Attachment C – List of Recusals and Quick Reference Chart

Based on information provided by Deputy Director Pendley, this attachment lists his former clients, former employers, financial interests, and other recusals. The inclusion of an individual or entity on this list does not necessarily mean that a determination has been made that Mr. Pendley is excluded from participating in all issues, actions, and decisions related to the individual or entity at the DOI.

Rather, the placement of an individual or entity on this list indicates that the screening protocol described in the accompanying memorandum must be followed, and, if necessary, additional advice from the Departmental Ethics Office (DEO) should be sought.

Entity/Particular	Within 2 years of	At all Times	Authorities	Comments
Matter Sirius XM (stock)	appointment	Do not participate in any particular matter that has a direct and predictable effect on the financial interests of SiriusXM.	18 U.S.C. § 208	Participation only permitted if a written waiver, pursuant to 18 U.S.C. § 208(b)(1) is issued, or the asset qualifies for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2).
Regnery Publishing		Do not participate personally and substantially in any particular matter involving specific parties in which Regnery Publishing is a party or represents a party.	5 C.F.R. § 2635.502; 5 C.F.R. § 2635.101(b)(14)	Participation only permitted if a written authorization, pursuant to 5 C.F.R. § 2635.502(d), is issued.
Mountain States Legal Foundation	Do not participate personally and substantially in particular matter(s) involving specific parties that are	Consider appearances before personal and substantial participation in particular matter(s) and seek DEO advice, as needed and appropriate. ¹	Ethics Pledge, E.O. 13770 paragraph 6 (2 years until July 15, 2019);	

¹ In considering appearances, the Deputy Director will consider the relevant facts about the particular matter in question and determine whether he believes that a reasonable person with knowledge of those facts would question his impartiality in performing his official duties in the particular matter. If the Deputy Director has questions, he will consult as needed and appropriate with the DEO for further guidance and assistance. If the Deputy Director personally determines that a

Entity/Particular Matter	Within 2 years of appointment	At all Times	Authorities	Comments
	directly and substantially		5 C.F.R. §	
	related to Mountain		2635.502; 5	
	States Legal Foundation.		C.F.R. §	
			2635.101(b)(14)	
American Exploration	Do not participate	Consider appearances before	Ethics Pledge,	
& Mining Association	personally and	personal and substantial	E.O. 13770	
U U	substantially in particular	participation in particular	paragraph 6	
	matter(s) involving	matter(s) and seek DEO advice,	(2 years until July	
	specific parties that are	as needed and appropriate.	15, 2019);	
	directly and substantially		5 C.F.R. §	
	related to American		2635.502; 5	
	Exploration & Mining		C.F.R. §	
	Association.		2635.101(b)(14)	
Caribou County, Idaho	For ONE (1) Year - Do	Consider appearances before	Ethics Pledge,	
	not participate personally	personal and substantial	E.O. 13770	
	and substantially in any	participation in particular	paragraph 6	
	particular matter(s)	matter(s) and seek DEO advice,	(2 years until July	
	involving specific parties	as needed and appropriate.	15, 2019);	
	that are directly and		5 C.F.R. §	
	substantially related to		2635.502; 5	
	Caribou County, ID.		C.F.R. §	
			2635.101(b)(14)	
Solenex, LLC	Do not participate	Consider appearances before	Ethics Pledge,	
	personally and	personal and substantial	E.O. 13770	
	substantially in particular	participation in particular	paragraph 6	
	matter(s) involving	matter(s) and seek DEO advice,	(2 years until July	
	specific parties that are	as needed and appropriate.	15, 2019);	
	directly and substantially		5 C.F.R. §	
	related to Solenex, LLC.		2635.502; 5	

reasonable person with knowledge of the relevant facts would not question his impartiality in performing his official duties in the particular matter, then the Deputy Director may participate in the particular matter as part of his official duties. Additional guidance on whether an issue, action, or decision pending at the DOI is a particular matter is found in Attachment A to this memorandum.

