**Department of Energy**
Washington, DC 20585

January 6, 2004

The Honorable Henry A. Waxman
Ranking Member
Committee on Government Reform
U.S. House of Representatives
Washington, D.C. 20515

Dear Congressman Waxman:

Secretary Abraham has asked me to respond to the letter dated December 22, 2003, that you and Congressman Dingell sent him regarding a report in the *National Journal* about a meeting that Deputy Secretary McSlarrow had with representatives of some trade groups. Your letter states that "[t]his press account suggests that DOE is coordinating with industry on a grassroots lobbying strategy. We are concerned that such activities may constitute an inappropriate use of taxpayer dollars. . . ."

I have discussed with Deputy Secretary McSlarrow the meeting that was reported upon in the *National Journal* and that is the subject of your letter. He has advised me that on the day the Senate announced that further consideration of the energy bill would be delayed until 2004, he, along with Mr. Dan Brouillette, Staff Director of the House Energy and Commerce Committee, and Mr. Alex Flint, Staff Director of the Senate Energy Committee, addressed attendees at a meeting on the energy bill hosted by the Edison Electric Institute. Deputy Secretary McSlarrow, Mr. Brouillette and Mr. Flint each spoke for 5 to 10 minutes, after which there was a short question and answer period. The thrust of Deputy Secretary McSlarrow's remarks was to communicate the Administration's resolve to continue working with House and Senate leaders, and in particular Chairmen Domenici and Tauzin, to meet the President's goal of passing an energy bill -- points that Mr. McSlarrow has made repeatedly in many public appearances, including appearances before Congressional committees, both before and since this meeting, at which he has explained the Administration's position on energy legislation. During the question and answer period, the Deputy Secretary declined to endorse specific strategies to meet that goal, instead deferring to the representatives of the Chairmen of the House and Senate Committees, and reiterated the Administration's desire to work with the two Chairmen to successfully produce energy legislation meeting the President's priorities.

More generally, with respect to your concern that there is a possibility that this meeting implicates the anti-lobbying provisions of 18 U.S.C. 1913 or section 501 of the Energy and Water Development Appropriations Act, 2004, Pub. Law No. 108-137, let me assure you that that is not the case. For over 40 years section 1913 has been understood as not prohibiting officials from supporting the Administration's legislative program through communications with

the public in speeches and through most forms of private communications to members of the public. In fact, anti-lobbying provisions have been construed as not limiting at all the lobbying activities personally undertaken by Senate-confirmed officials appointed by the President, such as Deputy Secretary McSlarrow, when acting within their areas of subject-matter responsibility, as was the case here. Because section 501 of the Energy and Water Development Appropriations Act is an appropriation act limitation that specifically refers to18 U.S.C. 1913, it is best understood as not prohibiting expenditures for activities permitted by the criminal law provision.

There is enclosed for your information a copy of the most recent formal guidance to agencies from the Department of Justice regarding anti-lobbying restrictions, a memorandum from Attorney General Reno to the heads of all executive departments and agencies dated April 18, 1995. Among the attachments to that memorandum was a memorandum from Walter Dellinger, Assistant Attorney General, Office of Legal Counsel, to the Attorney General and the Deputy Attorney General dated April 14, 1995.

If you have any further questions regarding this matter, please feel free to contact me or Rick Dearborn, Assistant Secretary for Congressional and Intergovernmental Affairs, at (202) 586-5450.

Sincerely,

Lee Liberman Otis
General Counsel

Enclosure

cc: The Honorable Tom Davis
Chairman, Committee on Government Reform

Office of the Attorney General
Washington, D. C. 20530

April 18, 1995

MEMORANDUM FOR HEADS OF ALL EXECUTIVE DEPARTMENTS AND AGENCIES

FROM: THE ATTORNEY GENERAL

SUBJECT: Anti-Lobbying Act Guidelines

The Office of Legal Counsel of the Department of Justice (OLC) has prepared the attached guidelines, identifying permitted and prohibited activities under the Anti-Lobbying Act, 18 U.S.C. § 1913. These guidelines are based on the Office's most recent opinion on this subject, and on the long-standing practice of the Department's Criminal Division.

The relevant OLC opinion was issued by then-Assistant Attorney General, later Attorney General William P. Barr. It is published at 13 Op. O.L.C. 361 (1989) (prelim. print). A copy of the opinion is enclosed for your convenience.

