Rezaeero, Paniz <paniz_rezaeero@ios.doi.gov>

Subject: Re: House ethics letters

Here are some edits. Mostly to streamline the response. I didn't reconcile Drew's note/comment. But take a look.

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Chris

From: Wallace, Andrew G <andrew_wallace@ios.doi.gov>

Sent: Wednesday, July 28, 2021 9:50 AM

To: Gottry, Heather C <heather.gottry@sol.doi.gov>; Rezaeero, Paniz <paniz_rezaeero@ios.doi.gov>

Cc: Salotti, Christopher <Chris_Salotti@ios.doi.gov>; Garcia, Monica L <monica.garcia@sol.doi.gov>

Subject: RE: House ethics letters

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

Sent: Wednesday, July 28, 2021 8:19 AM

To: Rezaeero, Paniz <paniz_rezaeero@ios.doi.gov>; Wallace, Andrew G <andrew_wallace@ios.doi.gov>

Cc: Salotti, Christopher <Chris_Salotti@ios.doi.gov>; Garcia, Monica L <monica.garcia@sol.doi.gov>

Subject: RE: House ethics letters

Good morning! Attached for review and discussion please find draft response letters for the requests on Klein and Culver. I look forward to meeting with you shortly. Many thanks!

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Sent: Monday, July 26, 2021 10:52 AM

To: Wallace, Andrew G <andrew_wallace@ios.doi.gov>; Gottry, Heather C <heather.gottry@sol.doi.gov>

Cc: Salotti, Christopher <Chris_Salotti@ios.doi.gov>

Subject: RE: House ethics letters

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Cc: Salotti, Christopher <Chris_Salotti@ios.doi.gov>
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Subject: RE: House ethics letters

Drew – Good morning! Thank you for reaching out and for your patience. We have been slammed, but I will make sure that you have drafts to review before we discuss next week. I am happy to look for an open time on the calendar. I hope your travels go well!

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Cc: Rezaeero, Paniz <paniz_rezaeero@ios.doi.gov>; Salotti, Christopher <Chris_Salotti@ios.doi.gov>
Subject: House ethics letters

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I'm on official travel starting today and we have a Senate budget hearing next Tuesday, but can we schedule some time next Wed (Aug 4?) to huddle? If there were some draft responses to look at then (or before) that would be awesome.

Thanks!

-Drew

Andrew G. Wallace
Director of the Office of Congressional and Legislative Affairs
U.S. Department of the Interior
1849 C Street, NW
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andrew_wallace@ios.doi.gov

From: [Salotti, Christopher](#)
To: [Gottry, Heather C](#); [Wallace, Andrew G](#); [Murphy, Timothy E](#); [Irish, Tony C](#)
Cc: [Garcia, Monica L](#); [Rezaeerod, Paniz](#); [Barkin, Pamela](#)
Subject: Re: House ethics letters
Date: Thursday, August 5, 2021 9:53:05 AM
Attachments: [DRAFT Response WGB re Klein OCL edits 7.28 clean dw3 \(Clean Copy DEO proposed edits 08.01.21\).docx](#)
[DRAFT Response WGB re Klein OCL edits 7.28 clean dw3 \(DEO proposed edits 08.01.21\).docx](#)

Thanks, Heather. I am adding Tim and Tony - Drew and I spoke about this last night and think it would be good to do a short discussion.

If people have availability today - early afternoon? - or tomorrow that would work best.

Tim/Tony - does anyone else need to participate in such a discussion? (b)(5) dpp

[REDACTED]

[REDACTED]

[REDACTED]

Thanks, Chris

From: Gottry, Heather C <heather.gottry@sol.doi.gov>
Sent: Thursday, August 5, 2021 9:39 AM
To: Wallace, Andrew G <andrew_wallace@ios.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>; Salotti, Christopher <Chris_Salotti@ios.doi.gov>; Rezaeerod, Paniz <paniz_rezaeerod@ios.doi.gov>
Subject: FW: House ethics letters

Drew – Hello again! I hope all is well with you. I am back from the beach and able to digitally sign letters either today or tomorrow. I wanted to circle back to see if the attached version is good to go. If so, should we make conforming edits to Nada's letter? Also, please let me know if it would be helpful to quickly touch base on attachments. I will have intermittent availability, but can certainly work to find an open time. Many thanks!

- Heather

From: Gottry, Heather C
Sent: Sunday, August 1, 2021 6:37 PM
To: Wallace, Andrew G <andrew_wallace@ios.doi.gov>
Cc: Salotti, Christopher <Chris_Salotti@ios.doi.gov>; Rezaeerod, Paniz <paniz_rezaeerod@ios.doi.gov>; Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: RE: House ethics letters

Drew – Hello from the beach! Attached please find our edits in both redline and clean copy for review. If these look good, please let us know and we will make conforming edits to Nada's letter. I am travelling with family, but will be able to check in intermittently this week and can digitally sign letters on Thursday. Please let us know if it would be helpful to touch base further in the interim.

Many thanks!

- Heather

From: Wallace, Andrew G <andrew_wallace@ios.doi.gov>
Sent: Friday, July 30, 2021 9:13 AM
To: Gottry, Heather C <heather.gottry@sol.doi.gov>; Garcia, Monica L <monica.garcia@sol.doi.gov>
Cc: Salotti, Christopher <Chris_Salotti@ios.doi.gov>; Rezaeero, Paniz <paniz_rezaeero@ios.doi.gov>
Subject: RE: House ethics letters

Yes and let's work with a firm goal of getting back to the committee next week both a) the Klein response (which may or may not have attachments) and b) the Culver response (which will have attachments) at the same time.

