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Armstrong
Anne

12/5/74
5

THE WHITE HOUSE
WASHINGTON

November 8, 1974

MEMORANDUM FOR: ANNE ARMSTRONG
FROM: DUDLEY CHAPMAN *DC*
SUBJECT: Participation in World
Food Conference

You have asked whether your interest in a domestic cattle ranch poses any conflict of interest problem concerning your participation in the World Food Conference.

The very generalized level at which this conference will function should serve to make any impact on your personal interests too remote to be of any consequence. Two cautions should be noted, however. In view of your obvious self interest, any unusual forceful or specific statements or positions that would bear directly -- or appear to bear directly -- on your narrow interests should be avoided. Second, is a reminder that no information or advantage gained from your official duties should be used to further your own personal interests. Obviously, these are matters in which you must exercise personal judgment; but it appears most unlikely that any serious questions would arise.

bcc: Mr. Buchen ✓



*Bird, Frederick
Personnel
Conflict of
Interest*

THE WHITE HOUSE
WASHINGTON

Date 4/23/75

TO: 1) Rod Hills
2) Phil Gochon

FROM: DUDLEY CHAPMAN

ACTION:

- Approval/~~Signature~~ *transmitted to them*
- Comments/Recommendations
- Prepare Response
- Please Handle
- For Your Information
- File

REMARKS:

*Approved
P.W.B.*



THE WHITE HOUSE

WASHINGTON

April 23, 1975

MEMORANDUM FOR: PHIL BUCHEN
ROD HILLS

FROM: DUDLEY CHAPMAN *DC*

SUBJECT: Conflict of Interest Review --
Speechwriter Staff

The problem I described at Monday's staff meeting has become less acute because Fred Bird is no longer expected to remain permanently on Paul Theis' staff. There remains the problem of what to do for the next 30 days, which I think can be handled by instructing Theis to limit the substance and type of Bird's work. My proposed memo to Theis is attached.



THE WHITE HOUSE

WASHINGTON

April 23, 1975

MEMORANDUM FOR: PAUL THEIS

FROM: DUDLEY CHAPMAN *DC*

SUBJECT: Conflict of Interest Review --
Frederick H. Bird, Jr.

Bird owns a diversified portfolio -- excluding mutual funds -- of over 50 securities with heavy representation in energy and industrial and financial issues that have substantial stakes in Government policy (Attachment). While some of his holdings are small enough to justify a determination that they pose no conflict under 18 U.S.C. 208(b), his cumulative holdings in energy, steel and financial institutions are too large for that solution. The normal remedy for this type of situation is a combination of divestiture and a blind trust.

Bird argues, as have others on the speechwriting staff, that he has no policy input. This may be true as a general description of what he does, but I do not think it a sufficient defense for a permanent appointment for at least three reasons: (1) The statute* may be violated by any conduct, regardless of intent or laudable motives, that amounts to substantial "participation" by way of "advice" or

* "(a) Except as permitted by subsection(b) hereof, whoever, being an officer or employee of the executive branch of the United States Government, of any independent agency of the United States, or of the District of Columbia, including a special Government employee, participates personally and substantially as a Government officer or employee, through decision, approval, disapproval, recommendation, the rendering of advice, investigation, or otherwise, in a judicial or other proceeding, application, request for a ruling or other determination, contract, claim, controversy, charge, accusation, arrest, or other particular matter in which, to his knowledge, he, his spouse, minor child, partner, organization in which he is serving as officer, director, trustee, partner or employee, or any person or organization with whom he is negotiating or has any arrangement concerning prospective employment, has a financial interest --

Shall be fined not more than \$10,000, or imprisoned not more than two years, or both." 18 U.S.C. 208(a)



"recommendation", inter alia. A writer who drafts a speech on a policy affecting his financial holdings, even though he has had no role in the formulation of that policy, may well contribute an idea or fact that could be construed as advice or recommendation, and it inevitably creates at least the appearance of participating in a matter affecting his financial interests. While such a case would probably not support criminal charges, the conflict of interest regulations specifically apply to appearances as well as the actuality of conflict. (2) Whatever technical validity there may be to the argument that particular speechwriters have no policy role, some have (e.g., Ted Sorensen, Pat Buchanan); and it is too fine and debatable a point to have credibility with the public. (3) The standards of conduct are broader than conflicts of interest in a technical sense, and embrace the use of inside information to further one's own financial interests. One who has advance knowledge of either the fact or content of Presidential speeches could use that information in making decisions to buy, sell or hold securities. The absence of policy input is completely irrelevant to this problem.

