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Certification and Waiver Pursuant to Section 3 of Executive Order 13770

Pursuant to section 3 of Executive Order 13770, I hereby certify that Mary Kissel is granted a waiver of restrictions under paragraph 6 of the Ethics Pledge on her involvement, as Senior Advisor to the Secretary of State, in certain particular matters involving specific parties directly and substantially related to her former employers and clients, the News Corp., 21st Century Fox, and Cumulus Media.

Scope of Waiver

Ms. Kissel is permitted to work on the following matters in the course of her official duties, even if they constitute particular matters involving specific parties directly and substantially related to the News Corp., 21st Century Fox, and/or Cumulus Media, as defined in section 2 of Executive Order 13770:

- Communications with employees of the News Corp., 21st Century Fox, and Cumulus Media in the course of briefings for journalists;
- Meetings and communications with employees of the News Corp., 21st Century Fox, and Cumulus Media to provide information about U.S. foreign policy or the Department of State, such as responding to press queries, requests for briefings or interviews, or placing editorials on behalf of Department of State officials;
- Interviews between employees of the News Corp., 21st Century Fox, or Cumulus Media and the Senior Advisor or other government officials.

This limited waiver does not permit Ms. Kissel to work on the following matters:

- Particular matters that directly and predictably affect her financial interests, as defined in 18 U.S.C. § 208;
- Funding or contracts with the News Corp., 21st Century Fox, or Cumulus Media.

Basis for Waiver

- Performing the official duties as Senior Advisor with a portfolio encompassing messaging strategy will require Ms. Kissel to participate personally and substantially in particular matters involving specific parties that are directly and substantially related to the News Corp., 21st Century Fox, and Cumulus Media, as defined in Executive Order 13770.
- It would be highly impractical for other employees to take Ms. Kissel's place in handling all meetings, communications, and other matters involving employees of the News Corp., 21st Century Fox, and Cumulus Media. Ms. Kissel is a Senior Advisor to the Secretary and is expected to assist Department leadership with media outreach. In order to achieve the Department's public diplomacy and press strategy goals, it is important

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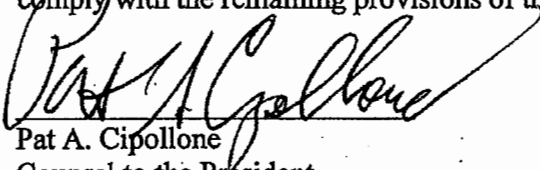
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that she have the capacity to communicate the Department's messaging clearly and consistently to any and all media outlets and platforms.

- Ms. Kissel will not have a continuing relationship with the News Corp., 21st Century Fox, or Cumulus Media. Nor will she have a financial interest in any of these companies.
- Opportunities for Ms. Kissel to use her position to further the interests of the News Corp., 21st Century Fox, or Cumulus Media at the expense of other outlets would be constrained by the mission and working methods of the State Department and its Bureau of Public Affairs, which seek to effectively communicate U.S. foreign policy and information about the Department to the entire U.S. and global community. This necessitates cooperation with the full range of accredited journalists.
- Principles of federal ethics law restrict Ms. Kissel from showing preference or favoritism toward employees of the News Corp., 21st Century Fox, or Cumulus Media in the course of her official duties. The State Department will counsel Ms. Kissel on the application of the federal ethics rules and there is no reason to question her integrity in this regard.

Accordingly, this limited waiver is hereby granted with the understanding that Ms. Kissel will comply with the remaining provisions of the Ethics Pledge and with government ethics rules.


Pat A. Cipollone
Counsel to the President

Dated: 12/21/2018

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