

Message

From: Garrison, Jessica [jgarrison@balch.com]
Sent: 4/24/2017 3:16:30 PM
To: Hale, Michelle [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=cb99f5247ab8412fa017133839301fee-Hale, Miche]
Subject: Re: Lunch Meeting
Attachments: Balch_Logo_17db8ea2-760c-49c3-b0ff-19f80bb6a179.jpg

Will you make sure that Justina knows that executives from Alabama Power and Power South will also be at the lunch. They will pick their own tickets and there is no agenda. Just a meet and greet. But since they are interested in EPA actions, I wanted to be sure that didn't change anything as it relates to me.

Sent from my iPhone

[[image]]

Jessica M. Garrison, Of Counsel, Balch & Bingham LLP
1901 Sixth Avenue North • Suite 1500 • Birmingham, AL 35203-4642
t: [redacted] f: (205) 488-5669 e: jgarrison@balch.com
www.balch.com<<http://www.balch.com>>

On Apr 20, 2017, at 7:35 PM, Hale, Michelle <hale.michelle@epa.gov<<mailto:hale.michelle@epa.gov>>> wrote:

FYI re lunch with the Admin. And, would love to get together with you on Wednesday or Thursday. Talk soon.

Sent from my iPhone

Begin forwarded message:

From: "Fugh, Justina" <Fugh.Justina@epa.gov<<mailto:Fugh.Justina@epa.gov>>>
Date: April 20, 2017 at 5:37:59 PM EDT
To: "Hale, Michelle" <hale.michelle@epa.gov<<mailto:hale.michelle@epa.gov>>>
Subject: RE: Lunch Meeting

Hi Michelle,
Thanks for thinking to include Ms. Garrison's resume. I can see that she has worked in a couple of different places that would allow her to intersect with the Administrator, so it's clear that they have known each other for a while. She is not a federally registered lobbyist, by the way. Yes, assuming that she is using her own money (as opposed to charging her firm or a client), she may treat the Administrator to lunch, and he may accept under the "gifts based on personal friendship" exception to the usual prohibition. See 5 CFR 2635.204(b).
Justina

Justina Fugh | Senior Counsel for Ethics | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772

From: Hale, Michelle
Sent: Thursday, April 20, 2017 5:21 PM
To: Fugh, Justina <Fugh.Justina@epa.gov<<mailto:Fugh.Justina@epa.gov>>>
Subject: Lunch Meeting

Justina, I need to check with you to see if it is ethical for Jessica Garrison to buy the Administrator's lunch next week. They are friends and have known one another since at least 2011. Thank you for your consideration.

Michelle Hale
Executive Assistant to the Administrator
Environmental Protection Agency
1200 Pennsylvania Ave., NW,
WJCS, Suite 3000
Washington, D.C. 20460
(202) 564-1430

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