



September 6, 2019

VIA EMAIL

U.S. Army Freedom of Information Act Office
Records Management and Declassification Agency
9301 Chapek Rd., Bldg 1458
Fort Belvoir, VA 22060-5605
usarmy.belvoir.hqda-oaa-ahs.mbx.rmda-foia@mail.mil

OSD/JS FOIA Requester Service Center
Office of Freedom of Information
1155 Defense Pentagon
Washington, DC 20301-1155
whs.mc-alex.esd.mbx.osd-js-foia-requester-service-center@mail.mil

Re: Freedom of Information Act Request

Dear FOIA Officers:

Pursuant to the Freedom of Information Act (FOIA), 5 U.S.C. § 552, and the implementing regulations of your agency, American Oversight makes the following request for records.

The president appointed former Secretary of the Army Mark Esper to serve as Acting Secretary of Defense in June of this year¹ and subsequently nominated Dr. Esper to serve as Secretary of Defense in a permanent capacity.² Congress fast-tracked Dr. Esper's confirmation process and confirmed him in late July.³

¹ Helene Cooper, *Trump to Officially Nominate Esper as Next Defense Secretary*, N.Y. TIMES, June 21, 2019, <https://www.nytimes.com/2019/06/21/us/politics/mark-esper-defense-secretary-nomination.html>.

² Donovan Slack, *Trump Officially Nominates Mark Esper as Next Defense Secretary*, USA TODAY (July 15, 2019, 3:30 PM), <https://www.usatoday.com/story/news/politics/2019/07/15/mark-esper-officially-nominated-trump-defense-secretary/1696656001/>.

³ Andrew Clevenger, *Esper on Path for Quick Confirmation Despite Raytheon Ties*, ROLL CALL (July 16, 2019, 2:13 PM), <https://www.rollcall.com/news/congress/esper-path-quick-confirmation-despite-raytheon-ties>; Connor O'Brien, *Esper Confirmed as Defense Secretary*, POLITICO (July 23, 2019, 11:36 PM), <https://www.politico.com/story/2019/07/23/mark-esper-defense-secretary-1611413>.



Dr. Esper previously served as a lobbyist for the defense contractor Raytheon,⁴ which raises concerns about the matters that Dr. Esper has influenced or may influence in his service in the Army and at the Department of Defense (DOD). It is particularly concerning that Dr. Esper filed lobbying disclosure reports that show he was actively lobbying the Trump administration throughout much of 2017, even as he presumably prepared to assume the post of Secretary of the Army.⁵

American Oversight seeks records with the potential to shed light on the implementation of Dr. Esper's ethics agreement(s) and screening arrangements designed to ensure that he did not participate in matters affecting his former employer.

Requested Records

American Oversight that DOD and the Army produce the following records within twenty business days:

- A. Copies of any updated or new screening arrangements put in place as part of Dr. Esper's ethics agreements since his confirmation as Secretary of Defense.

For item A, please provide all responsive records from July 23, 2019, through the date of the search.

- B. All records reflecting communications (including emails, email attachments, calendar invitations and entries, memoranda, and handwritten notes) demonstrating the implementation of screening arrangements described in Dr. Esper's ethics agreement(s) or created to ensure compliance with Dr. Esper's ethical obligations.

This includes records reflecting the communications of the Military Assistant Colonel designated in Dr. Esper's April 17, 2018 screening arrangement Memorandum, attached hereto as Exhibit A, as well as any other officials who have exercised screening responsibilities for Dr. Esper during his tenure as Secretary of the Army, Acting Secretary of Defense, and Secretary of Defense.

⁴ Cooper, *supra* note 1.

⁵ See Lobbying Report, Lobbying Disclosure Act of 1995 (Section 5), Q1 2017, <http://disclosures.house.gov/ld/ldxmlrelease/2017/Q1/300877717.xml>; Lobbying Report, Lobbying Disclosure Act of 1995 (Section 5), Q2 2017, <http://disclosures.house.gov/ld/ldxmlrelease/2017/Q2/300897575.xml>; Lobbying Report, Lobbying Disclosure Act of 1995 (Section 5), Q3 2017, <http://disclosures.house.gov/ld/ldxmlrelease/2017/Q3/300916838.xml>.

