From: Hall, Randall (HHS/OGC)
To: Orozco, Esmeralda (HHS/IOS)
Cc: McPhail, Mary (HHS/OGC); Hancock, Glenn (HHS/OGC)
Subject: Authorization
Date: Tuesday, March 23, 2021 2:52:17 PM
Attachments: Secretary 502 Authorization.pdf

Esmeralda,

Can you get this electronic document to the Secretary for tomorrow's training. We need to discuss this with him and have him electronically sign and date it. Let me know if you have questions or if there are any problems. Thanks.

Randy

Randall J. Hall

Acting Associate General Counsel for Ethics

Alternate Designated Agency Ethics Official

Ethics Division

Department of Health and Human Services

March ___, 2021

MEMORANDUM

TO: Randall J. Hall
Acting Designated Agency Ethics Official
Department of Health and Human Services

FROM: Xavier Becerra
Secretary
Department of Health and Human Services

SUBJECT: Limited Authorization to Participate in Matters Involving the State of California

The purpose of this memorandum is to memorialize my consultation with you concerning my decision to authorize, under 5 C.F.R. § 2635.502(d), my participation in specific-party matters involving, as a party or party representative, the State of California, for whom I served as Attorney General. You have advised me that I may be authorized to participate in these specific party matters, subject to the limitations detailed below, after considering the factors articulated in section 502(d) and a determination is made that the governmental interest in my participation in these specific party matters outweighs any countervailing appearance concerns. Note, this authorization does not affect the application of the prior-employer recusal requirement of 5 C.F.R. § 2635.502 and the Ethics Pledge (Executive Order 13989) to matters involving any other prior employers other than the State of California. Nor, consistent with the Ethics Agreement I signed on January 17, 2021, does it authorize me to participate in any litigation involving the State of California that was pending during my tenure as Attorney General; however, I am not prohibited from participating in particular matters of general applicability, *e.g.* policy-setting matters, regardless of their impact on such litigation.

BACKGROUND

On March 18, 2021, I resigned my position as Attorney General of the State of California to accept the appointment as the Secretary of the Department of Health and Human Services (HHS or Department), which began on March 19, 2021. As Secretary, my duties cover the entire range of public health and social welfare policy issues and programs of concern to the Department. Specifically, as the highest-ranking political official at the Department, I am involved in top-level discussions on policy and program developments and receive all information necessary to ensure successful management of the Department. Additionally, I meet with Agency heads and other members of the Department to convey the Biden-Harris Administration's priorities, direction, and goals. At times, I also represent HHS in meetings with key stakeholders, including state and territorial governments. As Secretary, all activities of HHS fall within my official responsibilities.

I have nearly 35 years of experience in federal and state government. During the four years prior to my appointment, I served as the Attorney General for the State of California. In this position I

was California's chief law enforcement officer and headed its Department of Justice, overseeing more than 4,500 lawyers, investigators, sworn peace officers, and other employees who provide state legal services and support for local law enforcement. Additionally, the Attorney General acts as the state's chief counsel in litigation. Prior to that, I served one term in the California General Assembly, before serving 12 terms as a Member of the U.S. House of Representatives, most recently representing the 34th Congressional District of California. During my time in Congress I also held leadership positions within the House Democratic Caucus, including that of Chair.

While the majority of my work as the Secretary is at a policy-setting level that does not constitute participation in particular matters involving specific parties, I infrequently may become involved in such matters, including those to which the State of California is a party. From my previous role, I bring direct state operational experience to HHS, which makes me an effective manager of federal policy and regulations with regard to the impact on states and other stakeholders. My experience and perspective have significant value to the federal government and aids the Administration and HHS in achieving its mission and objectives. To effectively carry out my function as Secretary of HHS, I must work with states, other federal agencies, non-governmental organizations, and industry stakeholders in administering HHS programs. These contacts may occur at a large meeting that may not be a particular matter involving specific parties or at a one-on-one or small group meeting or conversation that would be a party matter. Furthermore, I may be called on to participate in litigation or enforcement actions, or other party matters to which the State of California is a party. Therefore, it is important that I be able to effectively work with all states and territories, including the State of California. Nevertheless, I will not participate in any litigation involving the State of California that was pending during my tenure as Attorney General; however, I am not prohibited from participating in particular matters of general applicability, *e.g.* policy-setting matters, regardless of their impact on such litigation.

LEGAL ANALYSIS

Under the Standards of Ethical Conduct for Employees of the Executive Branch, a federal employee may not participate in a particular matter involving specific parties if one of the parties is, or is represented by, an entity with which the employee has a "covered relationship" and where the circumstances would cause a reasonable person to question the employee's impartiality in the matter. "Covered relationships" include persons or entities for which the employee has within the last year served as an employee or consultant. See 5 C.F.R. § 2635.502(b)(1)(iv). This requirement of disqualification only applies to "particular matters involving specific parties" and not to "particular matters of general applicability" or broad policy matters. It applies, for example, to litigation, grant awards, contracts, and other matters involving a specific request, determination, or ruling, but not to legislation or regulations that might affect an entity as part of a group. When an employee's participation in a particular matter involving specific parties gives rise to a concern about the employee's impartiality in the matter, the employee may be authorized to participate in the matter if the federal government's interest in the employee's participation outweighs the concern about a potential appearance of a lack of integrity in the agency's program and operations. See 5 C.F.R. § 2635.502(d).

