



USAID
FROM THE AMERICAN PEOPLE

JUN 21 2017

TRANSMITTED VIA EMAIL
collinsreports@gmail.com

Mr. Christopher Collins
758 Diamond Lake Dr.
Abilene, TX 79601

Re: FOIA Request No. F-00208-17
First Interim Response

Dear Mr. Collins:

This is the first interim response to your June 8, 2017 Freedom of Information Act (FOIA) request to the United States Agency for International Development (USAID). You requested a copy of all ethics waiver requests received by the USAID from January 1, 2016 to June 8, 2017, along with any corresponding memoranda regarding grants or denials of those requests.

For your information, Congress excluded three (3) discrete categories of law enforcement and national security records from the FOIA. See 5 U.S.C. § 552(c) (2006 & Supp. IV (2010)). This response is limited to those records that are subject to the requirements of the FOIA. This is a standard notification that is given to all of our requesters and should not be construed as an indication that excluded records do, or do not, exist.

USAID conducted a comprehensive search of the USAID Office of General Counsel, Ethics and Administration (GC/EA) for documents responsive to your request. This first interim response has produced a total of 88 pages. Of those pages, we have determined that two (2) pages of the records are releasable in their entirety and 86 pages are partially releasable pursuant to Title 5 U.S.C. § 552 (b)(6).

FOIA Exemption 6 exempts from disclosure information about individuals in personnel or medical files and similar files the release of which would cause a clearly unwarranted invasion of personal privacy. This requires a balancing of the public's right to disclosure against the individual's right to privacy. The privacy interests of the individuals in the records you have requested outweigh any minimal public interest in disclosure of the information. Any private interest you may have in that information does not factor into the aforementioned balancing test.

Within the records we withheld any information that would reveal the identity of the individual submitting the recusal agreement.

If you require any further assistance or would like to discuss any aspect of your request, you may contact Dexter E. Johnson, the assigned FOIA Specialist by phone on (202) 712-4618 or at dejohnson@usaid.gov. You may also contact USAID's FOIA Public Liaison, Lynn P. Winston, at foia@usaid.gov.

Additionally, you may contact the Office of Government Information Services (OGIS) at the National Archives and Records Administration to inquire about the FOIA mediation services offered:

Office of Government Information Services
National Records and Archives Administration
8601 Adelphi Road-OGIS
College Park, Maryland 20740-6001
E-mail: ogis@nara.gov
Telephone: (202) 741-5770; toll free at 1-877-684-6448
Fax (202) 741-5769

You have the right to appeal this first interim response. Your appeal must be received by USAID no later than 90 days from the date of this letter. In order for it to be considered an official appeal, please address and send directly to the FOIA Appeal Officer:

Director, Office of Management Services
U.S. Agency for International Development
1300 Pennsylvania Avenue, NW
Ronald Reagan Building, Room 2.12.010
Washington, DC 20523

If you wish to fax your appeal, the fax number is (202) 216-3369. Both the appeal and envelope should be marked "FOIA APPEAL." Please include your tracking number F-00208-17 First Interim Response in your letter.

Please be advised that this is not our final response, as we are still reviewing further potentially responsive records. We will continue to provide you with interim releases until such time all responsive records have been received. There is no charge for this FOIA request.

Thank you for your interest in USAID and continued patience.

Sincerely,

A handwritten signature in blue ink, appearing to read "L. Winston" followed by a stylized flourish.

Lynn P. Winston, Chief
FOIA Public Liaison Officer
FOIA Officer/Agency Records Officer
Bureau for Management
Office of Management Services
Information and Records Division

Enclosures: Responsive Records (88 pages)

RECUSAL STATEMENT

TO: Jack Ohlweiler, Assistant General Counsel for Ethics and Administration (GC/EA)

SUBJECT: USAID Employee Recusal

Name of Employee	(b)(6)	
Agency/Office	E3/AA	
Title	(b)(6)	

In order to avoid even the appearance of a conflict of financial interest or bias in the performance of my official duties, until further notice I hereby recuse myself as prescribed by 18 U.S.C. § 208 and 5 C.F.R. §§ 2635.402 & 2635.502 regarding the following entities:

Name(s) of Non-Federal Entity or Entities	
PanAmerican Development Foundation	

I hereby recuse myself from personal and substantial involvement in any particular matters in which any of these entities has a financial interest or may be a party or represent a party.

I hereby designate (b)(6) to screen such matters and consult with USAID's Assistant General Counsel for Ethics and Administration regarding such matters. Unless the Assistant General Counsel determines that either (1) this legal disqualification does not apply, or (2) a waiver is available, the matter will be referred to (b)(6) for action so that I am not involved. I will advise other immediate subordinates of this disqualification.

(b)(6)	Date Submitted
	2/23/17

CC:

(b)(6)

Immediate supervisor
Person screening matters
Person to whom matters are referred

Submit this Recusal Statement to recusal@usaid.gov, with a copy to the Regional Legal Officer (if applicable). If you have any questions about this Recusal Statement, please contact a GC/EA attorney or your RLO.