I now understand that Bird expects to remain for only about 30 days and that he is not expected to become a permanent employee. In these circumstances, divestiture or a blind trust would be unreasonably burdensome. The remaining alternative is to assure that he is given no substantial responsibilities with respect to energy, financial or monetary policies, or the steel industry. I assume that you will see to this unless you inform me to the contrary. Please do not hesitate to ask any questions you may have.

cc: Fred Bird



Cannon
James
3/6/25
Conflict
?
Interest

10:20 Ken:

Mr. Buchen asked if you or someone over there could take care of this.

(3/6 memo from Jim Cannon re Hatch Act)

Eva



*Confidential
Interest*

March 6, 1975

TO: Phil Buchen
FROM: Jim Cannon *Ji*
SUBJECT: Hatch Act

I understand that all members of the Domestic Council staff, with the exception of myself, come under the Hatch Act.

Can you give me your opinion of this? If the staff members do come under the Hatch Act, could you have someone on your staff give me a memorandum telling what they can and cannot do in a political way.

Many thanks.



W/H — Cheney
Richard
CONFIDENTIAL

THE WHITE HOUSE
WASHINGTON

April 15, 1976

MEMORANDUM FOR: JIM CONNOR

FROM: PHIL BUCHEN P.

With the departure of Rog Morton from the White House staff, the question is again raised how to treat Dick Cheney's travel expenses on political trips. Bob Visser believes that Dick's role on these trips does involve substantial political participation, especially since Rog or Stu does not always accompany the President on at least some of the trips. Bob recommends, and I agree, that we should consider Dick as political for the purpose of allocating expenses on trips. While a plausible defense can be made to the FEC that his role is primarily official on trips, Bob has some doubt that this position would prevail. We both feel that we should continue our previous position of paying politically for such policy-level staffers who do actively participate in political matters on trips.

Decision

- A. Continue to charge as official _____
- B. Charge as political effective upon Rog Morton's departure from the staff _____



THE WHITE HOUSE
WASHINGTON

September 22, 1975

*Friedersdorf,
Priscilla
C/W
interest*

MEMORANDUM FOR: JIM CANNON
FROM: PHIL BUCHEN *T.W.B.*
SUBJECT: Domestic Council Hearings

I see no legal problem in Mrs. Priscilla Friedersdorf doing volunteer advance work for the Domestic Council in connection with the forthcoming series of public hearings. In order to make clear the official nature of this activity, the expenses of these hearings, including those of the volunteer advance persons, should be paid from appropriated funds. Therefore, I suggest that each of these volunteers be brought onto the roles of either the Domestic Council or the relevant agencies participating in the hearings, as a consultant without compensation, but eligible to receive expenses.

In this capacity, each of these persons will have to fill out a financial disclosure form as a special government employment. In addition, for each day that they actually are working in this capacity, they are subject to the Hatch Act, and are thus prohibited from participating in partisan political management or campaign activities.

If you have any additional questions in this regard, please don't hesitate to contact me.



THE WHITE HOUSE

WASHINGTON

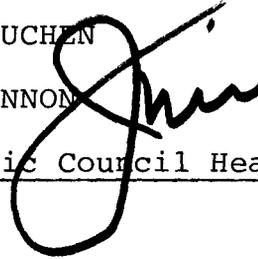
September 19, 1975

*By [unclear] 9/20
Kang?*

MEMORANDUM FOR PHIL BUCHEN

FROM: JIM CANNON

SUBJECT: Domestic Council Hearings



Mrs. Priscilla Friedersdorf has volunteered to do advance work for the Vice President and the Domestic Council in connection with the six hearings we now have scheduled.

Members of our advance team have talked with her about this, and we would like to have her work with us in setting up and conducting these hearings.

Mrs. Friedersdorf, like several other volunteers, would be reimbursed for expenses but receive no pay.

Do you see any legal or other problem with the Domestic Council having Mrs. Friedersdorf work with us?