- C. Records sufficient to show all matters that Dr. Esper has not participated in as a result of his screening arrangement(s), ethics agreement(s), or ethics pledge.

Please provide all responsive records from November 20, 2017, through the date the search is conducted.

Fee Waiver Request

In accordance with 5 U.S.C. § 552(a)(4)(A)(iii) and your agency's regulations, American Oversight requests a waiver of fees associated with processing this request for records. The subject of this request concerns the operations of the federal government, and the disclosures will likely contribute to a better understanding of relevant government procedures by the general public in a significant way. Moreover, the request is primarily and fundamentally for non-commercial purposes.

American Oversight requests a waiver of fees because disclosure of the requested information is "in the public interest because it is likely to contribute significantly to public understanding of operations or activities of the government."⁶ The public has a significant interest in understanding whether and how Dr. Esper's lobbying efforts directed at the federal government in the months before he joined the Trump administration have affected his performance in senior roles at DOD. The public, further, has a significant interest in understanding whether Dr. Esper has complied with ethical requirements. Records with the potential to shed light on the implementation of screening arrangements designed to prevent Dr. Esper from participating in matters that would raise ethical concerns would contribute significantly to public understanding of operations of the federal government, including whether Dr. Esper participated in matters that he previously lobbied on for his former employer. American Oversight is committed to transparency and makes the responses agencies provide to FOIA requests publicly available, and the public's understanding of the government's activities would be enhanced through American Oversight's analysis and publication of these records.

This request is primarily and fundamentally for non-commercial purposes.⁷ As a 501(c)(3) nonprofit, American Oversight does not have a commercial purpose and the release of the information requested is not in American Oversight's financial interest. American Oversight's mission is to promote transparency in government, to educate the public about government activities, and to ensure the accountability of government officials. American Oversight uses the information gathered, and its analysis of it, to educate the public through reports, press releases, or other media. American Oversight also makes

⁶ 5 U.S.C. § 552(a)(4)(A)(iii).

⁷ See 5 U.S.C. § 552(a)(4)(A)(iii).

materials it gathers available on its public website and promotes their availability on social media platforms, such as Facebook and Twitter.⁸

American Oversight has also demonstrated its commitment to the public disclosure of documents and creation of editorial content through numerous substantive analyses posted to its website.⁹ Examples reflecting this commitment to the public disclosure of documents and the creation of editorial content include the posting of records related to an ethics waiver received by a senior Department of Justice attorney and an analysis of what those records demonstrated regarding the Department's process for issuing such waivers;¹⁰ posting records received as part of American Oversight's "Audit the Wall" project to gather and analyze information related to the administration's proposed construction of a barrier along the U.S.-Mexico border, and analyses of what those records reveal;¹¹ posting records regarding potential self-dealing at the Department of Housing & Urban Development and related analysis;¹² posting records and analysis relating to the federal government's efforts to sell nuclear technology to Saudi Arabia;¹³ posting records and analysis regarding the Department of Justice's decision in response to demands from Congress to direct a U.S. Attorney to undertake a wide-ranging review and make recommendations regarding criminal investigations relating to the President's political opponents and allegations of misconduct by the Department of Justice itself and the Federal Bureau of Investigation.¹⁴

⁸ American Oversight currently has approximately 12,200 page likes on Facebook and 54,400 followers on Twitter. American Oversight, FACEBOOK, <https://www.facebook.com/weareoversight> (last visited July 17, 2019); American Oversight (@weareoversight), TWITTER, <https://twitter.com/weareoversight> (last visited July 17, 2019).

⁹ News, AMERICAN OVERSIGHT, <https://www.americanoversight.org/blog>.

¹⁰ DOJ Records Relating to Solicitor General Noel Francisco's Recusal, AMERICAN OVERSIGHT, <https://www.americanoversight.org/document/doj-civil-division-response-noel-francisco-compliance>; *Francisco & the Travel Ban: What We Learned from the DOJ Documents*, AMERICAN OVERSIGHT, <https://www.americanoversight.org/francisco-the-travel-ban-what-we-learned-from-the-doj-documents>.

¹¹ See generally *Audit the Wall*, AMERICAN OVERSIGHT, <https://www.americanoversight.org/investigation/audit-the-wall>; see, e.g., *Border Wall Investigation Report: No Plans, No Funding, No Timeline, No Wall*, AMERICAN OVERSIGHT, <https://www.americanoversight.org/border-wall-investigation-report-no-plans-no-funding-no-timeline-no-wall>.