USAID
FROM THE AMERICAN PEOPLE

March 30, 2017

From: Frank M. Walsh
Alternate Designated Agency Ethics Official

Re: 5 C.F.R. § 502(d) Determination for (b)(6) Participation on Matters Related to Chemonics

GC/EA makes this determination on the waiver of the appearance of conflict of interest concern created by (b)(6). The concern about the appearance of a conflict of interest stems from her adult daughter's employment at Chemonics.

BACKGROUND

(b)(6) is (b)(6) of the Nutrition and Environmental Health Division. The division will be soliciting for a major global nutrition award in March 2017 valued at approximately \$400 million. (b)(6) will lead the technical review of responses to the solicitation and will be involved in the selection of the recipient. (b)(6) adult daughter (b)(6) (DOB (b)(6)), lives with (b)(6) and her husband, and joined Chemonics in January 2017 as a full-time "country associate" working on the large USAID supply chain project. There is currently no business relationship (i.e. the division does not normally work with nutrition commodities or supply chains) between the GH/Nutrition and Environmental Health Division and the Chemonics project.

ANALYSIS

An employee has a covered relationship with any member of their household and any family member with whom the employee has a close personal relationship. You have a close personal relationship with your daughter, and she is a member of your household.

Potential concerns arise under the Standards of Ethical Conduct for Employees of the Executive Branch when an employee has a "covered relationship" with a specific party, and the employee participates on behalf of the Government personally and substantially in a particular matter concerning the party with whom she has a covered relationship. This could arise when you make decisions about your daughter's employer, Chemonics. Because it is possible that you will find yourself in a position to participate personally and substantially in matters concerning Chemonics, you have requested a waiver.

Under 5 C.F.R. § 2635.502(d), in situations where an employee participates on matter where the employee's participation would raise a question in the mind of a reasonable person about the

employee's impartiality, the agency designee may authorize the employee to participate in the matter based on a determination, made in light of all relevant circumstances, that the interest of the Government in the employee's participation outweighs the concern that a reasonable person may question the integrity of the agency's programs and operations. In making this determination, the agency designee considers the factors, discussed below.

1. Nature of the relationship involved

(b)(6) currently has no business or direct personal relationship with Chemonics or any Chemonics staff, other than her daughter. (b)(6) division has no business relationship with Chemonics.

(b)(6) daughter, (b)(6), lives at home and pays no room or board. (b)(6) is a country associate on the USAID procurement and supply chain project functioning at a very low level (a chart on this is attached). (b)(6) name is on page 3. She is not involved in new business, and does not deal with nutrition commodities.

In her role as the Technical Evaluation Committee (TEC) on the new nutrition procurement, (b)(6) may have to evaluate a Chemonics matter if that company is one of the respondents to the solicitation. Any interaction she would have with the entity during the procurement process would be through OAA and not directly with Chemonics. All of her interaction with the entity during the procurement process would be overseen and controlled by the Agreement Officer.

2. The effect that resolution of the matter would have upon the financial interests of the entity involved in the relationship

The value of the nutrition procurement is potentially up to \$400 million, including investments from Washington bureaus GH, BFS, DCHA and regional bureaus, as well as from field support from 20-25 countries. The final decisions will be made by the AO, with technical input from the (b)(6) by (b)(6)

3. The nature and importance of the employee's role in the matter, including the extent to which the employee is called upon to exercise discretion in the matter

(b)(6) will serve as the (b)(6). She will have discretion in the matter, and will be leading the group that determines how to award the procurement.

4. The sensitivity of the matter

It is unlikely that there would be public scrutiny over (b)(6) involvement on this procurement. If Chemonics were to receive the award as prime, then the fact that (b)(6) (b)(6) is a low level employee at Chemonics who would not financially benefit from the procurement would not make a reasonable person question (b)(6) impartiality.

5. The difficulty of reassigning the matter to another employee

As one of (b)(6) in the division and on the nutrition team, (b)(6) cannot easily reassign the role of (b)(6) to someone else. The (b)(6) in the division is a nutrition scientist, who will also be a member of the TEC. (b)(6) skills are less focused in the area of maternal and child clinical nutrition, which is a major component of the procurement. Moreover, he has never participated in a procurement process for USAID at this point having joined the Agency only four years ago.

6. Adjustments that may be made in the employee's duties that would reduce or eliminate the likelihood that a reasonable person would question the employee's impartiality

(b)(6) will inform the relevant Contractor Officer about her daughter's employment to ensure that the CO does not have any additional mitigation strategies. If Chemonics is given the award by USAID as the prime, then (b)(6) would ask Chemonics to ensure that her daughter is not involved in any way in the oversight, reporting, or implementation of the nutrition award and to document that in writing.

CONCLUSION

The undersigned concludes that the discussed engagement is authorized under 5 C.F.R. 2635.502.

