

From: [Heather A. Jones](#)
To: [David J. Apol](#)
Cc: [Deborah J. Bortot](#)
Subject: Another quote for Guilliani about not being paid by Trump
Date: Tuesday, October 15, 2019 11:44:04 AM

He apparently assert the same in his divorce proceeding.

https://www.washingtonpost.com/lifestyle/style/third-time-was-not-the-charm-rudy-giulianis-latest-divorce-is-bitter-expensive-and-very-public/2019/10/14/2e028b8a-ec3c-11e9-85c0-85a098e47b37_story.html

Heather Jones
Senior Counsel
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U.S. Office of Government Ethics

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From: [Heather A. Jones](#)
To: [Deborah J. Bortot](#); [Keith Labeledz](#)
Cc: [Heather A. Jones](#)
Subject: Trump's impeachment defense: Who is paying the president's lawyers? from The Washington Post
Date: Tuesday, January 28, 2020 1:12:15 PM

https://www.washingtonpost.com/local/legal-issues/trumps-impeachment-defense-who-is-paying-the-presidents-lawyers/2020/01/27/5ac18268-3eec-11ea-8872-5df698785a4e_story.html

From: [Seth Jaffe](#)
To: [Maura Leary](#)
Cc: [Rachel K. McRae](#)
Subject: FW: Draft Letter
Date: Monday, June 22, 2020 3:14:28 PM
Attachments: [Draft Letter.pdf](#)

2 page draft letter withheld in full - (b) (5).

Maura,

Per our conversation.

Thanks,
Seth

From: David J. Apol
Sent: Monday, June 22, 2020 11:41 AM
To: Seth Jaffe <sjaffe@oge.gov>
Subject: FW: Draft Letter

Here is the WH letter.

Can you remind me where our analysis is?

Also, (b) (5)

Thanks.

From: Gast, Scott F. EOP/WHO [[\(b\) \(6\)](mailto:(b) (6))]
Sent: Friday, June 19, 2020 6:34 PM
To: David J. Apol <djapol@oge.gov>
Subject: Draft Letter

As discussed earlier this week.

From: [Seth Jaffe](#)
To: [David J. Apol](#)
Cc: [Maura Leary](#)
Subject: RE: Draft Email - [Message contains CUI]
Date: Wednesday, June 24, 2020 3:56:21 PM

CONTROLLED

Dave,

This looks good to me. (b) (5)

Also, please note the very end of this email includes Maura's signature block and it should not be included in the final email that is transmitted.

Thanks,
Seth

From: Maura Leary
Sent: Wednesday, June 24, 2020 3:43 PM
To: David J. Apol <djapol@oge.gov>
Cc: Seth Jaffe <sjaffe@oge.gov>
Subject: Draft Email - [Message contains CUI]

CONTROLLED

Dave,

Below please find the draft proposed email we discussed earlier today.

Thank you,
Maura

(b)(5) deliberative draft - final version released with redactions below at pp 7-8



(b)(5) deliberative draft – final version released with redactions below at pp 7-8



Maura K. Leary
Assistant Counsel
U.S. Office of Government Ethics
Telephone: 202-482-9231
mleary@oge.gov

From: [David J. Apol](#)
To: [Seth Jaffe](#); [Maura Leary](#)
Subject: FW: Draft Email - [Message contains CUI]
Date: Wednesday, June 24, 2020 4:58:59 PM

FYI

From: David J. Apol
Sent: Wednesday, June 24, 2020 4:56 PM
To: Gast, Scott F. EOP/WHO (b) (6) >
Subject: FW: Draft Email - [Message contains CUI]

Scott,

Thank you very much for the analysis you provided last week.

We have a few additional questions, which are listed below.

(b)(5) - deliberative and pre-decisional



For reference, here are links to various news articles reporting on Mr. Giuliani's statements that he provided pro bono legal services to the President:

- o "A Great Big Gift Not on Trump's Disclosure Form: Giuliani's Legal Advice," New York Times, Dec. 13, 2019, available at <https://www.nytimes.com/2019/12/13/us/politics/giuliani-trump-financial-disclosure.html>
- o Luppe B. Luppen and Hunter Walker, 'The Wild West': Questions surround Trump legal team payments, Yahoo News, Oct. 29, 2019 ("In an interview earlier this month with Yahoo News, Giuliani responded with an unequivocal 'Yes, sir' when asked if he is representing Trump pro bono, including covering expenses."), available at <https://yhoo.it/36qiwJm>
- o Lachlan Markay, Dems Want to Know: Who Paid Rudy, Daily Beast, Oct. 10, 2019 ("In an interview with The Daily Beast this week, Giuliani steadfastly denied that he was paid for any work he did in Ukraine, saying that he helped Trump on a 'pro bono' basis."), available at <https://bit.ly/2r6CVTL>
- o Priscilla DeGregory, Rudy Giuliani allegedly losing money while working for Trump, New York Post, July 25, 2019 (Quoting Giuliani asserting: "I had decided to advise President Trump for free because I was outraged at how he was being very unfairly treated."), available at <https://bit.ly/325GXZf>
- o John Chandler and Dareh Gregorian, Trump lawyer Rudy Giuliani, in divorce court, is accused

of spending \$12K on cigars, NBC News, Nov. 7, 2018 (“[Justice] Katz asked Giuliani why he would represent Trump for nothing, given that the president’s other lawyers in the Russia probe are getting paid. Giuliani’s lawyer, Faith Miller, said he was doing so because of ‘a 30-year relationship with Mr. Trump.’”), available at <https://nbcnews.to/2oOGMUn>