The attached guidelines are, necessarily, general in nature. The Office of Legal Counsel is available for consultation should you wish advice in connection with specific activities your department or agency is considering undertaking.

cc: The Counsel to the President

U. S. Department of Justice

Office of Legal Counsel

Office of the
Assistant Attorney General

*Washington, D.C. 20530*

April 14, 1995

MEMORANDUM FOR THE ATTORNEY GENERAL
AND THE DEPUTY ATTORNEY GENERAL

FROM: WALTER DELLINGER
ASSISTANT ATTORNEY GENERAL
OFFICE OF LEGAL COUNSEL

SUBJECT: ANTI-LOBBYING ACT GUIDELINES

The attached OLC guidelines are based on a 1989 opinion of the Office, issued by then Assistant Attorney General William P. Barr, and on long-standing Criminal Division practice. The guidelines explain that the Anti-Lobbying Act, 18 U.S.C. § 1913, does not prohibit officials from supporting an Administration's legislative program through direct communications with Congress; through communications with the public in speeches, writings, and appearances; or through most forms of private communications to members of the public. The Act, however, does bar high-expenditure campaigns in which members of the public are expressly urged to write their Senators or Representatives.

U.S. Department of Justice
Office of Legal Counsel

Washington, D.C. 20530

April 14, 1995

# GUIDELINES ON 18 U.S.C. § 1913

The Anti-Lobbying Act, 18 U.S.C. § 1913, prohibits officers and employees of the executive branch from engaging in certain forms of lobbying. If applied according to its literal terms, section 1913 would have extraordinary breadth, and it has long been recognized that the statute, if so applied, might be unconstitutional. The Office of Legal Counsel has interpreted the statute in light of its underlying purpose "to restrict the use of appropriated funds for large-scale, high-expenditure campaigns specifically urging private recipients to contact Members of Congress about pending legislative matters on behalf of an Administration position." Memorandum for Dick Thornburgh, Attorney General, from William P. Barr, Assistant Attorney General, Office of Legal Counsel, "Constraints Imposed by 18 U.S.C. § 1913 on Lobbying Efforts," 13 Op. O.L.C. 361, 365 (1989) (prelim. print) (citation and footnote omitted) ("1989 Barr Opinion"). Although there has never been a criminal prosecution under the Act since its adoption in 1919, the Criminal Division and its Public Integrity Section have frequently construed the Act in the context of particular referrals. The principles that the Criminal Division has developed over time provide guidance to the meaning of the statute that is necessary in order for the Act to provide reasonably ascertainable guidance to those to whom it applies.

Section A below describes officials whose lobbying activities are not inhibited by the Anti-Lobbying Act. Section B describes the kind of lobbying permitted under the Act. Section C describes the kind of lobbying prohibited by the Act. Section D describes a further restriction that agencies may wish to observe, although they are not required to do so under the Act. Section E describes additional prohibitions imposed by typical "publicity or propaganda" riders, as interpreted by the Comptroller General, although identifying the precise restrictions, if any, applicable to any particular agency requires an examination of that agency's appropriations act.

A. The Department of Justice consistently has construed the Anti-Lobbying Act as not limiting the lobbying activities personally undertaken by the President, his aides and assistants within the Executive Office of the President, the Vice President, cabinet members within their areas of responsibility, and other Senate-confirmed officials appointed by the President within their areas of responsibility.

B. Under the Anti-Lobbying Act, government employees MAY:

- communicate directly with Members of Congress and their staffs in support of Administration or department positions. The Act does not apply to such direct communications.

- communicate with the public through public speeches, appearances and published writings to support Administration positions -- including using such public fora to call on the public to contact Members of Congress in support of or opposition to legislation.

- communicate privately with members of the public to inform them of Administration positions and to promote those positions -- but only to the extent that such communications do not contravene the limitations listed in Section C below.

- lobby Congress or the public (without any restriction imposed by the Anti-Lobbying Act) to support Administration positions on nominations, treaties, or any non-legislative, non-appropriations issue. The Act applies only to lobbying with respect to legislation or appropriations.

