

TO: STEPHEN ALEXANDER VADEN
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OFFICE OF THE GENERAL COUNSEL
U.S. DEPARTMENT OF AGRICULTURE

STUART BENDER
DESIGNATED AGENCY ETHICS OFFICIAL AND
DIRECTOR, USDA OFFICE OF ETHICS

FROM: DONALD F. MCGAHN II
COUNSEL TO THE PRESIDENT
THE WHITE HOUSE

DATE: December __, 2017

SUBJECT: Limited Waiver of Paragraph 7 of the Ethics Pledge

Official: Brooke Appleton, Chief of Staff to the Deputy Secretary
United States Department of Agriculture

After reviewing the U.S. Department of Agriculture's limited waiver request memorandum, I hereby waive the requirements of paragraph 7 of the Ethics Pledge for Ms. Brooke Appleton to allow her to advise the Secretary of Agriculture, the Deputy Secretary, and other senior Departmental officials with respect to the 2018 Farm Bill and USDA's Conservation Reserve Program, Conservation Stewardship Program, Environmental Quality Incentives Program, and Regional Conservation Partnership Program. I have determined that it is in the public interest to grant this limited waiver because of Ms. Appleton's expertise and understanding of the interests of the nation's corn and wheat farmers. Ms. Appleton's extensive understanding of the needs of farming communities makes her uniquely qualified to assist the Secretary of Agriculture, the Deputy Secretary, and USDA's senior leadership team on the 2018 Farm Bill and these USDA conservation programs.

In light of the importance of the 2018 Farm Bill and USDA's soil conservation programs to farmers and ranchers, a limited waiver of the provisions of paragraph 7 of the Ethics Pledge (contained in Section 3 of Executive Order 13770) is justified. Accordingly, I authorize Ms. Appleton to participate personally and substantially in matters regarding the 2018 Farm Bill and the four above-referenced conservation programs. I understand that Ms. Appleton will otherwise comply with the remainder of the requirements imposed by the President's Ethics Pledge and with all preexisting government ethics rules.



Donald F. McGahn II
Counsel to the President

Dated: 21 December 2017