- o Sarah Maslin Nir, Giuliani Divorce: It’s Ugly, It’s Operatic. What Did You Expect?, New York Times, Sept. 13, 2019, available at <https://nyti.ms/36oVv9l> (While in private practice, Mr. Giuliani was highly paid for his legal services. According to Mrs. Giuliani’s attorneys, Mr. Giuliani reportedly earned \$7.9 million in 2016 and \$9.5 million in 2017. In 2018, the year in which he began to work for President Trump, Mr. Giuliani’s “earnings dipped to \$6.8 million.)
- o Robert Costa and John Wagner, Giuliani parts ways with law firm, citing “pressing demands” of client Trump.” (May 10, 2018, available at https://www.washingtonpost.com/politics/giuliani-parts-ways-with-law-firm-citing-pressing-demands-of-client-trump/2018/05/10/72f60972-5473-11e8-9c91-7dab596e8252_story.html) (“This is a full-time job working for the president, and we’ve got to figure this out and get this over with,” Giuliani said. “That’s why the timing is right.”)

Finally, I wanted to share with you a (b)(5) - deliberative and pre-decisional [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From: [David J. Apol](#)
To: [Seth Jaffe](#); [Maura Leary](#); [Emory A. Rounds III](#)
Cc: [Deborah J. Bortot](#); [Shelley K. Finlayson](#)
Subject: FW: Draft Language
Date: Monday, July 6, 2020 3:46:09 PM

Here is what the White House has submitted as a draft note to be put on section 9.

Seth and Maura, let's discuss tomorrow at 10 (b) (5) .

Emory, we'll touch base with you after we have a recommendation.

From: Gast, Scott F. EOP/WHO [mailto:(b) (6)]
Sent: Monday, July 6, 2020 3:19 PM
To: David J. Apol <djapol@oge.gov>
Subject: Draft Language

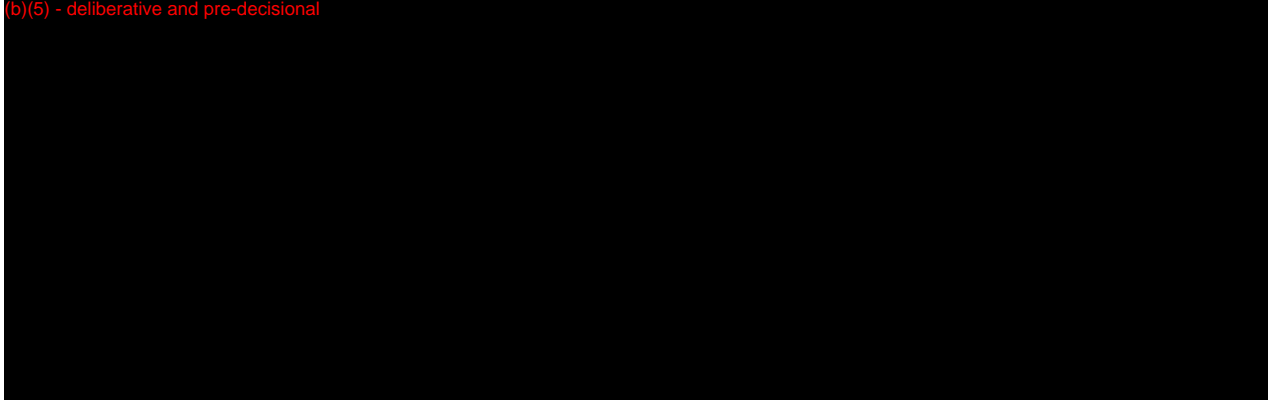
(b)(5) - deliberative and pre-decisional



From: [Gast, Scott F. EOP/WHO](#)
To: [David J. Apol](#)
Subject: Draft
Date: Friday, July 24, 2020 12:49:47 PM

Privileged and Confidential / Deliberative / Draft / Pre-Decisional

(b)(5) - deliberative and pre-decisional



From: [Gast, Scott F. EOP/WHO](#)
To: [David J. Apol](#)
Subject: Draft
Date: Tuesday, July 28, 2020 6:04:45 PM

Privileged and Confidential / Deliberative / Draft / Pre-Decisional

(b)(5) - deliberative and pre-decisional



From: [Elizabeth D. Horton](#)
To: [Agency Wide: News Clippings](#)
Subject: Legislative Update for Wednesday, August 5, 2020
Date: Wednesday, August 5, 2020 11:49:45 AM

The Senate convened at 10 a.m.