¹² *Documents Reveal Ben Carson Jr.'s Attempts to Use His Influence at HUD to Help His Business*, AMERICAN OVERSIGHT, <https://www.americanoversight.org/documents-reveal-ben-carson-jr-s-attempts-to-use-his-influence-at-hud-to-help-his-business>.

¹³ *Investigating the Trump Administration's Efforts to Sell Nuclear Technology to Saudi Arabia*, AMERICAN OVERSIGHT, <https://www.americanoversight.org/investigating-the-trump-administrations-efforts-to-sell-nuclear-technology-to-saudi-arabia>.

¹⁴ *Sessions' Letter Shows DOJ Acted On Trump's Authoritarian Demand to Investigate Clinton*, AMERICAN OVERSIGHT, <https://www.americanoversight.org/sessions-letter>.

Accordingly, American Oversight qualifies for a fee waiver.

Guidance Regarding the Search & Processing of Requested Records

In connection with its request for records, American Oversight provides the following guidance regarding the scope of the records sought and the search and processing of records:

- Please search all locations and systems likely to have responsive records, regardless of format, medium, or physical characteristics. For instance, if the request seeks “communications,” please search all locations likely to contain communications, including relevant hard-copy files, correspondence files, appropriate locations on hard drives and shared drives, emails, text messages or other direct messaging systems (such as iMessage, WhatsApp, Signal, or Twitter direct messages), voicemail messages, instant messaging systems such as Lync or ICQ, and shared messages systems such as Slack.
- Our request for records includes any attachments to those records or other materials enclosed with those records when they were previously transmitted. To the extent that an email is responsive to our request, our request includes all prior messages sent or received in that email chain, as well as any attachments to the email.
- Please search all relevant records or systems containing records regarding agency business. Do not exclude records regarding agency business contained in files, email accounts, or devices in the personal custody of your officials, such as personal email accounts or text messages. Records of official business conducted using unofficial systems or stored outside of official files are subject to the Federal Records Act and FOIA.¹⁵ It is not adequate to rely on policies and procedures that require officials to move such information to official systems within a certain period of time; American Oversight has a right to records contained in those files even if material has not yet been moved to official systems or if officials have, by intent or through negligence, failed to meet their obligations.¹⁶
- Please use all tools available to your agency to conduct a complete and efficient search for potentially responsive records. Agencies are subject to government-wide requirements to manage agency information electronically,¹⁷ and many agencies

¹⁵ See *Competitive Enter. Inst. v. Office of Sci. & Tech. Policy*, 827 F.3d 145, 149–50 (D.C. Cir. 2016); cf. *Judicial Watch, Inc. v. Kerry*, 844 F.3d 952, 955–56 (D.C. Cir. 2016).

¹⁶ See *Competitive Enter. Inst. v. Office of Sci. & Tech. Policy*, No. 14-cv-765, slip op. at 8 (D.D.C. Dec. 12, 2016).

¹⁷ Presidential Memorandum—Managing Government Records, 76 Fed. Reg. 75,423 (Nov. 28, 2011), <https://obamawhitehouse.archives.gov/the-press->

have adopted the National Archives and Records Administration (NARA) Capstone program, or similar policies. These systems provide options for searching emails and other electronic records in a manner that is reasonably likely to be more complete than just searching individual custodian files. For example, a custodian may have deleted a responsive email from his or her email program, but your agency's archiving tools may capture that email under Capstone. At the same time, custodian searches are still necessary; agencies may not have direct access to files stored in .PST files, outside of network drives, in paper format, or in personal email accounts.

- In the event some portions of the requested records are properly exempt from disclosure, please disclose any reasonably segregable non-exempt portions of the requested records. If a request is denied in whole, please state specifically why it is not reasonable to segregate portions of the record for release.
- Please take appropriate steps to ensure that records responsive to this request are not deleted by the agency before the completion of processing for this request. If records potentially responsive to this request are likely to be located on systems where they are subject to potential deletion, including on a scheduled basis, please take steps to prevent that deletion, including, as appropriate, by instituting a litigation hold on those records.