Entity/Particular Matter	Within 2 years of appointment	At all Times	Authorities	Comments
			C.F.R. § 2635.101(b)(14)	
United States Air Tour Association	Do not participate personally and substantially in particular matter(s) involving specific parties that are directly and substantially related to United States Air Tour Association.	Consider appearances before personal and substantial participation in particular matter(s) and seek DEO advice, as needed and appropriate.	Ethics Pledge, E.O. 13770 paragraph 6 (2 years until July 15, 2019); 5 C.F.R. § 2635.502; 5 C.F.R. § 2635.101(b)(14)	
Air Star Helicopters, Inc.	Do not participate personally and substantially in particular matter(s) involving specific parties that are directly and substantially related to Air Star Helicopters, Inc.	Consider appearances before personal and substantial participation in particular matter(s) and seek DEO advice, as needed and appropriate.	Ethics Pledge, E.O. 13770 paragraph 6 (2 years until July 15, 2019); 5 C.F.R. § 2635.502; 5 C.F.R. § 2635.101(b)(14)	
Grand Canyon Airlines, Inc.	Do not participate personally and substantially in particular matter(s) involving specific parties that are directly and substantially related to Grand Canyon Airlines.	Consider appearances before personal and substantial participation in particular matter(s) and seek DEO advice, as needed and appropriate.	Ethics Pledge, E.O. 13770 paragraph 6 (2 years until July 15, 2019); 5 C.F.R. § 2635.502; 5 C.F.R. § 2635.101(b)(14)	
Air Vegas Airlines	Do not participate personally and substantially in particular matter(s) involving	Consider appearances before personal and substantial participation in particular	Ethics Pledge, E.O. 13770 paragraph 6	

Entity/Particular Matter	Within 2 years of appointment	At all Times	Authorities	Comments
	specific parties that are directly and substantially related to Grand Canyon Airlines.	matter(s) and seek DEO advice, as needed and appropriate.	(2 years until July 15, 2019); 5 C.F.R. § 2635.502; 5 C.F.R. § 2635.101(b)(14)	
Kenair Air Hawaii	Do not participate personally and substantially in particular matter(s) involving specific parties that are directly and substantially related to Grand Canyon Airlines.	Consider appearances before personal and substantial participation in particular matter(s) and seek DEO advice, as needed and appropriate.	Ethics Pledge, E.O. 13770 paragraph 6 (2 years until July 15, 2019); 5 C.F.R. § 2635.502; 5 C.F.R. § 2635.101(b)(14)	
Las Vegas Helicopter	Do not participate personally and substantially in particular matter(s) involving specific parties that are directly and substantially related to Grand Canyon Airlines.	Consider appearances before personal and substantial participation in particular matter(s) and seek DEO advice, as needed and appropriate.	Ethics Pledge, E.O. 13770 paragraph 6 (2 years until July 15, 2019); 5 C.F.R. § 2635.502; 5 C.F.R. § 2635.101(b)(14)	
Maverick Helicopters	Do not participate personally and substantially in particular matter(s) involving specific parties that are directly and substantially related to Maverick Helicopters.	Consider appearances before personal and substantial participation in particular matter(s) and seek DEO advice, as needed and appropriate.	Ethics Pledge, E.O. 13770 paragraph 6 (2 years until July 15, 2019); 5 C.F.R. § 2635.502; 5 C.F.R. § 2635.101(b)(14)	

Entity/Particular Matter	Within 2 years of appointment	At all Times	Authorities	Comments
Papillion Grand Canyon Helicopters	Do not participate personally and substantially in particular matter(s) involving specific parties that are directly and substantially	Consider appearances before personal and substantial participation in particular matter(s) and seek DEO advice, as needed and appropriate.	Ethics Pledge, E.O. 13770 paragraph 6 (2 years until July 15, 2019); 5 C.F.R. §	
Scenic Airlines, Inc.	related to Papillion Grand Canyon Helicopters. Do not participate	Consider appearances before	2635.502; 5 C.F.R. § 2635.101(b)(14) Ethics Pledge,	
	personally and substantially in particular matter(s) involving specific parties that are directly and substantially related to Scenic Airlines, Inc.	personal and substantial participation in particular matter(s) and seek DEO advice, as needed and appropriate.	E.O. 13770 paragraph 6 (2 years until July 15, 2019); 5 C.F.R. § 2635.502; 5 C.F.R. § 2635.101(b)(14)	
Wyoming Stock Growers Association	Do not participate personally and substantially in particular matter(s) involving specific parties that are directly and substantially related to the Wyoming Stock Growers Association.	Consider appearances before personal and substantial participation in particular matter(s) and seek DEO advice, as needed and appropriate.	Ethics Pledge, E.O. 13770 paragraph 6 (2 years until July 15, 2019); 5 C.F.R. § 2635.502; 5 C.F.R. § 2635.101(b)(14)	
Petroleum Association of Wyoming	Do not participate personally and substantially in particular matter(s) involving specific parties that are directly and substantially	Consider appearances before personal and substantial participation in particular matter(s) and seek DEO advice, as needed and appropriate.	Ethics Pledge, E.O. 13770 paragraph 6 (2 years until July 15, 2019);	

