

From: [Bonanno, Natalie A - Washington, DC](#)
To: CD@oge.gov
Cc: [Brewster-Johnson, Jessica Y - Washington, DC](#)
Subject: #sensitive# CD Request
Date: Friday, August 14, 2020 4:25:12 PM
Attachments: [2020 08-14 cd request format--DeJoy.pdf](#)
[2020 08-14 Holdings Disclosure.pdf](#)
[2020 08-14 Written Notification Memorandum.pdf](#)
[OGE 201 Dejoy OGE 278.pdf](#)
[OGE 201 Dejoy OGE 278-T.pdf](#)

Good Afternoon:

I attached a certification of divestiture request for United States Postal Service Postmaster General Louis DeJoy. Please let us know if you have any questions or require additional information. Thanks so much.

Sincerely,

Natalie

Natalie A. Bonanno
Associate General Counsel and
Chief Ethics & Compliance Officer
United States Postal Service
475 L'Enfant Plaza SW
Room 6108
Washington, DC 20260-1127
Office: (202) 268-2944
Mobile: (b) (6)

Louis DeJoy - Holdings Disclosure
as of 8/13/2020

ATTACHMENT A

| Security Description | Symbol | Quantity | Owner of the Property | Relationship |
|---|---------------------|--------------------------------|-------------------------------------|--------------|
| CAPITAL ONE FINANCIAL CO 6%-H | COF.H | (b) (6) | Louis DeJoy | Self |
| CAPITAL ONE FINANCIAL CO 6%-H | COF.H | | LOUIS DEJOY FAMILY PARTNERSHIP, LLC | Manager |
| CAPITAL ONE FINANCIAL 5%-I PRF | COF.I | | LOUIS DEJOY FAMILY PARTNERSHIP, LLC | Manager |
| CAPITAL ONE FINANCIAL 5%-I PRF | COF.I | | Louis DeJoy | Self |
| CVS HEALTH CORP COM | CVS | | Louis DeJoy | Self |
| CALL CVS CORPORATION AT 67.500EXPIRES 08/21/2020 | CVS C 08/21/20 67.5 | | Louis DeJoy | Self |
| DOMINION ENERGY INC | D | | SANDY POINT INVESTMENTS, LLC | Manager |
| DOMINION ENERGY INC | D | | Louis DeJoy | Self |
| DISCOVER FINCL SVCS | DFS | | Louis DeJoy | Self |
| CALL DISCOVER FINCL SVCS AT 42.500 EXPIRES 10/16/2020 | DFS C 10/16/20 42.5 | | Louis DeJoy | Self |
| HONEYWELL INTERNATIONAL INC | HON | | SANDY POINT INVESTMENTS, LLC | Manager |
| HONEYWELL INTERNATIONAL INC | HON | | Louis DeJoy | Self |
| INTL BUSINESS MACHINES CORP | IBM | | Louis DeJoy | Self |
| INTL BUSINESS MACHINES CORP | IBM | | Louis DeJoy | Self |
| INTL BUSINESS MACHINES CORP | IBM | | SANDY POINT INVESTMENTS, LLC | Manager |
| CALL INTL BUSINESS MACHIN AT 135.000 EXPIRES 12/18/2020 | IBM C 12/18/20 135 | | Louis DeJoy | Self |
| JPMORGAN CHASE & CO | JPM | | Louis DeJoy | Self |
| JPMORGAN CHASE & CO | JPM | | SANDY POINT INVESTMENTS, LLC | Manager |
| JPMORGAN CHASE & CO | JPM | | Louis DeJoy | Self |
| CALL JP MORGAN CHASE&CO AT 100.000 EXPIRES 01/15/2021 | JPM C 01/15/21 100 | | Louis DeJoy | Self |
| JPMORGAN CHASE & CO 6.0% S-EE | JPM.C | | Louis DeJoy | Self |
| JPMORGAN CHASE & CO 6.0% S-EE | JPM.C | | LOUIS DEJOY FAMILY PARTNERSHIP, LLC | Manager |