Conclusion

If you have any questions regarding how to construe this request for records or believe that further discussions regarding search and processing would facilitate a more efficient production of records of interest to American Oversight, please do not hesitate to contact American Oversight to discuss this request. American Oversight welcomes an opportunity to discuss its request with you before you undertake your search or incur search or duplication costs. By working together at the outset, American Oversight and your agency can decrease the likelihood of costly and time-consuming litigation in the future.

Where possible, please provide responsive material in an electronic format by email. Alternatively, please provide responsive material in native format or in PDF format on a USB drive. Please send any responsive material being sent by mail to American Oversight, 1030 15th Street NW, Suite B255, Washington, DC 20005. If it will accelerate release of responsive records to American Oversight, please also provide responsive material on a rolling basis.

We share a common mission to promote transparency in government. American Oversight looks forward to working with your agency on this request. If you do not understand any

[office/2011/11/28/presidential-memorandum-managing-government-records](#); Office of Mgmt. & Budget, Exec. Office of the President, Memorandum for the Heads of Executive Departments & Independent Agencies, "Managing Government Records Directive," M-12-18 (Aug. 24, 2012), <https://www.archives.gov/files/records-mgmt/m-12-18.pdf>.

part of this request, please contact Dan McGrath at foia@americanoversight.org or 202.897.4213. Also, if American Oversight's request for expedition is not granted or its request for a fee waiver is not granted in full, please contact us immediately upon making such a determination.

Sincerely,

A handwritten signature in blue ink that reads "Austin R. Evers". The signature is fluid and cursive, with a long horizontal flourish extending to the left.

Austin R. Evers
Executive Director
American Oversight

EXHIBIT A



DEPARTMENT OF THE ARMY
OFFICE OF THE ADMINISTRATIVE ASSISTANT TO THE SECRETARY OF THE ARMY
9301 CHAPEK ROAD
FORT BELVOIR VA 22060-5527

August 1, 2019

SAAA-LS

Austin R. Evers
American Oversight
1030 15th Street NW, Suite B255
Washington, DC 20005
Sent via email: foia@americanoversight.org

Dear Mr. Evers:

This letter is in response to your Freedom of Information Act (FOIA) request dated June 24, 2019. Your request was referred to us by the U.S. Army Freedom of Information Act Division, Records Management Declassification Agency (RMDA). You are seeking records pertaining to your enclosed FOIA request. Your request was assigned our office tracking number FA-19-0138.

Under the FOIA, a government agency is required to make a “good faith effort to conduct a search” 5 USC 552(a)(3)(A). Our office requested a records search from the Office of the Secretary of the Army (SECARMY). SECARMY conducted a search and review for any records responsive to your FOIA request; however, this search failed to yield responsive records pertaining to item 1 of your request. We have determined this search was reasonable. See *Duenas Iturralde v. Comptroller of the Currency*, 315 F.3d 311, 3154 (D.C. Cir. 2003). Pertaining to item 2, we are releasing (4) pages with partial redactions that are responsive to your FOIA request. All redactions and withholdings have been made pursuant to Exemption (b)(6) of the FOIA as described below.

Exemption 6 of the FOIA 5 U.S.C. § 552(b)(6)

Exemption (b)(6) of the FOIA protects from mandatory disclosure “personnel and medical files the disclosure of which would constitute a clearly unwarranted invasion of privacy.” 5 U.S.C. § 552(b)(6) (2011). To qualify for protection under Exemption (b)(6), records must meet two criteria: (1) they must be “personnel and medical files and similar files,” (2) the disclosure of which “would constitute a clearly unwarranted invasion of personal privacy.” *Id.*; *United States Dep’t of State v. Washington Post Co.*, 456 U.S. 595, 599-603 (1982). The first prong is met if the information “appl[ies] to a particular individual” and is “personal” in nature. *New York Times Co. v. NASA*, 852 F.2d 602, 606 (D.C. Cir. 1988). The second prong requires courts to strike a “balance between the protection of an individual’s right to privacy and the preservation of the public’s right to government information.” *United States Dep’t of State v. Washington Post Co.*, 456 U.S. 595, 599 (1982). The “public interest” in the analysis is limited to the “core purpose” for which Congress enacted the FOIA: to “shed . . . light on an agency’s performance of its statutory duties.” *United States Dep’t of Justice v. Reporters Comm. for Freedom of the Press*, 489 U.S. 749, 773 (1989).