Entity/Particular Matter	Within 2 years of appointment	At all Times	Authorities	Comments
	related to the Petroleum Association of Wyoming.		5 C.F.R. § 2635.502; 5 C.F.R. §	
			2635.101(b)(14)	
WillSource Enterprise, LLC.	Do not participate personally and substantially in particular matter(s) involving specific parties that are directly and substantially related to WillSource Enterprise, LLC.	Consider appearances before personal and substantial participation in particular matter(s) and seek DEO advice, as needed and appropriate.	Ethics Pledge, E.O. 13770 paragraph 6 (2 years until July 15, 2019); 5 C.F.R. § 2635.502; 5 C.F.R. § 2635.101(b)(14)	
Garfield County, Utah	For ONE (1) Year - Do not participate personally and substantially in any particular matter(s) involving specific parties that are directly and substantially related to Garfield County, UT.	Consider appearances before personal and substantial participation in particular matter(s) and seek DEO advice, as needed and appropriate.	Ethics Pledge, E.O. 13770 paragraph 6 (2 years until July 15, 2019); 5 C.F.R. § 2635.502; 5 C.F.R. § 2635.101(b)(14)	
Kane County, Utah	For ONE (1) Year - Do not participate personally and substantially in any particular matter(s) involving specific parties that are directly and substantially related to Kane County, UT.	Consider appearances before personal and substantial participation in particular matter(s) and seek DEO advice, as needed and appropriate.	Ethics Pledge, E.O. 13770 paragraph 6 (2 years until July 15, 2019); 5 C.F.R. § 2635.502; 5 C.F.R. § 2635.101(b)(14)	

Entity/Particular Matter	Within 2 years of appointment	At all Times	Authorities	Comments
San Juan County,	For ONE (1) Year - Do	Consider appearances before	Ethics Pledge,	
Utah	not participate personally	personal and substantial	E.O. 13770	
	and substantially in any	participation in particular	paragraph 6	
	particular matter(s)	matter(s) and seek DEO advice,	(2 years until July	
	involving specific parties	as needed and appropriate.	15, 2019);	
	that are directly and		5 C.F.R. §	
	substantially related to		2635.502; 5	
	San Juan County, UT.		C.F.R. §	
			2635.101(b)(14)	
Boulder Rifle Club,	Do not participate	Consider appearances before	Ethics Pledge,	
Inc.	personally and	personal and substantial	E.O. 13770	
	substantially in particular	participation in particular	paragraph 6	
	matter(s) involving	matter(s) and seek DEO advice,	(2 years until July	
	specific parties that are	as needed and appropriate.	15, 2019);	
	directly and substantially		5 C.F.R. §	
	related to the Boulder		2635.502; 5	
	Rifle Club, Inc.		C.F.R. §	
			2635.101(b)(14)	
General Commerce,	Do not participate	Consider appearances before	Ethics Pledge,	
LLC. d/b/a Bison	personally and	personal and substantial	E.O. 13770	
Tactical	substantially in particular	participation in particular	paragraph 6	
	matter(s) involving	matter(s) and seek DEO advice,	(2 years until July	
	specific parties that are	as needed and appropriate.	15, 2019);	
	directly and substantially		5 C.F.R. §	
	related to General		2635.502; 5	
	Commerce, LLC or		C.F.R. §	
	Bison Tactical		2635.101(b)(14)	
Colorado Mining	Do not participate	Consider appearances before	Ethics Pledge,	
Association	personally and	personal and substantial	E.O. 13770	
	substantially in particular	participation in particular	paragraph 6	
	matter(s) involving	matter(s) and seek DEO advice,	(2 years until July	
	specific parties that are	as needed and appropriate.	15, 2019);	
	directly and substantially			

