

THE WHITE HOUSE
WASHINGTON

June 16, 1999

MEMORANDUM FOR GIFT RECIPIENT

FROM: LORI ABRAMS *Lori*
DEPUTY DIRECTOR, GIFT UNIT

SUBJECT: COUNSEL APPROVED STAFF GIFT

*Missy asked
that letter
not be sent
b/c offensive.
4/17/99*

The completed Staff Gift Record form that you submitted to our office for a ruling from the General Counsel's office is being returned to you with this memo. It has been determined that you may not personally retain the gift. Subsequently, we will return the gift to the sender with a letter explaining why it is being returned.

You do have the option to purchase the gift by reimbursing the donor for the fair market value of the item. If you are interested in the purchase procedure, please contact the Gift Unit on extension 6-7133 by July 7, 1999. Thank you.

Enclosure



GIFT REGISTER

THE WHITE HOUSE

Send entire form and gift to Gift Unit, Room 457, Ext. 67133

5-7-7-99

RS

To be completed by Staff Member

DONOR	STAFF MEMBER
Name: <u>Dr. Dean Ornish</u>	Name: <u>Missy Kincaid</u> first last
Title:	Title: <u>Special Assistant to the First Lady</u>
Organization/Type of Business: <u>Preventive Medicine Research Institute</u>	Gift intended for: ☒ White House Staff Member ☐ Other (spouse, children)
Address: <u>Suite 1</u> <u>900 Bridgeway</u> <u>Sausalito CA 94965</u>	Received By: ☐ Presented Personally ☐ Mail Room ☐ Other (please specify)
Donor Category: ☒ General Public ☐ Friend ☐ Foreign Government Official	Date Received: Circumstances of Presentation:
Description of Gift: <u>Hardcover book "Love & Survival"</u>	Report prepared by: <u>Lori Krause</u> Date: <u>3/11/99</u> Room: <u>457</u> Ext: <u>67133</u>

To be completed by Gift Unit

I.D. <u>428519</u>	Date: <u>3-16-99</u>	GSA Report #
Appraised value: <u>\$25</u> <u>given</u>		
Appraised by: ☐ Estimate ☒ other <u>Beck</u>		
Comments: <u>Staff member would like to keep book</u>		

To be completed by Counsel's Office

Decision: ☐ Approve ☒ Disapprove	Recommended Disposition: ☒ Return to donor ☐ Retain by Staff Member ☐ Turn over to Government
Pursuant to: ☒ 5 C.F.R. § 2635.202 (a) ☐ 5 C.F.R. § 2635.203 ☐ 5 C.F.R. § 2635.204 (a) ☐ 5 C.F.R. § 2635.204 (b) ☐ 5 C.F.R. § 2635.204 (d) ☐ 5 C.F.R. § 2635.204 (e) ☐ 5 U.S.C. § 7342 (b) ☐ 5 U.S.C. § 7342(c) (1) (A) ☐ 5 U.S.C. § 7342(c) (1) (B)	Signature: <u>Lieutenant</u> Date: <u>6-14-99</u>

COPY B - Staff Member do not detach copies

THE WHITE HOUSE
WASHINGTON

June 16, 1999

MEMORANDUM FOR GIFT RECIPIENT

FROM: LORI ABRAMS 
DEPUTY DIRECTOR, GIFT UNIT

SUBJECT: COUNSEL APPROVED STAFF GIFT

The completed Staff Gift Record form that you submitted to our office for a ruling from the General Counsel's office is being returned to you with this memo. It has been determined that you may personally retain the gift. Please call me if you have any questions on extension 6-5499.

enclosure



GIFT REGISTER

THE WHITE HOUSE

Send entire form and gift to Gift Unit, Room 457, Ext. 67133

To be completed by Staff Member

DONOR	STAFF MEMBER
Name: <u>Mary Gay Shipley</u>	Name: <u>Missy Kincaid</u>
Title:	Title: <u>Special Assistant to the First Lady</u>
Organization/Type of Business: <u>"That Bookstore in Blytheville,"</u>	Gift intended for: ☒ White House Staff Member ☐ Other (spouse, children)
Address: <u>316 West main Street Blytheville, AR 72315-3305</u>	Received By: ☒ Presented Personally ☐ Mail Room ☐ Other (please specify)
Donor Category: ☒ General Public ☐ Friend ☐ Foreign Government Official	Date Received: Circumstances of Presentation: <u>given to missy directly</u>
Description of Gift: <u>15" x 17" canvas book bag that depicts a John Grisham novel</u>	Report prepared by: Date: <u>3/1/99</u> Room: <u>457</u> Ext. <u>15527</u>