| JPMORGAN CHASE & CO 5.75-DD | JPM.D | | Louis DeJoy | Self |
| JPMORGAN CHASE & CO 5.75-DD | JPM.D | | LOUIS DEJOY FAMILY PARTNERSHIP, LLC | Manager |
| JPMORGAN CHASE & CO 6.15% BB | JPM.H | | Louis DeJoy | Self |
| JPMORGAN CHASE & CO 6.15% BB | JPM.H | | LOUIS DEJOY FAMILY PARTNERSHIP, LLC | Manager |
| LOCKHEED MARTIN CORP | LMT | | SANDY POINT INVESTMENTS, LLC | Manager |
| LOCKHEED MARTIN CORP | LMT | | Louis DeJoy | Self |
| REGIONS FINANCIAL CORP NEW | RF | | Louis DeJoy | Self |
| REGIONS FINANCIAL CORP NEW | RF | | SANDY POINT INVESTMENTS, LLC | Manager |
| REGIONS FINL CORP 6.375%-A | RF.A | | LOUIS DEJOY FAMILY PARTNERSHIP, LLC | Manager |
| REGIONS FINL CORP 6.375%-A | RF.A | | Louis DeJoy | Self |
| REGIONS FINANCIAL CO 6.375%-B | RF.B | | Louis DeJoy | Self |
| REGIONS FINANCIAL CO 6.375%-B | RF.B | | LOUIS DEJOY FAMILY PARTNERSHIP, LLC | Manager |
| AT&T INC | T | | Louis DeJoy | Self |
| AT&T INC | T | | SANDY POINT INVESTMENTS, LLC | Manager |
| AT&T INC | T | | Louis DeJoy | Self |
| CALL AT&T INC AT 31.000 EXPIRES 10/16/2020 | T C 10/16/20 31 | | Louis DeJoy | Self |
| AT&T INC 4.750% SER-C | T.C | | LOUIS DEJOY FAMILY PARTNERSHIP, LLC | Manager |
| AT&T INC 4.750% SER-C | T.C | | Louis DeJoy | Self |
| TRAVELERS COMPANIES INC COM | TRV | SANDY POINT INVESTMENTS, LLC | Manager | |
| UNITEDHEALTH GP INC | UNH | SANDY POINT INVESTMENTS, LLC | Manager | |
| VERIZON COMMUNICATIONS | VZ | Louis DeJoy | Self | |
| VERIZON COMMUNICATIONS | VZ | SANDY POINT INVESTMENTS, LLC | Manager | |
| VERIZON COMMUNICATIONS | VZ | Louis DeJoy | Self | |
| VERIZON COMMUNICATIONS | VZ | SANDY POINT INVESTMENTS, LLC | Manager | |
| XPO LOGISTICS INC | XPO | LOUIS DEJOY FAMILY PARTNERSHIP | Manager | |
| XPO LOGISTICS INC | XPO | Louis DeJoy | Self | |
| CALL XPO LOGISTICS INC NEW AT 80.000 EXPIRES 11/20/2020 | XPO C 11/20/20 80 | LOUIS DEJOY FAMILY PARTNERSHIP | Manager | |
| CALL XPO LOGISTICS INC NEW AT 80.000 EXPIRES 11/20/2020 | XPO C 11/20/20 80 | Louis DeJoy | Self | |
| CALL XPO LOGISTICS INC NEW AT 85.000 EXPIRES 11/20/2020 | XPO C 11/20/20 85 | Louis DeJoy | Self | |
| CALL XPO LOGISTICS INC NEW AT 85.000 EXPIRES 11/20/2020 | XPO C 11/20/20 85 | Louis DeJoy | Self | |

REQUEST FOR A CERTIFICATE OF DIVESTITURE
(must be completed by the agency, not by the requesting employee)

| | |
|--|---|
| Requesting employee's name and position title: Louis DeJoy | Employing agency and component: United States Postal Service |
| Agency point of contact: Natalie Bonanno, Associate General Counsel and Chief Ethics & Compliance Officer | Telephone number and email address for agency point of contact: (b) (6) |
| Signature of DAEO or ADAEO: | Date signed: 08/14/2020 |

For complete instructions on requesting a Certificate of Divestiture (CD), please review 5 C.F.R. part 2634, subpart J.