Then we can turn to Beaudreau and Cordalis

From: Gottry, Heather C <heather.gottry@sol.doi.gov>
Sent: Friday, July 30, 2021 7:09 AM
To: Wallace, Andrew G <andrew_wallace@ios.doi.gov>; Garcia, Monica L <monica.garcia@sol.doi.gov>
Cc: Salotti, Christopher <Chris_Salotti@ios.doi.gov>; Rezaeero, Paniz <paniz_rezaeero@ios.doi.gov>
Subject: RE: House ethics letters

Drew – Thanks! We will review and provide any further edits for consideration. Will getting those to you on Monday work?

- Heather

From: Wallace, Andrew G <andrew_wallace@ios.doi.gov>
Sent: Thursday, July 29, 2021 9:06 AM
To: Gottry, Heather C <heather.gottry@sol.doi.gov>; Garcia, Monica L <monica.garcia@sol.doi.gov>
Cc: Salotti, Christopher <Chris_Salotti@ios.doi.gov>; Rezaeero, Paniz <paniz_rezaeero@ios.doi.gov>
Subject: FW: House ethics letters

Hi Heather and Monica –

Attached are 2 things on the same Klein letter. The first is Chris' edits. He is also looking further into what the Department has provided in re: ethics requests in the past. Decisions have not been made, but looking to that info before they are.

(b)(5) dpp

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Thanks!

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From: [Gottry, Heather C](#)
To: [Wallace, Andrew G](#)
Cc: [Salotti, Christopher](#); [Rezaeerod, Paniz](#); [Barkin, Pamela](#)
Subject: RE: Updated Ltr Response WGC re Culver w/ Attachments
Date: Friday, August 20, 2021 8:22:15 AM

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- Heather

From: Wallace, Andrew G <andrew_wallace@ios.doi.gov>
Sent: Thursday, August 19, 2021 5:49 PM
To: Gottry, Heather C <heather.gottry@sol.doi.gov>; Salotti, Christopher <Chris_Salotti@ios.doi.gov>; Rezaeerod, Paniz <paniz_rezaeerod@ios.doi.gov>; Murphy, Timothy E <Timothy.Murphy@sol.doi.gov>; Mangum, Lara J <lara.mangum@sol.doi.gov>
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Cc: [Salotti, Christopher](#); [Rezaeerod, Paniz](#); [Barkin, Pamela](#)
Subject: RE: Updated Ltr Response WGC re Culver w/ Attachments
Date: Friday, August 20, 2021 9:16:58 AM

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Cc: Salotti, Christopher <Chris_Salotti@ios.doi.gov>; Rezaeerod, Paniz <paniz_rezaeerod@ios.doi.gov>; Barkin, Pamela <Pamela_Barkin@ios.doi.gov>
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Subject: RE: Updated Ltr Response WGC re Culver w/ Attachments
Date: Friday, August 20, 2021 9:23:54 AM

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Subject: RE: Updated Ltr Response WGC re Culver w/ Attachments
Date: Friday, August 20, 2021 9:31:38 AM

Sounds good – thank you

I'd say I'm excited that this project is off our plates but alas there are 2 more in the pipeline (Beaudreau and Cordalis) but I hope they will be easier now!

From: Gottry, Heather C <heather.gottry@sol.doi.gov>
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To: Wallace, Andrew G <andrew_wallace@ios.doi.gov>
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Subject: RE: Updated Ltr Response WGC re Culver w/ Attachments
Date: Friday, August 20, 2021 9:33:26 AM

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Date: Friday, August 20, 2021 10:31:08 AM

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Date: Friday, August 20, 2021 10:35:25 AM

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Date: Friday, August 20, 2021 10:47:36 AM

Drew – Hopefully, DGL can assist with the redactions today. Given other priorities, Nada’s final ethics guidance memo will not be ready today, but will likely be ready on Monday or Tuesday. Thanks.

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Subject: RE: Updated Ltr Response WGC re Culver w/ Attachments
Date: Friday, August 20, 2021 10:48:07 AM

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Paniz Rezaeero
Deputy Director of Congressional Affairs - House
Department of the Interior
1849 C Street, NW
Washington, DC 20240
paniz_rezaeero@ios.doi.gov

NOTE: Every email I send or receive is subject to release under the Freedom of Information Act.

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Date: Friday, August 20, 2021 12:39:14 PM
Attachments: [Klein, Elizabeth \(Liz\) - Resume Redacted.pdf](#)
[Culver, Nada - Resume Redacted.pdf](#)

Ok – we’ve got the redacted resumes

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Subject: Re: Updated Ltr Response WGC re Culver w/ Attachments
Date: Thursday, August 19, 2021 7:07:27 PM

Either is fine with me. The HNR minority may prefer ink but if that requires an otherwise unnecessary trip to the office I think digital is ok.

Get [Outlook for iOS](#)

From: Gottry, Heather C <heather.gottry@sol.doi.gov>
Sent: Thursday, August 19, 2021 6:12:18 PM
To: Wallace, Andrew G <andrew_wallace@ios.doi.gov>; Salotti, Christopher <Chris_Salotti@ios.doi.gov>; Rezaeero, Paniz <paniz_rezaeero@ios.doi.gov>; Murphy, Timothy E <Timothy.Murphy@sol.doi.gov>; Mangum, Lara J <lara.mangum@sol.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: RE: Updated Ltr Response WGC re Culver w/ Attachments

Drew – Hello! I sent the Klein materials and will forward on to you shortly. Also, do you have a preference for ink or digital signatures? Thanks!

