

MEMORANDUM

TO: RICHARD VISEK
DEPUTY LEGAL ADVISER AND
DESIGNATED AGENCY ETHICS OFFICER
UNITED STATES DEPARTMENT OF STATE

FROM: DAVID JONES
SENIOR ASSOCIATE COUNSEL TO THE PRESIDENT
WHITE HOUSE OFFICE

DATE: JULY 16, 2019

SUBJECT: Limited Waiver Certification Pursuant to Section 3 of Executive Order 13770

Official: Richard A. Grenell
U.S. Ambassador to the Federal Republic of Germany

After reviewing your limited waiver request memorandum, I hereby waive the requirements of Section 1, paragraph 6 of Executive Order 13770 for Ambassador Richard A. Grenell with regard to his involvement, as Ambassador to the Federal Republic of Germany, in certain particular matters involving specific parties directly and substantially related to the Fox Corporation, Fox News, Fox Television, Fox Business Network, and Fox Broadcasting Company.

Scope of Waiver

Ambassador Grenell is permitted to work on the following matters in the course of his official duties, even if they constitute particular matters involving specific parties as defined in section 2 of Executive Order 13770 directly and substantially related to the Fox Corporation, Fox News, Fox Television, Fox Business Network, or Fox Broadcasting Company:

- Communications with employees of these entities in the course of press briefings and other briefings involving a broad group of journalists;
- Meetings and communications with employees of these entities to provide information about U.S. foreign policy or the Department of State, such as responding to press queries or requests for briefings or interviews;
- Interviews with employees of these entities and appearances on programs produced by these entities for the purpose of providing information about U.S. foreign policy or the Department of State.

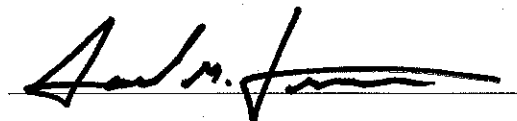
The waiver would not permit Ambassador Grenell to work on the following matters:

- Particular matters that directly and predictably affect the financial interests of the Ambassador, as defined in 18 U.S.C. § 208;
- Funding or contracts with the Fox Corporation or any of its subsidiaries.

Basis for Waiver

- In his capacity as the U.S. Ambassador to Germany, it is beneficial for Ambassador Grenell to appear in a variety of German- and English-language media outlets in order to explain the Administration's policy priorities relevant to our relations with Germany.
- German policy-makers, journalists, businesspeople, and U.S. citizens living in Germany view programs produced by the Fox Corporation and its affiliates as an important component of the U.S. news media, and follow them to understand American policy and public opinion. Ambassador Grenell's appearances on all major U.S. media outlets, including Fox News, Fox Television, Fox Business Network and Fox Broadcasting Company, can be a helpful way to reach these audiences, and such appearances frequently receive coverage in German media.
- Ambassador Grenell is the highest-ranking U.S. foreign affairs official in Germany and a public face of the Administration. In order to achieve U.S. public diplomacy and press strategy goals, it is important that the Ambassador have the capacity to communicate the Administration's messaging clearly and consistently to all media outlets and platforms relevant to our relations with Germany.
- Principles of federal ethics law restrict Ambassador Grenell from showing preference or favoritism toward the Fox Corporation or any of its subsidiaries in the course of his official duties.
- Ambassador Grenell does not have a continuing relationship with the Fox Corporation or its affiliates, and he does not have a financial interest in these entities.

Accordingly, this limited waiver is hereby granted with the understanding that Ambassador Grenell will comply with the remaining provisions of the Ethics Pledge and with government ethics rules.



David Jones
Senior Associate Counsel to the President

Dated: July 16, 2019

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DEPUTY LEGAL ADVISER AND
DESIGNATED AGENCY ETHICS OFFICER
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FROM: DAVID JONES
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DATE: JULY 16, 2019

SUBJECT Limited Waiver Certification Pursuant to Section 3 of Executive Order 13770

Official: Richard A. Grenell
U.S. Ambassador to the Federal Republic of Germany

After reviewing your limited waiver request memorandum, I hereby waive the requirements of Section 1, paragraph 6 of Executive Order 13770 for Ambassador Richard A. Grenell with regard to his involvement, as Ambassador to the Federal Republic of Germany, in certain particular matters involving specific parties directly and substantially related Newsmax Media.

Scope of Waiver

Ambassador Grenell is permitted to work on the following matters in the course of his official duties, even if they constitute particular matters involving specific parties as defined in section 2 of Executive Order 13770 directly and substantially related to Newsmax Media :

- Communications with employees of this entity in the course of press briefings and other briefings involving a broad group of journalists;
- Meetings and communications with employees of this entity to provide information about U.S. foreign policy or the Department of State, such as responding to press queries or requests for briefings or interviews;
- Interviews with employees of this entity and appearances on programs produced by this entity for the purpose of providing information about U.S. foreign policy or the Department of State.

The waiver would not permit Ambassador Grenell to work on the following matters:

- Particular matters that directly and predictably affect the financial interests of the Ambassador, as defined in 18 U.S.C. § 208;
- Funding or contracts with the Newsmax Media.

Basis for Waiver

- In his capacity as the U.S. Ambassador to Germany, it is beneficial for Ambassador Grenell to appear in a variety of German and English-language media outlets in order to explain the Administration's policy priorities relevant to our relations with Germany.
- German policy-makers, journalists, businesspeople, and U.S. citizens living in Germany may view content produced by Newsmax Media for the purpose of understanding American policy and public opinion. Ambassador Grenell's appearances on Newsmax Media, can be a helpful way to reach these audiences. The Ambassador's appearances on news programs have received coverage in German media.
- Ambassador Grenell is the highest ranking U.S. foreign affairs official in Germany and a public face of the Administration. In order to achieve U.S. public diplomacy and press strategy goals, it is important that the Ambassador have the capacity to communicate the Administration's messaging clearly and consistently to all media outlets and platforms relevant to our relations with Germany.
- Principles of federal ethics law restrict Ambassador Grenell from showing preference or favoritism toward Newsmax Media.
- Ambassador Grenell does not have a continuing relationship with Newsmax Media and he does not have a financial interest in the entity.
- Accordingly, this limited waiver is hereby granted with the understanding that Ambassador Grenell will comply with the remaining provisions of the Ethics Pledge and with government ethics rules.



David Jones
Senior Associate Counsel to the President

Dated: July 16, 2019