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Collection: Counsel to the President, Office of the:
Appointee Files
Folder Title: William E. Brock,
Secretary-DOL (1)
Box: CFOA 891

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Last Updated: 5/22/2024

THE UNITED STATES TRADE REPRESENTATIVE
WASHINGTON
20506

March 22, 1985

MEMO FOR: FRED F. FIELDING
FROM: WILLIAM E. BROCK
SUBJECT: Personal Data Statement

1. William Emerson Brock, III
2. Date of Birth: 11/23/30 - Chattanooga, Tennessee. Social Security No. Number 414-46-6603
3. U. S. Trade Representative, 600 17th Street, N.W. Washington, D.C. 20506 - telephone: (202) 395-3204
4. 2740 32nd Street, N.W., Washington, D. C. 20008 (202) 965-1846
5. Myself

6. Washington & Lee University, Lexington, Virginia, B.S. Commerce

7. *National Endowment for Democracy - Washington, D. C., Director

- *The Hand Foundation - Chattanooga, Tennessee, Director

- *St. Albans School - Washington, D. C., Director

- *The Hudson Institute - Indianapolis, Indiana, Public Director

- *Big Brothers & Big Sisters - Philadelphia, Pennsylvania, Director

- *Council on Foreign Relations - New York, New York, Member

- *Freedoms Foundation - Valley Forge, Pennsylvania, Director

Brock Candy Company, Chattanooga, Tennessee, Shareholder

Int'l Management & Development Institute, Washington, D.C., Member

American Legion - Chattanooga, Tennessee, Member

Previous Associations

Green Acres of America, Chattanooga, Tennessee, part owner

Democracy Program, Washington, D.C., Chairman

Trilateral Commission, New York, Member

American Enterprise Institute, Washington, D.C., Member

Brookings Institution, Washington, D.C., Member

Woodrow Wilson Center, Washington, D.C., Resident Scholar

American Political Foundation, Washington, D.C., Chairman

Future Business Leaders of America, - Washington, D. C., Chairman

Poconos Skyland Development Co. - Poconos, Pennsylvania, Owner

70001 - Washington, D.C., Honorary Director

8. Cameelious, Inc., Dover Delaware - President, Corporation owns a pleasure boat. (See Financial Disclosure Report - attached)

9. None

is money to be appointed

Jim will propose to receive himself on labor issue.

NO compensation

has no knowledge of the assets in the foundation

his role is determine the objects of Charlotte Library

1985

[illegible]

1985

[illegible]

NOTE 1 - Tax Parcel 28-4.13. This parcel includes approximately 0.2 acres which were deeded to The First Presbyterian Church in Chattanooga, in 1984.

THE WHITE HOUSE

WASHINGTON

March 20, 1985

MEMORANDUM FOR: AMBASSADOR WILLIAM BROCK

FROM: FRED F. FIELDING 
COUNSEL TO THE PRESIDENT

SUBJECT: Personal Data Statement

As part of the clearance procedures for your prospective appointment, please answer all of the following questions. For questions 7-12, inclusive, please supply information as it pertains to you, your spouse and any relatives living in your immediate household. In addition, in responding to the other questions, please supply any information regarding your spouse or relatives that you deem to be relevant. Your responses to this questionnaire, which is not subject to public disclosure, will remain confidential.

Because your appointment cannot be finalized until all necessary reviews have been completed, please supply this information at your earliest convenience.

If you have any questions or need assistance in responding to this questionnaire, please do not hesitate to contact this Office. Thank you for your cooperation.

* * * * *

1. Full name.
2. Date and place of birth and social security number.
3. Current position and business address and telephone number.
4. Home address and telephone number.
5. Name of person to contact (if other than yourself) with regard to clearance matters, and home and office telephone numbers for that person.
6. Schools attended beyond high school, degrees awarded and dates thereof.
7. The names of all corporations, firms, partnerships or other business enterprises, and all nonprofit organizations and other institutions with which you are now, or during the past three years have been, affiliated as an officer, owner, director, trustee, partner, advisor, attorney or consultant. In addition, please provide the

names of any other organizations with which you were affiliated prior to the past three years that might present a potential conflict or appearance of conflict of interest with your prospective appointment. (Please note that in the case of an attorney's client listing, it is only necessary to provide the names of major clients and those that might present a potential conflict or appearance of conflict of interest with the prospective appointment).

Those organizational affiliations that you plan to continue during your Government service should be noted with an asterisk.

8. The names of all corporations, firms or other business enterprises, partnerships, nonprofit organizations and educational or other institutions in which you presently have any continuing financial interest through ownership of stock, stock options, bonds or other arrangements, including a trust, pension or retirement plan, stock bonus, profit-sharing or other arrangement as a result of any prior employment or business or professional association. Also supply such details as are necessary for a thorough understanding of such continuing financial interests. Any interests you plan to retain during your Government service should be noted with an asterisk. (If the position to which you are being appointed requires the filing of an Executive Personnel Financial Disclosure Report ["Standard Form 278"], you may omit this question.)
9. The names of any creditors (other than those to whom you may be indebted by reason of a mortgage on property used as a personal residence, or for current and ordinary living expenses), setting forth the amount of such debt and any additional information deemed relevant to explain the transaction. (If the position to which you are being appointed requires the filing of a Standard Form 278, you may omit this question. Regardless of whether you are required to file a Standard Form 278, however, please include [and so note] any debts for which you are contingently liable, loans on which you are a guarantor, etc.)
10. The names of any debtors, setting forth the amount owed to you and any additional information deemed relevant to explain the transaction. You need not include loans to your spouse, dependents or siblings for non-business purposes. Please exclude all debts under \$5,000.
11. All your interests in real property, other than a personal residence, setting forth the nature of your interest, the type of property and the address.


