

MEMORANDUM

TO: KEVIN S. MINOLI  
ACTING GENERAL COUNSEL AND  
DESIGNATED AGENCY ETHICS OFFICIAL  
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

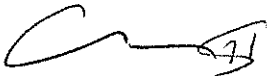
FROM: DONALD F. MCGAHN II  
COUNSEL TO THE PRESIDENT  
THE WHITE HOUSE

SUBJECT: Waiver of Section 1, Paragraph 7 of Executive Order 13770

Official: Jeffrey M. Sands to be appointed as Senior Advisor for Agriculture to the EPA Administrator

After reviewing your limited waiver request memorandum, I hereby waive the requirements of Section 1, paragraph 7 of Executive Order 13770 to Mr. Jeff Sands to allow him, upon his appointment, to advise the Administrator of the United States Environmental Protection Agency and other senior Agency officials with respect to agricultural issues. I have determined that it is in the public interest to grant this waiver because of Mr. Sands' extensive expertise in this area and in various entities, programs and policies. His deep understanding of agricultural issues forged through his previous service with Congress, a trade association and a company make him an ideal person to assist the Administrator and his senior leadership team to make EPA and its agriculture programs more efficient and effective.

In light of the importance of the aforementioned efforts to the Trump Administration and to the United States Environmental Protection Agency, a waiver of the provisions of paragraph 7 of the Ethics Pledge (contained in Section 1 of Executive Order 13770) is justified for Mr. Sands in the event of his appointment so that he can ably advise the EPA Administrator. Accordingly, I authorize Jeff Sands to be able to participate personally and substantially in matters regarding agricultural issues, including those on which he previously lobbied. I understand that he will otherwise fully comply with the remainder of the requirements imposed by the President's Ethics Pledge and with all applicable federal ethics laws and regulations.



Donald F. McGahn II  
Counsel to the President

Dated: 2 OCTOBER 2017