

To: Keith, Jennie[Keith.Jennie@epa.gov]; DeLaquil, Mark[mdelaquil@bakerlaw.com]
Cc: Hupp, Sydney[hupp.sydney@epa.gov]; GWebster@bgcgw.org[GWebster@bgcgw.org]
From: Stanley, Trevor M.
Sent: Thur 5/18/2017 10:45:05 PM
Subject: RE: ETHICS QUESTIONS for EPA Administrator's Attendance at Boys & Girls Club Event

Hi Jennie,

1) For total attendance:

a. For kids, probably 6 members of the Keystone Club will attend. These are teens from 14-18 who participate in a full-on leadership development experience, and they just secured an award for helping to develop the #1 youth and character development program in the Country. Having them meet the Administrator and attend the game is a reward for an awesome job. In addition, Gabrielle Webster (7), our new CEO will attend, Jim Almond (8), the former CEO will attend, probably a board member from HSBC will attend (9), and another board member (10) (potentially an accounting firm partner or the Board Chair, who works at CareFirst). We will also invite the teen director, LeVar Jones (11). <http://www.bgcgw.org/2016/02/meet-mr-levar-fbrs-inspired-teen-director/> That puts us at 11. The suite can hold 28, so we would have Mr. Pruitt and members of his team (I assume that would be no more than three people total). The remaining 14 spots would then go to donors to the Clubs. We thought an approximate even split made the most sense, but please let me know if a different ratio would be better—we would be happy to have more donors and the board members might be more than willing to give up their seat!

b. We are only honoring Mr. Pruitt, but we plan to honor other administration officials in the future.

c. Donors will come from a wide range of companies, and the invitations do not target a specific industry.

2) Run of show and donor commitments were not finalized. Here is what we use for our annual Tim Russert Congressional Dinner http://d251mkhdpuavfd.cloudfront.net/wp-content/uploads/2016/07/TRCD2017-FactSheet_PledgeForm.pdf We are accepting contributions if you are interested! Could you please send me your parameters on how to advertise the Administrator's presence? BGCGW will redo its forms to match your guidelines.

3) For that game on the 25th, the most expensive ticket available for purchase is \$370 for the Delta Sky360 Club. I believe the Nats use dynamic pricing, so once we lock down a new date, I will have to provide a revised figure.

I believe these responses answer all of your questions, but please feel free to call me at 202-861-1551 to discuss. Or I can put you directly in touch with Gabrielle.

The clubs would like to replicate this model with different administration officials and different companies as the donors in the future, so I am very happy to answer any questions you have. We are always in favor of doing things the correct and compliant way.

Trevor

From: Keith, Jennie [mailto:Keith.Jennie@epa.gov]
Sent: Thursday, May 18, 2017 11:58 AM
To: Stanley, Trevor M.; DeLaquil, Mark
Cc: Hupp, Sydney; GWebster@bgcgw.org
Subject: RE: ETHICS QUESTIONS for EPA Administrator's Attendance at Boys & Girls Club Event

Dear Mark and Trevor,

Thank you very much for this information.

The EPA's Scheduling Office also forwarded your recent note from May 17 suggesting to reschedule the event.

In any case, to continue considering the Administrator's attendance at the May 24 event or any similar event in the future (one hosted at the ballpark), the information you provided prompts these follow up questions:

1) How many people do you anticipate to be in attendance? Your note below suggests a minimum of 20 (only counting Club-affiliated staff and kids). But with donors, your law firm, and Club officers (management and board trustees), and any other "honorable" guests, it seems that the minimum I noted above is a bit of an underestimate. Of those in attendance, how many donors do you expect to be present? Also, I expect that donors come from a broad range of companies from the DC area (rather than a targeted industry, etc.), correct? If you have invited and confirmed any other "honorable" guests, please let me know that information as well.

2) If you have a program listing of donors and the run of show, that would be helpful to review. A copy of the donor letter would be great, too.

3) I really do need to have a dollar figure of the cost/person. From my initial email below, to determine this cost, "If there is no ticketing for the event, would you please provide a cost estimate/person of the expenses your firm incurred to sponsor the event? Please follow the guidelines in this advisory from the Office of Government Ethics (see first full paragraph on page 3)." We need this figure for gift reporting purposes.

Also, based on your note attached to your May 17 email, should EPA be able to confirm the Administrator for this event or any similar event in the future, the host of the event would have to follow our parameters on how it could communicate/advertise the Administrator's presence at the event.

Again, I apologize for the nosiness of these questions. This event implicates the gifts and fundraising rules of government ethics regulations which is why it's a bit complicated – hence the questions.

Many thanks!