THE WHITE HOUSE
WASHINGTON

December 10, 1975

MEMO FOR: PHIL BUCHEN

FROM: KEN LAZARUS *kl*

Attached are a copy of a Memorandum to the File (Tab A) and a memo to Jim Connor for your signature (Tab B).

You can destroy the copy of the Memorandum to the File after reading it. The original is contained in Hullin's security file.



THE WHITE HOUSE
WASHINGTON

December 10, 1975

ADMINISTRATIVELY CONFIDENTIAL

MEMORANDUM TO THE FILE

FROM: KEN LAZARUS *KL*

SUBJECT: Tod R. Hullin

In the course of my attempt to follow up on individuals earlier denied special clearances by the Special Prosecutor at Justice, I spoke with Carl Feldbaum toward the end of September regarding Tod Hullin. Carl indicated that the Special Prosecutor had decided against any adverse action relating to Hullin and no longer had any objection to the issuance of a special clearance in his name. He suggested, however, that prior to finalizing our clearance, I should check with the Postal Service authorities and the Criminal Division at the Department of Justice.

Thereafter, I spoke with the Office of the Inspector General at the Postal Service and the Office of the Assistant Attorney General, Criminal Division, Department of Justice, both of which indicated that they had no adverse information regarding Hullin and interposed no objection to granting him clearance.

cc: Jane Dannenhauer
Phil Buchen ✓



THE WHITE HOUSE
WASHINGTON

December 10, 1975

ADMINISTRATIVELY CONFIDENTIAL

MEMORANDUM FOR: JIM CONNOR
THROUGH: PHIL BUCHEN *P.*
FROM: KEN LAZARUS *pe*
SUBJECT: Tod R. Hullin

Attached please find a clearance form indicating the grant of special clearances to Mr. Hullin. At this time it would be appropriate to provide Mr. Hullin with his White House certificate.

Attachment



THE WHITE HOUSE

WASHINGTON

Date: 12/10/75

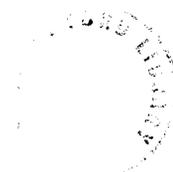
MEMORANDUM FOR: JIM CONNOR
FROM: KEN LAZARUS *KL*
SUBJECT: TOD R. HULLIN
Associate Director, Domestic Council

This is to notify you that the Counsel's Office has taken the following action with respect to the above-named individual:

- 1) Statement of Employment and Financial Interests,
approved 11/16/74
- 2) Security Clearance, approved 9/22/71
- 3) Special Clearances, approved 12/10/75
- 4) National Security Clearances,
approved _____
required and pending _____
not required at this time x

Comments:

cc: Doug Bennett
Bob Linder



*Lissy, David
Conflict*

THE WHITE HOUSE

INFORMATION

WASHINGTON

June 8, 1976

MEMORANDUM FOR: PHIL BUCHEN

FROM: JIM CANNON

Jai

It is my understanding that the Counsel's Office is agreeable to David Lissy going off the Domestic Council payroll to become a Special Assistant to the President, and on the White House payroll, in order that he may undertake responsibilities relating to White House activities which will be in addition to his Domestic Council responsibilities.

*OK
P.*



THE WHITE HOUSE

WASHINGTON

January 16, 1976

MEMORANDUM FOR:

JIM CANNON

FROM:

PHIL BUCHEN *P.*

In regard to the attached memo to you of January 13 from David Lissy, I sympathize with his problems and commend his good judgment about the restraint he has exercised in declining to participate in what may be perceived as political activities.

In the last paragraph of his memo, he talks about wearing "two hats" with one being of a type that does not involve the Hatch Act restrictions. Unfortunately, the Hatch Act does not allow for such bifurcation.



THE WHITE HOUSE
WASHINGTON

January 14, 1976

MEMORANDUM FOR :

PHIL BUCHEN

FROM :

JIM CANNON

A handwritten signature in black ink, appearing to read "Jim Cannon", written over the typed name "JIM CANNON". The signature is fluid and cursive, with a large loop at the end.

This is the kind of problem David Lissy is having,
and I would appreciate your guidance.