I served as the Attorney General for the State of California within the last year. As such, I have a covered relationship with the State of California. Furthermore, because I recently provided services to the State of California on issues that overlap with my current position, a reasonable person could question my impartiality in matters involving the state. Therefore, in order for me to participate in a particular matter in which the State of California is a party or represents a party, it must be determined - in light of all relevant circumstances - that the interest of the Government in my participation outweighs the concern that a reasonable person may question the integrity of the programs and operations of HHS. Consultation with you, the Acting Designated Agency Ethics Official, on the relevant factors to consider is also required. See 5 C.F.R. § 2635.102(b).

The ethics regulations provide that the following factors may be considered in determining whether to authorize my participation:

1. ***Nature of the relationship.*** I was employed by the State of California for four years of my approximately thirty-five-year career in government service. I am not on a leave of absence nor do I have a continuing relationship with the State of California. Furthermore, other than the standard defined benefit pension offered to all employees of the state, I have retained no personal financial interests that would create a financial conflict of interest with the State of California. Markedly different from private, for-profit entities, state governments as prior employers are generally less likely to create the type of bias or appearance of special treatment that 5 C.F.R. § 2635.502 was meant to prevent.

2. ***Effect of the matter on the finances of the State of California.*** As Secretary of HHS, I will participate in matters that are of significance to the financial interests of all the states. As stated above, I have broad responsibilities regarding the policies and operations of HHS, some of which will affect state policies and programs subject to HHS administration, state budget and resource allocation, and the legal posture between the states and the Department. My duties primarily focus on policy matters, and I will be sharing publicly available information with state officials and gathering input from them on how national policy decisions under consideration could impact the state and its residents. However, the ultimate nation-wide policy decisions that I will be working on would also impact other similarly situated states in the same way. Under these circumstances, including California in my national policy formulation discussions is not likely to have a special or unique impact on California and would not require California's exclusion from these discussions to avoid special access or appearance concerns.

   It is possible that I will be expected to participate personally and substantially in specific party matters that affect the financial interests of the State of California. Inasmuch as my participation in a specific party matter is an application of or is concerned with Departmental or Administration policy, it would be unlikely that such application of policy would favorably advantage any particular state. Rather, it would be presumed to have equal application to all similarly situated states. Furthermore, the financial effect of any specific party matters involving states in which I am likely to participate is not

particularly significant relative to the financial effect of my policy work, which would have an equal effect across all states. Of course, participation in litigation involving the State of California pending during my tenure as Attorney General presents a unique financial interest to California, one to which I committed the state as its Attorney General. Therefore, I will not participate in discussions or decisions concerning those litigation matters other than as part of a particular matter of general applicability, *i.e.* a larger policy-setting matter.

3. ***Nature and importance of my role.*** My role, as Secretary, is vitally important in carrying out the priorities and goals set for HHS by the Biden-Harris Administration, work that will profoundly affect all citizens of the United States. As Secretary, it is imperative that I be able to effectively work on all matters as needed. Though my role primarily involves setting departmental policy, I might be expected to attend meetings or weigh-in on decisions to which the State of California is a party. My engagement with public officials at all levels in all 50 states and every U.S. territory is necessary as the Department tackles difficult issues such as the country's battle with COVID-19, the welfare of children who have crossed the US-Mexico border unaccompanied, the disparities and obstacles in access to healthcare, and the promotion of better health outcomes for all Americans.

   Furthermore, I will be making departmental decisions as part of my regular work. All decision-making will, undoubtedly, be based on input from substantive experts and made in consultation with other senior leaders within the Department.

4. ***Sensitivity of the matter.*** Matters that come before the Secretary of HHS are typically the most sensitive in nature. The Immediate Office of the Secretary manages policy setting and decisions that typically have nation-wide impact and are expected to receive significant attention by the media and the Congress. Some issues are controversial in nature, and decisions on such issues may result in litigation against the Department. It is important that I be accessible to share the Department's views and rationale, as well as its decisions, with interested states. I will be able to share information that is publicly available and shared with other states that have requested a personal meeting with me or other senior Department officials to discuss issues of importance to the respective states. Allowing *all* states to participate in policy discussions as policy decisions are formulated helps to mitigate concerns that a reasonable person may question the integrity of the programs and operations of HHS due to preferential treatment.