/s/

Frank M. Walsh
Alternate Designated Agency Ethics Official

Supply Chain Solutions Division

Last Updated 02.27.2017

Anna Slother
Senior Vice President

SVP	1	0
Managing Directors	3	0
Directors	14	2
Managers	17	0
Associates	15	2
Totals (excluding 5 SMU staff)	50	4

Division Management and Talent Acquisition			
Operations/IDIQ Director and Country Programs Backstop	Corporate Finance	Resourcing & Recruitment	Security
<div>Larisa Romanenko</div> <div>Elizabeth Wolford</div> <div>Eleanor Doong</div>	<div>Sybilana Hall</div> <div>Jane Caudell-Feadan</div> <div>Lucy Homburg</div>	<div>Stacy Rollinger</div> <div>Santiago Jaramillo</div> <div>Abigail Whistler</div> <div>TBD</div>	<div>Jon Boeve</div> <div>Clara Richards</div> <div>Taylor Nickel</div> <div>TBD</div>

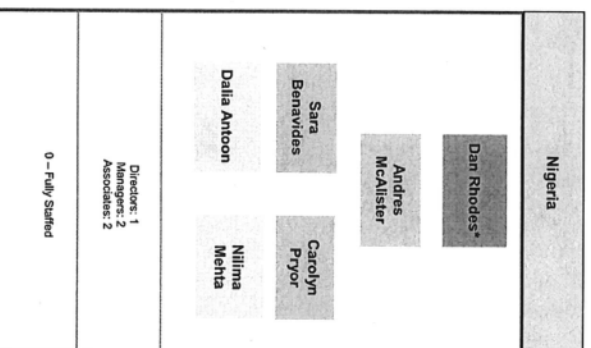
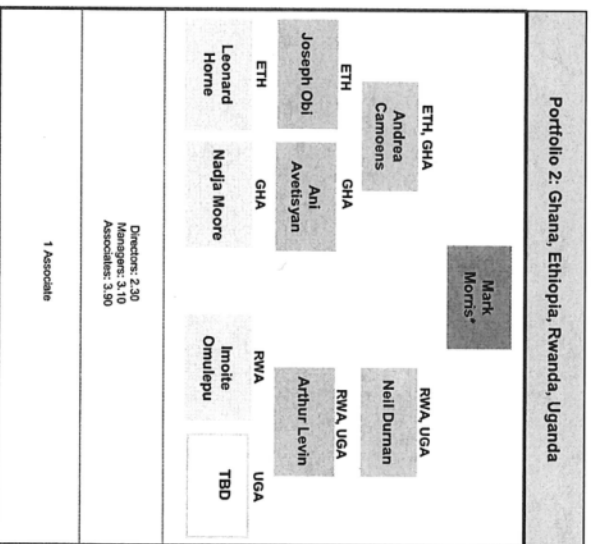
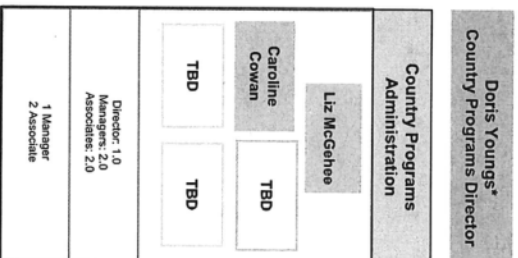
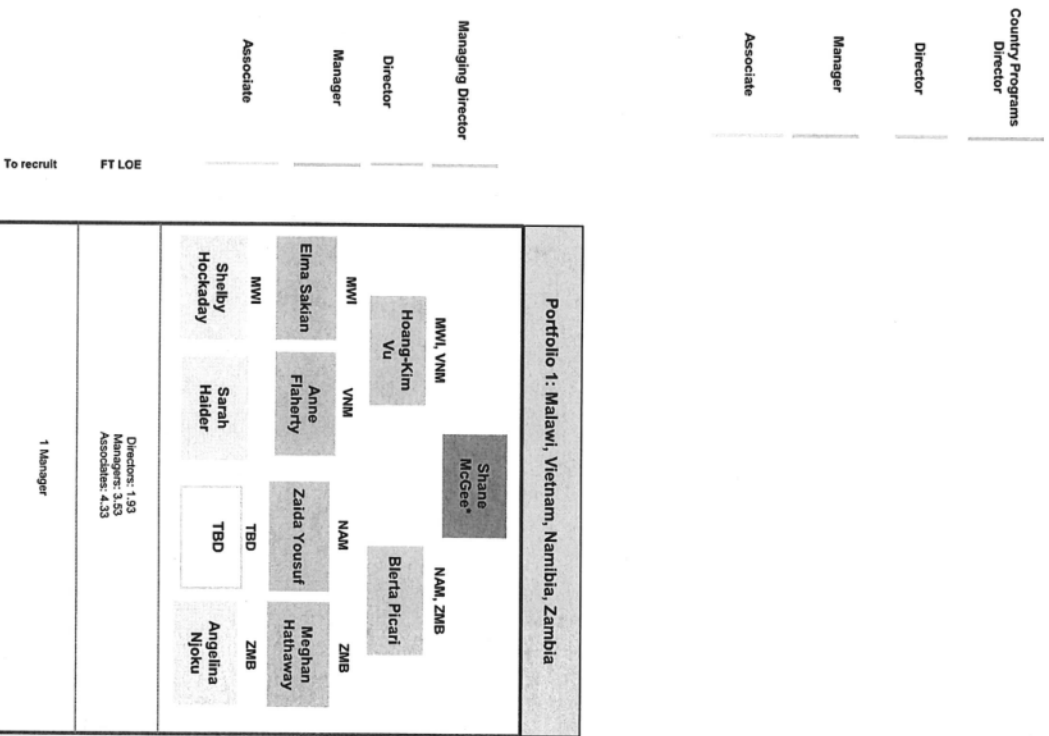
GHSC-TA PMU			
Jennifer Mullik, IDIQ PMU Director			
Francophone		Cote D'Ivoire	
<div>Kate Arden</div> <div>Shauneen Groux 03.06.17</div> <div>Katie Ayanian</div>	<div>Charles Smith</div> <div>Greg McCann</div> <div>Catherine Clarke</div>	<div>TBD</div> <div>Megan Barry 03.08.17</div> <div>TBD</div>	