Attachment



THE WHITE HOUSE
WASHINGTON

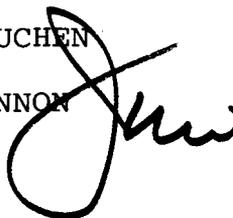
January 14, 1976

MEMORANDUM FOR :

PHIL BUCHEN

FROM :

JIM CANNON

A handwritten signature in black ink, appearing to read "Jim Cannon", written over the typed name "JIM CANNON". The signature is stylized with a large loop at the beginning and a cursive end.

This is the kind of problem David Lissy is having,
and I would appreciate your guidance.

Attachment



THE WHITE HOUSE

WASHINGTON

January 13, 1976

MEMORANDUM FOR: JIM CANNON
FROM: DAVID LISS 
SUBJECT: Hatch Act Problems

Two illustrations of the kind of problem I face:

1. I was asked to find a speaker for and subsequently was asked by someone else to speak at a meeting of Jewish leaders who will be in town next Monday and Tuesday to meet with candidates or their representatives. This would not be a campaign appearance in the sense of soliciting votes. It would just be an opportunity to answer questions about the President's stands on issues.

I had to indicate I could not help out.

2. I will be in Philadelphia in a few weeks to meet with leaders of the Philadelphia Jewish community -- on a non-partisan basis -- to discuss issues of concern to the community. It would make sense for me to have a separate smaller meeting with those leaders of the community who support the President so I could discuss with them political steps we should take -- or action they should take to get organized. I believe the Hatch Act restrictions would prohibit my participation in such a meeting.

I had a similar situation when I was in Los Angeles. I met with leaders of the Jewish Community there, but felt I could not get into any political discussions.



Page 2

As we discussed, this situation needs to be clarified. The problem is not time. I can and want to devote most of my time to substantive work. I believe I could wear two hats, be un-Hatched in one and still do justice to my Domestic Council responsibilities. I am also not suggesting that once un-Hatched I would do blatantly political work but it is really illogical to have me represent the President to the Jewish community and not be able to address the political aspects of the situation for the coming year.



September 27, 1974

Marrs,
Dr Theodore

MEMORANDUM FOR:

DR. THEODORE MARRS

FROM:

SKIP WILLIAMS

I am attaching the letter dated September 23, 1974, addressed to you and your wife which describes the work she will be doing while employed with Flying Tiger.

As indicated in our discussion today, I believe that there should be no conflict of interest problem in connection with your wife's employment. I would only caution you to avoid making any recommendations or making any substantive decisions that might have an effect upon Flying Tiger.

Enclosure

bcc: Mr. Buchen



9/26/74

To: Skip

From: Jay



THE WHITE HOUSE

WASHINGTON

September 25, 1974

MEMORANDUM FOR:

MR. PHILIP W. BUCHEN

FROM:

DR. THEODORE C. MARRS 

I would appreciate your evaluation of this for a conflict of interest prior to Annette committing herself to it.

Enclosure

Ltr dtd Sep 23, 1974,
from Mrs. Anna Chennault

THE **FLYING TIGER LINE** INC.

1020 INVESTMENT BUILDING
1511 K STREET, N.W.
WASHINGTON, D. C. 20005
(202) 347-0516

RS. ANNA CHENNAULT
VICE PRESIDENT
INTERNATIONAL AFFAIRS

September 23, 1974

Dr. and Mrs. Theodore C. Marrs
3441 Rose Lane
Falls Church, Virginia 22042

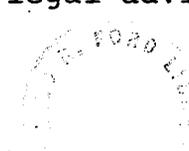
Dear Annette and Ted:

I am leaving for the Far East and Southeast Asia this coming Sunday. This trip came up rather suddenly. I thought before I leave, I owe you this letter to clear up our verbal arrangement regarding the position Annette is to have with our Company.

I previously asked Annette to come into work as a part-time worker with Mrs. Lou Tower the first part of October. At that time, I thought I would be in Washington and would supervise the working arrangement. As you know, Lou Tower is also relatively new with the Company. Now that I have to go on a business trip, and won't be back until the middle part of October, may I suggest that Annette come into work on Monday, October 21. Tentatively we would like to have Annette have the title of Secretary. This office of international affairs, handles negotiations with foreign nations and contact with many of the embassies in Washington with which we have business arrangements. As our office is relatively small, the job responsibility varies. Annette's job will cover making appointments, making phone calls, writing letters and taking care of foreign VIPs. I would like to set the first month from October to November as a test period. After that, if all is satisfactory, our Personnel Director at headquarters will come out for an in depth interview with Annette.