- Heather

From: Wallace, Andrew G <andrew_wallace@ios.doi.gov>
Sent: Thursday, August 19, 2021 5:49 PM
To: Gottry, Heather C <heather.gottry@sol.doi.gov>; Salotti, Christopher <Chris_Salotti@ios.doi.gov>; Rezaeero, Paniz <paniz_rezaeero@ios.doi.gov>; Murphy, Timothy E <Timothy.Murphy@sol.doi.gov>; Mangum, Lara J <lara.mangum@sol.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: RE: Updated Ltr Response WGC re Culver w/ Attachments

Thank you Heather and all who have helped

Let's plan to send tomorrow if that's ok to give time for heads ups

Can you send a similar one for the Klein letter and materials? (if others don't need, then just for me and my own notifications)

Thank you!

From: Gottry, Heather C <heather.gottry@sol.doi.gov>
Sent: Thursday, August 19, 2021 4:05 PM
To: Wallace, Andrew G <andrew_wallace@ios.doi.gov>; Salotti, Christopher <Chris_Salotti@ios.doi.gov>; Rezaeero, Paniz <paniz_rezaeero@ios.doi.gov>; Murphy, Timothy E

<Timothy.Murphy@sol.doi.gov>; Mangum, Lara J <lara.mangum@sol.doi.gov>

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

Subject: Updated Ltr Response WGC re Culver w/ Attachments

Hello! As requested, attached please find a clean version of the response letter to Representative Westerman regarding the questions asked about Nada Culver. Additionally, attached please find the proposed enclosures of the letter. Please let me know if it would be helpful to discuss further or if we can be of any additional assistance. Thank you.

- Heather

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To: [Salotti, Christopher](#); [Wallace, Andrew G](#); [Barkin, Pamela](#); [Rezaeerod, Paniz](#); [Murphy, Timothy E](#); [Mangum, Lara J](#)
Cc: [Garcia, Monica L](#)
Subject: RE: Updated Response WGB re Culver
Date: Wednesday, August 18, 2021 4:56:12 PM

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Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: Re: Updated Response WGB re Culver

Here is the Culver letter with the minor edits discussed below (b)(5) dpp

[REDACTED]

Question for Heather: (b)(5)

[REDACTED]

[REDACTED]

[REDACTED]

Chris

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Sent: Friday, August 13, 2021 12:15 PM
To: Gottry, Heather C <heather.gottry@sol.doi.gov>; Salotti, Christopher <Chris_Salotti@ios.doi.gov>; Barkin, Pamela <Pamela_Barkin@ios.doi.gov>; Rezaeerod, Paniz <paniz_rezaeerod@ios.doi.gov>; Murphy, Timothy E <Timothy.Murphy@sol.doi.gov>; Mangum, Lara J <lara.mangum@sol.doi.gov>
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A few final things to note:

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[REDACTED]
[REDACTED]
[REDACTED]
2. (b)(5) dpp [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
3. (b)(5) dpp [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
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[REDACTED]

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Cc: [Garcia, Monica L](#); [Salotti, Christopher](#); [Wallace, Andrew G](#); [Barkin, Pamela](#); [Rezaeerod, Paniz](#)
Subject: RE: Updated Response WGB re Culver
Date: Wednesday, August 18, 2021 5:49:02 PM

Chris – Thanks!

Tim and Lara – Can you please let us know if you have any concerns about the proposed attachments I shared last week for the Klein and Culver letters? I am happy forward them again if helpful.

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Sent: Wednesday, August 18, 2021 5:08 PM
To: Gottry, Heather C <heather.gottry@sol.doi.gov>; Wallace, Andrew G <andrew_wallace@ios.doi.gov>; Barkin, Pamela <Pamela_Barkin@ios.doi.gov>; Rezaeerod, Paniz <paniz_rezaeerod@ios.doi.gov>; Murphy, Timothy E <Timothy.Murphy@sol.doi.gov>; Mangum, Lara J <lara.mangum@sol.doi.gov>
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[REDACTED]

Question for Heather: (b)(5)

[REDACTED]
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[REDACTED]

Chris

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[REDACTED]
[REDACTED]

(b)(5) dpp
[REDACTED]
[REDACTED]
[REDACTED]

2. (b)(5) dpp
[REDACTED]
[REDACTED]
[REDACTED]

(b)(5) dpp

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Cc: [Garcia, Monica L](#); [Salotti, Christopher](#); [Barkin, Pamela](#); [Rezaeerood, Paniz](#)
Subject: RE: Updated Response WGB re Culver
Date: Thursday, August 19, 2021 2:02:54 PM

I think that would be helpful in a clean new email – both letters and the attachments.

I'd like to share them with some folks ahead of them going out as an FYI/heads up

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Sent: Wednesday, August 18, 2021 5:08 PM
To: Gottry, Heather C <heather.gottry@sol.doi.gov>; Wallace, Andrew G <andrew_wallace@ios.doi.gov>; Barkin, Pamela <Pamela_Barkin@ios.doi.gov>; Rezaeerood, Paniz

<paniz_rezaeerod@ios.doi.gov>; Murphy, Timothy E <Timothy.Murphy@sol.doi.gov>; Mangum, Lara J <lara.mangum@sol.doi.gov>

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

Subject: Re: Updated Response WGB re Culver

Thanks, Heather! I am comfortable with the enclosures to both letters; I cannot speak for DGL!