Drew Luten, Managing Director
Regional Compliance
Systems Strengthening Backstop
<div>Ayesha Ali</div> <div>Jackie Feldman</div>

Anthony Latta, Managing Director			
GHSC-PSM IDIQ PMU			
Prime Contract Management and Administration/Program Operations Backstop	Subcontracts and Partnerships/MS and Global Supply Chain Backstop	Finance/TO Directors Backstop	
<div>Rebecca Logan</div> <div>Susan Bell</div> <div>Adrian Gonzalez</div>	<div>Laura Petruzzelli</div> <div>Beth Bearden</div> <div>Charlene Onyango-Obbo</div>	<div>Anthony Panella</div> <div>Sarah Fakhr</div> <div>Masood Habib 03.21.17</div>	

Neal Donahue, Managing Director			
Innovation and Growth			
Practice/Strategic Engagement Backstop	Global Fund	New Business	
<div>TBD</div> <div>James Legerre (F)</div> <div>Edel Tessema</div>	<div>Vanessa Brigham</div> <div>Scott Perkowski</div>	<div>Caitlin Coast</div> <div>Dueaa Elzin</div> <div>Kylie Chase</div>	

PSM Country Programs Organizational Chart



PSM Billable Staff			
	Fully Staffed	To Recruit	
Country Programs Director	1	0	
Managing Directors	6+1	0	
Totals	8	0	

*denotes PSM staff

SCS Staff			
	Fully Staffed	To Recruit	
Directors	16	0	
Managers	28	5	
Associates	33	2	
Totals	77	7	

Managing Director

Director

Manager

Associate

FT LOE

To recruit

(b)(6)

Portfolio 4: Botswana, Burma, Cambodia, Lesotho, Pakistan, PNG

Alan
Pringle*

PAK, CMB, PNG

Danielle
Ulrich

BWA, LSO, BRM

Amanda
Clemons

BWA, PNG

Nikhil
Padivan

PAK, CMB

Samuel
Stevens

LSO, BRM

Danielle
Weideman

PAK, BWA

Mark Hsen

PAK, PNG

Ryan Triche

LSO

Ashley
Greve

BRM, CMB

Ahmed
Abdallah

Directors: 2.30
Managers: 3.10
Associates: 3.90

0- Fully Staffed

Portfolio 5: Burkina Faso, Burundi, Cameroon, Haiti, Madagascar

Patrick
Daniere (F)*

HTI

Valerie
Power (F)

MDG, BDI

Juan
Fernando
Gomez (F)

CMR, BFA

Stephanie
Barret (F)

HTI

Morgan
Stuart

HTI

Henok
Yemane

MDG, BDI

Linda Flynn

MDG, BDI

Daniel Lim
(F)

CMR, BFA

Netsy
Woldesemait
(F)

HTI

Casey
Murphy (F)

HTI

Jonathan
Gatke (F)

MDG, BDI

Caitlin Vaka

MDG, BDI

Matthew
Ault (F)

CMR, BFA

Henry
Noonan

Directors: 3.05
Managers: 4.65
Associates: 5.45

0- Fully Staffed

Portfolio 6: Angola, Nepal, Zimbabwe, Kenya

Kim Shelsby*

ZWE, KEN

Brian
Zuidema

AGO, NPL

Jay
Gutzwiller

ZWE

Alina
Scutaru

NPL, KEN

Abdullah
Alfayadh

AGO

Camila
Bonilla

TBD

ZWE

Joseph
Paquette

ZWE

Baylee Molloy

NPL, KEN

Anne-Marie
Waringo

AGO

Ian
Vandenbuekel

Fanny
Lomingo

Directors: 2
Managers: 4
Associates: 5

1 Manager

Managing Director

Director

Manager

Associate

FT LOE

To recruit

RECUSAL STATEMENT

TO: Jack Ohlweiler, Assistant General Counsel for Ethics and Administration (GC/EA)

SUBJECT: USAID Employee Recusal

Name of Employee	(b)(6)
Agency/Office	USAID Tanzania, Health Office
Title	(b)(6)

In order to avoid even the appearance of a conflict of financial interest or bias in the performance of my official duties, until further notice I hereby recuse myself as prescribed by 18 U.S.C. § 208 and 5 C.F.R. §§ 2635.402 & 2635.502 regarding the following entities:

Name(s) of Non-Federal Entity or Entities	Cultural Practice LLC.
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I hereby recuse myself from personal and substantial involvement in any particular matters in which any of these entities has a financial interest or may be a party or represent a party.

I hereby designate (b)(6) to screen such matters and consult with USAID's Assistant General Counsel for Ethics and Administration regarding such matters. Unless the Assistant General Counsel determines that either (1) this legal disqualification does not apply, or (2) a waiver is available, the matter will be referred to (b)(6) for action so that I am not involved. I will advise other immediate subordinates of this disqualification.