5. ***Difficulty of reassigning the matter.*** As the highest Presidentially-appointed Senate confirmed official at HHS, the President, Administration, and Congress have entrusted me to act on behalf of the American people to manage the work of the Department. All matters are pending under my authority. It would be inefficient to reassign these management duties, as reassignment based on a single stakeholder's participation or interest in a matter could create inconsistency in function and policy. Furthermore, reassignment to a subordinate advisor would unduly disadvantage the citizens of California were the Department to engage with that state in a different manner than the

other states and territories. While other policy advisors will often also be present, the duties and authority of the Secretary cannot readily be reassigned.

The reassignment of decisions regarding specific litigation, on the other hand, can be reassigned to other members of Departmental leadership and the capable career attorneys already participating in the cases.

6. ***Adjustments to my duties.*** I was brought to HHS because of my extensive experience as a Member of Congress and as the Attorney General of California on many issues pending before HHS. Alteration to my duties would undermine the value I bring to the Department and the respective authorities of the President and the Senate to appoint and confirm me to serve the country in this role. As stated above, such changes would be inefficient, and the Department would lose the benefit of my expertise on party matters involving the State of California. Further, it would disadvantage the citizens of California inasmuch as other states could rely on and benefit from my involvement and input in their party matters.

DECISION

After consultation with the Acting Designated Agency Ethics Official regarding all of the relevant factors to consider, I have determined that, other than certain litigation matters described above, the interest of the government in my participation in specific party matters involving the State of California as a party or party representative outweighs any concern about a potential appearance of lack of integrity. Therefore, in accordance with 5 C.F.R. § 2635.502(d), the limited authorization as described above is granted.

cc:
OGC/Ethics Division
HHS Chief of Staff

From: Card Mina, Mary (HHS/OGC)
To: Hancock, Glenn (HHS/OGC)
Subject: FW: Clarification on the Ethics Question
Date: Monday, March 8, 2021 10:00:46 AM
Attachments: image001.png
image003.png
image005.png
image007.png
image009.png
image011.png

Glenn

Just FYSA

Mary

From: Dees, Karena (HHS/OGC) <Karena.Dees@hhs.gov>
Sent: Monday, March 8, 2021 9:53 AM
To: Card Mina, Mary (HHS/OGC) <Mary.CardMina@hhs.gov>
Cc: Shouman, Mohammad (HHS/OGC/ETHICS) <Mohammad.Shouman@hhs.gov>
Subject: RE: Clarification on the Ethics Question

Hi Mary,

Both really good questions. I'm going to answer in reverse order…

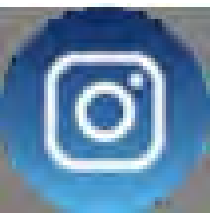
(b)(5)

-k

From: Card Mina, Mary (HHS/OGC) <Mary.CardMina@hhs.gov>
Sent: Friday, March 5, 2021 1:56 PM

The Washington Post

wp
LIFE



in

To: Dees, Karena (HHS/OGC) <Karena.Dees@hhs.gov>
Cc: Shouman, Mohammad (HHS/OGC/ETHICS) <Mohammad.Shouman@hhs.gov>
Subject: RE: Clarification on the Ethics Question

Karena,

Just two quick follow-ups as we finalize the ethics agreement.

(b)(5)

(b)(5) Thanks for any information.

Mary

From: Dees, Karena (HHS/OGC) <Karena.Dees@hhs.gov>
Sent: Friday, March 5, 2021 9:33 AM
To: Card Mina, Mary (HHS/OGC) <Mary.CardMina@hhs.gov>; Shouman, Mohammad (HHS/OGC/ETHICS) <Mohammad.Shouman@hhs.gov>
Subject: FW: Clarification on the Ethics Question

Good Morning Mohammad and Mary,

(b)(5)

Sincerely,
Karena

From: Shestakova, Irina <Irina.Shestakova@washpost.com>
Sent: Friday, March 5, 2021 9:04 AM

To: Dees, Karena (HHS/OGC) <Karena.Dees@hhs.gov>
Subject: Clarification on the Ethics Question

Dear Ms. Dees,

I am writing on behalf of one of our employees, Zachary Goldfarb, regarding his wife's position with HHS. I am confirming that there is no direct correlation between the company's revenue or profitability and the amount of Mr. Goldfarb's bonus. Therefore, we do not see foresee that Mrs. Goldfarb's interactions with The Washington Post in her position of a senior HHS official will create any direct and predictable financial benefit to her or Mr. Goldfarb.

Please let me know if you have any further questions.

Thanks,
Irina

Irina Shestakova
Director, Total Rewards

202.334.6426 (Desk)
(b)(6) (Mobile)

From Ms. Dees:

> "We can appreciate that they do not want to share proprietary information. And we are not asking for that. We are trying to discern whether "performance" is tied to profitability. We will accept verification from the company that the bonus is not tied to profitability, email will suffice? This would be to enable the spouse of one of their employees to confirm that she will not be violating a criminal conflict of interest law while performing her official functions for the Department."
>
> "…What I'm suggesting is that your husband ask them not for any specific information about the bonus, only that the company confirm that his bonus is not tied to the profitability of the company. If it would be easier for you and your spouse, I am happy to ask for clarification. I would just need who to contact."