1. Provide the requested information about the property being divested and the owner(s) of that property (see sample table to the right):

(a) description of the property: include the name of the property being divested;

(b) quantity or percentage owned: quantity may be represented by the number of shares of stock, units owned, or percentage of the partnership owned;

(c) owner(s) of the property: provide the full name of the owner(s) of the property; and

(d) relationship to the employee: indicate whether each property owner is one of the following: (i) a government employee; (ii) a spouse, a minor child or a dependent child of the government employee; or (iii) a trustee of a trust for the benefit of the government employee, the spouse, minor or dependent child of the government employee.

| (a) Description of the property | (b) Quantity or percentage owned | (c) Owner(s) of the property | (d) Relationship to the employee |
|---------------------------------|----------------------------------|---|----------------------------------|
| McDonald's Corp. | 57 shares | John A. Jones | self |
| General Electric Co. | 251 shares | John A. Jones (joint) Mary B. Jones | self spouse |
| Play Toys, LP | 12.24% interest | Mary B. Jones | spouse |
| Merck & Co., Inc. | 33 shares | William C. Smith | trustee |
| Coca-Cola, Co. | 55 shares | John A. Jones (as custodian) Robert D. Jones | self dependent child |

Please provide the requested information in an Excel spreadsheet or Word document if a CD is being requested for more than six holdings. Please do not submit financial statements.

| (a) Description of the property | (b) Quantity or percentage owned | (c) Owner(s) of the property | (d) Relationship to the employee |
|---------------------------------|----------------------------------|------------------------------|----------------------------------|
| | | | |
| | | | |
| | | | |
| | | | |

| (a) Description of the property | (b) Quantity or percentage owned | (c) Owner(s) of the property | (d) Relationship to the employee |
|---------------------------------|----------------------------------|------------------------------|----------------------------------|
| | | | |
| | | | |

2. Provide a brief description of the employee’s position or provide a citation to a statute or regulation that sets forth the duties of the position. **(If additional space is needed, please use the [continuation page](#) at the end of the format.)**

The postmaster general of the United States is the chief executive officer of the United States Postal Service. See 39 U.S.C. § 203.

3. Provide a detailed explanation of the basis for your conclusion that divestiture is reasonably necessary to comply with Federal ethics rules. **(If additional space is needed, please use the [continuation page](#) at the end of the format.)**

(b) (5)

4. Provide the date that the requirement to divest first applied or the date the employee first agreed that the eligible person would divest the property in order to comply with conflict of interest requirements. **(If additional space is needed, please use the [continuation page](#) at the end of the format.)**

July 21, 2020

5. Please address all items below **(If additional space is needed, please use the [continuation page](#) at the end of the format.):**

a. Has the employee been informed of their obligation to recuse from particular matters in which the employee would have a disqualifying financial interest arising from the property described in the employee's request for a Certificate of Divestiture?

Yes No (if no, please explain using the [continuation page](#))

b. Was the property acquired prior to appointment?

Yes No (if no, please explain using the [continuation page](#))

c. Will divestiture of the property incur capital gains rather than ordinary income?

Yes No (if no, please explain using the [continuation page](#))

d. Has the ethics office confirmed that none of the employee's other financial interests are "similar or related" to the property being divested (i.e., will divestiture resolve the entire conflict)?

Yes No (if no or if additional explanation is needed, please explain using the [continuation page](#))

e. Has the ethics office confirmed that the property being divested is not held in an account that can be rolled into permissible property in a tax-deferred account without incurring capital gains (e.g., IRA, 401(k), etc.)?

Yes No (if no, please explain using the [continuation page](#))

f. Is the request within the divestiture deadline?

Yes No (if no, please explain using the [continuation page](#))

6. Are there any other factors that are not addressed above that weigh against issuing a certificate of divestiture (e.g., is the ethics office aware that the employee may be leaving the Government soon, or is under investigation or subject to a disciplinary action related to the conflict of interest requirements)? If yes, provide a detailed statement identifying the factors that weigh against issuing a certificate of divestiture on a [continuation page](#).