Entity/Particular Matter	Within 2 years of appointment	At all Times	Authorities	Comments
Colorado Union of	related to the Colorado Mining Association.	Consider appearances before	5 C.F.R. § 2635.502; 5 C.F.R. § 2635.101(b)(14) Ethics Pledge,	
Taxpayers Foundation	personally and substantially in particular matter(s) involving specific parties that are directly and substantially related to the Colorado Union of Taxpayers Foundation.	personal and substantial participation in particular matter(s) and seek DEO advice, as needed and appropriate.	E.O. 13770 paragraph 6 (2 years until July 15, 2019); 5 C.F.R. § 2635.502; 5 C.F.R. § 2635.101(b)(14)	
Rothe Development, Inc.	Do not participate personally and substantially in particular matter(s) involving specific parties that are directly and substantially related to Rothe Development, Inc.	Consider appearances before personal and substantial participation in particular matter(s) and seek DEO advice, as needed and appropriate.	Ethics Pledge, E.O. 13770 paragraph 6 (2 years until July 15, 2019); 5 C.F.R. § 2635.502; 5 C.F.R. § 2635.101(b)(14)	
Anesi Mining Ventures, LLC	Do not participate personally and substantially in particular matter(s) involving specific parties that are directly and substantially related to Anesi Mining Ventures, LLC.	Consider appearances before personal and substantial participation in particular matter(s) and seek DEO advice, as needed and appropriate.	Ethics Pledge, E.O. 13770 paragraph 6 (2 years until July 15, 2019); 5 C.F.R. § 2635.502; 5 C.F.R. § 2635.101(b)(14)	

Entity/Particular Matter	Within 2 years of appointment	At all Times	Authorities	Comments
National Mining Association	Do not participate personally and substantially in particular matter(s) involving specific parties that are directly and substantially related to the National Mining Association.	Consider appearances before personal and substantial participation in particular matter(s) and seek DEO advice, as needed and appropriate.	Ethics Pledge, E.O. 13770 paragraph 6 (2 years until July 15, 2019); 5 C.F.R. § 2635.502; 5 C.F.R. § 2635.101(b)(14)	
TABOR Foundation	Do not participate personally and substantially in particular matter(s) involving specific parties that are directly and substantially related to the TABOR Foundation.	Consider appearances before personal and substantial participation in particular matter(s) and seek DEO advice, as needed and appropriate.	Ethics Pledge, E.O. 13770 paragraph 6 (2 years until July 15, 2019); 5 C.F.R. § 2635.502; 5 C.F.R. § 2635.101(b)(14)	
Wyoming Farm Bureau Federation	Do not participate personally and substantially in particular matter(s) involving specific parties that are directly and substantially related to the Wyoming Farm Bureau Federation.	Consider appearances before personal and substantial participation in particular matter(s) and seek DEO advice, as needed and appropriate.	Ethics Pledge, E.O. 13770 paragraph 6 (2 years until July 15, 2019); 5 C.F.R. § 2635.502; 5 C.F.R. § 2635.101(b)(14)	
Wyoming Wool Growers Association	Do not participate personally and substantially in particular matter(s) involving specific parties that are directly and substantially	Consider appearances before personal and substantial participation in particular matter(s) and seek DEO advice, as needed and appropriate.	Ethics Pledge, E.O. 13770 paragraph 6 (2 years until July 15, 2019);	