12. List direct involvement through contracts, provision of consulting services, etc., that you or your current business has with the Federal Government. Please specify the agency or agencies involved.
13. The details of any contractual or informal arrangement you may have with any person or any business enterprise in regard to future employment.
14. Any employee fringe benefits you are now receiving and would desire to retain during your Government service.
15. Have you or any firm, company or other entity with which you have been associated ever (1) registered as an agent of a foreign principal; (2) requested and received an exemption from such registration requirements; or (3) acted as an agent of a foreign government? If so, please give full details (e.g., date of registration, request for exemption, or notice provided to the Secretary of State concerning service as an agent of a foreign government; name in which filing was made; name of foreign principal; identity of country involved; and, if applicable, date representation was terminated).
16. Have you or any firm, company or other entity with which you have been associated ever been convicted of a violation of any Federal, state, county or municipal law, regulation or ordinance? If so, please give full details (do not include traffic violations for which a fine of \$25.00 or less was imposed).
17. Have you or any firm, company or other entity with which you have been associated ever been the subject of Federal, state or local investigation for possible violation of a criminal statute? If so, please give full details.
18. Has a tax lien or other collection procedure ever been instituted against you by Federal, state or local authorities? If so, please give full details.
19. Have you ever been involved in civil or criminal litigation, or in administrative or legislative proceedings of any kind, either as a plaintiff, defendant, respondent, witness or party in interest? If so, please give full details.
20. Have you ever been disciplined or cited for a breach of ethics or unprofessional conduct by, or been the subject of a complaint to, any court, administrative agency, professional association, disciplinary committee or other professional group? If so, please give full details.

21. Have you ever run for political office, served on a political committee or been identified in a public way with a particular organization, candidate or issue? If so, please describe.
22. Have you ever been publicly identified, in person or by organizational membership, with a particularly controversial */ national or local issue? If so, please describe.
23. Have you ever submitted oral or written views to any government authority (executive or legislative) or the news media on any particularly controversial */ issue other than in an official governmental capacity? If so, please describe.
24. Have you ever written any particularly controversial */ books or articles? If so, please describe.
25. Have you ever had any association with any person, group or business venture that could be used, even unfairly, to impugn or attack your character and qualifications for this position?
26. Do you know anyone who might take any steps, overtly or covertly, to attack your appointment? If so, please identify and explain the basis for the potential attack.
27. Please provide any other information that could be a possible source of embarrassment to you, your family or the President, if publicly known.

*/ Reference to "particularly controversial" is intended to focus on issues that could be used, even unfairly, against you.

THE UNITED STATES TRADE REPRESENTATIVE
WASHINGTON
20506

March 22, 1985

MEMO FOR: FRED F. FIELDING
FROM: WILLIAM E. BROCK 
SUBJECT: Personal Data Statement

1. William Emerson Brock, III
2. Date of Birth: 11/23/30 - Chattanooga, Tennessee. Social Security No. Number 414-46-6603
3. U. S. Trade Representative, 600 17th Street, N.W. Washington, D.C. 20506 - telephone: (202) 395-3204
4. 2740 32nd Street, N.W., Washington, D. C. 20008 (202) 965-1846
5. Myself

6. Washington & Lee University, Lexington, Virginia, B.S. Commerce
7.
 - *National Endowment for Democracy - Washington, D. C., Director
 - *The Hand Foundation - Chattanooga, Tennessee, Director
 - *St. Albans School - Washington, D. C., Director
 - *The Hudson Institute - Indianapolis, Indiana, Public Director
 - *Big Brothers & Big Sisters - Philadelphia, Pennsylvania, Director
 - *Council on Foreign Relations - New York, New York, Member
 - *Freedoms Foundation - Valley Forge, Pennsylvania, Director

BEEN AROUND
for 1 1/2 yrs.

Created by Fed. legislation - funded by tax \$ -

NO COMPENSATION
desired.

Talk to
Bud McFarlane

Brock Candy Company, Chattanooga, Tennessee, Shareholder
Int'l Management & Development Institute, Washington, D.C., Member
American Legion - Chattanooga, Tennessee, Member

Previous Associations

Green Acres of America, Chattanooga, Tennessee, part owner
Democracy Program, Washington, D.C., Chairman
Trilateral Commission, New York, Member
American Enterprise Institute, Washington, D.C., Member
Brookings Institution, Washington, D.C., Member
Woodrow Wilson Center, Washington, D.C., Resident Scholar
American Political Foundation, Washington, D.C., Chairman
Future Business Leaders of America, - Washington, D. C., Chairman
Poconos Skyland Development Co. - Poconos, Pennsylvania, Owner
70001 - Washington, D.C., Honorary Director

8. Cameelious, Inc., Dover Delaware - President, Corporation owns a pleasure boat. (See Financial Disclosure Report - attached)
9. None

