
From: Baune, Margaret
Sent: Wednesday, April 14, 2021 14:16
To: Santiago-Moreno, Jorge
Subject: OGE Form 278, New Entrant Report: Update, Ethics Advice

Jorge,

Thank you for your assistance on your OGE Form 278, Public Financial Disclosure New Entrant Report. There are no apparent issues remaining. Please read and be mindful of the following ethics advice:

Conflicts of Interest/Disqualifications

Under the Federal conflict of interest statute, 18 U.S.C. § 208(a), you may not participate personally and substantially, in your official Department 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 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.

Pursuant to Executive Order 13989 (1/20/2021), and the ethics pledge you signed when you came to the Department of Education, 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)(5); (b)(6)

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

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

Please let me know if you have any questions about this information. Thanks again!

Margaret A. Baune
Attorney
U.S. Department of Education
Office of the General Counsel
Ethics Division
400 Maryland Avenue, S.W.
Washington, D.C. 20202
margaret.baune@ed.gov

CONFIDENTIALITY NOTICE: The information in this email is confidential and may be legally privileged. Access to this email by anyone other than the intended addressee(s) is unauthorized. If you are not the intended recipient of this message, any review, disclosure, copying, distribution, retention, or any action taken or not taken in reliance on it is prohibited and may be unlawful. If you

are not the intended recipient, please reply to or forward a copy of this message to the sender and delete the message, any attachments, and any copies thereof from your system.

From: Santiago-Moreno, Jorge
Sent: Wednesday, April 14, 2021 10:54
To: Baune, Margaret
Subject: RE: OGE Form 278, Public Financial Disclosure, New Entrant Report: Ethics Follow-up

Good Morning Margret,

(b)(5); (b)(8)

From: Baune, Margaret <Margaret.Baune@ed.gov>
Sent: Wednesday, April 14, 2021 8:51 AM
To: Santiago-Moreno, Jorge <Jorge.Santiago@ed.gov>
Subject: RE: OGE Form 278, Public Financial Disclosure, New Entrant Report: Ethics Follow-up

Hi Jorge,

Thank you for this information! A few more questions for you based on your responses:

(b)(5); (b)(8)

This should be everything I'll need to complete the review of your New Entrant Report. Thanks again!

Margaret A. Baune

U.S. Department of Education

Office of the General Counsel, Ethics Division

Confidentiality Notice: This message, including any and all attachments, is being sent by or on behalf of a lawyer. It is intended exclusively for the individual(s) or entity/ies to which it is addressed. This communication may contain information that is proprietary, privileged or confidential or otherwise legally exempt from disclosure. If you are not among the named addressees, you are not authorized to read, print, retain, copy or disseminate this message or any part of it. If you have received this message in error, please notify the sender immediately by e-mail and delete all copies of the message.

From: Santiago-Moreno, Jorge <Jorge.Santiago@ed.gov>
Sent: Tuesday, April 13, 2021 12:52 PM
To: Baune, Margaret <Margaret.Baune@ed.gov>
Subject: RE: OGE Form 278, Public Financial Disclosure, New Entrant Report: Ethics Follow-up

Here are the answers to the questions you asked please let me know if you'd like me to elaborate more on any of these.

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

From: Baune, Margaret
Sent: Monday, April 5, 2021 10:14 PM
To: Santiago-Moreno, Jorge <Jorge.Santiago@ed.gov>
Subject: OGE Form 278, Public Financial Disclosure, New Entrant Report: Ethics Follow-up

Hello Jorge,

Welcome to the Department! I am an attorney in the Office of the General Counsel, Ethics Division. I have been assigned to review your OGE Form 278, Public Financial Disclosure, New Entrant Report. This email contains my initial review questions. Many of these items are asking you to confirm that the information you have already reported is complete. This is not due to any perceived deficiencies with your Report; rather, these questions are asked of all new filers, as a matter of course. Please respond at your earliest convenience, **preferably by COB April 13, 2021**. **Thank you in advance for your assistance with this!**

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

Please do not hesitate to contact me with any questions you may have. Thanks again!

Margaret A. Baune

Attorney

U.S. Department of Education

Office of the General Counsel

Ethics Division

400 Maryland Avenue, S.W.

Washington, D.C. 20202

margaret.baune@ed.gov

CONFIDENTIALITY NOTICE: The information in this email is confidential and may be legally privileged. Access to this email by anyone other than the intended addressee(s) is unauthorized. If you are not the intended recipient of this message, any review, disclosure, copying, distribution, retention, or any action taken or not taken in reliance on it is prohibited and may be unlawful. If you are not the intended recipient, please reply to or forward a copy of this message to the sender and delete the message, any attachments, and any copies thereof from your system.