According to *CQ*, the Senate convened at 10 a.m. Following leader remarks, the Senate will be in a period of morning business. Votes are possible, but none have been scheduled.

The House is not in session.

Legislative and Related News

Multiple outlets report that Sen. Elizabeth Warren is asking the Securities and Exchange Commission to investigate whether a flurry of trades and executive purchases of Eastman Kodak stock ahead of the announcement of a massive federal loan involved insider trading. [Warren asks SEC to investigate Kodak stock buys for insider trading \(The Hill\)](#); [Warren asks SEC about insider trading in Trump's Kodak pharmaceuticals announcement \(Roll Call\)](#); [Warren asks SEC to investigate Kodak deal \(Politico\)](#); [Kodak Spent Big Money Lobbying Trump Before Scoring \\$765 Million COVID Deal \(The Daily Beast\)](#); [The SEC Is Reportedly Investigating Kodak Stock Trades. Here's What That Means. \(Barron's\)](#)

New York Magazine reports that House leadership last week suspended its month-long recess, with Majority Leader Steny Hoyer vowing to keep the legislative body open for as long as it takes to pass a second coronavirus stimulus bill through Congress. The article notes that some senators are also lobbying Majority Leader Mitch McConnell to delay their vacation scheduled to start on Friday.

[Vulnerable Republicans Ask McConnell to Get Stimulus Deal or Suspend Senate Recess](#)

Executive Branch Ethics and Related News

Above the Law reports on the disclosure of pro bono legal services on President Trump's annual financial disclosure report. [Trump Financial Disclosure Values Rudy Giuliani's Legal Services At... Zero](#)

Ring of Fire reports on the alleged conflicts of interest of Ivanka Trump and Jared Kushner. [Ivanka And Jared Pocket MILLIONS From Massive Conflicts Of Interest](#)

The Washington Post reports that the internal State Department watchdog, whom President Trump installed after the previous inspector general was abruptly fired, has resigned, the department said in a statement, marking another significant shake-up for an office sworn to investigate malfeasance and wrongdoing. [State Department watchdog resigns in another shake-up at IG's office](#)

Federal Agency and Related News

Federal Times reports that the Office of Personnel Management released its timeline for removing degree requirements from the majority of federal job listings and moving to a more assessment-based hiring process. [Degree requirements are on the way out for federal jobs](#)

Next Scheduled Recess:

House: Aug. 3 - Sept. 8

Senate: Aug. 8 - Sept. 8

From: [David J. Apol](#)
To: [David J. Apol](#); [Shelley K. Finlayson](#); [Emory A. Rounds III](#); [Heather A. Jones](#); [Seth Jaffe](#); [Nicole Stein](#)
Cc: [Deborah J. Bortot](#)
Subject: RE: President and VP 278s
Date: Friday, June 26, 2020 6:36:50 PM

As of now, it looks like all issues on both reports have been resolved other than the Part 9 questions on the President's. They hope to be able to resolve this on Monday and get us a signed report. If that can't be done, they may do a short extension.

From: David J. Apol [mailto:djapol@oge.gov]
Sent: Friday, June 26, 2020 10:15 AM
To: Shelley K. Finlayson <skfinlay@oge.gov>; Emory A. Rounds III <earounds@oge.gov>; Heather A. Jones <hajones@oge.gov>; Seth Jaffe <sjaffe@oge.gov>; Nicole Stein <nstein@oge.gov>
Subject: President and VP 278s

We are hopeful at this point of resolving the remaining questions on each report with an eye towards certifying on Monday. We will have more definitive info by the end of the day and give you an update when we do.

Dave

Sent from my Verizon, Samsung Galaxy smartphone
We will know

From: [Shelley K. Finlayson](#)
To: [Heather A. Jones](#); [David J. Apol](#); [Deborah J. Bortot](#)
Subject: RE: The President's report
Date: Tuesday, June 30, 2020 12:56:22 PM

I just learned, as did the rest of comms, who are being faced with press questions, that the VP's report was posted today.

From: Heather A. Jones
Sent: Monday, June 29, 2020 4:33 PM
To: David J. Apol <djapol@oge.gov>; Emory A. Rounds III <earounds@oge.gov>; Shelley K. Finlayson <skfinlay@oge.gov>; Elizabeth D. Horton <edhorton@oge.gov>; Deborah J. Bortot <djbortot@oge.gov>
Subject: RE: The President's report

What is happening with the VP's report? Is he signing?

From: David J. Apol
Sent: Monday, June 29, 2020 4:27 PM
To: Emory A. Rounds III <earounds@oge.gov>; Shelley K. Finlayson <skfinlay@oge.gov>; Elizabeth D. Horton <edhorton@oge.gov>; Heather A. Jones <hajones@oge.gov>; Deborah J. Bortot <djbortot@oge.gov>
Subject: The President's report

They will be giving him another 45 day extension and continue to work on a letter proposing a way forward on the Gift question similar to the manner which we proposed. Scott thinks it will take considerably less than 45 days, but does not want to chance having to do multiple short extensions.

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