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

Sent: Wednesday, August 18, 2021 4:56 PM

To: Salotti, Christopher <Chris_Salotti@ios.doi.gov>; Wallace, Andrew G

<andrew_wallace@ios.doi.gov>; Barkin, Pamela <Pamela_Barkin@ios.doi.gov>; Rezaeerod, Paniz

<paniz_rezaeerod@ios.doi.gov>; Murphy, Timothy E <Timothy.Murphy@sol.doi.gov>; Mangum, Lara

J <lara.mangum@sol.doi.gov>

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

Subject: RE: Updated Response WGB re Culver

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- Heather

From: Salotti, Christopher <Chris_Salotti@ios.doi.gov>

Sent: Monday, August 16, 2021 10:26 AM

To: Wallace, Andrew G <andrew_wallace@ios.doi.gov>; Gottry, Heather C

<heather.gottry@sol.doi.gov>; Barkin, Pamela <Pamela_Barkin@ios.doi.gov>; Rezaeerod, Paniz

<paniz_rezaeerod@ios.doi.gov>; Murphy, Timothy E <Timothy.Murphy@sol.doi.gov>; Mangum, Lara

J <lara.mangum@sol.doi.gov>

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

Subject: Re: Updated Response WGB re Culver

Here is the Culver letter with the minor edits discussed below (b)(5) dpp

[REDACTED]

Question for Heather: (b)(5)

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Chris

From: Wallace, Andrew G <andrew_wallace@ios.doi.gov>

Sent: Friday, August 13, 2021 12:15 PM

To: Gottry, Heather C <heather.gottry@sol.doi.gov>; Salotti, Christopher

<Chris_Salotti@ios.doi.gov>; Barkin, Pamela <Pamela_Barkin@ios.doi.gov>; Rezaeero, Paniz

<paniz_rezaeero@ios.doi.gov>; Murphy, Timothy E <Timothy.Murphy@sol.doi.gov>; Mangum, Lara J <lara.mangum@sol.doi.gov>

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

Subject: RE: Updated Response WGB re Culver

Thanks so much for the work on both of these Heather and Monica and others. Chris is giving them one more read through.

A few final things to note:

1. (b)(5) dpp

[REDACTED]

(b)(5) dpp

[REDACTED]

2. (b)(5) dpp

[REDACTED]

3. (b)(5) dpp

[REDACTED]

4. (b)(5) dpp

[REDACTED]

I know the goal was today but Chris is taking a well deserved day off and so our new goal is early next week (ideally Monday, no later than Tuesday). Thank you to everyone again for their time and thoughtful attention.

-Drew

From: Gottry, Heather C <heather.gottry@sol.doi.gov>
Sent: Thursday, August 12, 2021 1:28 PM
To: Wallace, Andrew G <andrew_wallace@ios.doi.gov>; Salotti, Christopher <Chris_Salotti@ios.doi.gov>; Barkin, Pamela <Pamela_Barkin@ios.doi.gov>; Rezaeerood, Paniz <paniz_rezaeerood@ios.doi.gov>; Murphy, Timothy E <Timothy.Murphy@sol.doi.gov>; Mangum, Lara J <lara.mangum@sol.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: Updated Response WGB re Culver

Hello again! Attached for review and consideration please find an updated letter and proposed attachments. As we discussed, I have included proposed attachments and did not include email guidance provided on other ethics questions. I have also attached a copy of Nada's resume above as I recall that the plan was to include it in the response. Please let me know if it would be helpful to discuss further or if we can be of any assistance. Thank you.

- Heather

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Director & DAEO
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Email: heather.gottry@sol.doi.gov

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

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Customer service matters to us. Please take our short survey, [click here](#).

From: [Gottry, Heather C](#)
To: [Wallace, Andrew G](#); [Murphy, Timothy E](#); [Mangum, Lara J](#)
Cc: [Garcia, Monica L](#); [Salotti, Christopher](#); [Barkin, Pamela](#); [Rezaeerod, Paniz](#)
Subject: RE: Updated Response WGB re Culver
Date: Thursday, August 19, 2021 3:19:57 PM

Of course! I will send out shortly. Many thanks.

From: Wallace, Andrew G <andrew_wallace@ios.doi.gov>
Sent: Thursday, August 19, 2021 2:03 PM
To: Gottry, Heather C <heather.gottry@sol.doi.gov>; Murphy, Timothy E <Timothy.Murphy@sol.doi.gov>; Mangum, Lara J <lara.mangum@sol.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>; Salotti, Christopher <Chris_Salotti@ios.doi.gov>; Barkin, Pamela <Pamela_Barkin@ios.doi.gov>; Rezaeerod, Paniz <paniz_rezaeerod@ios.doi.gov>
Subject: RE: Updated Response WGB re Culver

I think that would be helpful in a clean new email – both letters and the attachments.