C. Under the Anti-Lobbying Act, government employees MAY NOT:

- engage in substantial "grass roots" lobbying campaigns of telegrams, letters, and other private forms of communication expressly asking recipients to contact Members of Congress, in support of or opposition to legislation. Grass roots lobbying does not include communication with the public through public speeches, appearances, or writings. Although the 1989 Barr Opinion does not define the meaning of "substantial" grass roots campaigns, the opinion notes that the 1919 legislative history cites an expenditure of $7500 -- roughly equivalent to $50,000 in 1989 -- for a campaign of letter-writing urging recipients to contact Congress.

D. Although not required by the Anti-Lobbying Act, agencies may wish to observe a more general restriction with respect to officials other than those listed in Section A:

- against expressly urging citizens to contact Congress in support of or opposition to legislation. As Sections B and C taken together indicate, the Anti-Lobbying Act does not forbid

government employees from urging citizens to contact Members of Congress on behalf of an Administration position, except in the context of a grass roots campaign. Nevertheless, the Comptroller General, following his understanding of the Department of Justice's historical interpretation of the Act before the 1989 Barr Opinion, has construed the restriction as being triggered by explicit requests for citizens to contact their representatives in support of or opposition to legislation. Given the Comptroller General's interpretation, and given the difficulty of predicting what may be perceived as a grass roots campaign in a particular context, agencies may wish to err on the side of caution, by refraining from including in their communications with private citizens any requests to contact Members of Congress in support of or opposition to legislation.

E. The Office of Legal Counsel's published opinions do not set out a detailed, independent analysis of "publicity or propaganda" riders contained in the appropriations acts of some agencies. The Comptroller General has suggested that, under such riders, government employees also MAY NOT (1) provide administrative support for the lobbying activities of private organizations, (2) prepare editorials or other communications that will be disseminated without an accurate disclosure of the government's role in their origin, and (3) appeal to members of the public to contact their elected representatives in support of or opposition to proposals before Congress.

U.S. Department of Justice

Office of Legal Counsel

Office of the
Assistant Attorney General

Washington, D.C. 20530

September 28, 1989

MEMORANDUM FOR DICK THORNBURGH
Attorney General

Re: Constraints Imposed by 18 U.S.C. § 1913 on Lobbying Efforts

## I. Introduction

You have requested our guidance concerning the extent to which the Anti-Lobbying Act, 18 U.S.C. § 1913 (the "Act"), imposes constraints on activities by Executive Branch employees that relate to legislative matters. Section 1913, which has not been the basis of a single prosecution since its enactment in 1919, prohibits the use of appropriated funds for activities designed to influence Members of Congress concerning any legislation or appropriation.

To summarize our analysis of this statute, we offer the following guidelines for you and the Department as to what lobbying activities are permitted and prohibited.

Permitted activities:

1. The Act does not apply to direct communications between Department of Justice officials and Members of Congress and their staffs. Consequently, there is no restriction on Department officials directly lobbying Members of Congress and their staffs in support of Administration or Department positions.

2. The Act does not apply to public speeches, appearances and writings. Consequently, Department officials are free to publicly advance Administration and Department positions, even to the extent of calling on the public to encourage Members of Congress to support Administration positions.

3. The Act does not apply to private communications designed to inform the public of Administration positions or to promote those positions. Thus, there is no restriction on private communications with members of the public as long as there is not

a significant expenditure of appropriated funds to solicit pressure on Congress.

4. The Act does not circumscribe the traditional activities of Department components whose duties historically have included responsibility for communicating the Department's views to Members of Congress, the media, or the public.

5. By its terms, the Act is inapplicable to communications or activities unrelated to legislation or appropriations. Consequently, there is no restriction on Department officials lobbying Congress or the public to support Administration nominees.

Prohibited activities:

The Act may prohibit substantial "grass roots" lobbying campaigns of telegrams, letters and other private forms of communication designed to encourage members of the public to pressure Members of Congress to support Administration or Department legislative or appropriations proposals.

If a question should arise with respect to any activity not listed here, we would be happy to analyze whether the statute applies to it.