Jennie for EPA Ethics

202-564-3412

Jennie Keith | Ethics Officer | Office of General Counsel | US EPA | Mail Code 2311A | Room 4313 North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone 202-564-3412 | fax 202-564-1772

From: Stanley, Trevor M. [<mailto:tstanley@bakerlaw.com>]
Sent: Friday, May 12, 2017 6:39 PM
To: DeLaquil, Mark <mdelaquil@bakerlaw.com>
Cc: Keith, Jennie <Keith.Jennie@epa.gov>; Hupp, Sydney <hupp.sydney@epa.gov>;
GWebster@bgcgw.org
Subject: Re: ETHICS QUESTIONS for EPA Administrator's Attendance at Boys & Girls Club Event

Hi Jennie,

Looping in the CEO of the Boys & Girls Clubs, Gabrielle Webster. Gabrielle is new this week, and she is fabulous!

Baker Hostetler is donating the suite and all food to the Boys & Girls Clubs, and the invitation is solely from the former CEO, Jim Almond, and the organization. The clubs have chosen to use the suite in this manner without influence from any lobbying interests, BakerHostetler, or any of the event donors. Generally the Boys and Girls Clubs have used the suite in the past for Board retreats, but given a precarious financial situation, the clubs determined a fundraising event would be a better use of the suite this year.

The Boys & Girls Clubs of Greater Washington is raising funds by reaching out to potential sponsors to donate between \$5,000 to \$10,000 to the clubs. At the moment we are attempting to recruit donors and we will be happy to provide a copy of the donor letter if that would be helpful. There will be a program listing the key donors and the run of show.

We are also having 6-8 kids from the Clubs in attendance (it's a school night, so that's why we have a range). Gabrielle will also attend, along with board members of the organization and 1-2 staff members from the clubs. We plan to have an opportunity for the kids to speak with Mr. Pruitt and have their photo taken with him.

The Administrator is not required to give a speech, but we hope he will. Generally when we conduct these types of fundraising events, the CEO thanks all of the donors for coming and explains about the missions of the clubs and the role they play in keep kids in DC safe. The Clubs focus on a mission to enable all young people, especially those who need us most, become productive, caring, responsible citizens. The secondary goal is to help Gabrielle begin to meet donors who care about our organization and to meet officials who do as well. We have employed a similar fundraising mode at our Tim Russert Congressional dinner for years, and we have had wonderful success. Then Gabrielle would introduce Mr. Pruitt, and he would then say a few words about the Clubs and the club kids.

Please let me know if you need anything else, and I am happy to put you on the phone with Gabrielle.

Sincerely,

Trevor Stanley

On May 12, 2017, at 5:00 PM, DeLaquil, Mark <mdelaquil@bakerlaw.com> wrote:

Thanks for touching base Jennie. I am copying Trevor Stanley of my law firm as I think he is the best person to answer these questions. Have a great weekend.

Sent from my iPhone

On May 12, 2017, at 5:42 PM, Keith, Jennie <Keith.Jennie@epa.gov> wrote:

Hi Mark,

I provide ethics advice to EPA Administrator Pruitt, and I have a few nosy questions I need

to ask before his Scheduling Office can get back to you.

You mention that this is a fundraiser. Is the Boys and Girls Club selling “tickets” to the event? If so, what are the ticket prices/scheme? If there is no pricing, how is the host raising funds?

Are there any obligations of the host’s special guests? Does the host expect them to have any active or visible role in the promotion, production, or presentation of the event such as standing in a reception line, speaking (e.g., mc’ing)?

If there is no ticketing for the event, would you please provide a cost estimate/person of the expenses your firm incurred to sponsor the event? Please follow the [guidelines](#) in this advisory from the Office of Government Ethics (see first full paragraph on page 3).

I need confirmation that you are authorized by the Boys & Girls Club to extend this invitation upon its behalf and that the invitation is indeed from the host of the event. The invitation attachment appears that way; however, because you are a federally registered lobbyist (the law firm) and the President’s Ethics Pledge prohibits political appointees from receiving gifts from lobbyists, I need to be sure that the host of the organization is actually issuing the invitation, not the underwriter of the event.

Thank you for entertaining my questions!

Sincerely,

Jennie for EPA Ethics

202-564-3412

From: DeLaquil, Mark [<mailto:mdelaquil@bakerlaw.com>]
Sent: Thursday, May 11, 2017 8:19 AM
To: Hupp, Sydney <hupp.sydney@epa.gov>
Subject: Boys & Girls Club Event

Dear Sydney,

I hope all is well. I have attached an invitation from the Boys & Girls Club inviting Administrator Pruitt to attend a fundraiser at the Washington Nationals' game on May 24 as an honored guest. Our law firm is a long-time supporter of the Boys & Girls Club, which does great work for the children of the Washington area. Please let me know if Mr. Pruitt will be able to attend or if you need additional information.

Best regards,

Mark

Mark DeLaquil
Partner

<image007.jpg>
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