- 14.
10. None
 11. 640 Acres in Bozeman, Montana (\$267,000)
17.61 acres on West River, Annapolis, Maryland (\$90,000)
357 S. Washington St., Sarasota, Florida (\$140,000) - rental
Hamilton County, Tennessee (appraisal list attached)
 12. None
 13. None
 14. Pension rights and health and life insurance
 15. No
 16. No
 17. No
 18. No
 19. Yes - George Agree vs. American Political Foundation (civil)
RNC, Ripon Society & ACLU vs. FEC - 1977
L.W. McCormick vs. William E. Brock (civil not pursued) - 1977; suit for fiduciary fee.
Testified numerous times before the House of Representatives and
U.S. Senate on controversial issues
 20. No
 21. Yes - Candidate to the House of Representative in 1962, 1964, 1966
and 1968 (and elected). Candidate for United States Senate in 1970
and 1976 (elected in 1970 and defeated in 1976). Candidate and
elected Chairman of Republican National Committee in January 1977,
and reelected in January 1979.
 22. No.
 23. No
 24. No
 25. No
 26. No
 27. None

1985

PARCEL NUMBER	DESCRIPTION	PRIOR YEAR		CURRENT YEAR		
		APPRAISAL	ASSESSMENT	APPRAISAL	RATIO	ASSESSMENT
In Name of W. E. Brock, III						
Lee Pike						
(A) 28-4.13	Remainder lot; Tract Lee Pike:					
(Note 1)	Land	1,800	100	-0-		-0-
In Name of W. E. Brock, III and Laura H. Brock						
Hermitage Avenue						
(B) 167H-D-20	Lots 7, 8 and 9, Block T, Lookout Mountain Addition No. 1:					
	Land	27,830	7,000	27,830	25	7,000
	Improvements	<u>55,100</u>	<u>13,700</u>	<u>55,100</u>	25	<u>13,700</u>
	Total	<u>82,930</u>	<u>20,700</u>	<u>82,930</u>		<u>20,700</u>
1.11 acre	\$767,000 600 ac					
17.11 ac rd off						
1.11 ac River						
1.11 ac 895,000.						

1985

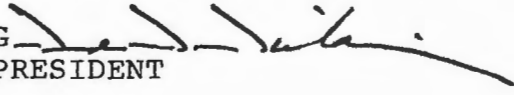
[illegible]

THE WHITE HOUSE

WASHINGTON

March 20, 1985

MEMORANDUM FOR: AMBASSADOR WILLIAM BROCK

FROM: FRED F. FIELDING 
COUNSEL TO THE PRESIDENT

SUBJECT: Personal Data Statement

As part of the clearance procedures for your prospective appointment, please answer all of the following questions. For questions 7-12, inclusive, please supply information as it pertains to you, your spouse and any relatives living in your immediate household. In addition, in responding to the other questions, please supply any information regarding your spouse or relatives that you deem to be relevant. Your responses to this questionnaire, which is not subject to public disclosure, will remain confidential.

Because your appointment cannot be finalized until all necessary reviews have been completed, please supply this information at your earliest convenience.

If you have any questions or need assistance in responding to this questionnaire, please do not hesitate to contact this Office. Thank you for your cooperation.

* * * * *

1. Full name.
2. Date and place of birth and social security number.
3. Current position and business address and telephone number.
4. Home address and telephone number.
5. Name of person to contact (if other than yourself) with regard to clearance matters, and home and office telephone numbers for that person.
6. Schools attended beyond high school, degrees awarded and dates thereof.
7. The names of all corporations, firms, partnerships or other business enterprises, and all nonprofit organizations and other institutions with which you are now, or during the past three years have been, affiliated as an officer, owner, director, trustee, partner, advisor, attorney or consultant. In addition, please provide the

names of any other organizations with which you were affiliated prior to the past three years that might present a potential conflict or appearance of conflict of interest with your prospective appointment. (Please note that in the case of an attorney's client listing, it is only necessary to provide the names of major clients and those that might present a potential conflict or appearance of conflict of interest with the prospective appointment).

Those organizational affiliations that you plan to continue during your Government service should be noted with an asterisk.

8. The names of all corporations, firms or other business enterprises, partnerships, nonprofit organizations and educational or other institutions in which you presently have any continuing financial interest through ownership of stock, stock options, bonds or other arrangements, including a trust, pension or retirement plan, stock bonus, profit-sharing or other arrangement as a result of any prior employment or business or professional association. Also supply such details as are necessary for a thorough understanding of such continuing financial interests. Any interests you plan to retain during your Government service should be noted with an asterisk. (If the position to which you are being appointed requires the filing of an Executive Personnel Financial Disclosure Report ["Standard Form 278"], you may omit this question.)
9. The names of any creditors (other than those to whom you may be indebted by reason of a mortgage on property used as a personal residence, or for current and ordinary living expenses), setting forth the amount of such debt and any additional information deemed relevant to explain the transaction. (If the position to which you are being appointed requires the filing of a Standard Form 278, you may omit this question. Regardless of whether you are required to file a Standard Form 278, however, please include [and so note] any debts for which you are continuously liable, loans on which you are a guarantor, etc.)
10. The names of any debtors, setting forth the amount owed to you and any additional information deemed relevant to explain the transaction. You need not include loans to your spouse, dependents or siblings for non-business purposes. Please exclude all debts under \$5,000.
11. All your interests in real property, other than a personal residence, setting forth the nature of your interest, the type of property and the address.