From: Card Mina, Mary (HHS/OGC)
To: Hancock, Glenn (HHS/OGC)
Subject: FW: Clarification on the Ethics Question
Date: Friday, March 5, 2021 10:22:30 AM
Attachments: image007.png
image008.png
image009.png
image010.png
image011.png
image012.png

Glenn,

FYSA

Mary

From: Card Mina, Mary (HHS/OGC)
Sent: Friday, March 5, 2021 10:22 AM
To: Dees, Karena (HHS/OGC) <Karena.Dees@hhs.gov>; Shouman, Mohammad (HHS/OGC/ETHICS) <Mohammad.Shouman@hhs.gov>
Subject: RE: Clarification on the Ethics Question

Good morning Karena,

Thank you for your time and assistance with this matter. (b)(5) (b)(5) Thank you!

Mary

From: Dees, Karena (HHS/OGC) <Karena.Dees@hhs.gov>
Sent: Friday, March 5, 2021 9:33 AM
To: Card Mina, Mary (HHS/OGC) <Mary.CardMina@hhs.gov>; Shouman, Mohammad (HHS/OGC/ETHICS) <Mohammad.Shouman@hhs.gov>
Subject: FW: Clarification on the Ethics Question

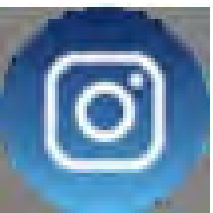
Good Morning Mohammad and Mary,

(b)(5)

Unless I have missed something, I think that resolves all of her outstanding issues.

The Washington Post

wp
LIFE



in

Sincerely,
Karena

From: Shestakova, Irina <Irina.Shestakova@washpost.com>
Sent: Friday, March 5, 2021 9:04 AM
To: Dees, Karena (HHS/OGC) <Karena.Dees@hhs.gov>
Subject: Clarification on the Ethics Question

Dear Ms. Dees,

I am writing on behalf of one of our employees, Zachary Goldfarb, regarding his wife's position with HHS. I am confirming that there is no direct correlation between the company's revenue or profitability and the amount of Mr. Goldfarb's bonus. Therefore, we do not see foresee that Mrs. Goldfarb's interactions with The Washington Post in her position of a senior HHS official will create any direct and predictable financial benefit to her or Mr. Goldfarb.

Please let me know if you have any further questions.

Thanks,
Irina

Irina Shestakova
Director, Total Rewards

202.334.6426 (Desk)
(b)(6) (Mobile)

From Ms. Dees:

> "We can appreciate that they do not want to share proprietary information. And we are not asking for that. We are trying to discern whether "performance" is tied to profitability. We will accept verification from the company that the bonus is not tied to profitability, email will suffice? This would be to enable the spouse of one of their employees to confirm that she will not be violating a criminal conflict of interest law while performing her official functions for the Department."
>
> "…What I'm suggesting is that your husband ask them not for any specific information about the bonus, only that the company confirm that his bonus is not tied to the profitability of the company. If it would be easier for you and your spouse, I am happy

to ask for clarification. I would just need who to contact."

From: Card Mina, Mary (HHS/OGC)
To: Hancock, Glenn (HHS/OGC)
Subject: FW: draft Ethics Agreement
Date: Sunday, January 31, 2021 9:35:14 PM
Attachments: Sommers Ethics Agreement Signed 1-2021.pdf

Glenn,

(b)(5)

Mary

From: Sommers, Benjamin (HHS/ASPE) <Benjamin.Sommers@hhs.gov>
Sent: Friday, January 29, 2021 11:21 AM
To: Olesh, Stanley D. (HHS/OGC) <Stanley.Olesh@HHS.GOV>
Cc: Card Mina, Mary (HHS/OGC) <Mary.CardMina@hhs.gov>; Dees, Karena (HHS/OGC) <Karena.Dees@hhs.gov>; Benson, Paul-Jon (HHS/OGC) <Paul-Jon.Benson@hhs.gov>
Subject: Re: draft Ethics Agreement

Thank you Stanley. See attached - let me know if you need anything else.

Ben

From: Olesh, Stanley D. (HHS/OGC) <Stanley.Olesh@HHS.GOV>
Sent: Friday, January 29, 2021 9:14 AM
To: Sommers, Benjamin (HHS/ASPE) <Benjamin.Sommers@hhs.gov>
Cc: Card Mina, Mary (HHS/OGC) <Mary.CardMina@hhs.gov>; Dees, Karena (HHS/OGC) <Karena.Dees@hhs.gov>; Benson, Paul-Jon (HHS/OGC) <Paul-Jon.Benson@hhs.gov>
Subject: RE: draft Ethics Agreement

Ben –
Since you have started here at HHS now, I am following up on getting a signed/dated Ethics Agreement from you. I have attached the draft – slightly updated from before, but mainly just because there is a new Ethics Pledge that applies to political appointees under the Executive Order signed on the 20th. It is e-signable -- please fill in the fields for the delegate, the date, then sign and email back to me. I have cc'd PJ Benson on this email, who is the ethics advice attorney for ASPE,

and who I believe you have already dealt with on the b-1 waiver issue.