Employee Signature	Date Submitted
(b)(6)	March 13, 2017

CC: (b)(6) Immediate supervisor
Person screening matters
Person to whom matters are referred

Submit this Recusal Statement to recusal@usaid.gov, with a copy to the Regional Legal Officer (if applicable). If you have any questions about this Recusal Statement, please contact a GC/EA attorney or your RLO.

March 3, 2017

RECUSAL STATEMENT

TO: James M. Peters, Designated Agency Ethics Official (DAEO) and Assistant General Counsel for Ethics and Administration (GC/EA)

FROM: (b)(6) U.S. Personal Services Contractor, USAID/Indonesia

SUBJECT: USAID Employee Recusal

Name of Employee: (b)(6)
Agency/Office: USAID/Indonesia, ASEAN Office
Title: (b)(6)

In order to avoid even the appearance of a conflict of financial interest or bias in the performance of my official duties, until further notice I hereby recuse myself as prescribed by 18 U.S.C. § 208 and 5 C.F.R. §§ 2635.402 & 2635.502 regarding the following entities:

Name(s) of Non-Federal Entity or Entities: Development Alternatives, Inc. (DAI)

I hereby recuse myself from personal and substantial involvement in any particular matters in which any of these entities has a financial interest or may be a party or represent a party.

I hereby designate (b)(6) Regional Legal Officer, USAID/Indonesia to screen such matters and consult with USAID's Assistant General Counsel for Ethics and Administration regarding such matters. Unless the Assistant General Counsel determines that either (1) this legal disqualification does not apply, or (2) a waiver is available, the matter will be referred to Mr. (b)(6) for action so that I am not involved. I will advise other immediate colleagues of this disqualification.

Employee Signature

(b)(6)

Date Submitted

3 March 2017

cc:

(b)(6)

RECUSAL STATEMENT

TO: Frank M. Walsh, Alternate Designated Agency Ethics Official (ADAEO) and
Assistant General Counsel (Acting) for Ethics and Administration (GC/EA)

SUBJECT: USAID Employee Recusal

Name of Employee: (b)(6)

Agency/Office: USAID/E3 Office of Education

Title: (b)(6)

In order to avoid even the appearance of a conflict of financial interest or bias in the performance of my official duties, until further notice I hereby recuse myself as prescribed by 18 U.S.C. § 208 and 5 C.F.R. §§ 2635.402 & 2635.502 regarding the following entities: Chemonics, Creative Associates, Education Development Center, FHI 360, RTI International.

I hereby recuse myself from personal and substantial involvement in any particular matters in which any of these entities has a financial interest or may be a party or represent a party.

I hereby designate (b)(6) to screen such matters and consult with USAID's Assistant General Counsel for Ethics and Administration regarding such matters. Unless the Assistant General Counsel determines that either (1) this legal disqualification does not apply, or (2) a waiver is available, the matter will be referred to (b)(6) for action so that I am not involved. I will advise other immediate subordinates of this disqualification.

Employee Signature (b)(6)

Date Submitted: February 28, 2017

CC: (b)(6), Immediate supervisor

(b)(6), Person screening matters

(b)(6), Person to whom matters are referred

RECUSAL STATEMENT

TO: Jack Ohlweiler, Assistant General Counsel for Ethics and Administration (GC/EA)

SUBJECT: USAID Employee Recusal

Name of Employee	(b)(6)
Agency/Office	USAID/Madagascar
Title	(b)(6)

In order to avoid even the appearance of a conflict of financial interest or bias in the performance of my official duties, until further notice I hereby recuse myself as prescribed by 18 U.S.C. § 208 and 5 C.F.R. §§ 2635.402 & 2635.502 regarding the following entities:

Name(s) of Non-Federal Entity or Entities	Catholic Relief Services
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I hereby recuse myself from personal and substantial involvement in any particular matters in which any of these entities has a financial interest or may be a party or represent a party.

I hereby designate (b)(6) to screen such matters and consult with USAID/[mission]'s Designated Ethics Official (the Resident Legal Officer (RLO) for the Mission) regarding such matters. Unless the RLO determines that either (1) this legal disqualification does not apply, or (2) a waiver is available, the matter will be referred to (b)(6) for action so that I am not involved. I will advise other immediate subordinates of this disqualification.

Employee Signature	Date Submitted
(b)(6)	2/27/17

CC: (b)(6) Immediate supervisor

(b)(6)	Person to whom matters are referred
	Person screening matters
	RLO

**NOTIFICATION OF POST-EMPLOYMENT NEGOTIATION OR
AGREEMENT AND RECUSAL STATEMENT**

Section 17 of the Stop Trading on Congressional Knowledge Act of 2012 (STOCK Act) requires all OGE 278 filers to file a statement notifying their agency ethics official of any negotiation for or agreement of future employment or compensation with a non-federal entity within three business days after commencement of the negotiation or agreement. Employees who file this notification statement also must file with their agency ethics official a recusal statement whenever there is a conflict of interest or appearance of a conflict of interest with the entity. In any such case, the employee must recuse, unless the employee has first obtained a written waiver or authorization as discussed in 5 C.F.R. § 2635.605, or qualifies for a regulatory exemption pursuant to 18 U.S.C. § 208(b)(2).