## II. Discussion

Section 1913 of Title 18 provides that

> [n]o part of the money appropriated by any enactment of Congress shall, in the absence of express authorization by Congress, be used directly or indirectly to pay for any personal service, advertisement, telegram, telephone, letter, printed or written matter, or other device, intended or designed to influence in any manner a Member of Congress, to favor or oppose, by vote or otherwise, any legislation or appropriation by Congress, whether before or after the introduction of any bill or resolution proposing such legislation or appropriation; but this shall not prevent officers or employees of the United States or of its departments or agencies from communicating to Members of Congress on the request of any Member or to Congress, through the proper official channels, requests for legislation or appropriations which they deem necessary for the efficient conduct of the public business.
>
> Whoever, being an officer or employee of the United States or of any department or agency thereof, violates or attempts to violate this section, shall be fined not

> more than $500 or imprisoned not more than one year, or both; and after notice and hearing by the superior officer vested with the power of removing him, shall be removed from office or employment.

several limitations on the otherwise expansive scope of this provision appear from the statute's face.

First, the statute applies only to activities "intended or designed to influence . . . legislation or appropriation[s] . . . ." Thus, lobbying activities related to other matters, such as nominations and treaties, are not subject to the statute.

Second, the statute prohibits only lobbying that is conducted in the form of the provision of a personal service or advertisement, that is presented in written form, or that is communicated by telephone or "other device." Read in context, the prohibition on other "device[s]" does not appear to prohibit speeches or other verbal communications that are not relayed by telephone. Thus, we do not believe that the statute prohibits public speeches by Executive Branch employees aimed at generating public support for Administration policies and legislative proposals.

Third, the statute makes clear that it does not prohibit government officials from communicating "to Members of Congress on the request of any Member or to Congress, through the proper official channels" on matters those officials "deem necessary for the efficient conduct of the public business."[1] Thus, the statute does not bar contacts between Administration officials and Congress that are initiated by Members of Congress or that relate to requests for legislation or appropriations that the Executive Branch employee in the fulfillment of his official duties deems necessary to conduct the public business. Consistent with this provision, this Office and the Criminal Division previously have concluded that section 1913 does not apply to the lobbying activities of Executive Branch officials whose positions typically and historically entail an active effort to secure public support for the Administration's

---

[1] Congressman Good, who introduced the bill, was asked whether the bill was "intended . . . to prevent the employees or officers of the Government from communicating directly with their Representatives in Congress." He replied, "No, that is expressly reserved . . . . They have, of course, the right to communicate, just as before, with their Members of Congress." 58 Cong. Rec. 404 (May 29, 1919).

legislative program.[2] Such officials include presidential aides, appointees, and their delegees in areas within their official responsibility.[3]

This construction of section 1913 is strongly supported by the statute's exemption of lobbying activities that are conducted pursuant to an "express authorization by Congress." We believe that Congress' continued appropriation of funds for positions held by Executive Branch officials whose duties historically have included seeking support for the Administration's legislative program constitutes "express authorization by Congress" for the lobbying activities of these officials, and thus, that their activities are exempt from section 1913.[4] Officials whose activities are covered by this "express authorization" exception to section 1913 include the President, his aides and assistants within the Executive Office of the President, Cabinet members within their areas of responsibility, and persons to whom the Cabinet official traditionally has assigned such responsibilities.[5]

The legislative history to section 1913 sheds additional light on the type of activities that Congress intended to bar. Representative Good, who introduced the bill, described the statute's purpose as follows:

> [I]t will prohibit a practice that has been indulged in so often, without regard to what administration is in power -- the practice of a bureau chief or the head of

---

[2] See Memorandum from Charles J. Cooper, Assistant Attorney General, Office of Legal Counsel, to Arthur B. Culvahouse, Jr., Counsel to the President, December 31, 1987 ("Culvahouse memo"), at 6 n. 7; Memorandum from Charles J. Cooper, Assistant Attorney General, Office of Legal Counsel, to John R. Bolton, Assistant Attorney General, Office of Legislative Affairs, October 27, 1987 ("Bolton memo"), at 5-6; Memorandum from John M. Harmon, Assistant Attorney General, Office of Legal Counsel, to Paul Michel, Acting Deputy Attorney General, February 20, 1980 ("Michel memo"), at 2, 3-4; Memorandum from Thomas H. Henderson, Jr., Chief, Public Integrity Section, Criminal Division, to Philip B. Heymann, Assistant Attorney General, Criminal Division, October 15, 1979 ("Henderson memo"), at 8-10.

[3] See Michel memo at 3.

[4] Culvahouse memo at 6 n. 7; Bolton memo at 5-6; Henderson memo at 8-10; Michel memo at 2, 3-4.