Entity/Particular Matter	Within 2 years of appointment	At all Times	Authorities	Comments
	related to the Wyoming		5 C.F.R. §	
	Wool Growers		2635.502; 5	
	Association.		C.F.R. §	
			2635.101(b)(14)	
Montana Farm Bureau	Do not participate	Consider appearances before	Ethics Pledge,	
Federation	personally and	personal and substantial	E.O. 13770	
	substantially in particular	participation in particular	paragraph 6	
	matter(s) involving	matter(s) and seek DEO advice,	(2 years until July	
	specific parties that are	as needed and appropriate.	15, 2019);	
	directly and substantially		5 C.F.R. §	
	related to the Montana		2635.502; 5	
	Farm Bureau Federation.		C.F.R. §	
			2635.101(b)(14)	
Idaho Farm Bureau	Do not participate	Consider appearances before	Ethics Pledge,	
Federation	personally and	personal and substantial	E.O. 13770	
	substantially in particular	participation in particular	paragraph 6	
	matter(s) involving	matter(s) and seek DEO advice,	(2 years until July	
	specific parties that are	as needed and appropriate.	15, 2019);	
	directly and substantially		5 C.F.R. §	
	related to the Idaho Farm		2635.502; 5	
	Bureau Federation.		C.F.R. §	
			2635.101(b)(14)	
Utah Farm Bureau	Do not participate	Consider appearances before	Ethics Pledge,	
Federation	personally and	personal and substantial	E.O. 13770	
	substantially in particular	participation in particular	paragraph 6	
	matter(s) involving	matter(s) and seek DEO advice,	(2 years until July	
	specific parties that are	as needed and appropriate.	15, 2019);	
	directly and substantially		5 C.F.R. §	
	related to the Utah Farm		2635.502; 5	
	Bureau Federation.		C.F.R. §	
			2635.101(b)(14)	

Entity/Particular Matter	Within 2 years of appointment	At all Times	Authorities	Comments
Colorado Farm Bureau Federation	Do not participate personally and substantially in particular matter(s) involving specific parties that are directly and substantially related to the Colorado	Consider appearances before personal and substantial participation in particular matter(s) and seek DEO advice, as needed and appropriate.	Ethics Pledge, E.O. 13770 paragraph 6 (2 years until July 15, 2019); 5 C.F.R. § 2635.502; 5	
South Dakota	Farm Bureau Federation. Do not participate	Consider appearances before	C.F.R. § 2635.101(b)(14) Ethics Pledge,	
Cattlemen's Association	personally and substantially in particular matter(s) involving specific parties that are directly and substantially related to the South Dakota Cattlemen's Association.	personal and substantial participation in particular matter(s) and seek DEO advice, as needed and appropriate.	E.O. 13770 paragraph 6 (2 years until July 15, 2019); 5 C.F.R. § 2635.502; 5 C.F.R. § 2635.101(b)(14)	
Town of Taos, New Mexico	For ONE (1) Year - Do not participate personally and substantially in any particular matter(s) involving specific parties that are directly and substantially related to the Town of Taos, NM.	Consider appearances before personal and substantial participation in particular matter(s) and seek DEO advice, as needed and appropriate.	Ethics Pledge, E.O. 13770 paragraph 6 (2 years until July 15, 2019); 5 C.F.R. § 2635.502; 5 C.F.R. § 2635.101(b)(14)	
W&M Thoman Ranches, LLC	Do not participate personally and substantially in particular matter(s) involving specific parties that are directly and substantially	Consider appearances before personal and substantial participation in particular matter(s) and seek DEO advice, as needed and appropriate.	Ethics Pledge, E.O. 13770 paragraph 6 (2 years until July 15, 2019);	

Entity/Particular Matter	Within 2 years of appointment	At all Times	Authorities	Comments
Washington Examiner	related to W&M Thoman Ranches, LLC. For ONE (1) Year - Do not participate personally and substantially in any particular matter(s) involving specific parties that are directly and substantially related to the Washington	Consider appearances before personal and substantial participation in particular matter(s) and seek DEO advice, as needed and appropriate.	5 C.F.R. § 2635.502; 5 C.F.R. § 2635.101(b)(14) 5 C.F.R. § 2635.502; 5 C.F.R. § 2635.101(b)(14)	
Property Rights Foundation of America	Examiner. UNTIL OCTOBER 20, 2019 - Do not participate personally and substantially in any particular matter(s) involving specific parties that are directly and substantially related to the Property Rights Foundation of America.	Consider appearances before personal and substantial participation in particular matter(s) and seek DEO advice, as needed and appropriate.	5 C.F.R. § 2635.502; 5 C.F.R. § 2635.101(b)(14)	
Pendley Law Group	Do not participate personally and substantially in particular matter(s) involving specific parties that are directly and substantially related to the Pendley Law Group	Do not participate personally and substantially in particular matter(s) involving specific parties that are directly and substantially related to the Pendley Law Group.	Ethics Pledge, E.O. 13770 paragraph 6 (2 years until July 15, 2019); 5 C.F.R. § 2635.502; 5 C.F.R. § 2635.101(b)(14)	