NOTIFICATION OF POST-EMPLOYMENT NEGOTIATION OR AGREEMENT

Name of Employee	(b)(6)
Agency/Office	complement
Date Negotiation or Agreement Commenced	Jan 23 and thereafter (A) Feb 21 (B)
Name(s) of Non-Federal Entity or Entities Disclose each non-federal entity with which you are negotiating for or have an agreement of future employment or compensation	A - Portland Trust, Social Finance, Venable LLP, MIT, B - Skoll Foundation, Skoll Global Threats, McColm & Company, Mercy Corps

RECUSAL STATEMENT

For as long as I am negotiating for or have an agreement of employment or compensation with any entity listed above, I will not participate personally and substantially in any particular matter that has a direct and predictable effect on the financial interests of that entity, unless I first obtain a written waiver or authorization consistent with 5 C.F.R. § 2635.605, or qualify for a regulatory exemption pursuant to 18 U.S.C. § 208(b)(2).

Employee Signature	Date Submitted
(b)(6)	Jan 27
Agency Ethics Official Signature	Date Received

RECUSAL STATEMENT

TO: Jack Ohlweiler, Assistant General Counsel for Ethics and Administration (GC/EA)

SUBJECT: USAID Employee Recusal

Name of Employee	(b)(6)
Agency/Office	USAID/ASHA
Title	(b)(6)

In order to avoid even the appearance of a conflict of financial interest or bias in the performance of my official duties, until further notice I hereby recuse myself as prescribed by 18 U.S.C. § 208 and 5 C.F.R. §§ 2635.402 & 2635.502 regarding the following entities:

Name(s) of Non-Federal Entity or Entities	Universidad del Valle de Guatemala (mother is part time employee at institution)
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I hereby recuse myself from personal and substantial involvement in any particular matters in which any of these entities has a financial interest or may be a party or represent a party.

I hereby designate (b)(6) to screen such matters and consult with USAID's Assistant General Counsel for Ethics and Administration regarding such matters. Unless the Assistant General Counsel determines that either (1) this legal disqualification does not apply, or (2) a waiver is available, the matter will be referred to (b)(6) for action so that I am not involved. I will advise other immediate subordinates of this disqualification.

Employee Signature	Date Submitted
(b)(6)	2/15/2017

CC: (b)(6) _____, Immediate supervisor
_____, Person screening matters
_____, Person to whom matters are referred

Submit this Recusal Statement to recusal@usaid.gov, with a copy to the Regional Legal Officer (if applicable). If you have any questions about this Recusal Statement, please contact a GC/EA attorney or your RLO.

**NOTIFICATION OF POST-EMPLOYMENT NEGOTIATION OR
AGREEMENT AND RECUSAL STATEMENT**

Section 17 of the Stop Trading on Congressional Knowledge Act of 2012 (STOCK Act) requires all OGE 278 filers to file a statement notifying their agency ethics official of any negotiation for or agreement of future employment or compensation with a non-federal entity within three business days after commencement of the negotiation or agreement. Employees who file this notification statement also must file with their agency ethics official a recusal statement whenever there is a conflict of interest or appearance of a conflict of interest with the entity. In any such case, the employee must recuse, unless the employee has first obtained a written waiver or authorization as discussed in 5 C.F.R. § 2635.605, or qualifies for a regulatory exemption pursuant to 18 U.S.C. § 208(b)(2).

NOTIFICATION OF POST-EMPLOYMENT NEGOTIATION OR AGREEMENT

Name of Employee	(b)(6)
Agency/Office	complement
Date Negotiation or Agreement Commenced	Jan 23 and thereafter
Name(s) of Non-Federal Entity or Entities Disclose each non-federal entity with which you are negotiating for or have an agreement of future employment or compensation	Portland Trust, Social Finance, Venable LLP, MIT

RECUSAL STATEMENT

For as long as I am negotiating for or have an agreement of employment or compensation with any entity listed above, I will not participate personally and substantially in any particular matter that has a direct and predictable effect on the financial interests of that entity, unless I first obtain a written waiver or authorization consistent with 5 C.F.R. § 2635.605, or qualify for a regulatory exemption pursuant to 18 U.S.C. § 208(b)(2).

Employee Signature	Date Submitted
(b)(6)	Jan 27
Agency Ethics Official Signature	Date Received

RECUSAL STATEMENT

TO: James M. Peters, Designated Agency Ethics Official (DAEO) and Assistant General Counsel for Ethics and Administration (GC/EA)

SUBJECT: USAID Employee Recusal

Name of Employee	(b)(6)
Agency/Office	USAID -
Title	FOREIGN SERVICE OFFICER

In order to avoid even the appearance of a conflict of financial interest or bias in the performance of my official duties, until further notice I hereby recuse myself as prescribed by 18 U.S.C. § 208 and 5 C.F.R. §§ 2635.402 & 2635.502 regarding the following entities:

Name(s) of Non-Federal Entity or Entities	C2 TECHNOLOGIES
---	-----------------

I hereby recuse myself from personal and substantial involvement in any particular matters in which any of these entities has a financial interest or may be a party or represent a party.

