



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Washington, D.C. 20460

APR - 9 2018

OFFICE OF
GENERAL COUNSEL

David J. Apol
Acting Director and General Counsel
U.S. Office of Government Ethics
1201 New York Avenue, NW Suite 500
Washington, D.C. 20005

Dear Mr. Apol:

As the Designated Agency Ethics Official for the United States Environmental Protection Agency (EPA), I am writing to acknowledge receipt of your April 6, 2018, letter. In that letter, you cited press articles regarding EPA Administrator E. Scott Pruitt's reported actions. You asked the EPA ethics office to review and analyze those alleged actions to determine whether any constitute a violation of the Standards of Ethical Conduct for Employees of the Executive Branch.

We are committed to ensuring that the EPA and all of its employees serve the public trust free from any actual or perceived conflicts. To that end, EPA's ethics officials provide advice and counseling to prospective, current and former employees regarding federal ethics laws and regulations based upon the information available to us. As you and I discussed briefly, however, federal ethics officials lack independent investigatory authority. Consequently, in an instance in which the EPA ethics office lacks sufficient evidence to assess fully an ethics matter, we have a long-standing practice of referring it to the EPA's Inspector General (IG) for investigation. As you know, the IG has independent authority to investigate allegations of fraud, waste, abuse, and corruption. When the IG is investigating a matter, we generally defer to his office to take the lead.

Consistent with our practice, we referred your letter to the EPA IG. We will coordinate as closely as possible with the EPA IG as he carries out his review. To the extent that there are ethics issues to resolve, we will serve as the subject matter expert on those issues. As always, the EPA's ethics office stands ready to assist the IG in any way. Finally, if the IG identifies recommendations or areas for improving our counselling effort, we will pursue improvements to the program.

We appreciate your interest in the EPA and your assistance as we fulfill our obligations to ensure compliance with federal ethics laws and regulations.

Sincerely yours,

A handwritten signature in green ink, appearing to read "K S Minoli".

Kevin S. Minoli
Designated Agency Ethics Official and
Principal Deputy General Counsel