[5] We caution, however, against these officials engaging in "grass-roots" campaigns of the type mentioned in the legislative history to section 1913. See infra p. 4-5.

> a department writing letters throughout the country, sending telegrams throughout the country, for this organization, for this man, for that company to write his Congressman, to wire his Congressman, in behalf of this or that legislation. The gentleman from Kentucky, Mr. Sherley, former chairman of this committee, during the closing days of the last Congress was greatly worried because he had on his desk thousands upon thousands of telegrams that had been started right here in Washington by some official wiring out for people to write Congressman Sherley for this appropriation and for that. Now, they use the contingent fund for that purpose, and I have no doubt that the telegrams sent for that purpose cost the Government more than $7,500. Now, it was never the intention of Congress to appropriate money for this purpose, and section 5 of the bill will absolutely put a stop to that sort of thing.

58 Cong. Rec. 403 (1919). These remarks demonstrate that Congress was concerned about the use of appropriated funds to implement "grass roots"[6] mass mailing campaigns at great expense.[7] Based on this legislative history, this Office consistently has concluded that the statute was enacted to restrict the use of appropriated funds for large-scale, high-expenditure campaigns specifically urging private recipients to contact Members of Congress about pending legislative matters on behalf of an Administration position. See, e.g., Memorandum for Paul Michel, Acting Deputy Attorney General from John M. Harmon, Assistant Attorney General, Office of Legal Counsel, February 20, 1980, at 5 (section 1913 was intended to "prohibit the Executive from using appropriated funds to create artificially the

---

[6] By "grass roots" lobbying we mean communications by executive officials directed to members of the public at large, or particular segments of the general public, intended to persuade them in turn to communicate with their elected representatives on some issue of concern to the Executive. This type of activity is to be distinguished from communications by executive officials aimed directly at the elected representatives themselves, no matter how much incidental publicity those communications may receive in the normal course of press coverage. See Memorandum from John M. Harmon, Assistant Attorney General, Office of Legal Counsel, to Robert J. Lipschutz, Counsel to the President, at 10 (Dec. 29, 1977) ("1977 Harmon Memorandum") ("As long . . . as a federal official limits himself to public forums and relies upon normal workings of the press, he may say anything he wishes without fear of violating section 1913.").

[7] Our calculations indicate that an expenditure of $7500 in 1919 would be roughly equivalent to one of $50,000 today.

impression that there is a ground swell of public support for the Executive's position on a given piece of legislation.").[8] Accordingly, we do not believe the statute should be construed to prohibit the President or Executive Branch agencies from engaging in a general open dialogue with the public on the Administration's programs and policies. Nor do we believe the statute should be construed to prohibit public speeches and writings designed to generate support for the Administration's policies and legislative proposals.

Because section 1913 imposes criminal penalties, it is appropriate that it be construed narrowly. Under the widely recognized "rule of lenity," criminal provisions subject to more than one reasonable construction should be interpreted narrowly, and ambiguity should be resolved in favor of lenience. See, e.g., Bifulco v. United States, 447 U.S. 381 (1980); 3 Sutherland, Statutory Construction § 59.03 et seq. (4th ed. 1973). In addition, a narrow construction of section 1913 is necessary to avoid the constitutional issues that would arise if the section were interpreted as imposing a broader ban.[9] In previous analyses of this statute, we have identified at least three serious constitutional problems that would arise if section 1913 were construed as a blanket prohibition on Executive Branch activities relating to legislation or appropriations.

First, construing section 1913 broadly to restrict Executive Branch contacts with Members of Congress would interfere with the President's constitutionally mandated role in the legislative process. Article II, Section 3, Clause 1 of the Constitution provides that the President "shall from time to time give to the Congress Information on the State of the Union, and recommend to their Consideration such Measures as he shall judge necessary and expedient . . . ." This Clause imposes on the President a responsibility to recommend measures to Congress and constitutes a formal basis for the President's role in influencing the legislative process.[10] The President cannot be deprived of this

---

[8] Culvahouse memo at 6 n. 7; Bolton memo at 5; 1977 Harmon Memorandum, at 10-14.

[9] See 1977 Harmon Memorandum, supra note 6. See also Memorandum to Leo Krulitz, Solicitor, Dept. of the Interior from Assistant Attorney General John M. Harmon, July 18, 1978; Memorandum to Assistant Attorney General McConnell from Deputy Assistant Attorney General Simms, October 5, 1982, forwarding a proposed draft report on S. 1969, a bill to "prohibit the use of appropriations for the payment of certain lobbying costs."

