

**To:** dbramer@bramergruop.com[dbramer@bramergruop.com]  
**Cc:** Melinda Loftin[melinda.loftin@sol.doi.gov]; Kimberly Benton[kimberly.benton@sol.doi.gov]; Heindl, Jennifer[jennifer.heindl@sol.doi.gov]; Leila Getto[leila\_getto@ios.doi.gov]; Timothy Nigborowicz[timothy\_nigborowicz@ios.doi.gov]  
**From:** McDonnell, Edward  
**Sent:** 2017-11-30T09:13:55-05:00  
**Importance:** Normal  
**Subject:** Fwd: Mistletoe Event  
**Received:** 2017-11-30T09:14:47-05:00

Hi Mr. Bramer,

I'm the Alternate Designated Agency Ethics Official for the Department of the Interior and I wondered if I may please ask you a few questions that would further help with our analysis. Or, if there is someone else to whom I should ask these questions, I would appreciate it if you could provide contact information for that person.

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Fourth, is selection of award recipients made pursuant to written standards? If so, would it be possible to get a copy of those written standards?

If you have any questions or would care to discuss, please feel free to contact me by email or at (202) 510-8427.

Thank you very much,  
Ed

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by the Department of Justice in the selection of cases for prosecution. ---

Ed McDonnell

Alternate Designated Agency Ethics Official/Deputy Designated Agency Ethics Official  
U.S. Department of the Interior

*Departmental Ethics Office*

*Office of the Solicitor*

E-mail: [edward.mcdonnell@sol.doi.gov](mailto:edward.mcdonnell@sol.doi.gov)

Fax: (202) 208-5515 (Please call or e-mail me to let me know you've sent me a fax as the fax machine is in a separate room.)

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From: **Boulton, Caroline** <[caroline\\_boulton@ios.doi.gov](mailto:caroline_boulton@ios.doi.gov)>

Date: Tue, Nov 28, 2017 at 6:12 PM

Subject: Fwd: Mistletoe Event

To: Melinda Loftin <[melinda.loftin@sol.doi.gov](mailto:melinda.loftin@sol.doi.gov)>, "McDonnell, Edward" <[edward.mcdonnell@sol.doi.gov](mailto:edward.mcdonnell@sol.doi.gov)>, Kimberly Benton <[kimberly.benton@sol.doi.gov](mailto:kimberly.benton@sol.doi.gov)>, "Heindl, Jennifer" <[jennifer.heindl@sol.doi.gov](mailto:jennifer.heindl@sol.doi.gov)>, Leila Getto <[leila\\_getto@ios.doi.gov](mailto:leila_getto@ios.doi.gov)>, Timothy Nigborowicz <[timothy\\_nigborowicz@ios.doi.gov](mailto:timothy_nigborowicz@ios.doi.gov)>

Hi all--

Another update on the selection process for the Mistletoe event on 12/6. Please let me know if there are further questions.

Best,  
Caroline

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From: **Don Bramer** <[dbramer@bramergruop.com](mailto:dbramer@bramergruop.com)>  
Date: Tue, Nov 28, 2017 at 6:01 PM  
Subject: Re: Mistletoe Event  
To: "Boulton, Caroline" <[caroline\\_boulton@ios.doi.gov](mailto:caroline_boulton@ios.doi.gov)>

Caroline -

Thanks for your email. We are excited to have Ryan Zinke as the recipient of this year's Three Star Award for Outstanding Service to the Veteran Community. Ryan will join the company of Woodrow "Woody" Williams, the oldest living MOH Survivor of WWII and Iowa Jima.

The event, Manhattans, Martinis & Mistletoe is hosted by the American Freedom Fund. A 501c(19) created to support Veterans and Veteran organizations.

We were thrilled to have Mr. Zinke join us in 2015 as a one of our guest speakers to this event. In fact, he was among the finalist for the 2016 Award by the Committee. However, Mr. Williams beat him by just a few votes.

As the 2016 Cmte wrapped up its business for the year, three names were submitted for the 2017 event to be recognized for there amazing work to the Veteran community. Those were Michael Thornton, Condolesa Rice and Ryan Zinke. At the time of our consideration, Mr. Zinke was still the Congressman for Montana. This meeting was held at the Annual After Action Meeting during the week of December 7th 2016.

Again, thank you for your continued assistance and cooperation. You've been amazing to work with and we look forward to having the Secretary join us next week.

Regards,

DB  
Donald R. Bramer  
Chairman  
Bramer Group LLC  
+1.502.386.0036 (M)

On Nov 28, 2017, at 15:38, Boulton, Caroline <[caroline\\_boulton@ios.doi.gov](mailto:caroline_boulton@ios.doi.gov)> wrote:

Hi Don,

I spoke with our Ethics office today again about the event next week, and they have asked for documentation (via email) of when the selection of Secretary Zinke for the award took place (roughly; whether it was before or after the announcement of his nomination) and what the criteria for the selection process was. I know that we have spoken about it over the phone, but they would like it in writing so that they can refer back to it.

If you are able to send that to me, that would be greatly appreciated.

Best,  
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Caroline Boulton  
Special Assistant to the Secretary  
U.S. Department of the Interior  
Office of Scheduling & Advance  
[Caroline\\_Boulton@ios.doi.gov](mailto:Caroline_Boulton@ios.doi.gov) | [Scheduling@ios.doi.gov](mailto:Scheduling@ios.doi.gov)

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**Cc:** dbramer@bramergroup.com[dbramer@bramergroup.com]  
**From:** McDonnell, Edward  
**Sent:** 2017-11-30T12:05:22-05:00  
**Importance:** Normal  
**Subject:** Fwd: Mistletoe Event  
**Received:** 2017-11-30T12:06:14-05:00

All,

I have spoken with Mr. Bramer and I understand that:

1. The award is to Ryan Zinke from American Freedom Fund;
2. The selection was made prior to the White House's announcement of the intent to nominate then-Congressman Zinke and was in no way based on his position as Secretary of the Interior;
3. American Freedom Fund is not a prohibited source; and
4. American Freedom Fund is not a registered lobbying organization.

Based on the above, I have determined that the award does not constitute a prohibited gift and that a reasonable person with knowledge of the relevant facts would not question the Secretary's integrity or impartiality as a result of accepting the award. Accordingly, the Secretary may accept the award.

If you have any questions or would care to discuss, please let me know.

Thanks,  
Ed

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From: **McDonnell, Edward** <[edward.mcdonnell@sol.doi.gov](mailto:edward.mcdonnell@sol.doi.gov)>

Date: Thu, Nov 30, 2017 at 9:13 AM

Subject: Fwd: Mistletoe Event

To: [dbramer@bramergruop.com](mailto:dbramer@bramergruop.com)

Cc: Melinda Loftin <[melinda.loftin@sol.doi.gov](mailto:melinda.loftin@sol.doi.gov)>, Kimberly Benton

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