I hereby designate _____ to screen such matters and consult with USAID's Assistant General Counsel for Ethics and Administration regarding such matters. Unless the Assistant General Counsel determines that either (1) this legal disqualification does not apply, or (2) a waiver is available, the matter will be referred to _____ for action so that I am not involved. I will advise other immediate subordinates of this disqualification.

Employee Signature	Date Submitted
(b)(6)	1/25/2017

CC: _____, Immediate supervisor
_____, Person screening matters
_____, Person to whom matters are referred

Submit this Recusal Statement to recusal@usaid.gov, with a copy to the Regional Legal Officer (if applicable). If you have any questions about this Recusal Statement, please contact a GC/EA attorney or your RLO.

DATE: 01/25/2017

TO: Frank Walsh, Acting Assistant General Counsel for Ethics and Administration (GC/EA)

FROM: (b)(6) USAID/Nicaragua (b)(6)

RE: USAID Employee Recusal for Chemonics International

Summary

Upon entry on duty with USAID, I, (b)(6) placed a recusal on file related to matters involving Chemonics. I am writing this memo to maintain the recusal during my first Foreign Service Post in Nicaragua. This recusal is necessary due to my participation in the Employee Stock Ownership Plan, a retirement plan offered by Chemonics International to its employee. Under this plan, I qualified for benefits from on/a November 2014 – (on/a) March 19, 2016. I subsequently entered on duty at USAID on March 20, 2016.

At the end of the 2016 tax year (calendar year), I elected for the maximum distribution possible to divest from the ESOP plan. To my understanding, this covered the period from November 2014 until December 2015. However, I still hold financial interests that cannot be divested until the 2017 calendar year for the two months that I worked at Chemonics in 2016.

As such, I am attaching a letter from Mir. John N. Ohlweiler that we sent to Chemonics, my initial recusal upon entrance on duty to USAID, and my new recusal that will stay in effect until distribution is possible for the remaining amount.

Further, Chemonics is allowed us accelerated distribution but they are restricted in allowing former employees to remove assets that have not yet been determined due to changing stock prices and adjustments. As such, we will have to wait until the end of the 2017 calendar year to elect final distribution. Until then, the recusal will be in effect.

Written by: (b)(6) Democracy and Governance Office, USAID/Nicaragua

Signature

(b)(6)

RECUSAL STATEMENT

TO: Frank Walsh, Acting Assistant General Counsel for Ethics and Administration
(GC/EA)

SUBJECT: USAID Employee Recusal

Name of Employee (b)(6)
Agency Office USAID/Nicaragua
Title (b)(6)

In order to avoid even the appearance of a conflict of financial interest or bias in the performance of my official duties, until further notice I hereby recuse myself as prescribed by 18 US.C. § 208 and 5 C.F.R. §§ 2635.402 & 2635.502 regarding the following entities:

Name(s) of Non-Federal Entity or Entities	Chemonics Int'l
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I hereby recuse myself from personal and substantial involvement in any particular matters in which any of these entities has a financial interest or may be a party or represent a party.

I hereby designate (b)(6) USAID/Nicaragua
immediate supervisor to screen such matters and consult with USAID's Assistant General Counsel for Ethics and Administration regarding such matters. Unless the Assistant General Counsel determines that either (1) this legal disqualification does not apply, or (2) a waiver is available, the matter will be referred for action so that I am not involved. I will advise other immediate subordinates of this disqualification.

(b)(6)	Date Submitted
	01-25-17

CC: (b)(6)

____ Immediate supervisor

____, Person screening matters

____, Person to whom matters are referred

Submit this Recusal Statement to recusal@usaid.gov, with a copy to the Regional Legal Officer (if applicable). If you have any questions about this Recusal Statement, please contact a GCIEA attorney or your RLO.

RECUSAL STATEMENT

TO: Frank Walsh, Acting Assistant General Counsel for Ethics and Administration
(GC/EA)

SUBJECT: USAID Employee Recusal

Name of Employee: (b)(6)
Agency/Office: DCHA/DRG/EPT
Title: (b)(6)

In order to avoid even the appearance of a conflict of financial interest or bias in the performance of my official duties, until further notice I hereby recuse myself as prescribed by 18 U.S.C. § 208 and 5 C.F.R. §§ 2635.402 & 2635.502 regarding the following entities:

Name(s) of Non-Federal Entity or
Entities

James J. Brennan, Inc.

I hereby recuse myself from personal and substantial involvement in any particular matters in which any of these entities has a financial interest or may be a party or represent a party.

I hereby designate (b)(6) Elections and Political Transitions Division
USAID/DCHA/DRG Center/Immediate Supervisor to screen such matters and consult with
USAID's Assistant General Counsel for Ethics and Administration regarding such matters.
Unless the Assistant General Counsel determines that either (1) this legal disqualification does
not apply, or
(2) a waiver is available, the matter will be referred to assigned as relevant for action so that I
am not involved. I will advise other immediate subordinates of this disqualification.

Employee Signature: (b)(6) Date Submitted: 2/27/12

CC: (b)(6)
Immediate supervisor
Person screening matters
Person to whom matters are referred

Submit this Recusal Statement to recusal@usaid.gov, with a copy to the Regional Legal Officer (if applicable). If you have any questions about this Recusal Statement, please contact a GC/EA attorney or your RLO.