[10] See E. Corwin, The Constitution of the United States 536 (rev. ed. 1973). The early Presidents, Washington, Jefferson and (continued...)

capacity to explain why he believes particular measures are "necessary and expedient."

Second, legislation curtailing the President's ability to implement his legislative program through communications with Congress and the American people would infringe upon his constitutional obligation to "take Care that the Laws be faithfully executed." U.S. Const. Art. II, § 3.[11] It would be impossible for the President to fulfill this constitutional responsibility if he could not communicate freely with those who make the laws, as well as with those whose actions are governed by them.

Third, section 1913, if construed broadly, would weaken the constitutional framework established in Article II, which in general imposes on the President the duty to communicate with the American people. The President, of course, "is a representative of the people, just as the members of the Senate and of the House are." Myers v. United States, 272 U.S. 52, 123 (1927). Indeed, "on some subjects . . . the President, elected by all the people, is rather more representative of them all than are the members of either body of the Legislature, whose constituencies are local and not country wide." Id. Because of his unique position as the only elected official with a truly "'national' perspective," INS v. Chadha, 462 U.S. 919, 948 (1983), it is necessary to the independent power of the Executive Branch that the President be able to communicate freely with the citizens of the United States, including on matters that relate to legislative affairs. Thus, reading section 1913 broadly to restrict all communications with the public with respect to legislation or appropriations

---

[10](...continued)
Jackson among them, took an active role in their relations with Congress. "Today there is no subject on which the President may not appropriately communicate to Congress, in as precise terms as he chooses, his conception of its duty." Id. at 537.

[11] Supreme Court precedent establishes that Congress may not interfere with the President's ability to carry out his constitutional prerogatives. See, for example, Hart v. United States, 118 U.S. 62 (1886), and United States v. Klein, 80 U.S. (13 Wall.) 128 (1872), invalidating congressional attempts to interfere with the President's pardon power. Even where, as here, Congress acts pursuant to its appropriations power, its authority is not absolute. Congress may not, for example, use its appropriations power to establish a religion, Flast v. Cohen, 392 U.S. 83, 104-105 (1968), or to diminish the compensation of federal judges. United States v. Will, 449 U.S. 200 (1980).

would interfere with the Executive's ability to perform his constitutionally imposed responsibilities.[12]

## III. Conclusion

We conclude that section 1913 prohibits large-scale publicity campaigns to generate citizen contacts with Congress on behalf of an Administration position with respect to legislation or appropriations. It does not proscribe lobbying activities with respect to other matters, such as nominations or treaties. It does not prohibit speeches or other communications designed to inform the public generally about Administration policies and proposals or to encourage general public support for Administration positions. In addition, the statute does not prohibit contacts between Executive Branch officials and Members of Congress that either were initiated by the Member of Congress, or that relate to a request for legislation or appropriations that the employee deems "necessary for the efficient conduct of the public business." Finally, the statute does not prohibit lobbying activities expressly authorized by Congress, such as activities by Executive Branch employees whose official duties historically have included lobbying functions, for whose positions Congress has continued to appropriate funds.

If this Office can be of any further assistance on this

---

[12] To discharge these responsibilities effectively, the President must be permitted to employ the services of his political aides, appointees and other officials. Any restrictions on the ability of such officials to assist the President necessarily undermines the President's ability to fulfill his constitutional responsibilities and amount to restrictions on the President himself. See Memorandum from John O. McGinnis, Acting Deputy Assistant Attorney General, Office of Legal Counsel, to Steve Markman, Assistant Attorney General, Office of Legal Policy, October 19, 1987 (Congress may not restrict the President's ability to communicate with the public by restricting those the President has chosen to assist him in this regard). In particular, the President must be permitted to employ the services of his political appointees and aides necessary to effectuate his constitutionally protected ability to communicate with his constituency concerning the decisions for which the President, as the politically accountable head of the executive branch, is alone responsible. For these reasons, section 1913 must be construed narrowly as it relates to the ability of Executive Branch employees to communicate with the public on legislative matters.

matter, please do not hesitate to let me know.

William P. Barr
Assistant Attorney General
Office of Legal Counsel