As I mentioned to Annette before, Mrs. Lou Tower will not be able to work for us full time and we are planning to have Annette replace Lou Tower and have Lou Tower work as part time staff. I hope this arrangement will work out for all of us and the agreement mentioned above is agreeable with you.

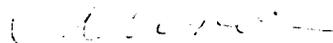
Ted has promised me that he would check with his legal advisor and I hope his response is favorable.



I will be talking to you before my departure.

Warmest regards.

Sincerely,


Anna Chennault



THE WHITE HOUSE
WASHINGTON

November 7, 1975

*McConahey, Steve
Personnel;*

*Conflicts
of Int.*

*McConahey,
Steve*

MEMORANDUM FOR: JIM CANNON
FROM: PHIL BUCHEN *P.*
SUBJECT: Steve McConahey/
Possible Conflict

Steve McConahey's proposal for eliminating any possible conflicts with his local government responsibilities is in accord with advice given by this office and from a legal standpoint we recommend your approval of his proposal.



Barry

THE WHITE HOUSE
WASHINGTON

November 5, 1975

MEMORANDUM FOR : PHIL BUCHEN
FROM : JIM CANNON
SUBJECT : Possible Conflict

Could you give me your counsel on this?

Many thanks.

Attachment



THE WHITE HOUSE

INFORMATION

WASHINGTON

October 30, 1975

MEMORANDUM FOR:

JIM CANNON
JIM CAVANAUGH

FROM:

STEVE McCONAHEY *sem*

SUBJECT:

Eliminating Conflict with
Local Government Respon-
sibilities

The purpose of this memorandum is to explain to you my position as Town Councilman of the Town of Vienna, Virginia, and to propose a course of action that will eliminate any possibility of conflict and, at the same time, not inhibit my role as Associate Director.

I currently hold the position of Councilman in the Town of Vienna based on an election for that position in May of 1974. The position is strictly non-partisan. Immediately upon joining the Domestic Council I requested a legal opinion from the Counsel's office on the question of whether there would be any conflict arising as a result of my holding positions both at the White House and at the local government level. Counsel's office and I have discussed this matter and have reached the following conclusions:

1. My position on the Town Council does not violate the Hatch Act;
2. The only possibility for conflict is where a Federal transportation decision might result in a beneficial impact unique to the Town of Vienna and where, as a member of both levels of government, I would be in a position of using privileged information;
3. That, to avoid these situations, I should remove myself from the information flow and decision process for transportation matters falling into these categories. Currently,



this rule should be applied to four transportation issues: Washington Metro; I-66; Dulles access road; and, landing rights of the Concorde at Dulles Airport.

I do not feel that my removal from these subject matters will pose a serious problem or adversely affect my role as Associate Director. To begin with, the matters of Metro and I-66 are already being handled by Jim Falk. The Dulles access road questions could easily be handled by Jim as well since they affect, most directly, the Washington metropolitan area. The Concorde issue is the only one, in my judgment, which is not being handled by someone else on the Domestic Council. In this case, I would recommend that it be placed under the responsibility of George Humphreys since the main issue is one of environmental impact. In addition to the fact that these issues can be easily assigned, they do not represent a major portion of my time. Therefore, I do not believe their reassignment would substantively affect my ability to act as Associate Director for transportation.

The Counsel's office recommends that you review and approve this proposal as part of the White House record. In turn, I will explain this action in the record of the Town Council. Finally, if another issue of particular importance to the Town of Vienna should arise, I will recommend that it be reassigned within the Domestic Council; however, I do not anticipate these situations to be numerous.

I would be happy to discuss the matter with you and clarify any questions that you may have.

_____ APPROVE

_____ DISAPPROVE



THE WHITE HOUSE

WASHINGTON

September 23, 1975

*to be care
of the case*
K

MEMORANDUM FOR GENERAL COUNSEL'S OFFICE

FROM: STEVE McCONAHEY *SEM*

I have recently joined the Domestic Council as an Associate Director. In order to become totally familiar with the guidelines for operation as a member of the White House staff, I would like to receive a copy of the Code of Ethics developed for the Ford Administration as a guide to White House staff members.