USAID
FROM THE AMERICAN PEOPLE

May 25, 2016

Re: Divestment of (b)(6) ownership interests in the Employee Stock Ownership Plan maintained by Chemonics International, Inc.

To Whom It May Concern:

(b)(6) is currently a Foreign Service Officer in the United States Agency for International Development's (USAID) Center of Excellency on Democracy, Human Rights, and Governance. Prior to joining USAID, he was an employee of your firm Chemonics International, Inc. While he was an employee of your firm, (b)(6) was enrolled in its Employee Stock Ownership Plan (ESOP).

In light of these facts, (b)(6) has been required by this Agency to recuse himself from participating in any contract decision that could affect the financial interests of Chemonics. One main reason for this recusal is his continued ownership interest in Chemonics by way of her participation in its ESOP.

In my capacity as USAID's Assistant General Counsel for Ethics and Administration and as the designee of this Agency's Designated Agency Ethics Official (DAEO), I am writing to convey USAID's support (b)(6) request for divestment of her interest in the Chemonics ESOP.

Upon (b)(6) entry on duty with USAID, two ethics regulations made it necessary for (b)(6) to recuse himself from any Chemonics-related matters. Firstly, the rule on appearance of conflict of interest, 5 CFR 2635.502, requires that a US Government employee cannot participate in any matter affecting any former employer they had within the preceding one-year period. One year after the date that employment relationship ended, there is no longer a conflict of interest issue based on this rule.

The second ethics rule (b)(6) recusal is 18 U.S.C. § 208, which prohibits a US Government employee from participating in any matter that could affect their financial interests. Participation in the Chemonics ESOP creates a financial interest in Chemonics and, consequently, a conflict of interest regarding any matter involving Chemonics. Accordingly, as long as (b)(6) maintains this financial interest by way his ESOP participation, he will not be able to work on any matter involving Chemonics. As Chemonics does a significant amount of business with USAID and submits proposals for many USAID contracts, we have determined that in order for (b)(6) to be able to perform his duties and contribute to the work of his office in the long term, it would be best if he removed this financial conflict of

interest with Chemonics. In order to do this, he needs to divest his ownership interest in Chemonics—He needs to end his participation in the Chemonics ESOP. USAID supports his request to do so.

Sincerely,

(b)(6)

John N. Ohlweiler
Assistant General Counsel
Ethics & Administration

Cc: (b)(6)

RECUSAL STATEMENT

TO: Assistant General Counsel for Ethics and Administration (Recusals@usaid.gov)

SUBJECT: USAID Employee Recusal

Name of Employee	(b)(6)
Agency/Office	USAID ExO
Title	(b)(6)

In order to avoid even the appearance of a conflict of financial interest or bias in the performance of my official duties, until further notice I hereby recuse myself as prescribed by 18 U.S.C. § 208 and 5 C.F.R. §§ 2635.402 & 2635.502 regarding the following entities:

Name(s) of Non-Federal Entity or Entities	Global Communities / Cooperative Housing Foundation
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I hereby recuse myself from personal and substantial involvement in any particular matters in which any of these entities has a financial interest or may be a party or represent a party.

I hereby designate USAID to screen such matters and consult with USAID's Assistant General Counsel for Ethics and Administration regarding such matters. Unless the Assistant General Counsel determines that either (1) this legal disqualification does not apply, or (2) a waiver is available, the matter will be referred to USAID for action so that I am not involved. I will advise other immediate subordinates of this disqualification.

Employee Signature	Date Submitted
(b)(6)	Jan 05, 2017

CC:

(b)(6)

, Immediate supervisor

, Person to whom matters are referred

, Resident Legal Officer

RECUSAL STATEMENT

TO: Jack Ohlweiler, Assistant General Counsel for Ethics and Administration (GC/EA)

SUBJECT: USAID/Uganda Employee Recusal

Name of Employee	(b)(6)
Agency/Office	USAID/PPD
Title	(b)(6)

In order to avoid even the appearance of a conflict of financial interest or bias in the performance of my official duties, until further notice I hereby recuse myself as prescribed by 18 U.S.C. § 208 and 5 C.F.R. §§ 2635.402 & 2635.502 regarding the following entities:

Name(s) of Non-Federal Entity or Entities	Chemonics International, Inc., a/k/a Chemonics
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I hereby recuse myself from personal and substantial involvement in any particular matters in which any of these entities has a financial interest or may be a party or represent a party.

I hereby designate (b)(6), PPD DOC Specialist, in consultation with the Mission's Regional Legal Officer (currently, Karen Hunter) to screen such matters and consult with USAID's Assistant General Counsel for Ethics and Administration regarding such matters. Unless the Assistant General Counsel determines that either (1) this legal disqualification does not apply, or (2) a waiver is available, the matter will be referred to (b)(6) for action, who will report directly to PPD Officer Director, Jenny VerNooy, on any matters that are referred so that I will not be involved. I will advise other immediate subordinates of this disqualification.

Employee Signature	Date Submitted:
(b)(6)	11/9/2017

CC:

(b)(6)	PPD Officer Director
(b)(6)	PPD DOC Specialist

Submit this Recusal Statement to recusal@usaid.gov, with a copy to the Regional Legal Officer (if applicable). If you have any questions about this Recusal Statement, please contact a GC/EA attorney or your RLO.