We are withholding the names of personnel, other than Senior Executive Service members and General Officers and contact information for all Army personnel under Exemption 6. 5

U.S.C. § 552(b)(6). See *Judicial Watch, Inc. v. United States*, No. 03-1160, 2004 WL 26736, at *4 (4th Cir. Jan. 6, 2004). Under the Exemption (b)(6) balancing test, the Supreme Court held in a similar case that disclosure of employee addresses “would not appreciably further the citizens’ right to be informed about what their Government is up to and, indeed, would reveal little or nothing about the employing agencies or their activities.” *United States Dep’t of Defense v. Fed. Labor Relations Auth.*, 510 U.S. 487 (1994). The same is true here. Disclosure of the names, contact and personal information of government employees would contribute little to the public’s understanding of government activities. By contrast, such disclosure would constitute a “non-trivial” and “not insubstantial” invasion of government employees’ privacy interests. *Id.* at 500, 501.

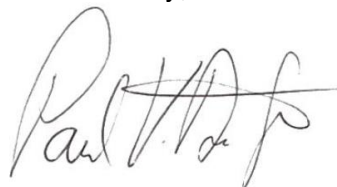
For any further assistance and to discuss any aspect of your request, you have the right to contact the Army FOIA Public Liaison Officer, Alecia Bolling, by email at us.army.hqda-oaa-ahs.mbx.rmda-foia-public-liaison@mail.mil or by phone at (571) 515-0306. Additionally, you may contact the Office of Government Information Services (OGIS) at the national Archives and Records Administration (NARA) to inquire about the FOIA mediation services they offer. The contact information for OGIS is as follows: NARA-OGIS, 8601 Adelphi Road-OGIS, College Park, MD 20740-6001, email at ogis@nara.gov, telephone number (202) 741-5770 toll free at (877) 684-6448 or by facsimile at (202) 741-5769.

This letter constitutes a “no record” determination under the FOIA. This determination has been made on behalf of the Administrative Assistant to the Secretary of the Army, who has designated that this office will act as the Initial Denial Authority for records maintained by the Office of the Secretary of the Army and its serviced activities. You have the right to file an administrative appeal with the Office of the Army General Counsel within ninety (90) calendar days. See 32 C.F.R. § 518.17(c). Their mailing address is:

Department of the Army
Office of the General Counsel
104 Army Pentagon, Room 2E724
Washington, D.C. 20310

If you have any questions regarding this letter or the information furnished, please contact this office at (703) 614-5871 or email at usarmy.belvoir.hqda-oaa-rpa.mbx.oaa-cals-mailbox-foia@mail.mil. In all correspondence please refer to FOIA number FA-19-0138.

Sincerely,

A handwritten signature in black ink, appearing to read "Paul V. DeAgostino". The signature is stylized and cursive.

Paul V. DeAgostino
Senior Counsel

Enclosure(s): 4 pages



SECRETARY OF THE ARMY
WASHINGTON

17 April 2018

MEMORANDUM FOR SECRETARY OF THE DEFENSE

SUBJECT: SECRETARY OF THE ARMY ESPER, AMENDED DISQUALIFICATION STATEMENT AND SCREENING ARRANGEMENT

1. This memorandum amends the Disqualification Statement and Screening Arrangement I executed on 28 November 2017, principally to notify you that I no longer hold the conflicting interests directed for divestment in the Ethics Agreement I executed on 26 July 2017. With the assistance of Army Ethics Officials, I want to continue to ensure that I do not participate in certain matters with parties with which I had a personal or business relationship.

2. RECUSAL OBLIGATIONS

a. STATUTORY REQUIREMENTS.

1) On 7 February 2018, I divested all my interests in Raytheon Company (Raytheon) stock, as required by 18 U.S.C. § 208(a) and my Ethics Agreement. On 12 February 2018, the Office of the Army General Counsel notified the Office of Government Ethics (OGE) and the Department of Defense Standards of Conduct Office (SOCO) of this divestiture and compliance with my Ethics Agreement. I will continue to not participate personally and substantially in any "particular matter" that has a direct and predictable effect on my remaining financial interests or those of any persons whose interests are imputed to me, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2). I understand that the interests of the following persons are imputed to me: any spouse or minor child of mine; any general partner of a partnership in which I am a limited or general partner; any organization in which I serve as officer, director, trustee, general partner or employee; and any person or organization with which I am negotiating or have an arrangement concerning prospective employment.