Thanks very much – Welcome to HHS!

Stanley Olesh
Attorney-Advisor/Financial Disclosure Counsel
HHS/OGC/Ethics Division
202-690-7251
Telework cell (b)(6)

From: Olesh, Stanley D. (HHS/OGC)
Sent: Wednesday, January 13, 2021 4:36 PM
To: Sommers, Ben <(b)(6) @hsph.harvard.edu>
Cc: Card Mina, Mary (HHS/OGC) <Mary.CardMina@hhs.gov>; Dees, Karena (HHS/OGC) <Karena.Dees@hhs.gov>
Subject: RE: draft Ethics Agreement

(b)(5)

Thanks!

Stanley Olesh
Attorney-Advisor/Financial Disclosure Counsel
HHS/OGC/Ethics Division
202-690-7251
Telework cell (b)(6)

From: Sommers, Ben <(b)(6) @hsph.harvard.edu>
Sent: Wednesday, January 13, 2021 4:03 PM
To: Olesh, Stanley D. (HHS/OGC) <Stanley.Olesh@HHS.GOV>
Cc: Card Mina, Mary (HHS/OGC) <Mary.CardMina@hhs.gov>; Dees, Karena (HHS/OGC) <Karena.Dees@hhs.gov>
Subject: Re: draft Ethics Agreement

This looks great, thank you very much. (b)(5)

Ben

On Jan 13, 2021, at 2:15 PM, Olesh, Stanley D. (HHS/OGC) <Stanley.Olesh@HHS.GOV> wrote:

Dr. Sommers –

(b)(5)

Thanks!

Stanley Olesh
Attorney-Advisor/Financial Disclosure Counsel
HHS/OGC/Ethics Division
202-690-7251
Telework cell (b)(6)

From: Sommers, Ben <(b)(6)@hsph.harvard.edu>
Sent: Wednesday, January 13, 2021 12:26 PM
To: Olesh, Stanley D. (HHS/OGC) <Stanley.Olesh@HHS.GOV>
Cc: Card Mina, Mary (HHS/OGC) <Mary.CardMina@hhs.gov>; Dees, Karena (HHS/OGC) <Karena.Dees@hhs.gov>
Subject: Re: draft Ethics Agreement

Thanks so much for sending this.

Two questions came up in reading this over.

(b)(5)

(b)(6)

Ben

On Jan 13, 2021, at 10:02 AM, Olesh, Stanley D. (HHS/OGC) <Stanley.Olesh@HHS.GOV> wrote:

Dr. Sommers –

(b)(5)

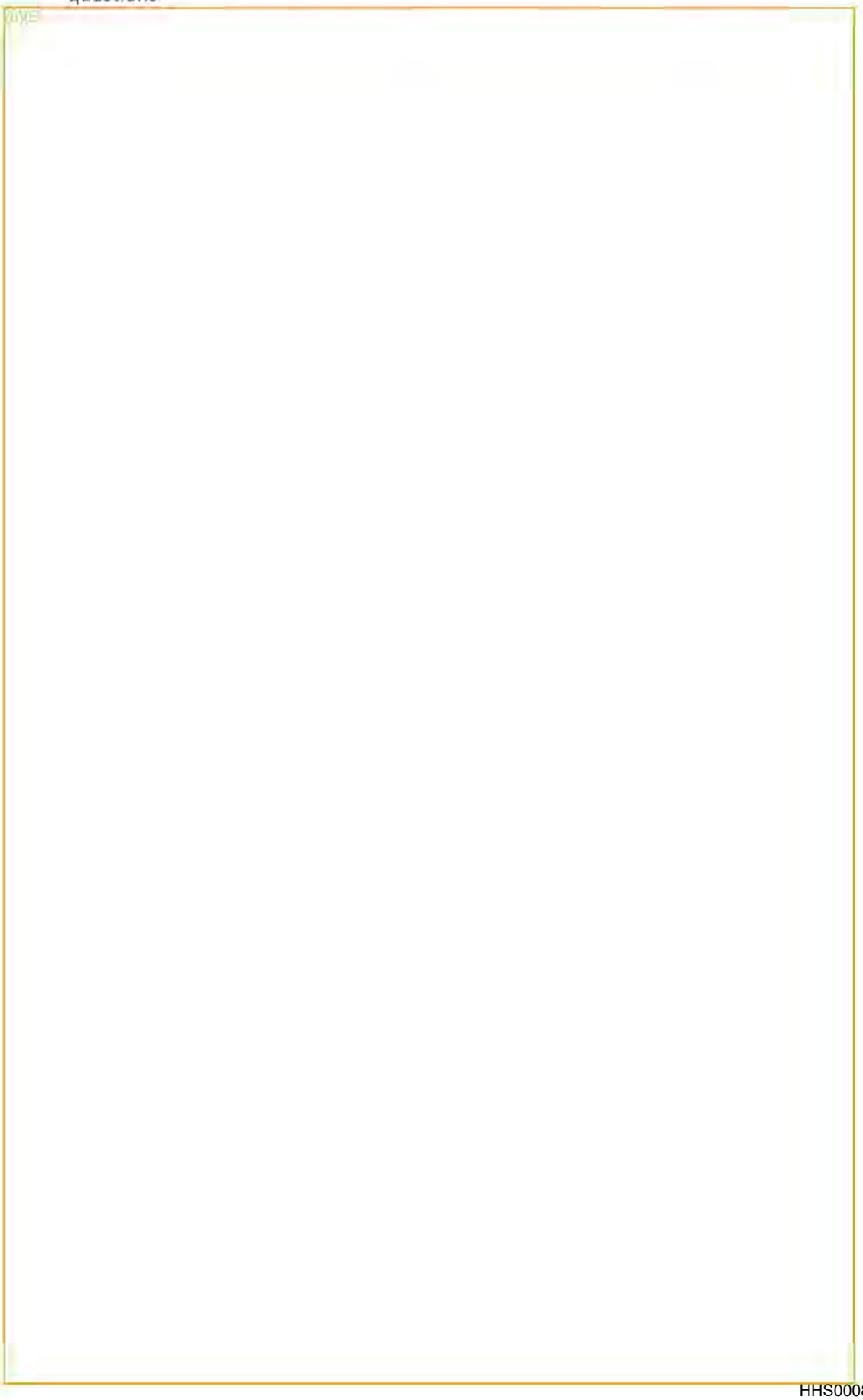
Thank you very much. Please reply back at your earliest convenience to confirm your agreement with the draft.