I'd like to share them with some folks ahead of them going out as an FYI/heads up

From: Gottry, Heather C <heather.gottry@sol.doi.gov>
Sent: Thursday, August 19, 2021 1:58 PM
To: Murphy, Timothy E <Timothy.Murphy@sol.doi.gov>; Mangum, Lara J <lara.mangum@sol.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>; Salotti, Christopher <Chris_Salotti@ios.doi.gov>; Wallace, Andrew G <andrew_wallace@ios.doi.gov>; Barkin, Pamela <Pamela_Barkin@ios.doi.gov>; Rezaeerod, Paniz <paniz_rezaeerod@ios.doi.gov>
Subject: RE: Updated Response WGB re Culver

Tim – Hello! I wanted to circle back and see if it would be helpful for me to recirculate the documents that are being considered as enclosures for the Klein and Culver letters. If so, I am to do so. I am also happy to discuss if helpful. Many thanks!

- Heather

From: Gottry, Heather C
Sent: Wednesday, August 18, 2021 5:49 PM
To: Murphy, Timothy E <Timothy.Murphy@sol.doi.gov>; Mangum, Lara J <lara.mangum@sol.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>; Salotti, Christopher <Chris_Salotti@ios.doi.gov>; Wallace, Andrew G <andrew_wallace@ios.doi.gov>; Barkin, Pamela <Pamela_Barkin@ios.doi.gov>; Rezaeerod, Paniz <paniz_rezaeerod@ios.doi.gov>
Subject: RE: Updated Response WGB re Culver

Chris – Thanks!

Tim and Lara – Can you please let us know if you have any concerns about the proposed attachments I shared last week for the Klein and Culver letters? I am happy forward them again if helpful.

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Subject: Re: Updated Response WGB re Culver

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Subject: RE: Updated Response WGB re Culver

Chris – Hello again! I am also comfortable with the edits to the Culver letter. In response to your question, we prepared a number of memos from 2019 onward for political staff providing ethics guidance on their recusals. We did not complete these memos for all political appointees but for those identified as having a higher need for specific guidance. If requested, we can certainly provide those memos. On a related note, are you and DGL comfortable with the enclosures for this letter we circulated last week? Please do not hesitate to let me know if it would be helpful to discuss further. Thanks.

- Heather

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To: Wallace, Andrew G <andrew_wallace@ios.doi.gov>; Gottry, Heather C <heather.gottry@sol.doi.gov>; Barkin, Pamela <Pamela_Barkin@ios.doi.gov>; Rezaeerod, Paniz <paniz_rezaeerod@ios.doi.gov>; Murphy, Timothy E <Timothy.Murphy@sol.doi.gov>; Mangum, Lara J <lara.mangum@sol.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>

Subject: Re: Updated Response WGB re Culver

Here is the Culver letter with the minor edits discussed below (b)(5) dpp

Question for Heather: (b)(5)

Chris

From: Wallace, Andrew G <andrew_wallace@ios.doi.gov>

Sent: Friday, August 13, 2021 12:15 PM

To: Gottry, Heather C <heather.gottry@sol.doi.gov>; Salotti, Christopher <Chris_Salotti@ios.doi.gov>; Barkin, Pamela <Pamela_Barkin@ios.doi.gov>; Rezaeerod, Paniz <paniz_rezaeerod@ios.doi.gov>; Murphy, Timothy E <Timothy.Murphy@sol.doi.gov>; Mangum, Lara J <lara.mangum@sol.doi.gov>

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

Subject: RE: Updated Response WGB re Culver

Thanks so much for the work on both of these Heather and Monic and others. Chris is giving them one more read through.

A few final things to note:

1. (b)(5) dpp

2. (b)(5) dpp

3. (b)(5) dpp

(b)(5) dpp

4. (b)(5) dpp

I know the goal was today but Chris is taking a well deserved day off and so our new goal is early next week (ideally Monday, no later than Tuesday). Thank you to everyone again for their time and thoughtful attention.

-Drew

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

Sent: Thursday, August 12, 2021 1:28 PM

To: Wallace, Andrew G <andrew_wallace@ios.doi.gov>; Salotti, Christopher <Chris_Salotti@ios.doi.gov>; Barkin, Pamela <Pamela_Barkin@ios.doi.gov>; Rezaeerod, Paniz <paniz_rezaeerod@ios.doi.gov>; Murphy, Timothy E <Timothy.Murphy@sol.doi.gov>; Mangum, Lara J <lara.mangum@sol.doi.gov>

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Hello again! Attached for review and consideration please find an updated letter and proposed attachments. As we discussed, I have included proposed attachments and did not include email guidance provided on other ethics questions. I have also attached a copy of Nada's resume above as I recall that the plan was to include it in the response. Please let me know if it would be helpful to discuss further or if we can be of any assistance. Thank you.

- Heather

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Email: heather.gottry@sol.doi.gov

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From: [Wallace, Andrew G](#)
To: [Gottry, Heather C](#); [Salotti, Christopher](#); [Barkin, Pamela](#); [Rezaeerood, Paniz](#); [Murphy, Timothy E](#); [Manqum, Lara J](#)
Cc: [Garcia, Monica L](#)
Subject: RE: Updated Response WGB re Culver
Date: Friday, August 13, 2021 12:15:40 PM

Thanks so much for the work on both of these Heather and Monic and others. Chris is giving them one more read through.

A few final things to note:

1. (b)(5) dpp [REDACTED]
[REDACTED]
[REDACTED]

(b)(5) dpp [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
2. (b)(5) dpp [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
3. (b)(5) dpp [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
4. (b)(5) dpp [REDACTED]
[REDACTED]

I know the goal was today but Chris is taking a well deserved day off and so our new goal is early next week (ideally Monday, no later than Tuesday). Thank you to everyone again for their time and thoughtful attention.