12. List direct involvement through contracts, provision of consulting services, etc., that you or your current business has with the Federal Government. Please specify the agency or agencies involved.
13. The details of any contractual or informal arrangement you may have with any person or any business enterprise in regard to future employment.
14. Any employee fringe benefits you are now receiving and would desire to retain during your Government service.
15. Have you or any firm, company or other entity with which you have been associated ever (1) registered as an agent of a foreign principal; (2) requested and received an exemption from such registration requirements; or (3) acted as an agent of a foreign government? If so, please give full details (e.g., date of registration, request for exemption, or notice provided to the Secretary of State concerning service as an agent of a foreign government; name in which filing was made; name of foreign principal; identity of country involved; and, if applicable, date representation was terminated).
16. Have you or any firm, company or other entity with which you have been associated ever been convicted of a violation of any Federal, state, county or municipal law, regulation or ordinance? If so, please give full details (do not include traffic violations for which a fine of \$25.00 or less was imposed).
17. Have you or any firm, company or other entity with which you have been associated ever been the subject of Federal, state or local investigation for possible violation of a criminal statute? If so, please give full details.
18. Has a tax lien or other collection procedure ever been instituted against you by Federal, state or local authorities? If so, please give full details.
19. Have you ever been involved in civil or criminal litigation, or in administrative or legislative proceedings of any kind, either as a plaintiff, defendant, respondent, witness or party in interest? If so, please give full details.
20. Have you ever been disciplined or cited for a breach of ethics or unprofessional conduct by, or been the subject of a complaint to, any court, administrative agency, professional association, disciplinary committee or other professional group? If so, please give full details.

21. Have you ever run for political office, served on a political committee or been identified in a public way with a particular organization, candidate or issue? If so, please describe.
22. Have you ever been publicly identified, in person or by organizational membership, with a particularly controversial */ national or local issue? If so, please describe.
23. Have you ever submitted oral or written views to any government authority (executive or legislative) or the news media on any particularly controversial */ issue other than in an official governmental capacity? If so, please describe.
24. Have you ever written any particularly controversial */ books or articles? If so, please describe.
25. Have you ever had any association with any person, group or business venture that could be used, even unfairly, to impugn or attack your character and qualifications for this position?
26. Do you know anyone who might take any steps, overtly or covertly, to attack your appointment? If so, please identify and explain the basis for the potential attack.
27. Please provide any other information that could be a possible source of embarrassment to you, your family or the President, if publicly known.

*/ Reference to "particularly controversial" is intended to focus on issues that could be used, even unfairly, against you.

THE WHITE HOUSE
WASHINGTON

Date 4.2.85

Suspense Date _____

MEMORANDUM FOR: *Larry*

FROM: **DIANNA G. HOLLAND**

ACTION

- _____ Approved
- _____ Please handle/review
- _____ For your information
- _____ For your recommendation
- _____ For the files
- _____ Please see me
- _____ Please prepare response for
_____ signature
- _____ As we discussed
- _____ Return to me for filing

COMMENT

THE WHITE HOUSE

WASHINGTON

WHITE HOUSE
SECURITY OFFICE

APR 2 1985

FYI only

TO: Jane Dannenhauer

M.B. Oglesby

Katja Bullock

FROM: Nancy Perot, Presidential Personnel

Please start appropriate clearance for the following prospective nominee and return clearance/comments to 142 OEOB, X2780. Thank you.

William E. Brock

2743 32nd Street NW

Washington, D.C. 20008

Date of Birth 11/23/30

Place of Birth Chatanooga, TN

who is under serious consideration for appointment as

Secretary of Labor, Department of Labor

(PAS)

Recommended by _____

Associate Director

Kathie Regan

Senior Staff 3/28/85

President 4/1/85

Announcement 3/20/85

Full Field _____

Nomination Memo _____

THE WHITE HOUSE
WASHINGTON

WHITE HOUSE
SECURITY OFFICE

APR 2 1985

PREPARED BY: Karen M. Pitts

DATE: March 27, 1985

NAME: William E. Brock

PARTY: Republican

POSITION: Secretary

TYPE: PAS: X PA: SES: FT X /PT TERM:

VICE: Raymond J. Donovan

CURRENT HOME ADDRESS:

2743 32nd Street, NW
Washington, D.C. 20008

SEX: M DOB: 11/23/30

BIRTHPLACE: Chattanooga, TN

RESIDENCE PHONE: 202/965-1846

1980 VOTING STATE: TN

FOR NOMINATION, IF DIFFERENT
STATE FROM ABOVE: TN

SSAN: 494-46-6603

CURRENT POSITION/ADDRESS:

U.S. Trade Representative
1800 G Street, NW
Washington, D.C. 20506

RACE: Caucasian

ETHNIC HERITAGE: Anglo Saxon

OFFICE PHONE: 202/395-3204

FAMILY:

SPOUSE: Laura (Muffet) Handly
CHILDREN: Three sons, One
daughter

PRIOR POSITION HELD:

Chairman, Republican
National Committee

PREVIOUS PRESIDENTIAL APPTS:

MILITARY SERVICE:

United States Navy

EDUCATION:

B.S.; Washington and Lee
University, 1953

Senator Bill Brock

Chairman, Republican National Committee

WHITE HOUSE
SECURITY OFFICE OCT 28 1980

APR 2 1985

Republican National Chairman Bill Brock was born in Chattanooga, Tennessee on November 23, 1930. He attended Washington and Lee University in Lexington, Virginia, where he earned a B.S. degree in 1953. Following his military service as an officer in the United States Navy, Bill Brock became associated with the Brock Candy Company in Chattanooga as a marketing executive. In 1957 he married the former Laura (Muffet) Handy and they have been blessed with four children, Bill, Oscar, Hutchee, and John.

