

Office to the Deputy Secretary

U.S. Department of the Interior

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Gareth C. Rees

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To: "Rees["Rees]; Gareth"[gareth_rees@ios.doi.gov]
Cc: "Bernhardt["Bernhardt]; David" [REDACTED]; Daniel Jorjani[daniel.jorjani@sol.doi.gov]; Scott De La Vega[scott.delavega@sol.doi.gov]; Matthew Parsons[matthew.parsons@sol.doi.gov]
From: "McDonnell, Edward" <edward.mcdonnell@sol.doi.gov>
Sent: 2018-11-18T16:19:44-05:00
Importance: Normal
Subject: Fwd: [EXTERNAL] Meeting Request for the Deputy Secretary: American Bus Association
Received: 2018-11-18T17:20:25-05:00
[ABA Meeting Request to Deputy Secretary Bernhardt November 15 2018.docx](#)
[National Park Fee Memo to NPS.PDF](#)
[Coalition Issues Paper - NPS CUAs Fees Res System FINAL.PDF](#)
[2019-Memo-Road-based-Commercial-Tour-Commercial-Use-Authorizations-CUAs_....pdf](#)
[image62aad7.PNG](#)
[imageb55292.PNG](#)
[image0ed1a5.PNG](#)

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:

Michael G. Rosetti, Partner, Lippes Mathias

Peter J. Pantuso, President and CEO, American Bus Association

Suzanne M. Rohde, Senior Vice President, Government Affairs & Policy, American Bus Association

to discuss the National Park Service's new system for road-based tour commercial use authorizations.

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

None of the expected meeting participants is on the Deputy Secretary's recusal lists, or is expected to represent anyone on the Deputy Secretary's recusal lists at the meeting. Nor does it appear that the meeting would include discussion of any particular matter involving a specific party or parties in which Brownstein Hyatt Farber Schreck (BHFS) or any of the Deputy Secretary's former clients under 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 the Pledge is or represents a party to a matter under discussion, discussion of that matter must cease.

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.

Additionally, we recommend that the Deputy Secretary consider including pertinent SOL attorneys and Department subject matter experts in the 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