To be completed by Gift Unit

I.D. <u>428111</u>	Date: <u>3-2-99</u>	GSA Report #
Appraised value: <u>20</u>		
Appraised by: ☒ Estimate ☐ other		
Comments:		

To be completed by Counsel's Office

Decision: ☒ Approve ☐ Disapprove	Recommended Disposition: ☐ Return to donor ☐ Retain by Staff Member ☐ Turn over to Government
Pursuant to: ☐ 5 C.F.R. § 2635.202 (a) ☐ 5 C.F.R. § 2635.203 ☒ 5 C.F.R. § 2635.204 (a) ☐ 5 C.F.R. § 2635.204 (b) ☐ 5 C.F.R. § 2635.204 (d) ☐ 5 C.F.R. § 2635.204 (e) ☐ 5 U.S.C. § 7342 (b) ☐ 5 U.S.C. § 7342(c) (1) (A) ☐ 5 U.S.C. § 7342(c) (1) (B)	Signature: <u>[Signature]</u> Date: <u>6-14-99</u>

COPY B -Staff Member do not detach copies

THE WHITE HOUSE
WASHINGTON

Lori-

2/26

This bag was given
to me by Ms Mary
Gay Shipley (card attached).
I'm pretty sure it's under
value, but wanted to make
sure. Please return —
so I can give away!
Missy Kincaid

**THAT BOOKSTORE
IN BLYTHEVILLE**

Mary Gay Shipley

316 W. Main St. Blytheville, AR 72315-3305

E-Mail: bookstbly@missconet.com

PH. 1-800-844-8306 OR 870-763-3333 FAX: 870-763-1125
bookweb.org/bookstore/blytheville/

*Mary
thanks for
everything
Mary Gay*

PHOTOCOPY
PRESERVATION

THE WHITE HOUSE
WASHINGTON

January 14, 1999

MEMORANDUM FOR GIFT RECIPIENT

FROM: LORI ABRAMS *Lori*
DEPUTY DIRECTOR, GIFT UNIT

SUBJECT: NON-PERMISSIBLE STAFF GIFT

The completed paperwork on the gift that you submitted to our office for a ruling from the General Counsel's office is being returned to you with this memo. It has been determined that you **may not personally retain** the gift. Subsequently, we will return the gift to the sender with a letter explaining why it is being returned.

You do have the option to purchase the gift by reimbursing the donor for the fair market value of the item. If you are interested in the purchase procedure, or if you have any further questions, please feel free to contact me on extension 6-5499. Thank you.

Enclosure



GIFT REGISTER

THE WHITE HOUSE

Send entire form and gift to Gift Unit, Room 457, Ext. 67133

To be completed by Staff Member

DONOR	STAFF MEMBER <i>mxk</i>
Name:	Name: <i>Missy</i> <i>Kincaid</i> first m.i. last
Title:	Title:
Organization/Type of Business: <i>Birmingham International Airport</i>	Gift intended for: ☒ White House Staff Member ☐ Other (spouse, children)
Address:	Received By: ☐ Presented Personally ☐ Mail Room ☐ Other (please specify)
Donor Category: ☒ General Public ☐ Friend ☐ Foreign Government Official	Date Received:
Description of Gift: <i>Yellow raincoat w/ hood</i>	Circumstances of Presentation:
	Report prepared by: <i>Lori Krause</i> Date: <i>12/3</i> Room: <i>457</i> Ext: <i>65457</i>

To be completed by Gift Unit

I.D. <i>424282</i>	Date: <i>12-8-98</i>	GSA Report #
Appraised value: <i>35</i>		
Appraised by: ☐ Estimate ☐ other		
Comments:		

To be completed by Counsel's Office

Decision: ☐ Approve ☒ Disapprove	Recommended Disposition: ☒ Return to donor ☐ Retain by Staff Member ☐ Turn over to Government
Pursuant to: ☒ 5 C.F.R. § 2635.202 (a) ☐ 5 C.F.R. § 2635.203 ☐ 5 C.F.R. § 2635.204 (a) ☐ 5 C.F.R. § 2635.204 (b) ☐ 5 C.F.R. § 2635.204 (d) ☐ 5 C.F.R. § 2635.204 (e) ☐ 5 U.S.C. § 7342 (b) ☐ 5 U.S.C. § 7342(c) (1) (A) ☐ 5 U.S.C. § 7342(c) (1) (B)	Signature: <i>Meredith Allen</i> Date: <i>1.11.99</i>