In 1960 at the age of 30, he and several colleagues, disillusioned with one-party rule in Tennessee, revitalized the 3rd District (Chattanooga) Republican Committee and the state Young Republican Federation. Starting at the grass-roots, Brock built a strong precinct program where friends and business associates were asked to "get involved" by participating in the political process.

The response to the "get involved" campaign was encouraging, and with much hard door-to-door work, a growing volunteer organization emerged. Financial support for the political organization increased so that the Central Committee was able to hire a full-time executive director. Two years later, in 1962 Bill Brock became the first Republican to be elected to Congress since 1920, from the third district of Tennessee.

Bill Brock devoted himself to building the Republican Party in Tennessee, extending the "people-to-people" program statewide and involving thousands of new volunteers, and his efforts kept paying bigger and bigger dividends. The number of Republicans in the Tennessee legislature grew from 27 in 1962 to 32 in 1964, and to 47 in 1966, the year Ward Baker became Tennessee's first Republican Senator since Reconstruction. In 1968 Republicans carried the state for their presidential nominee and elected 62 Republicans to the state legislature, a majority of the State Assembly.

In 1970, after four terms in Congress, Bill Brock challenged three-term Democrat Albert Gore for the U. S. Senate. Drawing upon his "people-to-people" experience in building the Hamilton County and Tennessee Republican parties, Bill Brock involved some 10,000 volunteers in his campaign, most of them young people, and won an upset victory. Elected with him in 1970 were Winfield Dunn, Tennessee's first Republican Governor in half a century, and 5 of the 8 Republican Congressional candidates.

Senator Bill Brock's interest in Party-building continued undiminished at the national level as well. In 1972 he headed the National Young Voters Program which mobilized some 500,000 volunteers nationwide. The Republicans won a majority of the 18 to 24 year-old vote that year, which was considered a near miracle by most political observers, who had expected the youth vote to go overwhelmingly to Senator McGovern.

In 1974 Bill Brock was selected by his GOP colleagues to head the Republican Senatorial Campaign Committee. In that post, he brought about an unprecedented level of cooperation among the Senatorial Committee, the Congressional Committee, and the RNC. For the first time, these groups shared field staff and eliminated duplicative efforts.

In 1977 the Republican Party turned to Bill Brock to lead its efforts to restore its grass roots, expand its base, and re-earn the support of a majority of the American people, electing him as its National Chairman.

THE WHITE HOUSE

WASHINGTON

April 3, 1985

Dear Ambassador Brock:

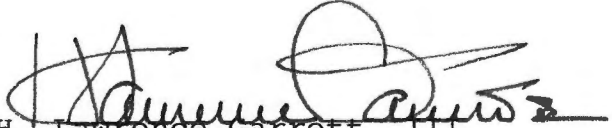
Congratulations on your prospective appointment as Secretary of the Department of Labor. In conjunction with your prospective appointment, I would ask that you complete the enclosed forms and return them to me at your earliest convenience.

With regard to the Personal Data Statement (PDS), you may respond in memorandum form, addressed to Mr. Fielding; the questions need not be repeated. As the questions on the Executive Personnel Financial Disclosure Report (SF-278) have generated many questions, please do not hesitate to contact me if the need arises. My telephone number is (202) 456-6257.

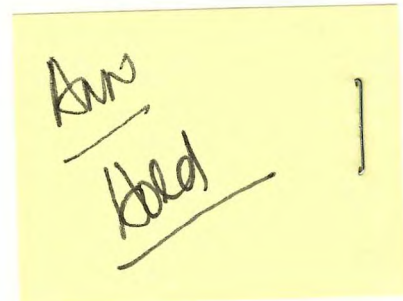
I have also enclosed memoranda outlining how the conflict of interest laws apply to one in your position.

Again, my congratulations.

Sincerely,


H. Lawrence Garrett, III
Associate Counsel to the
President

The Honorable William E. Brock
United States Trade Representative
The White House
Washington, D.C. 20500



SECRETARY OF LABOR

Department of Labor

AUTHORITY: 29 U.S.C. 551

METHOD: Nominated to the Senate

TERM: Pleasure of the President

SALARY: Level I (5 U.S.C. 5312)

NOTE: E.O. 10513 of 1/19/54 prescribes the order of succession.

THE WHITE HOUSE

WASHINGTON

April 19, 1985

APPOINTMENT PROCESS PERSONAL INTERVIEW RECORD

DATE OF INTERVIEW: No Interview Conducted

CANDIDATE: Ambassador William E. Brock

POSITION: Secretary of Labor

INTERVIEWER: H. Lawrence Garrett, III

COMMENTS:

Ambassador Brock currently serves as the United States Trade Representative with the rank of Ambassador, having continuously served in that position since his appointment by President Reagan on January 22, 1981. From 1977 until his appointment as the United States Trade Representative, Ambassador Brock served as the Chairman of the Republican National Committee. From 1974 until 1977, he headed the Republican Senatorial Campaign Committee. In 1970, after four terms in Congress, Ambassador Brock was elected to the Senate. Prior to his entry into national politics, he was associated with the Brock Candy Company in Chattanooga, TN.

If confirmed, Ambassador Brock will serve as the Secretary of Labor, appointed by the President, by and with the advice and consent of the Senate, pursuant to the provisions of 29 U.S.C. § 551. The purpose of the Department of Labor is to foster, promote, and develop the welfare of wage earners of the United States, to improve their working conditions, and to advance their opportunities for profitable employment. The Secretary of Labor serves at the pleasure of the President.

