

RSVPs can be sent to either Wendi Weber or to me. I hope both of you can join us in Maine.

Best regards,

jimmy

**Jimmy Bullock**

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**To:** "Rees"[Rees]; Gareth"[gareth\_rees@ios.doi.gov]  
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**From:** "McDonnell, Edward" <edward.mcdonnell@sol.doi.gov>  
**Sent:** 2018-10-24T08:17:06-04:00  
**Importance:** Normal  
**Subject:** Fwd: [EXTERNAL] TPUD, Westlands Water Meeting Request-Deputy Secretary-Monday, 10/29, Tuesday 10/30  
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Hi Gareth,

After reviewing the meeting request, we have determined that there is no legal objection under the ethics statutes and regulations, or the Trump administration Ethics Pledge (Pledge), to the Deputy Secretary accepting this meeting with:

Paul Hauser, General Manager, Trinity Public Utilities District (TPUD)

Shelley Ostrowski, Associate General Manager, Water Policy, Westlands Water District (Westlands)

Susan Stohr, TPUD Federal Government Relations

to discuss the allocation of Central Valley Project Improvement Act (CVPIA) restoration fund costs and, in particular, concerns that the current arrangement compromises the financial viability of the entire Central Valley Project.

If anyone is added to the list of expected attendees, please let us know sufficiently in advance of the meeting that we can make a determination with respect to the new expected attendee(s) prior to the start of the meeting.

TPUD is not on the Deputy Secretary's recusal lists. While Westlands is on the Deputy Secretary's 5 CFR 2635.502 recusal list, that recusal list correctly indicates that the last day of his recusal requirement with respect to Westlands was 7/31/2018 -- the last day of his one-year covered relationship with Westlands under 5 CFR 2635.502b(1)(iv). The Deputy Secretary was never required to recuse from Westlands matters under paragraph 6 of the Pledge, as Westlands is an entity of State government and, therefore, not considered a former client under paragraph 6 of the Pledge. To the best of his knowledge, the Deputy Secretary never worked on or represented anyone on this matter while at Brownstein Hyatt Farber Schreck (BHFS). It does not appear that the meeting would include discussion of any particular matter involving a specific party or parties in which BHFS or any of the Deputy Secretary's former clients under paragraph 6 of the Pledge is or represents a party. If, during the meeting, it becomes apparent that BHFS or any of the Deputy Secretary's former clients under paragraph 6 of the Pledge is or represents a party to a matter under discussion, discussion of that matter must cease.

Consistent with prior advice, we recommend that the meeting remain focused on general topics, and that the Deputy Secretary refrain from discussing or making any commitments about any particular matters involving specific parties, such as litigation, contracts, leases, permits, etc. at this meeting.

Please do not hesitate to let us know if it would be helpful to discuss further, or if we can be of any additional assistance.

Thanks very much,

Ed