

UNITED STATES OFFICE OF
GOVERNMENT ETHICS



February 17, 2017

Eric R. Bolinder
Counsel
Cause of Action Institute
1875 Eye St., NW, Suite 800
Washington, DC 20006

Dear Mr. Bolinder:

I am in receipt of your February 14, 2017, letter expressing concern that employees of the White House Office may not be covered by 5 C.F.R. part 2635. This letter is to reassure you that their coverage is well settled.¹ In addition, regulations applicable to the White House Office provide that, "Employees of the Executive Office of the President are subject to the executive branch-wide standards of ethical conduct at 5 CFR part 2635...." 3 C.F.R. § 100.1.²

Sincerely,

A handwritten signature in blue ink, appearing to read "Walter M. Shaub, Jr.", written in a cursive style.

Walter M. Shaub, Jr.
Director

cc: The Honorable Jason Chaffetz
Chairman
Committee on Oversight and Government Reform
United States House of Representatives
2157 Rayburn House Office Building
Washington, DC 20515

The Honorable Elijah E. Cummings
Ranking Member
Committee on Oversight and Government Reform
United States House of Representatives
2471 Rayburn House Office Building
Washington, DC 20515

The Honorable Donald F. McGahn
White House Counsel
1600 Pennsylvania Avenue, NW
Washington, DC 20500

¹ See, e.g., 5 C.F.R. § 2635.204(h), example 1 (illustrating applicability of the Standards of Conduct to White House employees).

² See also 64 Fed. Reg. 12,881 (Mar. 16, 1999) (acknowledging that 5 C.F.R. part 2635 "superseded" EOP's former standards of conduct and "established uniform standards of ethical conduct that apply to all executive branch personnel").