Entity/Particular Matter	Within 2 years of appointment	At all Times	Authorities	Comments
Matthew, Michele, and Aaron Hull	Do not participate personally and substantially in particular matter(s) involving specific parties that are directly and substantially related to Matthew, Michele, and Aaron Hull	Consider appearances before personal and substantial participation in particular matter(s) and seek DEO advice, as needed and appropriate.	Ethics Pledge, E.O. 13770 paragraph 6 (2 years until July 15, 2019); 5 C.F.R. § 2635.502; 5 C.F.R. §	
Michael Whited	Do not participate personally and substantially in particular matter(s) involving specific parties that are directly and substantially related to Michael Whited	Consider appearances before personal and substantial participation in particular matter(s) and seek DEO advice, as needed and appropriate.	2635.101(b)(14) Ethics Pledge, E.O. 13770 paragraph 6 (2 years until July 15, 2019); 5 C.F.R. § 2635.502; 5 C.F.R. § 2635.101(b)(14)	
Andrew Brigida	Do not participate personally and substantially in particular matter(s) involving specific parties that are directly and substantially related to Andrew Brigida	Consider appearances before personal and substantial participation in particular matter(s) and seek DEO advice, as needed and appropriate.	Ethics Pledge, E.O. 13770 paragraph 6 (2 years until July 15, 2019); 5 C.F.R. § 2635.502; 5 C.F.R. § 2635.101(b)(14)	
Professor James W. Ely, Jr.	Do not participate personally and substantially in particular matter(s) involving specific parties that are directly and substantially	Consider appearances before personal and substantial participation in particular matter(s) and seek DEO advice, as needed and appropriate.	Ethics Pledge, E.O. 13770 paragraph 6 (2 years until July 15, 2019);	

Entity/Particular Matter	Within 2 years of appointment	At all Times	Authorities	Comments
	related to Professor James W. Ely, Jr.		5 C.F.R. § 2635.502; 5 C.F.R. §	
Jon Caldara	Do not participate personally and substantially in particular matter(s) involving specific parties that are directly and substantially related to Jon Caldara	Consider appearances before personal and substantial participation in particular matter(s) and seek DEO advice, as needed and appropriate.	2635.101(b)(14) Ethics Pledge, E.O. 13770 paragraph 6 (2 years until July 15, 2019); 5 C.F.R. § 2635.502; 5 C.F.R. § 2635.101(b)(14)	
Tyler Faye	Do not participate personally and substantially in particular matter(s) involving specific parties that are directly and substantially related to Tyler Faye	Consider appearances before personal and substantial participation in particular matter(s) and seek DEO advice, as needed and appropriate.	Ethics Pledge, E.O. 13770 paragraph 6 (2 years until July 15, 2019); 5 C.F.R. § 2635.502; 5 C.F.R. § 2635.101(b)(14)	
Mark Ringer	Do not participate personally and substantially in particular matter(s) involving specific parties that are directly and substantially related to Mark Ringer	Consider appearances before personal and substantial participation in particular matter(s) and seek DEO advice, as needed and appropriate.	Ethics Pledge, E.O. 13770 paragraph 6 (2 years until July 15, 2019); 5 C.F.R. § 2635.502; 5 C.F.R. § 2635.101(b)(14)	