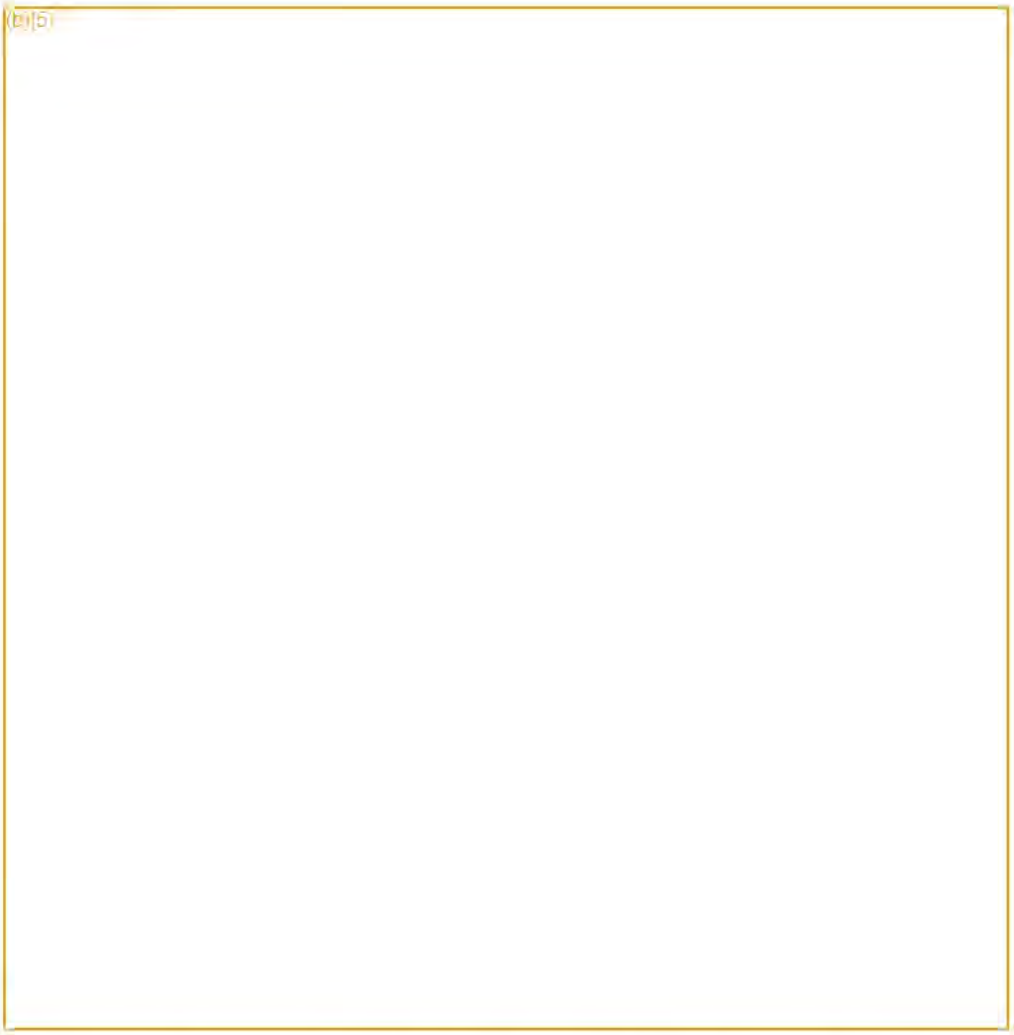
Stanley Olesh
Attorney-Advisor/Financial Disclosure Counsel
HHS/OGC/Ethics Division
202-690-7251
Telework cell (b)(6)