COPY B - Staff Member do not detach copies

THE WHITE HOUSE

WASHINGTON

December 1, 1998

MEMORANDUM FOR WHITE HOUSE STAFF

FROM: CHARLES F.C. RUFF 
COUNSEL TO THE PRESIDENT

MEREDITH E. CABB 
ASSOCIATE COUNSEL TO THE PRESIDENT

SUBJECT: Reminder on Ethics Obligations and Holiday Gifts

With the arrival of the holiday season, we want to remind you of your obligations under the ethics rules regarding acceptance of gifts and attendance at holiday functions. These rules are both statutory and regulatory, and it is important that you understand and follow them. Below, please find the answers to the most frequently asked questions.

What is a gift? A gift is anything of value. In addition to the usual tangible items, the definition of "gift" includes: meals, flowers, tickets to events, donations, loans, favors, discounts, travel, lodging, entertainment, or other hospitality.

What should I do when I receive a gift? You may keep any gifts:

- (1) received from family members;
- (2) which are motivated by a close personal relationship pre-dating your employment at the White House, if the gift is paid for by your friend, and not by his or her company or client (please note: if you are required to file a financial disclosure form, you will need to report gifts falling within this category which are worth more than \$100 if the total value of gifts received from the same source exceeds \$250 per reporting year); or
- (3) which are perishable, like fruit, candy, or flowers. With the approval of your supervisor or of the Counsel's Office, you may place perishable gifts in the reception area of your office to be shared among your co-workers.

If you receive a gift under other circumstances, or if you are unsure whether a gift meets the above criteria, you should:

- (1) Complete a White House Staff Gift Report form (forms may be obtained from the White House Gift Unit, OEOB 457); and
- (2) Submit your gift, along with the completed form, to the Gift Unit for appraisal.

- (3) Call the Counsel's Office (6-7900) if you have any questions.

Will I get to keep the gift I submitted to the Gift Unit? Yes, if one of the following is true:

- (1) The appraised value of the gift is \$20 or less;
- (2) It is clear that the gift was motivated by your spouse's business relationships and is not enhanced by your official status; or
- (3) You pay the donor the gift's market value.

May I give my supervisor a gift? The answer is yes only if one of the following is true:

- (1) The gift is an item, other than cash, worth \$10 or less;
- (2) The gift is food and refreshments to be shared in the office among several employees;
- (3) The gift is personal hospitality provided at a residence which is of a type and value customarily provided by the employee to personal friends (e.g., an employee can invite his or her boss to a holiday party at home);
- (4) The gift is given in connection with the receipt of personal hospitality of a type and value customarily given on such occasions (e.g., an employee may bring a bottle of wine to a dinner party at his or her boss's home); or
- (5) The gift marks a special occasion (other than traditional gift-giving occasions like birthdays and holidays), like a birth or adoption, an illness, a marriage, or a retirement.

May I give a gift to my co-worker? Yes, so long as you have a personal friendship with your co-worker and he or she is not your official supervisor.

May I attend holiday parties? You may attend the following types of functions:

- (1) Parties sponsored by a government agency;
- (2) Parties of a purely personal, social nature, not paid for by a prohibited source.

You may also attend parties not falling in either of the above categories if they are "widely attended gatherings." Events are widely attended if a large number of people are invited and many interests and viewpoints are represented. Also, your attendance at such an event must be in your agency's interest. You may attend these functions if one of the following is true:

- (a) you are attending as a guest of the sponsor of the entire event, without regard to the face value of the ticket to the event; or

- (b) you are attending as a guest of someone other than the sponsor of the event, provided that more than 100 people are expected to attend, and the total face value of the ticket(s) you receive does not exceed \$250.

Please consult with the Counsel's Office if you believe you have received an invitation to an event meeting the above criteria.

Is there any type of entertainment fund that our department can use to pay for refreshments for a departmental holiday party? Unfortunately, no. You may, however, collect voluntary contributions from those in the office to provide food and refreshments for a holiday party.

If you have any questions concerning receipt of gifts or attendance at functions during the holidays, please call Meredith Cabe at 6-7900.

KINCAID, KATHERINE D.
WHITE HOUSE OFFICE

FIRST LADY

WH

IFL/WW

THE WHITE HOUSE
WASHINGTON

August 7, 1998

Ms. Arlene Brickner
Coach
516 West 34th Street
New York, New York 10001

Dear Arlene:

How thoughtful of you to send the beautiful Neo Tote Coach bag! Unfortunately, as we discussed this morning, due to government regulations, I am unable to accept this gift and must return it.