Review of Ambassador Brock's financial disclosure report reveals the existence of approximately 17 separate trusts. Two of these trusts are qualified blind trusts created in April 1981, shortly after Ambassador Brock assumed his duties as the United States Trade Representative. The remaining trusts are "old family trusts" which were, until the Ethics in Government Act of 1978 was amended in 1983, incapable of being "blinded." Section 202f(7) of the Ethics in Government Act now provides that any such trust may be considered to be a "qualified blind trust" if "the trust instrument is amended to comply with the requirements of [(5 U.S.C. app. § 202f(3))] or, in the case of a trust instrument which does not, by its terms, permit amendment, the trustee, the reporting individual, and any other interested party agree in writing that the trust shall be administered in accordance with the requirements of [5 U.S.C. app. § 202f(3)] and the trustee of such trusts meets the requirements of [5 U.S.C. app. § 202f(3)(A)]."

Because the assets contained in the aforementioned trusts consist primarily of common stock in a substantial number of varying corporate entities, many of which will, in my opinion, and in the opinion of the Solicitor of the Department of Labor, present Ambassador Brock with potential conflicts of interest; upon my recommendation, Ambassador Brock has agreed to undertake to blind all of these trusts pursuant to the provisions of 5 U.S.C. app. § 202(f)(7). Notwithstanding the conversion of these trusts to the equivalent of qualified blind trusts, the "blinded" assets will continue to constitute financial interests of the reporting individual for the purposes of section 208 of Title 18, United States Code. (5 U.S.C. app. § 202(f)(4)(A)). Accordingly, an analysis by Department of Labor attorneys is currently underway to determine the scope of any waiver which may be necessary to allow Ambassador Brock to function effectively as the Secretary of Labor. I spoke to Mr. Jim Frierson of Ambassador Brock's staff and he represented, on behalf of Ambassador Brock, that the Ambassador would recuse himself from participating in "case, or controversy specific issues" as the Secretary of Labor. Such recusal will be at the Ambassador's discretion, however, and he will reserve the right to divest himself of any offending financial interest rather than disqualify himself from participation in a particular matter as the Secretary of Labor.

At some point in the near future, I will make a recommendation to the Counsel to the President that the President issue Ambassador Brock a "generic waiver" under the provisions of 18 U.S.C. § 208(b) specifically to allow him to participate as the Secretary of Labor in broad policy matters and the issuance of regulations affecting an entire industry or industries, notwithstanding the fact that reposing in one or more of his blind trusts will be common stock from an entity which may be directly and predictably effected by such participation.

Review of Ambassador Brock's responses to the questions on the Personal Data Statement reveals no information of a potentially embarrassing or controversial nature. He does report that he wishes to maintain the following positions: Director, National Endowment for Democracy; Director, the Hand Foundation; Director, St. Alban's School; Public Director, the Hudson Institute; Director, Big Brothers and Big Sisters; member, Council on Foreign Relations; and Director, Freedom's Foundation. Ambassador Brock will, in regard to the National Endowment for Democracy, recuse himself from participating in any labor issues which may come before the Endowment. The Hand Foundation is a family foundation which generates income for the Brock's to donate to charity. Mr. Hunter Heggie, Ambassador Brock's attorney

and Mr. Jim Frierson, who serves with him in the Office of the U.S. Trade Representative, both advised that Ambassador Brock has no knowledge of the assets in the Foundation; his role is solely to determine the objects of charitable giving. The Ambassador receives no compensation for serving in any of the aforementioned positions and I see no potential for actual or apparent conflicts of interest arising out of the his continuation of those relationships. Since Ambassador Brock has continuously served as the U.S. Trade Representative since his appointment in January 1981, I did not conduct a personal interview in this instance, but rather relied upon my review of the materials he most recently submitted, together with a review of the information he submitted in relation to his earlier appointment and, my discussions with members of his staff, his personal attorney, and the Solicitor of the Department of Labor and members of his staff.

No matters of a potentially embarrassing or controversial nature were revealed during the course of my review of all of the information submitted by Ambassador Brock.

Accordingly, assuming successful completion of all other background checks, I reaffirm my earlier recommendation that this nomination go forward. Ambassador Brock's original financial disclosure report has been forwarded for review to the Office of the Solicitor, Department of Labor; draft copies have been forwarded for preliminary review to the Office of Government Ethics.

DRAFT

- 2 -

In any event, it is my view that the conditions set forth in this waiver are adequate to assure full protection of the public interest. Accordingly, it is my finding that the interests listed on the attachment to this memorandum are not so substantial as to affect the integrity of the services to be rendered by you.

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For the foregoing reasons, I am hereby granting you this limited waiver in accordance with 18 U.S.C. 208(b)(1) to engage in the following official activities insofar as they may affect the interests listed on the attachment: the setting of policy (including enforcement policy), the making of legislative recommendations and other legislative matters, rulemaking, and administrative matters. This waiver does not apply to particular investigations; or to individual exemptions, advisory opinions, variances, enforcement actions, litigation, grants, contracts or other particular matters in which the listed interests are parties, subjects, applicants, petitioners, respondents or defendants. In situations not covered by this waiver you must either divest the interest or recuse yourself whenever your participation would constitute a violation of 18 U.S.C. 208(a), as discussed earlier in this memorandum.