Secondly, I would like your opinion on whether or not my current activity as a member of the Town Council of the Town of Vienna, Virginia is in violation of any White House policy. Town elections are non-partisan in nature, and therefore, to the best of my knowledge, are not in violation of the Hatch Act. However, I would like to receive your clarification on this policy and any other comments you might have on things I should or should not do as a member of a local legislative body.

If it would be helpful to you for me to outline more of the activities of the Council and their methods of election procedures, I would be happy to discuss this matter with you. I would appreciate your attention and response.



Personnel Appts.

THE WHITE HOUSE

WASHINGTON

August 11, 1976

MEMORANDUM FOR: JIM CONNOR

THROUGH: PHIL BUCHEN *P.*

FROM: BOBBIE GREENE KILBERG *Bobbie*

SUBJECT: Baroody Memo re Appointment of Brad Patterson

Brad Patterson would do an excellent job as the White House liaison with the American Indian community, and I would strongly support Bill Baroody's recommendation.

First paragraph of Presidential memorandum: When Art Quern and I were considering language for a Presidential memorandum to Department and Agency Heads, Art preferred utilizing the words "to encourage the improved coordination", rather than the more activist wording of "to improve the coordination". (See paragraph 1 of Presidential memorandum.) Art is out of town until Thursday, and you may specifically want to check the wording with him.

Attachment



THE WHITE HOUSE

ACTION MEMORANDUM

WASHINGTON

LOG NO.:

Date: August 9, 1976

Time:

FOR ACTION:

cc (for information):

Phil Buchen
 Jim Cannon
 Bob Hartmann

FROM THE STAFF SECRETARY

DUE: Date: Wednesday, Aug. 11

Time: 11 A.M.

SUBJECT:

Baroody memo dated August 4, 1976 re
 appointment of Brad Patterson to work with
 Indian leaders

ACTION REQUESTED:

<input type="checkbox"/> For Necessary Action	<input checked="" type="checkbox"/> For Your Recommendations
<input type="checkbox"/> Prepare Agenda and Brief	<input type="checkbox"/> Draft Reply
<input checked="" type="checkbox"/> For Your Comments	<input type="checkbox"/> Draft Remarks

REMARKS:



PLEASE ATTACH THIS COPY TO MATERIAL SUBMITTED.

If you have any questions or if you anticipate a delay in submitting the required material, please telephone the Staff Secretary immediately.

Jim Connor
 For the President

MEMORANDUM

THE WHITE HOUSE

WASHINGTON

October 24, 1975

CIP 11

MEMORANDUM FOR:

PHIL BUCHEN

FROM:

DONALD RUMSFELD

I have read your memo to Brent Scowcroft of October 20 concerning gifts to U. S. Government Officials. It seems to me that what you ought to do is sit down with Brent and Henry and lay down the law. I don't see any need for a meeting unless that doesn't work.



MEMORANDUM

THE WHITE HOUSE

WASHINGTON

October 24, 1975

MEMORANDUM FOR:

PHIL BUCHEN

FROM:

DONALD RUMSFELD

I have read your memo to Brent Scowcroft of October 20 concerning gifts to U. S. Government Officials. It seems to me that what you ought to do is sit down with Brent and Henry and lay down the law. I don't see any need for a meeting unless that doesn't work.

*Called Brent
11/7/75*



NATIONAL ARCHIVES AND RECORDS ADMINISTRATION
Presidential Libraries Withdrawal Sheet

WITHDRAWAL ID 01488

REASON FOR WITHDRAWAL Donor restriction
TYPE OF MATERIAL Letter(s)
CREATOR'S NAME Staudinger, George
RECEIVER'S NAME Buchen, Philip
DESCRIPTION Personal matter.
CREATION DATE 01/31/1976

COLLECTION/SERIES/FOLDER ID . 001900445
COLLECTION TITLE Philip W. Buchen Files
BOX NUMBER 42
FOLDER TITLE Personnel - White House: General

DATE WITHDRAWN 08/25/1988
WITHDRAWING ARCHIVIST LET

Wimer, Dave

9/3/74

Memo for Mr. Buchen from Dave Wimer

re Waivers of Security and Conflict of
Interest review

Mr. Buchen approved and we returned to Mr. Wimer ----- eyes only