From: Olesh, Stanley D. (HHS/OGC)
Sent: Monday, January 11, 2021 8:58 AM
To: (b)(6) @post.harvard.edu
Cc: Card Mina, Mary (HHS/OGC) <Mary.CardMina@hhs.gov>
Subject: Review of your Public Financial Disclosure Report (OGE 278e)

Greetings Dr. Sommers –
I am in the Ethics Division of the Office of the General Counsel at HHS and I am doing the ethics review on your Public Financial Disclosure Report

(OGE 278e) that you e-filed in the Integrity system. I have a few follow-up questions –





Thank you very much. Don't hesitate to let me know if you have any questions about this.

Stanley Olesh
Attorney-Advisor/Financial Disclosure Counsel
HHS/OGC/Ethics Division
202-690-7251
Telework cell (b)(6)

From: LeFevre, Julie (HHS/IOS) <julie.lefevre@hhs.gov>
Sent: Wednesday, January 6, 2021 6:15 PM
To: Blanchette, Jason (HHS/OGC) <Jason.Blanchette@hhs.gov>; Lee, Steven (HHS/OGC) <Steven.Lee@hhs.gov>; Card Mina, Mary (HHS/OGC) <Mary.CardMina@hhs.gov>; Olesh, Stanley D. (HHS/OGC) <Stanley.Olesh@HHS.GOV>
Subject: Another for entry into Integrity - 2021 - Benjamin Sommers, MD

Good evening!

(b)(5)

(b)(5)

(b)(5)

Thank you!

Julie

Julia M.C. LeFevre, Ph.D.
Senior Advisor for Presidential Personnel
Department of Health & Human Services
Office of the Secretary
Office of the White House Liaison

Hubert H. Humphrey Building
200 Independence Avenue, SW
Suite 625-D
Washington, DC 20201
PH: 202.690.6864-Desk Direct
PH: 202-690-6625-Main
PH: (b)(6) -Cell
EMAIL: julie.lefevre@hhs.gov

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<SommersASPE EA.docx>

<SommersASPE EA.docx>

From: Card Mina, Mary (HHS/OGC)
To: Hancock, Glenn (HHS/OGC)
Subject: FW: Draft Ethics Agreement
Date: Thursday, March 18, 2021 11:43:25 AM
Attachments: TripathiONC EA e-signable.pdf

Glenn,

FYSA....Randy just called.

(b)(5)

Mary

From: Card Mina, Mary (HHS/OGC)
Sent: Thursday, March 18, 2021 11:42 AM
To: Olesh, Stanley D. (HHS/OGC) <Stanley.Olesh@HHS.GOV>
Cc: Cole, Tyler (HHS/OGC) <Tyler.Cole@hhs.gov>
Subject: FW: Draft Ethics Agreement
Importance: High

Stan and Tyler,

Greetings again (b)(5)

(b)(5)

(b)(5) Thanks!

Mary

From: Olesh, Stanley D. (HHS/OGC) <Stanley.Olesh@HHS.GOV>
Sent: Tuesday, March 16, 2021 10:54 PM
To: Tripathi, Micky (OS/ONC) <Micky.Tripathi@hhs.gov>
Cc: Card Mina, Mary (HHS/OGC) <Mary.CardMina@hhs.gov>; Cole, Tyler (HHS/OGC) <Tyler.Cole@hhs.gov>
Subject: RE: Draft Ethics Agreement

Hi Micky –
I need to follow-up with the below email regarding your Ethics Agreement. Generally we try to get signed Ethics Agreements for our political appointees as soon as possible after their start date, in case they are publicly requested. I've attached another copy of the e-signable PDF. Please add the name or title of the person who would likely be handling matters from which you are recused (in the space in the last paragraph), date and sign, then email back to me as soon as you are able.

Page 35

Withheld pursuant to exemption

(b)(5)

of the Freedom of Information Act

Page 36

Withheld pursuant to exemption

(b)(5)

of the Freedom of Information Act

Page 37

Withheld pursuant to exemption

(b)(5)

of the Freedom of Information Act

Page 38

Withheld pursuant to exemption

(b)(5)

of the Freedom of Information Act

Thank you very much.

Stanley Olesh
Attorney-Advisor/Financial Disclosure Counsel
HHS/OGC/Ethics Division
202-690-7251
Telework cell (b)(6)

From: Olesh, Stanley D. (HHS/OGC)
Sent: Friday, February 26, 2021 11:40 AM
To: Tripathi, Micky (OS/ONC) <Micky.Tripathi@hhs.gov>
Cc: Card Mina, Mary (HHS/OGC) <Mary.CardMina@hhs.gov>; Cole, Tyler (HHS/OGC) <Tyler.Cole@hhs.gov>
Subject: Draft Ethics Agreement

Hi Micky –

(b)(5)

Thanks very much. Please let me know if you have any further questions about this.