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allow

Finally, as noted above, I respect your concern for avoiding the appearance of impropriety in carrying out your important duties. The Department of Labor's ethics and conduct regulations reflect this concern in providing for the avoidance of apparent conflict-of-interest situations on the part of Labor Department officials. I therefore understand that there may be situations in which it will be appropriate for you to recuse yourself from participation in a particular matter, notwithstanding the applicability of this waiver.

Attachment

DRAFT

MEMORANDUM FOR WILLIAM E. BROCK, III
FROM: RONALD REAGAN
SUBJECT: Waiver of 18 U.S.C. 208

This memorandum provides you with a limited waiver under 18 U.S.C. 208 in the exercise of your authority and responsibilities as Secretary of Labor.

~~I share your view that adherence to the highest ethical standards is essential in maintaining public confidence in the integrity of the government. I am aware that you have already taken some actions and are planning to take other steps to assure that in carrying out your responsibilities as Secretary of Labor you will avoid even the appearance of any conflict of interest.~~ It is my understanding that you have already established two qualified blind trusts. I further understand that you intend to convert other trusts in which you and your family have beneficial interests into qualified blind trusts, which are subject to approval by the Office of Government Ethics. The future acquisitions of qualified trusts would therefore present no conflict-of-interest issues as you perform your official duties.

As you know, current blind trust assets as well as other non-trust interests are fully subject to the provisions of 18 U.S.C. 208. Section 208 prohibits a government official from taking actions which affect the interests which are set forth in its provisions. Should a situation arise involving a potential application of 18 U.S.C. 208, you have agreed either to recuse yourself from taking action or to divest the interest in question where such actions are not governed by a waiver under the statute. I believe that this action on your part is fully appropriate.

It is also my judgment that it is in the public interest to grant you a limited waiver with respect to certain of your activities as Secretary of Labor. I believe it is essential that, to the maximum degree practicable, you be able to bring to bear the full range of your expertise on the wide variety of important issues facing your office. Your official actions in matters of policy and other matters of general applicability would not necessarily contravene the provisions of 18 U.S.C. 208. Any impact on your interests or those of your family may be speculative and may not have a direct and predictable financial impact.

DRAFT

MEMORANDUM FOR WILLIAM E. BROCK, III
FROM: RONALD REAGAN
SUBJECT: Waiver of 18 U.S.C. 208

This memorandum provides you with a limited waiver under 18 U.S.C. 208 in the exercise of your authority and responsibilities as Secretary of Labor.

I share your view that adherence to the highest ethical standards is essential in maintaining public confidence in the integrity of the government. I am aware that you have already taken some actions and are planning to take other steps to assure that in carrying out your responsibilities as Secretary of Labor you will avoid even the appearance of any conflict of interest. It is my understanding that you have already established two qualified blind trusts. I further understand that you intend to convert other trusts in which you and your family have beneficial interests into qualified blind trusts, which are subject to approval by the Office of Government Ethics. The future acquisitions of qualified trusts would therefore present no conflict-of-interest issues as you perform your official duties.

As you know, current blind trust assets as well as other non-trust interests are fully subject to the provisions of 18 U.S.C. 208. Section 208 prohibits a government official from taking actions which affect the interests which are set forth in its provisions. Should a situation arise involving a potential application of 18 U.S.C. 208, you have agreed either to recuse yourself from taking action or to divest the interest in question where such actions are not governed by a waiver under the statute. I believe that this action on your part is fully appropriate.

It is also my judgment that it is in the public interest to grant you a limited waiver with respect to certain of your activities as Secretary of Labor. I believe it is essential that, to the maximum degree practicable, you be able to bring to bear the full range of your expertise on the wide variety of important issues facing your office. Your official actions in matters of policy and other matters of general applicability would not necessarily contravene the provisions of 18 U.S.C. 208. Any impact on your interests or those of your family may be speculative and may not have a direct and predictable financial impact.

DRAFT

- 2 -

In any event, it is my view that the conditions set forth in this waiver are adequate to assure full protection of the public interest. Accordingly, it is my finding that the interests listed on the attachment to this memorandum are not so substantial as to affect the integrity of the services to be rendered by you.

For the foregoing reasons, I am hereby granting you this limited waiver in accordance with 18 U.S.C. 208(b)(1) to engage in the following official activities insofar as they may affect the interests listed on the attachment: the setting of policy (including enforcement policy), the making of legislative recommendations and other legislative matters, rulemaking, and administrative matters. This waiver does not apply to particular investigations; or to individual exemptions, advisory opinions, variances, enforcement actions, litigation, grants, contracts or other particular matters in which the listed interests are parties, subjects, applicants, petitioners, respondents or defendants. In situations not covered by this waiver you must either divest the interest or recuse yourself whenever your participation would constitute a violation of 18 U.S.C. 208(a), as discussed earlier in this memorandum.

Finally, as noted above, I respect your concern for avoiding the appearance of impropriety in carrying out your important duties. The Department of Labor's ethics and conduct regulations reflect this concern in providing for the avoidance of apparent conflict-of-interest situations on the part of Labor Department officials. I therefore understand that there may be situations in which it will be appropriate for you to recuse yourself from participation in a particular matter, notwithstanding the applicability of this waiver.

