

**From:** [Gentry, Sarah](#)  
**To:** [Sanchez, Marco](#)  
**Subject:** RE: New Entrant Public Financial Disclosure Report  
**Date:** Friday, July 16, 2021 7:41:00 AM

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**CUI//FNC/PRIVILEGE/PRVCY**

Hi Marco,

Your New Entrant OGE Form 278e has been certified. Based on my review, please be mindful of the following updated ethics advice related to your previous employment.

Conflict of Interest Statute – General Advice

Under the conflict of interest statute, 18 U.S.C. § 208(a), you may not participate personally and substantially, in your official Department of Education capacity, in any particular matter in which, to your knowledge, you, or anyone whose interests are imputed to you, has a financial interest, unless you first obtain a written waiver, pursuant to section 208(b)(1), or qualify for a regulatory exemption, pursuant to section 208(b)(2). Interests imputed to you under the law include those of your spouse, minor children, general partner, an organization or entity which you serve as an officer, director, trustee, general partner or employee, and any person with whom you are negotiating for employment or with whom you have an arrangement concerning prospective employment.

Ethics Pledge Disqualification

Pursuant to Executive Order 13989 (1/20/2021), and the ethics pledge you signed on 4/29/2021, you may not, for a period of two years from the date of your appointment, participate in any particular matter involving specific parties in which any of your former employers or former clients is, or represents, a party. This disqualification covers meetings or other communications with your former employers and former clients, even if the subject of the meeting is a particular matter of general applicability, unless the meeting or other communication is open to all interested parties. A “former employer” includes any entity for which you have, within the last two years, served as an employee, officer, director, trustee, or general partner, except that it does not include any State or local government. A “former client” includes any entity for which you have personally served as an agent, attorney, or consultant within two years prior to your appointment. (b)(6)

(b)(6)

Please let me know if you have any questions.

Thanks,

Sarah

**Sarah M. Gentry**

Attorney  
Ethics Division

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**From:** Gentry, Sarah

**Sent:** Tuesday, June 22, 2021 1:35 PM  
**To:** Sanchez, Marco <Marco.Sanchez@ed.gov>  
**Subject:** RE: New Entrant Public Financial Disclosure Report

**CUI//FNC/PRIVILEGE/PRVCY**

Thank you! I'll be in touch.

Sarah

**Sarah M. Gentry**  
Attorney  
Ethics Division

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**From:** Sanchez, Marco <[Marco.Sanchez@ed.gov](mailto:Marco.Sanchez@ed.gov)>  
**Sent:** Tuesday, June 22, 2021 1:12 PM  
**To:** Gentry, Sarah <[Sarah.Gentry@ed.gov](mailto:Sarah.Gentry@ed.gov)>  
**Subject:** RE: New Entrant Public Financial Disclosure Report

Hi Sarah,

Absolutely.

(b)(3)



(b)(5)

Please let me know if you need anything else.

Best,  
Marco

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**From:** Gentry, Sarah <[Sarah.Gentry@ed.gov](mailto:Sarah.Gentry@ed.gov)>

**Sent:** Tuesday, June 22, 2021 9:07 AM

**To:** Sanchez, Marco <[Marco.Sanchez@ed.gov](mailto:Marco.Sanchez@ed.gov)>

**Subject:** RE: New Entrant Public Financial Disclosure Report

**CUI//FNC/PRIVILEGE/PRVCY**

Hi Marco,

(b)(5); (b)(5)

(b)(6)



Thanks,

Sarah

**Sarah M. Gentry**

Attorney  
Ethics Division

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**From:** Sanchez, Marco <[Marco.Sanchez@ed.gov](mailto:Marco.Sanchez@ed.gov)>  
**Sent:** Monday, June 14, 2021 3:00 PM  
**To:** Gentry, Sarah <[Sarah.Gentry@ed.gov](mailto:Sarah.Gentry@ed.gov)>  
**Subject:** RE: New Entrant Public Financial Disclosure Report

Great! I'm free at 2PM EST tomorrow.

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**From:** Gentry, Sarah <[Sarah.Gentry@ed.gov](mailto:Sarah.Gentry@ed.gov)>  
**Sent:** Monday, June 14, 2021 11:58 AM  
**To:** Sanchez, Marco <[Marco.Sanchez@ed.gov](mailto:Marco.Sanchez@ed.gov)>  
**Subject:** RE: New Entrant Public Financial Disclosure Report

**CUI//FNC/PRIVILEGE/PRVCY**

Hi Marco,

Yes, of course! I am available tomorrow between 1:00 and 4:00 EST. Would any time in that frame work well for you?

Thanks,

Sarah



**Sarah M. Gentry**

Attorney  
Ethics Division

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**From:** Sanchez, Marco <[Marco.Sanchez@ed.gov](mailto:Marco.Sanchez@ed.gov)>  
**Sent:** Monday, June 14, 2021 2:55 PM  
**To:** Gentry, Sarah <[Sarah.Gentry@ed.gov](mailto:Sarah.Gentry@ed.gov)>  
**Subject:** RE: New Entrant Public Financial Disclosure Report

Hi Sarah,

My schedule is flexible do you have time this week to meet? Thanks!

Best,  
Marco


**From:** Gentry, Sarah <[Sarah.Gentry@ed.gov](mailto:Sarah.Gentry@ed.gov)>  
**Sent:** Monday, June 14, 2021 11:20 AM  
**To:** Sanchez, Marco <[Marco.Sanchez@ed.gov](mailto:Marco.Sanchez@ed.gov)>  
**Subject:** New Entrant Public Financial Disclosure Report  
**Importance:** High

**CUI//FNC/PRIVILEGE/PRVCY**

Hello,

I am the attorney assigned to review your New Entrant Public Financial Disclosure Report and I have some follow up questions for you. **I would greatly appreciate it if you could provide a response by Monday, June 21.** I am also providing you with preliminary ethics advice, which may be updated upon a final review of your New Entrant Report. Please let me know if you have any questions or concerns.

(b)(5); (b)(6)



(b)(5); (b)(6)

**Preliminary Ethics Advice**

Please keep the following general ethics guidance in mind. As stated previously, this guidance may be updated upon a final review of your New Entrant Report.

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**Conflict of Interest Statute**

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Thank you,

Sarah

**Sarah M. Gentry**

Attorney

U.S. Department of Education

Office of the General Counsel

Ethics Division

[sarah.gentry@ed.gov](mailto:sarah.gentry@ed.gov)

202-453-7936

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