

**From:** Minton, Shira  
**Sent:** Friday, May 12, 2017 9:28 AM  
**To:** Hinman, William  
**Cc:** Brightwell, Tamara; Serrano, Danae  
**Subject:** Documents  
**Importance:** High

Bill attached please find the following:

- 1) Draft Screening memo. Please insure I got all the financial holdings. I divided them into two groups one that you plan to divest and one you do not. POD means “proof of divestiture”
- 2) Draft CD documentation I put in the names of all securities I thought you might want a CD for but if any are too small to be worth it, please delete them. also fill in the highlighted. Thanks

Shira Pavis Minton  
Ethics Counsel  
Office of the Ethics Counsel  
Securities and Exchange Commission  
[REDACTED]

<Draft Hinman Screening Memo (5-11-17) (2).docx>

**MEMORANDUM**

**TO:** Shira Pavis Minton, Ethics Counsel  
**FROM:** Bill Hinman, Director, Division of Corporation Finance  
**DATE:** May, 2017  
**RE:** Screening Arrangement

This memorandum is to provide you with written notification of the screening arrangement I have implemented to ensure that I comply with my obligation to recuse myself from certain matters with which I have a financial interest, or a personal or business relationship.

**Until these assets have been divested**, 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 am disqualified from participating personally and substantially in any particular matter that would have a direct and predictable effect on:

Goldman Sachs Group (POD required)  
Blackstone Group (POD required)  
PJT Partners (POD required)  
IBM

(b) (6)

(b) (6)

Under 18 U.S.C. § 208, I am disqualified from participating personally and substantially in any particular matter that would have a direct and predictable effect on:

Simpson, Thacher & Bartlett LLP  
Teton Westwood Equity Fund (WESX)  
Oakmark Int'l Fund (OAKIX)  
Oakmark Select Fund (OAKLX)  
Vanguard 500 Index Fund (VFINX)  
LZD Cap All Glb Bal (LCAOX)  
JPMCB SR 2020 C. (JTTIX)  
MIP II C1 2  
Euro pacific Growth F-2. (AEPFX)  
Teton Westwood Equity Fund. (WESWX)  
New Perspective Fund Class f-2. (ANWFX)  
Vanguard Specialized Portfolio. (VIG)

FID Contrafund (FCNTX)  
TRP Equity Income (PRFDX)  
FID Intl Index INS (FSPNX)  
Harbor Capital Appr Inv (HACAX)  
FID Retire Govt MM (FGMXX)  
American Century Diversified (ADFIX)

(b) (6)

Credit Suisse Commodity RTN  
Matthews Pacific Tiger (MAPTX)  
New Perspective Fund (ANWFX)  
PIMCO Inc Fund (PONPX)  
Vanguard REIT Fund (VGSLX)  
ISHARES TR Select (DVY)  
SPDR S&P 500 ETF TR unit (SPY)  
Vanguard Appreciation Index (VIG)  
Vanguard Index Mid Cap (VO)  
Vanguard Index Sm Cap (VB)  
American Century Real Estate (REACX)  
Ariel Fund (ARGFX)  
Delaware Emerging Mkts (DEMIX)  
Eagle Small Cap (HSIIX)  
Euro Pacific Growth F-2 (AEPIX)  
Fidelity Total Bond Fund (FEPIX)  
Franklin Convertible Securities (FCSZX)  
John Hancock Disciplined Value Mid Cap (JVMIX)  
New Perspectives Fund (ANWIX)  
TRP Short Term Bond (PRWBX)  
Vanguard REIT (VGSLX)  
Vanguard Total Intl Index (VFIAX)  
Power Shares (QQQ)  
Vanguard Index Growth (VUG)  
Vanguard Index Value (VTV)

Unless I am authorized to participate, I also am disqualified from participating in any particular matter involving specific parties in which any of the following entities is a party or represents a party covered by 5 C.F.R. § 2635.502:

**BILL** FILL IN ANY CLIENT FOR WHOM YOU HAVE WORKED WITHIN THE PAST YEAR

In order to help ensure that I do not participate in matters relating to any of the entities listed above, I have taken or will take the following steps:

{PAGE }

1. I have instructed Tamara Brightwell to screen all SEC 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.
2. I will provide Tamara Brightwell with a copy of this memorandum so that they may fully understand the purpose and scope of my recusal obligations and this screening arrangement. In order to help ensure that I do not inadvertently participate in matters from which I should be recused, I am directing her to seek the assistance of an agency ethics official if she is ever uncertain whether or not I may participate in a matter.
3. I will provide a copy of this memorandum to my principal subordinates. In consultation with an agency ethics official, I will revise and update this memorandum whenever that is warranted by changed circumstances, including changes in my financial interests, my personal or business relationships, or the nature of my official duties.
4. In the event of any changes to this screening arrangement, I will provide a copy of the revised screening arrangement memorandum to you and Tamara Brightwell and my principal subordinates.

On May 12, 2017, at 5:58 PM, Hinman, William <[REDACTED]> wrote:

Shira

Here is the client list.

I left this in draft for now for your review. Thanks- Have a great weekend

Bill

**To:** Hinman, William [REDACTED]  
**Cc:** Brightwell, Tamara [REDACTED]; Serrano, Danae [REDACTED]  
**From:** Minton, Shira  
**Sent:** 2017-05-12T18:21:57-04:00  
**Importance:** Normal  
**Subject:** Re: Documents  
**Received:** 2017-05-12T18:21:58-04:00

Thanks Bill!

Sent from my iPhone

**To:** Minton, Shira [REDACTED]  
**From:** Hinman, William  
**Sent:** 2017-05-16T19:22:47-04:00  
**Importance:** Normal  
**Subject:** Retirement event and for CD  
**Received:** 2017-05-16T19:22:47-04:00

Dear Shira,

I have the CD nearly finished. Need to confirm a couple of share numbers.

Also this is to confirm that we discussed my upcoming retirement party from STB and that I am clear to attend.

Thanks

Bill

**To:** Hinman, William [REDACTED]  
**From:** Minton, Shira  
**Sent:** 2017-05-17T07:54:24-04:00  
**Importance:** Normal  
**Subject:** RE: Retirement event and for CD  
**Received:** 2017-05-17T07:54:25-04:00

Bill your attendance at the event is permissible under an exception to the gift prohibition in the Government wide Standards of conduct. - S