I appreciate your generosity and trust that you understand.

Please let me know if I can ever be of assistance.

Sincerely,



Missy Kincaid
Special Assistant to the First Lady

So very sorry about
the misunderstanding!
Thank you

May 7, 1998

To Whom It Concerns:

This is to certify that the gift(s) presented to Missy Kincaid from Coach have a retail value of less than \$250.

(1) Coach Neo Large Tote \$248

Sincerely,

A handwritten signature in black ink, appearing to read "Tom Carr", with a stylized flourish at the end.

Tom Carr
Public Relations Coordinator



Lori -
sorry I wasn't clear -
I don't want to
keep these. Please
file with other
staff gifts if possible.

THE WHITE HOUSE
WASHINGTON

June 15, 1998

Thanks
Kissin
7/2/98

MEMORANDUM FOR GIFT RECIPIENT

FROM: LORI ABRAMS
DEPUTY DIRECTOR, GIFT UNIT 494-0000

SUBJECT: COUNSEL APPROVED STAFF GIFT

The completed Staff Gift Record form that you submitted to our office for a ruling from the General Counsel's office is being returned to you with this memo. It has been determined that you may personally retain the gift. Please call me if you have any questions on extension 6-5499.

enclosure

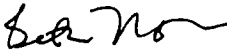
THE WHITE HOUSE

WASHINGTON

December 10, 1999

MEMORANDUM FOR WHITE HOUSE STAFF

FROM:

BETH NOLAN 
COUNSEL TO THE PRESIDENT

MEREDITH E. CABE 
ASSOCIATE COUNSEL TO THE PRESIDENT

SUBJECT:

Reminder on Ethics Obligations and Holiday Gifts

With the arrival of the holiday season, we want to remind you of your obligations under the ethics rules regarding acceptance of gifts and attendance at holiday functions. These rules are both statutory and regulatory, and it is important that you understand and follow them. Below, please find the answers to the most frequently asked questions.

What is a gift? A gift is anything of value. In addition to tangible items, the definition of "gift" includes: meals, flowers, tickets to events, donations, loans, favors, discounts, travel, lodging, entertainment, or other hospitality.

What should I do when I receive a gift?

- (1) If you are certain you may accept the gift, because it fits in one of the categories listed below, then you may keep the gift;
- (2) if you are not certain whether you may accept a gift, you should:
 - (a) Complete a White House Staff Gift Report form (forms may be obtained from the White House Gift Unit, OEOB 457); and
 - (b) Submit your gift, along with the completed form, to the Gift Unit for appraisal.
- (3) Remember that some gifts will have to be reported on your financial disclosure report form, if you are required to file one.

As always, call the Counsel's Office (6-5388) if you have any questions.

Under what circumstances may I accept a gift? You may accept a gift:

- (1) Given to you by a family member;
- (2) Motivated by a close personal relationship (if the relationship does not pre-date your employment at the White House, or if your friend's company or client pays for the gift, please check with the Counsel's Office before accepting the gift);
- (3) When its appraised value is \$20 or less;
- (4) When it is clear that the gift was motivated by your spouse's business relationships and is not enhanced by your official status; or
- (5) If you reimburse the donor the gift's market value.

If you are given a perishable gift -- like fruit, candy, or flowers -- that does not fit in one of the above categories, you may place the item in a common area of your office to be shared among your co-workers if you get approval from your supervisor or from the Counsel's Office.

May I give my supervisor a gift? The answer is yes only if one of the following is true:

- (1) The gift is an item, other than cash, worth \$10 or less;
- (2) The gift is food and refreshments to be shared in the office among several employees;
- (3) The gift is personal hospitality provided at a residence which is of a type and value you would customarily provide personal friends (e.g., you can invite your supervisor to a holiday party at home);
- (4) The gift is given in connection with the receipt of personal hospitality of a type and value customarily given on such occasions (e.g., an employee may bring a bottle of wine to a dinner party at his or her supervisor's home); or
- (5) The gift marks a special occasion (other than traditional gift-giving occasions like birthdays and holidays), like a birth or adoption, an illness, a marriage, or a retirement.

May I give a gift to my co-worker? Yes, so long as you have a personal friendship with your co-worker and he or she is not your official supervisor (see above).

May I accept a gift from my supervisor? You bet.

May I attend holiday parties? You may attend the following types of functions:

- (1) Parties sponsored by a government agency;
- (2) Parties of a purely personal, social nature, not paid for by a prohibited source.