Entity/Particular Matter	Within 2 years of appointment	At all Times	Authorities	Comments
David and Pamela Herr	Do not participate personally and substantially in particular matter(s) involving specific parties that are directly and substantially related to David and Pamela Herr	Consider appearances before personal and substantial participation in particular matter(s) and seek DEO advice, as needed and appropriate.	Ethics Pledge, E.O. 13770 paragraph 6 (2 years until July 15, 2019); 5 C.F.R. § 2635.502; 5 C.F.R. §	
Marvin M. Brandt	Do not participate personally and substantially in particular matter(s) involving specific parties that are directly and substantially related to Marvin M. Brandt	Consider appearances before personal and substantial participation in particular matter(s) and seek DEO advice, as needed and appropriate.	2635.101(b)(14) Ethics Pledge, E.O. 13770 paragraph 6 (2 years until July 15, 2019); 5 C.F.R. § 2635.502; 5 C.F.R. § 2635.101(b)(14)	
Matthew Mcllroy	Do not participate personally and substantially in particular matter(s) involving specific parties that are directly and substantially related to Matthew Mcllroy	Consider appearances before personal and substantial participation in particular matter(s) and seek DEO advice, as needed and appropriate.	Ethics Pledge, E.O. 13770 paragraph 6 (2 years until July 15, 2019); 5 C.F.R. § 2635.502; 5 C.F.R. § 2635.101(b)(14)	
Elizabeth Nesbitt (nee Morris)	Do not participate personally and substantially in particular matter(s) involving specific parties that are directly and substantially	Consider appearances before personal and substantial participation in particular matter(s) and seek DEO advice, as needed and appropriate.	Ethics Pledge, E.O. 13770 paragraph 6 (2 years until July 15, 2019);	

Entity/Particular Matter	Within 2 years of appointment	At all Times	Authorities	Comments
	related to Elizabeth Nesbitt (nee Morris)		5 C.F.R. § 2635.502; 5 C.F.R. §	
Alan C. Baker	Do not participate personally and substantially in particular matter(s) involving specific parties that are	Consider appearances before personal and substantial participation in particular matter(s) and seek DEO advice, as needed and appropriate.	2635.101(b)(14) Ethics Pledge, E.O. 13770 paragraph 6 (2 years until July 15, 2019);	
Ererk I. Arresi	directly and substantially related to Alan C. Baker	Consider or no or no of or	5 C.F.R. § 2635.502; 5 C.F.R. § 2635.101(b)(14)	
Frank J. Anesi	Do not participate personally and substantially in particular matter(s) involving specific parties that are directly and substantially related to Frank J. Anesi	Consider appearances before personal and substantial participation in particular matter(s) and seek DEO advice, as needed and appropriate.	Ethics Pledge, E.O. 13770 paragraph 6 (2 years until July 15, 2019); 5 C.F.R. § 2635.502; 5 C.F.R. § 2635.101(b)(14)	
Charles C. Price	Do not participate personally and substantially in particular matter(s) involving specific parties that are directly and substantially related to Charles C. Price	Consider appearances before personal and substantial participation in particular matter(s) and seek DEO advice, as needed and appropriate.	Ethics Pledge, E.O. 13770 paragraph 6 (2 years until July 15, 2019); 5 C.F.R. § 2635.502; 5 C.F.R. § 2635.101(b)(14)	

Entity/Particular	Within 2 years of	At all Times	Authorities	Comments
Matter	appointment			
	1	r		
James S. Rankin	Do not participate	Consider appearances before	Ethics Pledge,	
	personally and	personal and substantial	E.O. 13770	
	substantially in particular	participation in particular	paragraph 6	
	matter(s) involving	matter(s) and seek DEO advice,	(2 years until July	
	specific parties that are	as needed and appropriate.	15, 2019);	
	directly and substantially		5 C.F.R. §	
	related to James S.		2635.502; 5	
	Ranking		C.F.R. §	
			2635.101(b)(14)	
Rebecca R. Sopkin	Do not participate	Consider appearances before	Ethics Pledge,	
	personally and	personal and substantial	E.O. 13770	
	substantially in particular	participation in particular	paragraph 6	
	matter(s) involving	matter(s) and seek DEO advice,	(2 years until July	
	specific parties that are	as needed and appropriate.	15, 2019);	
	directly and substantially		5 C.F.R. §	
	related to Rebecca R.		2635.502; 5	
	Sopkin		C.F.R. §	
			2635.101(b)(14)	