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Sent: Thursday, August 12, 2021 1:28 PM

To: Wallace, Andrew G <andrew_wallace@ios.doi.gov>; Salotti, Christopher <Chris_Salotti@ios.doi.gov>; Barkin, Pamela <Pamela_Barkin@ios.doi.gov>; Rezaeerod, Paniz <paniz_rezaeerod@ios.doi.gov>; Murphy, Timothy E <Timothy.Murphy@sol.doi.gov>; Mangum, Lara J <lara.mangum@sol.doi.gov>

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From: [Salotti, Christopher](#)
To: [Wallace, Andrew G](#); [Gottry, Heather C](#); [Barkin, Pamela](#); [Rezaeero, Paniz](#); [Murphy, Timothy E](#); [Manqum, Lara J](#)
Cc: [Garcia, Monica L](#)
Subject: Re: Updated Response WGB re Culver
Date: Monday, August 16, 2021 10:26:01 AM
Attachments: [DRAFT Response WGB re Culver OCL 8.16.docx](#)

Here is the Culver letter with the minor edits discussed below (b)(5) dpp

[REDACTED]

Question for Heather: (b)(5)

[REDACTED]

Chris

From: Wallace, Andrew G <andrew_wallace@ios.doi.gov>
Sent: Friday, August 13, 2021 12:15 PM
To: Gottry, Heather C <heather.gottry@sol.doi.gov>; Salotti, Christopher <Chris_Salotti@ios.doi.gov>; Barkin, Pamela <Pamela_Barkin@ios.doi.gov>; Rezaeero, Paniz <paniz_rezaeero@ios.doi.gov>; Murphy, Timothy E <Timothy.Murphy@sol.doi.gov>; Mangum, Lara J <lara.mangum@sol.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: RE: Updated Response WGB re Culver

Thanks so much for the work on both of these Heather and Monica and others. Chris is giving them one more read through.

A few final things to note:

1. (b)(5) dpp [REDACTED]

[REDACTED]

2. (b)(5) dpp [REDACTED]

(b)(5) dpp [REDACTED]

3. (b)(5) dpp [REDACTED]

4. (b)(5) dpp [REDACTED]

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Sent: Thursday, August 12, 2021 1:28 PM

To: Wallace, Andrew G <andrew_wallace@ios.doi.gov>; Salotti, Christopher <Chris_Salotti@ios.doi.gov>; Barkin, Pamela <Pamela_Barkin@ios.doi.gov>; Rezaeerod, Paniz <paniz_rezaeerod@ios.doi.gov>; Murphy, Timothy E <Timothy.Murphy@sol.doi.gov>; Mangum, Lara J <lara.mangum@sol.doi.gov>

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From: [Gottry, Heather C](#)
To: [Rezaeero, Paniz](#); [Wallace, Andrew G](#); [Salotti, Christopher](#); [Barkin, Pamela](#); [Murphy, Timothy E](#); [Mangum, Lara J](#)
Cc: [Garcia, Monica L](#)
Subject: RE: Updated Response WGB re Klein
Date: Wednesday, August 18, 2021 10:49:13 AM

Paniz – Thank you for the follow up. As quick update, I need to finish several ethics matters for the Secretary and Deputy Secretary and will then turn back to the letters. My hope that I will be able to do so early this afternoon. Please let me know if it would be helpful to touch base in the interim. Thanks.

- Heather

From: Rezaeero, Paniz <paniz_rezaeero@ios.doi.gov>
Sent: Wednesday, August 18, 2021 10:42 AM
To: Wallace, Andrew G <andrew_wallace@ios.doi.gov>; Salotti, Christopher <Chris_Salotti@ios.doi.gov>; Gottry, Heather C <heather.gottry@sol.doi.gov>; Barkin, Pamela <Pamela_Barkin@ios.doi.gov>; Murphy, Timothy E <Timothy.Murphy@sol.doi.gov>; Mangum, Lara J <lara.mangum@sol.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: RE: Updated Response WGB re Klein
Importance: High

Heather, Tim, Lara, Monica – see Drew’s note below. We’d like to get these out today.

Paniz Rezaeero
Deputy Director of Congressional Affairs - House
Department of the Interior
1849 C Street, NW
Washington, DC 20240
paniz_rezaeero@ios.doi.gov

NOTE: Every email I send or receive is subject to release under the Freedom of Information Act.

From: Wallace, Andrew G <andrew_wallace@ios.doi.gov>
Sent: Tuesday, August 17, 2021 11:04 AM
To: Salotti, Christopher <Chris_Salotti@ios.doi.gov>; Gottry, Heather C <heather.gottry@sol.doi.gov>; Barkin, Pamela <Pamela_Barkin@ios.doi.gov>; Rezaeero, Paniz <paniz_rezaeero@ios.doi.gov>; Murphy, Timothy E <Timothy.Murphy@sol.doi.gov>; Mangum, Lara J <lara.mangum@sol.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: Re: Updated Response WGB re Klein

It would be good to understand answers to both (b)(5) but barring any need to revise based on (b)(5) And then let’s prep these to send by Wed COB

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From: Salotti, Christopher <Chris_Salotti@ios.doi.gov>

Sent: Tuesday, August 17, 2021 10:23:08 AM

To: Gottry, Heather C <heather.gottry@sol.doi.gov>; Barkin, Pamela <Pamela_Barkin@ios.doi.gov>; Rezaeerod, Paniz <paniz_rezaeerod@ios.doi.gov>; Murphy, Timothy E <Timothy.Murphy@sol.doi.gov>; Mangum, Lara J <lara.mangum@sol.doi.gov>

Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>; Wallace, Andrew G <andrew_wallace@ios.doi.gov>

Subject: Re: Updated Response WGB re Klein

Checking back in on these two letters to make sure there were no questions or input and that we can prep finals for transmittal? Let me know ...