Yes No

7. Please confirm that you are submitting a completed CD package, including:

a. A written request from the employee that includes an unconditional statement that the eligible person holding the property (i.e., the employee, spouse, and/or relevant trustee) has agreed to divest the property

Yes No

b. A copy of the employee's most recent financial disclosure report including any required subsequent Periodic Transaction Reports, or a list of the equivalent information if the employee does not file a financial disclosure report.

Yes No

c. A copy of the trust document if any of the property is held in a trust.

N/A Yes No

8. Please provide any additional information that you would like OGE to consider when processing the request. (If additional space is needed, please use the [continuation page](#) at the end of the format.)

Please send the completed CD package to CD@oge.gov or to the following address: Director, U.S. Office of Government Ethics, 1201 New York Avenue, NW, Suite 500, Washington, DC 20005-3917.

Clear Form

Print

REQUEST FOR A CERTIFICATE OF DIVESTITURE
Continuation Page

Before each response, please indicate the question for which you are providing additional information.

REQUEST FOR A CERTIFICATE OF DIVESTITURE
Continuation Page

Before each response, please indicate the question for which you are providing additional information.

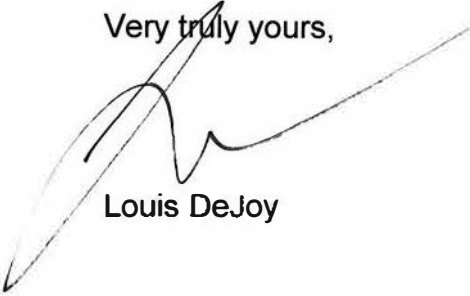
August 13, 2020

USPS Ethics Office

This memorandum is to provide written notification that I as well as the persons holding the property will divest all interest in all common stock and preferred securities (including preferred stock) in the entities listed in Attachment A within 60 days of receipt of the Certificate of Divestiture. With regard to each of these entities, I will not participate personally and substantially in any particular matter that to my knowledge has a direct and predictable effect on the financial interests of the entity until I have divested it.

Please let me know if you need additional information.

Very truly yours,

A handwritten signature in black ink, appearing to read "Louis DeJoy", written over a light blue horizontal line. The signature is stylized and cursive.

Louis DeJoy



July 21, 2020

USPS ETHICS OFFICE
KATHERINE SIGLER, ACTING SECRETARY OF THE BOARD OF GOVERNORS

SUBJECT: Notification of Commitment to Recuse and Screening Arrangement

This memorandum is to provide you with written notification of my commitment to refrain from participation in certain matters in which I may have a financial interest, and the screening arrangement I have implemented to ensure my compliance with this commitment.

Under 18 U.S.C. § 208, I am prohibited from participating personally and substantially in any particular matter that would have a direct and predictable effect on my own financial interests or those of certain other persons or organizations identified in section 208. I have a financial interest in each of the companies listed below worth more than \$15,000. As such, I am disqualifying myself from participating personally and substantially in any particular matter that would have a direct and predictable effect on the financial interests of the following companies:

AT&T INC COM
CAPITAL ONE FINANCIAL CORP
CVS HEALTH CORP COM
DISCOVER FINCL SVCS
DOMINION ENERGY INC
HONEYWELL INTERNATIONAL INC
INTL BUSINESS MACHINES CORP
LOCKHEED MARTIN CORP
REGIONS FINANCIAL CORP
TRAVELERS COMPANIES INC
UNITEDHEALTH GP INC
VERIZON COMMUNICATIONS
XPO LOGISTICS INC

Until further notice, I will not officially participate in any way in such matters. To help ensure that I do not officially participate in these matters, the following steps have already been taken or are in the process of being taken:

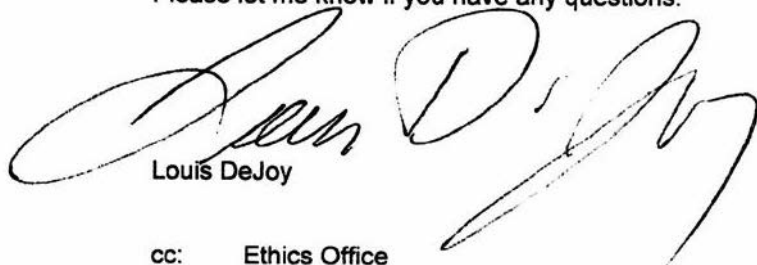
(1) Heather Clarke, Chief of Staff to the Postmaster General, and Michael Elston, Special Senior Advisor to the Postmaster General, have been instructed to screen all matters assigned to me to ensure that I do not directly or indirectly participate in any matter involving the companies listed above. Ms. Clarke and Mr. Elston have also agreed to forward all matters involving these companies to David Williams, Chief Operating Officer and Executive Vice President.

(2) Ms. Clarke, Mr. Elston, and Mr. Williams agree that if any questions arise concerning the above-noted procedures, they must immediately contact the Ethics Office for consultation and advice.

In consultation with the Ethics Office, I will revise and update this memorandum whenever it is warranted by changed circumstances, such any sale or exchange of stock, or a change in the nature of my official duties. In the event of any changes to this arrangement, I will provide you with written notice.

If you would prefer to select someone other than the individuals named in this agreement, please notify me of your determination so that I might provide the information to the appropriate personnel.

Please let me know if you have any questions.



Louis DeJoy

cc: Ethics Office



August 3, 2020

USPS ETHICS OFFICE
KATHERINE SIGLER, ACTING SECRETARY OF THE BOARD OF GOVERNORS

SUBJECT: Notification of Commitment to Recuse and Screening Arrangement

This memorandum is to provide you with written notification of my commitment to refrain from participation in certain matters in which I may have a financial interest, and the screening arrangement I have implemented to ensure my compliance with this commitment.

Under 18 U.S.C. § 208, I am prohibited from participating personally and substantially in any particular matter that would have a direct and predictable effect on my own financial interests or those of certain other persons or organizations identified in section 208. I have a financial interest in JP Morgan Chase worth more than \$15,000. As such, I am disqualifying myself from participating personally and substantially in any particular matter that would have a direct and predictable effect on the financial interests of this company.

Until further notice, I will not officially participate in any way in such matters. To help ensure that I do not officially participate in these matters, the following steps have already been taken or are in the process of being taken:

(1) Heather Clarke, Chief Of Staff to the Postmaster General, and Michael Elston, Special Senior Advisor to the Postmaster General, have been instructed to screen all matters assigned to me to ensure that I do not directly or indirectly participate in any matter involving JP Morgan Chase. Ms. Clarke and Mr. Elston have also agreed to forward all matters involving JP Morgan Chase to David E. Williams, Chief Operating Officer and Executive Vice President.

(2) Ms. Clarke, Mr. Elston, and Mr. Williams agree that if any questions arise concerning the above-noted procedures, they must immediately contact the Ethics Office for consultation and advice.

In consultation with the Ethics Office, I will revise and update this memorandum whenever it is warranted by changed circumstances, such any sale or exchange of stock, or a change in the nature of my official duties. In the event of any changes to this arrangement, I will provide you with written notice.

If you would prefer to select someone other than the individuals named in this agreement, please notify me of your determination so that I might provide the information to the appropriate personnel.

Please let me know if you have any questions.

A handwritten signature in black ink, appearing to read "Louis DeJoy", written over a horizontal line.

Louis DeJoy

cc: Ethics Office

FINANCIAL CONFLICTS OF INTEREST

PRIORITY
★ MAIL ★

TRACKED
★ ★ ★
INSURED
★

**XPO
Logistics**

Four Contracts



Another senior postal manager should be assigned to screen and handle all XPO Logistics matters. That senior postal manager should have no connection to or financial interest in XPO Logistics.

Best Practices

Invest in diversified mutual funds instead of stock.

If you choose to invest in stock, limit investment to \$15,000 or less.

Significant investment in stock? Consider permanent recusal and reassignment.

Pay attention to your financial interests and those financial interests of certain others before approving a contract, agreement, initiative, or project.