2) Additionally, because of my continued participation in Raytheon's deferred compensation plan, I will not participate personally and substantially in any particular matter that to my knowledge has a direct and predictable effect on the ability or willingness of Raytheon to provide these benefits, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1).

SUBJECT: SECRETARY OF THE ARMY ESPER, DISQUALIFICATION STATEMENT AND SCREENING ARRANGEMENT

b. REGULATORY & ETHICS PLEDGE REQUIREMENTS.

1) For a period of two years beginning on November 20, 2017, I will continue to not participate personally and substantially in any particular matter involving specific parties that are directly and substantially related to Raytheon, including regulations and contracts. While it is possible to receive a waiver of the Administration's Ethics Pledge (Executive Order 13770) or, during my first year in office, to obtain the appropriate authorization from the agency designee pursuant to 5 C.F.R. 2635.502(d), as stated in my 21 September 2017 letter to the Chairman of the Senate Armed Services Committee, I will not seek or accept waivers to this two year restriction.

2) For a period of two years beginning on November 20, 2017, I will continue to not participate in any particular matter on which I lobbied within the two years before my appointment or participate in the specific issue area in which that particular matter falls, pursuant to paragraph 7 of my Ethics Pledge. As stated in my 21 September 2017 letter to the Chairman of the Senate Armed Services Committee, I will not seek or accept waivers to this two year restriction.

3) For a period of one year after my resignation from the Lake Braddock Athletic Boosters Club, I will continue to not participate personally and substantially in any particular matter involving specific parties in which I know this Club is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

3. SCREENING ARRANGEMENT.

To help ensure that I do not participate in matters relating to these entities, I have taken or will take the following steps:

a. I have instructed COL (b) (6) as my Military Assistant, or his successor, to screen all matters directed to my attention that involve outside entities or that require my participation to determine if they involve any of the entities or organizations listed above.

b. If COL (b) (6) or his successor determines that any particular matter may directly and predictably affect a financial interest in any entity or organization listed above, that any such entity or organization is or represents a party to a particular matter involving specific parties, he/she will refer them to Under Secretary of the Army Ryan D. McCarthy for action or assignment, or another appropriate senior Army official, without my knowledge or involvement.

c. To help ensure that I do not inadvertently participate in matters from which I should be recused, I am directing COL (b) (6) to seek the assistance of an ethics

SUBJECT: SECRETARY OF THE ARMY ESPER, DISQUALIFICATION STATEMENT
AND SCREENING ARRANGEMENT

official in the Army Office of General Counsel if he/she is uncertain whether I may participate in a matter.

4. In consultation with an Army ethics official, I will again revise and update this memorandum if warranted by changed circumstances, including changes in my financial interests, my personal or business relationships, or the nature of my official duties. I will provide a copy of the revised screening arrangement memorandum to you, Under Secretary McCarthy, COL (b) (6) and the General Counsel.



Mark T. Esper
Secretary of the Army

cc:
Under Secretary of the Army
Army General Counsel
Deputy General Counsel (Ethics & Fiscal)
Special Assistant to the Secretary
Executive Officer



GENERAL COUNSEL OF THE DEPARTMENT OF THE ARMY
104 ARMY PENTAGON
WASHINGTON, DC 20310-0104

SAGC

17 April 2018

MEMORANDUM FOR Secretary of the Army

MR. SECRETARY,

SUBJECT: Amended Disqualification Statement and Screening Arrangement

On 12 February 2018, you divested all of your interests in Raytheon Company stock as required by 18 U.S.C. §208 and your Ethics Agreement. In light of this divestment, attached for your signature is an amended disqualification statement and screening arrangement, reflecting your changed status under the ethics provisions. My office will ensure this amended statement is given to the Department of Defense Standards of Conduct Office who will in turn provide it to the Secretary of Defense. This will fulfil your promise in your 28 November 2017 disqualification statement to notify the Secretary of Defense once you no longer held the Raytheon stock.

v/r Jim

Encl.

James E. McPherson
General Counsel

MR. SECRETARY,

*ROUTINE "HOUSEKEEPING" FROM
YOUR RAYTHEON DIVESTMENT -*

v/r Jim