Chris

From: Salotti, Christopher <Chris_Salotti@ios.doi.gov>

Sent: Monday, August 16, 2021 10:43 AM

To: Wallace, Andrew G <andrew_wallace@ios.doi.gov>; Gottry, Heather C <heather.gottry@sol.doi.gov>; Barkin, Pamela <Pamela_Barkin@ios.doi.gov>; Rezaeerod, Paniz <paniz_rezaeerod@ios.doi.gov>; Murphy, Timothy E <Timothy.Murphy@sol.doi.gov>; Mangum, Lara J <lara.mangum@sol.doi.gov>

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

Subject: Re: Updated Response WGB re Klein

Here is a lightly edited Klein final draft.

One question - (b)(5) dpp

[REDACTED]

[REDACTED]

[REDACTED] (b)(5) dpp

[REDACTED]

[REDACTED]

From: Salotti, Christopher <Chris_Salotti@ios.doi.gov>

Sent: Monday, August 16, 2021 10:26 AM

To: Wallace, Andrew G <andrew_wallace@ios.doi.gov>; Gottry, Heather C <heather.gottry@sol.doi.gov>; Barkin, Pamela <Pamela_Barkin@ios.doi.gov>; Rezaeerod, Paniz <paniz_rezaeerod@ios.doi.gov>; Murphy, Timothy E <Timothy.Murphy@sol.doi.gov>; Mangum, Lara J <lara.mangum@sol.doi.gov>

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

Subject: Re: Updated Response WGB re Culver

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Question for Heather: (b)(5)

Chris

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(b)(5)

(b)(5)

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

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- Heather

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From: [Salotti, Christopher](#)
To: [Gottry, Heather C](#); [Barkin, Pamela](#); [Rezaeerod, Paniz](#); [Murphy, Timothy E](#); [Mangum, Lara J](#)
Cc: [Garcia, Monica L](#); [Wallace, Andrew G](#)
Subject: Re: Updated Response WGB re Klein
Date: Tuesday, August 17, 2021 10:23:08 AM

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Chris

From: Salotti, Christopher <Chris_Salotti@ios.doi.gov>
Sent: Monday, August 16, 2021 10:43 AM
To: Wallace, Andrew G <andrew_wallace@ios.doi.gov>; Gottry, Heather C <heather.gottry@sol.doi.gov>; Barkin, Pamela <Pamela_Barkin@ios.doi.gov>; Rezaeerod, Paniz <paniz_rezaeerod@ios.doi.gov>; Murphy, Timothy E <Timothy.Murphy@sol.doi.gov>; Mangum, Lara J <lara.mangum@sol.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>
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One question - (b)(5) dpp

[REDACTED]

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[REDACTED]

Question for Heather: (b)(5)

[REDACTED]

(b)(5)

Chris

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Sent: Friday, August 13, 2021 12:15 PM

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Thanks so much for the work on both of these Heather and Monica and others. Chris is giving them one more read through.

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From: [Rezaeero, Paniz](#)
To: [Gottry, Heather C](#); [Wallace, Andrew G](#); [Salotti, Christopher](#); [Barkin, Pamela](#); [Murphy, Timothy E](#); [Mangum, Lara J](#)
Cc: [Garcia, Monica L](#)
Subject: RE: Updated Response WGB re Klein
Date: Wednesday, August 18, 2021 3:25:19 PM

Ok, let me know when you were able to review them today! The hope is to still send them today.

Paniz Rezaeero
Deputy Director of Congressional Affairs - House
Department of the Interior
1849 C Street, NW
Washington, DC 20240
paniz_rezaeero@ios.doi.gov

NOTE: Every email I send or receive is subject to release under the Freedom of Information Act.

From: Gottry, Heather C <heather.gottry@sol.doi.gov>
Sent: Wednesday, August 18, 2021 10:49 AM
To: Rezaeero, Paniz <paniz_rezaeero@ios.doi.gov>; Wallace, Andrew G <andrew_wallace@ios.doi.gov>; Salotti, Christopher <Chris_Salotti@ios.doi.gov>; Barkin, Pamela <Pamela_Barkin@ios.doi.gov>; Murphy, Timothy E <Timothy.Murphy@sol.doi.gov>; Mangum, Lara J <lara.mangum@sol.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: RE: Updated Response WGB re Klein

Paniz – Thank you for the follow up. As quick update, I need to finish several ethics matters for the Secretary and Deputy Secretary and will then turn back to the letters. My hope that I will be able to do so early this afternoon. Please let me know if it would be helpful to touch base in the interim. Thanks.

- Heather

From: Rezaeero, Paniz <paniz_rezaeero@ios.doi.gov>
Sent: Wednesday, August 18, 2021 10:42 AM
To: Wallace, Andrew G <andrew_wallace@ios.doi.gov>; Salotti, Christopher <Chris_Salotti@ios.doi.gov>; Gottry, Heather C <heather.gottry@sol.doi.gov>; Barkin, Pamela <Pamela_Barkin@ios.doi.gov>; Murphy, Timothy E <Timothy.Murphy@sol.doi.gov>; Mangum, Lara J <lara.mangum@sol.doi.gov>
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Subject: RE: Updated Response WGB re Klein
Importance: High

Heather, Tim, Lara, Monica – see Drew’s note below. We’d like to get these out today.