Stanley Olesh
Attorney-Advisor/Financial Disclosure Counsel
HHS/OGC/Ethics Division
202-690-7251
Telework cell (b)(6)

From: Olesh, Stanley D. (HHS/OGC)
Sent: Monday, January 18, 2021 12:50 PM
To: Micky Tripathi <Micky.Tripathi@arcadia.io>
Cc: Card Mina, Mary (HHS/OGC) <Mary.CardMina@hhs.gov>
Subject: RE: [EXT] Review of your OGE 278e form (Public Financial Disclosure Report)

Thank you! So sorry for the typo, I will fix that.
Thanks again and welcome aboard.

Stanley Olesh
Attorney-Advisor/Financial Disclosure Counsel
HHS/OGC/Ethics Division
202-690-7251
Telework cell (b)(6)

From: Micky Tripathi <Micky.Tripathi@arcadia.io>
Sent: Monday, January 18, 2021 12:38 PM
To: Olesh, Stanley D. (HHS/OGC) <Stanley.Olesh@HHS.GOV>
Cc: Card Mina, Mary (HHS/OGC) <Mary.CardMina@hhs.gov>
Subject: RE: [EXT] Review of your OGE 278e form (Public Financial Disclosure Report)

Hi Stanley

(b)(5)

Thanks for your help with this – you've been extremely responsive and helpful and I really appreciate it!

Micky

From: Olesh, Stanley D. (HHS/OGC) <Stanley.Olesh@HHS.GOV>
Sent: Monday, January 18, 2021 10:55 AM
To: Micky Tripathi <Micky.Tripathi@arcadia.io>
Cc: Card Mina, Mary (HHS/OGC) <Mary.CardMina@hhs.gov>
Subject: FW: [EXT] Review of your OGE 278e form (Public Financial Disclosure Report)
Importance: High

Hi Micky –
Please reply back as soon as possible, to confirm your agreement with the draft, so your appointment can clear our office.
Thank you very much.

Stanley Olesh
Attorney-Advisor/Financial Disclosure Counsel
HHS/OGC/Ethics Division
202-690-7251
Telework cell (b)(6)

From: Olesh, Stanley D. (HHS/OGC)
Sent: Saturday, January 16, 2021 12:21 PM
To: Micky Tripathi <Micky.Tripathi@arcadia.io>
Cc: Card Mina, Mary (HHS/OGC) <Mary.CardMina@hhs.gov>

Subject: RE: [EXT] Review of your OGE 278e form (Public Financial Disclosure Report)

Micky –

(b)(6)

(b)(6)

Stanley Olesh
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From: Micky Tripathi <Micky.Tripathi@arcadia.io>
Sent: Saturday, January 16, 2021 7:29 AM
To: Olesh, Stanley D. (HHS/OGC) <Stanley.Olesh@HHS.GOV>
Cc: Card Mina, Mary (HHS/OGC) <Mary.CardMina@hhs.gov>
Subject: RE: [EXT] Review of your OGE 278e form (Public Financial Disclosure Report)
Importance: High

Thanks so much Stanley. A couple of bigger questions up top and some detailed comments in red.

(b)(5)

Thanks for your help!

Micky

From: Olesh, Stanley D. (HHS/OGC) <Stanley.Olesh@HHS.GOV>
Sent: Friday, January 15, 2021 3:52 PM
To: Micky Tripathi <Micky.Tripathi@arcadia.io>
Cc: Card Mina, Mary (HHS/OGC) <Mary.CardMina@hhs.gov>
Subject: [EXT] Review of your OGE 278e form (Public Financial Disclosure Report)
Importance: High

Mickey –
Thanks very much for submitting your 278e form in Integrity. (b)(5)

(b)(5)

(b)(5)

(b)(5)

Thank you very much, I truly appreciate your time and cooperation in this. Contact me if you have any questions.

Stanley Olesh
Attorney-Advisor/Financial Disclosure Counsel
HHS/OGC/Ethics Division
202-690-7251
Telework cell (b)(6)

From: LeFevre, Julie (HHS/IOS) <julie.lefevre@hhs.gov>
Sent: Monday, January 11, 2021 1:30 PM
To: Blanchette, Jason (HHS/OGC) <Jason.Blanchette@hhs.gov>; Lee, Steven (HHS/OGC) <Steven.Lee@hhs.gov>; Card Mina, Mary (HHS/OGC) <Mary.CardMina@hhs.gov>
Cc: Olesh, Stanley D. (HHS/OGC) <Stanley.Olesh@HHS.GOV>; Hall, Randall (HHS/OGC) <randall.hall@hhs.gov>
Subject: Another for entry into Integrity - 2021 - Suhas (Micky) Tripathi

Good afternoon *again* ☺!

(b)(5)

Thank you!

Julie

Julia M.C. LeFevre, Ph.D.
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