

From: Rojewski, Cole J
Sent: Monday, August 3, 2020 5:48 PM
To: Goodwin, Nicholas R; Goldey, Benjamin H; Swanson, Conner D
Cc: Vander Voort, Faith C
Subject: FW: Rojewski, Cole J shared the folder "DRAFT Videos" with you.

Please see Ethics clearance below. I sent you a link to the final videos in a separate email.

From: Rojewski, Cole J
Sent: Monday, August 3, 2020 5:46 PM
To: Gottry, Heather C <heather.gottry@sol.doi.gov>
Cc: Zerzan, Gregory P <gregory.zerzan@sol.doi.gov>
Subject: RE: Rojewski, Cole J shared the folder "DRAFT Videos" with you.

Heather-

Thank you for reviewing.

DRAFT10.mp4 – Now named Final GAOA Signing Video. I can confirm all images of POTUS, FLOTUS, and the Secretary come from official DOI events.

GAOA Stomp v2.mp4 – now called FINAL Stomp GAOA video. It has been edited as you suggest to “for signing the great American outdoors act”.

You can find the final videos here: https://doimssp-my.sharepoint.com/:f:/g/personal/crojewski_ios_doi_gov/ErLoSSQIHMFInd45ZeV0e8oBdTNsCFLUmxoPhi7V22eGOA?e=Y4A8Yf

Based off your guidance we consider these cleared. Please let me know if you have any additional thoughts or concerns.

Thank you,
Cole

From: Gottry, Heather C <heather.gottry@sol.doi.gov>
Sent: Monday, August 3, 2020 4:45 PM
To: Rojewski, Cole J <cole_rojewski@ios.doi.gov>
Cc: Zerzan, Gregory P <gregory.zerzan@sol.doi.gov>
Subject: RE: Rojewski, Cole J shared the folder "DRAFT Videos" with you.

Cole – Hello! Thank you for your patience as we reviewed the GAOA event tomorrow, event signs, and other GAOA communications. We are still reviewing the Draft Law and Order.mp4 video, but I wanted to circle back ASAP on the two GAOA videos.

DRAFT10.mp4: I have reviewed the video link and, presuming the images of POTUS, FLOTUS, and the Secretary come from official DOI events, it does not do not violate either the Hatch Act or applicable ethics laws and regulations. Based on our records, it appears that the images of POTUS, FLOTUS, and the Secretary do come from official DOI events, but

ask that please be confirmed. As you know, we typically advise that consideration be given to revising references to President Trump to read "Trump Administration" in order to mitigate against Hatch Act concerns, but in the context of this video, the reference to the President does not violate the prohibitions of the Hatch Act or other applicable ethics laws and regulations because it is tied to official actions. In particular, the video tracks the President's tweet on March 3, 2020 in which he publicly called on Congress "to send me a Bill that fully and permanently funds the LWCF and restores our National Parks". <https://twitter.com/realDonaldTrump/status/1234949358644289541>. However, the prominence of text and images of the President and FLOTUS in the video may raise concerns from outside stakeholders about elevating the profile of a partisan candidate as we near an election. Slight changes to the video – such as thanking both the President and the bi-partisan effort in Congress to pass the legislation – would go a long way to removing the potential appearance of partisanship and minimize the potential that the video could be interpreted as partisan political activity. As noted above, however, I do not believe that the video as is violates the prohibitions of the Hatch Act because it does not contain explicit language advocating for partisan political candidates or activities, but instead focuses on legislation that directly affects DOI and its mission areas.

GAOA Stomp v2.mp4: I have reviewed the video link and recommend that it be revised to thank the President for either signing the Great American Outdoors Act or Calling on Congress to pass the Great American Outdoors Act at the 4 second mark in order to mitigate against concerns that it violates the Hatch Act. As discussed above, the prominence of text the President's name in the short video may raise concerns from outside stakeholders about elevating the profile of a partisan candidate. Slight changes to the video – such as thanking both the President and Congress– would go a long way to removing the potential appearance of partisanship and minimize the potential that the video could be interpreted as partisan political activity. However, if the video is edited as recommended above, then I do not believe that the video as is violates the prohibitions of the Hatch Act.

Please let me know if it would be helpful to discuss further. Thank you.

- Heather

Heather C. Gottry
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Integrity is our mission.

From: Rojewski, Cole J <cole_rojewski@ios.doi.gov>
Sent: Monday, August 3, 2020 11:38 AM
To: Gottry, Heather C <heather.gottry@sol.doi.gov>; Zerzan, Gregory P <gregory.zerzan@sol.doi.gov>
Subject: Rojewski, Cole J shared the folder "DRAFT Videos" with you.

Heather could you please review.

Thank you,
Cole



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DRAFT Videos

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