You may also attend parties not falling in either of the above categories if they are “widely attended gatherings” and you receive Counsel’s Office approval. Events are widely attended if a large number of people are invited and many interests and viewpoints are represented. Also, your attendance at such an event must be in your agency’s interest. You may attend these functions if one of the following is true:

- (a) you are attending as a guest of the sponsor of the entire event, without regard to the face value of the ticket to the event; or
- (b) you are attending as a guest of someone other than the sponsor of the event, provided that more than 100 people are expected to attend, and the total face value of the ticket(s) you receive does not exceed \$250.

Please consult with the Counsel’s Office (6-5388 or 6-6229) if you believe you have received an invitation to an event meeting the above criteria.

Is there any type of entertainment fund that our department can use to pay for refreshments for a departmental holiday party? Unfortunately, no. You may, however, collect voluntary contributions from those in the office to provide food and refreshments for a holiday party. To ensure the contributions are voluntary, supervisors should not collect contributions, and it should be made clear in the office that participation is voluntary.

If you have any questions concerning receipt of gifts or attendance at functions during the holidays, please call Meredith Cabe at 6-5388.

KINCAID, KATHERINE D.
WHITE HOUSE OFFICE

FIRST LADY

WH

1FL/EW

Lori K. Krause

03/24/99

12:42:57 PM

Record Type: Record

To: See the distribution list at the bottom of this message

cc: Lori E. Abrams/WHO/EOP, Denise M. Diorio/WHO/EOP, Amy Comstock/WHO/EOP

Subject: FYI - New foreign official gift limit

Counsel just learned from GSA that **effective Jan. 1, 1999, the foreign official gift limitation has been raised from \$245 to \$260.** This means that the First Family may retain gifts from foreign officials whose total value is \$259 or under.

I will send Betty and Eric a list of all gifts affected by this change received between Jan. 1 and March 23rd. Please let me know if you have any questions.

Message Sent To:

Nancy V. Hernreich/WHO/EOP
Betty W. Currie/WHO/EOP
Capricia P. Marshall/WHO/EOP
Eric P. Hothem/WHO/EOP
Katherine D. Kincaid/WHO/EOP

THE WHITE HOUSE

WASHINGTON

March 15, 1994

MEMORANDUM FOR TIM FLYNN
DIRECTOR, GIFT UNIT

FROM: CHERYL MILLS 
ASSOCIATE COUNSEL TO THE PRESIDENT

SUBJECT: Disclosure of Gifts from Long-time Friends

This memorandum responds to Jim Derskin's memorandum of March 14, 1994. In his memorandum, he asked whether gifts from long-time friends of the Clintons are subject to public disclosure.

The President, along with all other Public Financial Disclosure filers, must disclose the donor and value of any gift -- subject to certain exceptions which are not relevant for purpose of this inquiry -- received during a year in which he is required to file a report, unless the gift is from a family member. The regulations provide that each financial disclosure report "shall contain the identity of the source, a brief description, and in the case of public financial disclosure reports the value, of all gifts aggregating \$250 or more in value which are received by the filer during the reporting period from any one source." 5 C.F.R. § 2634.304(a) (emphasis added).

A gift, under the regulations, is defined as "a payment, advance, forbearance, rendering, or deposit of money, or anything of value, unless consideration of equal or greater value is received by the donor." *Id.* at § 2634.105(b). The only pertinent exception to this definition of gifts for reporting purposes is gifts from relatives, which need not be disclosed on the report.

Relative is defined as an individual who is related to the reporting individual as "father, mother, son, daughter, brother, sister, uncle, aunt, great uncle, great aunt, first cousin, nephew, niece, husband, wife, grandfather, grandmother, grandson, granddaughter, father-in-law, mother-in-law, daughter-in-law, son-in-law, brother-in-law, sister-in-law, stepfather, stepmother, stepson, stepdaughter, stepbrother, stepsister, half brother, half sister, or who is the grandfather or grandmother of the spouse of the reporting individual, and shall be deemed to include the fiancé or fiancée of the reporting individual." *Id.* at § 2634.105(c).

Because close personal friends are not deemed under the regulations to be relatives and there is no other relevant exception for close friends, filers must disclose gifts from

long-time friends. A clear example of the stringency of this rule is that the Office of Government Ethics requires a filer who lives with a significant other to disclose gifts from his or her partner unless the filer seeks, in writing, and receives a waiver from the reporting requirements.

I trust this explanation of the regulations resolves this inquiry.

cc: Marsha Scott
Capricia Marshall
Dan Burkhardt
Marvin Krislov
Clarissa Cerda
Jim Dorskind