

To: "Rees["Rees]; Gareth"[gareth_rees@ios.doi.gov]
Cc: "Bernhardt["Bernhardt]; David"[REDACTED] "Wackowski["Wackowski];
Stephen"[stephen_wackowski@ios.doi.gov]; Scott De La Vega[scott.delavega@sol.doi.gov]; Daniel
Jorjani[REDACTED]; Matthew Parsons[matthew.parsons@sol.doi.gov]
From: "McDonnell, Edward" <edward.mcdonnell@sol.doi.gov>
Sent: 2018-11-08T17:06:00-05:00
Importance: Normal
Subject: Fwd: [EXTERNAL] Meeting Proposal Information Form Deputy Secretary (2).docx
Received: 2018-11-08T18:06:39-05:00
[Meeting Proposal Information Form Deputy Secretary \(2\).docx](#)

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:

Alan Mintz, counsel to Arctic Slope Regional Corporation, Van Ness Feldman

Teresa Imm, Senior Vice President, Arctic Slope Regional Corporation (on the phone)

Jeff Hastings, Chairman and Chief Executive Officer, SAExploration, Inc. (on the phone)

for a consultation regarding the seismic survey.

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

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 normally recommend that the meeting remain focused on general topics and that the Deputy Secretary refrain from discussing and making any commitments regarding particular matters involving specific parties, such as litigation, contracts, leases, permits, agreements, etc. at the meeting. In this case, it appears that this discussion will be about particular matters in which the Arctic Slope Regional Corporation and SAExploration, Inc. are parties. While such discussion is not prohibited, we continue to recommend that the Deputy Secretary refrain from making any commitments about any particular matters involving specific parties during the 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

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--- Please note that a current or former employee who discloses information to an agency ethics official or a Government attorney does not personally enjoy an attorney-client privilege with respect to such communications. Additionally, reliance on the oral or written advice of an agency ethics official cannot ensure that an employee will not be prosecuted for a violation of Title 18 of the United States Code. However, good faith reliance on such advice is a factor that may be taken into account by the Department of Justice in the selection of cases for prosecution. ---

Ed McDonnell

Deputy Director, Ethics Law and Policy
Departmental Ethics Office
Office of the Solicitor
U.S. Department of the Interior

Located at:

Main Interior Building
Room 5313
Office: (202) 208-5916
Cell: (202) 510-8427

E-mail: 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.)

Mailing Address:

Departmental Ethics Office
Office of the Solicitor
Department of the Interior
Mail Stop 5311
1849 C Street NW
Washington, DC 20240

E-mail the Departmental Ethics Office at DOI_Ethics@sol.doi.gov or visit us online at www.doi.gov/ethics

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----- Forwarded message -----

From: **Rees, Gareth** <gareth_rees@ios.doi.gov>

Date: Thu, Nov 8, 2018 at 2:38 PM

Subject: Fwd: [EXTERNAL] Meeting Proposal Information Form Deputy Secretary (2).docx