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Cc: [Garcia, Monica L](#)
Subject: Re: Updated Response WGB re Klein
Date: Tuesday, August 17, 2021 11:03:31 AM

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Cc: [Garcia, Monica L](#)
Subject: RE: Updated Response WGB re Klein
Date: Wednesday, August 18, 2021 4:55:27 PM

Chris – Hello! Please accept my delay in circling back. I am comfortable with the edits to the letter. In response to your question, there was an additional step for Nada in that she was issued draft interim guidance, interim guidance, and updated interim guidance. Liz received multiple drafts of interim guidance and then final guidance. Are you and DGL comfortable with the enclosures for this letter we circulated last week? Please let me know if it would be helpful to discuss further. Thanks.

- Heather

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Date: Wednesday, August 18, 2021 10:42:13 AM
Importance: High

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3. (b)(5) dpp [REDACTED]
4. (b)(5) dpp [REDACTED]

I know the goal was today but Chris is taking a well deserved day off and so our new goal is early next week (ideally Monday, no later than Tuesday). Thank you to everyone again for their time and thoughtful attention.

-Drew

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

Sent: Thursday, August 12, 2021 1:28 PM

To: Wallace, Andrew G <andrew_wallace@ios.doi.gov>; Salotti, Christopher <Chris_Salotti@ios.doi.gov>; Barkin, Pamela <Pamela_Barkin@ios.doi.gov>; Rezaeerood, Paniz <paniz_rezaeerood@ios.doi.gov>; Murphy, Timothy E <Timothy.Murphy@sol.doi.gov>; Mangum, Lara J <lara.mangum@sol.doi.gov>

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

Subject: Updated Response WGB re Culver

Hello again! Attached for review and consideration please find an updated letter and proposed attachments. As we discussed, I have included proposed attachments and did not include email guidance provided on other ethics questions. I have also attached a copy of Nada's resume above as I recall that the plan was to include it in the response. Please let me know if it would be helpful to discuss further or if we can be of any assistance. Thank you.

- Heather

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

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From: [Salotti, Christopher](#)
To: [Wallace, Andrew G](#); [Gottry, Heather C](#); [Barkin, Pamela](#); [Rezaeerod, Paniz](#); [Murphy, Timothy E](#); [Mangum, Lara J](#)
Cc: [Garcia, Monica L](#)
Subject: Re: Updated Response WGB re Klein
Date: Monday, August 16, 2021 10:43:58 AM
Attachments: [DRAFT Response WGB re Klein OCL 8.16.docx](#)

Here is a lightly edited Klein final draft.

One question - (b)(5) dpp [REDACTED]

[REDACTED]
[REDACTED] (b)(5) dpp [REDACTED]
[REDACTED]
[REDACTED]

From: Salotti, Christopher <Chris_Salotti@ios.doi.gov>
Sent: Monday, August 16, 2021 10:26 AM
To: Wallace, Andrew G <andrew_wallace@ios.doi.gov>; Gottry, Heather C <heather.gottry@sol.doi.gov>; Barkin, Pamela <Pamela_Barkin@ios.doi.gov>; Rezaeerod, Paniz <paniz_rezaeerod@ios.doi.gov>; Murphy, Timothy E <Timothy.Murphy@sol.doi.gov>; Mangum, Lara J <lara.mangum@sol.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: Re: Updated Response WGB re Culver

Here is the Culver letter with the minor edits discussed below (b)(5) dpp [REDACTED]

[REDACTED]

Question for Heather: (b)(5) [REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]

Chris

From: Wallace, Andrew G <andrew_wallace@ios.doi.gov>
Sent: Friday, August 13, 2021 12:15 PM
To: Gottry, Heather C <heather.gottry@sol.doi.gov>; Salotti, Christopher <Chris_Salotti@ios.doi.gov>; Barkin, Pamela <Pamela_Barkin@ios.doi.gov>; Rezaeerod, Paniz <paniz_rezaeerod@ios.doi.gov>; Murphy, Timothy E <Timothy.Murphy@sol.doi.gov>; Mangum, Lara J <lara.mangum@sol.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>
Subject: RE: Updated Response WGB re Culver

Thanks so much for the work on both of these Heather and Monic and others. Chris is giving them one more read through.

A few final things to note:

1. (b)(5) dpp [REDACTED]
2. (b)(5) dpp [REDACTED]
3. (b)(5) dpp [REDACTED]
4. (b)(5) dpp [REDACTED]

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Sent: Thursday, August 12, 2021 1:28 PM
To: Wallace, Andrew G <andrew_wallace@ios.doi.gov>; Salotti, Christopher <Chris_Salotti@ios.doi.gov>; Barkin, Pamela <Pamela_Barkin@ios.doi.gov>; Rezaeero, Paniz <paniz_rezaeero@ios.doi.gov>; Murphy, Timothy E <Timothy.Murphy@sol.doi.gov>; Mangum, Lara J <lara.mangum@sol.doi.gov>
Cc: Garcia, Monica L <monica.garcia@sol.doi.gov>

Subject: Updated Response WGB re Culver

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