Attachment

Attachment

DRAFT

American National Bank and Trust Co.
J.P. Morgan and Co.
Texas Comm. Bankshares Inc.
Coca Cola
Temple Inland
Dow Chemical Co.
Minnesota Mng. and Mfg. Co.
American Home Products Corp.
General Electric Co.
Emerson Electric Co.
Harris Corp.
American Express Co.
McDonalds Corp.
Procter and Gamble
Provident Life and Accident Insurance
U.S. Life Corp.
Caterpillar Tractor Co.
Combustion Engineering Inc.
Abbott Labs
Johnson and Johnson Co.
International Business Machine Corp.
Baxter Travenol Labs Inc.
Exxon Corp.
Union Camp Corp.
Eastman Kodak Co.
Browning-Ferris Industries
Time Inc.
Norfolk Southern Corp.
Wal Mart Stores Inc.
Philip Morris Inc.
AMP Inc.
Haystack Limited
Central Illinois Public Suc. Co.
Texas New Mexico Power Co.
Cambridge Electric Light Co.
Institutional Telephone Trust Unit
Union Pacific Corp.
General Foods Corp.
Standard Oil Co. Ind.
Taxaco Inc.
Texas Utilities Co.
Duke Power Co.
Utah Power and Light Co.
Iowa Electric Light and Power Co.
Bell South Corp.
Southwestern Bell corp.
K Mart Corp.
BPF Inc.
Ceco Corp.
DuPont Co.
Carter Hawley Hale Stores Inc.
Revlon Inc.

DRAFT

- 2 -

F.W. Building & Associates (Tenn. partnership)
Pioneer Bank
Texas Industries
M/A Com Inc.
Perkin-Elmer Corp.
Smithkline Corp.
Paradyne Corp.
PHH Group Inc.
ABCD Associates Ltd. Partnership
Gamma Associates Ltd. Partnership
Beta Associates Ltd. Partnership
Airport Associates Ltd. Partnership
Deere & Co.
Citicorp
Freeport McMoran
McGraw Hill Inc.
Standard Oil Co. Ohio
Lookout Mountain Golf Club 4.500% 12/1/91
Shawmut Corp.
Edwards (A G) & Sons

U.S. Department of Labor

Solicitor of Labor
Washington, D.C. 20210

APR 22 1985

Mr. David H. Martin
Director
Office of Government Ethics
Office of Personnel Management
Washington, D.C. 20415

Dear Mr. Martin:

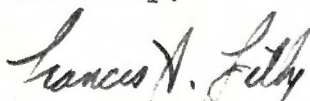
In accordance with the regulations promulgated under Title II of the Ethics in Government Act, at 5 C.F.R. 734.604(c), and as the designated agency ethics official for the Department of Labor, I have reviewed the enclosed financial disclosure report (SF 278) filed by Mr. William E. Brock, III, who has been nominated as the Secretary of Labor. I have the following comments on Mr. Brock's report.

Because of the broad mission of the Department of Labor, it is possible that some of the interests disclosed on Mr. Brock's report could be affected by Labor Department activities. However, the specific impact of any future actions by Mr. Brock on his own financial interests or those of his family would generally be speculative. In order to avoid any such impact, Mr. Brock has undertaken important preventative actions.

As indicated on his report, Mr. Brock has placed certain interests into a qualified blind trust approved by your office. He also intends to submit to your office a request to convert the other family trusts into qualified blind trusts. If approved, this will prevent the trusts' future acquisitions from raising conflict-of-interest issues. In addition, in the absence of any waiver issued under 18 U.S.C. 208(b), we understand that Mr. Brock is willing either to recuse himself from any particular matters involving the listed entities whenever his participation would constitute a violation of 18 U.S.C. 208(a), or to divest the interest involved.

In view of the considerations discussed above, I have signed the certification for Mr. Brock's report.

Sincerely,


Francis X. Lilly

Enclosure

Lilly -

Here are the letters.
We got for Brock. We
need to know when a
decision is made on
the waiver.

Jane

THE UNITED STATES TRADE REPRESENTATIVE

WASHINGTON
20506

April 22, 1985

Mr. David E. Martin, Director
Office of Government Ethics
Office of Personnel Management
Washington, D. C. 20415

Dear Mr. Martin:

I am writing to you in connection with my nomination as Secretary of Labor. As indicated in my financial disclosure report, my family and I have certain financial interests that potentially might be affected by official actions, especially in light of the broad and varied responsibilities of the Secretary of Labor.

As you know, I have already established two qualified blind trusts that have been approved by your office. If confirmed by the Senate, I intend to submit to your office for approval a request to convert the other trusts in which members of my family and I are beneficiaries into qualified blind trusts as soon as possible. If approved, the future acquisitions of these trusts would not present conflict-of-interest issues for me in performing my official duties.

With respect to the trusts' current interests, I recognize that there may be a possibility that some official actions on my part could be viewed as affecting certain financial interests. Accordingly, in the absence of a waiver under 18 U.S.C. 208(b), I propose either to divest the interest involved or to recuse myself whenever my participation would constitute a violation of 18 U.S.C. 208(a).

I hope this information is helpful to you.

Very truly yours,



WILLIAM E. BROCK

WEB:cb

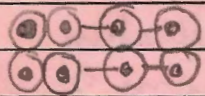
To Larry
 Date 4/16 Time 2:20

WHILE YOU WERE OUT
 M Carol Browning
 of _____
 Phone 3204
 Area Code Number Extension

TELEPHONED	<input checked="" type="checkbox"/>	PLEASE CALL	<input checked="" type="checkbox"/>
CALLED TO SEE YOU	<input checked="" type="checkbox"/>	WILL CALL AGAIN	<input type="checkbox"/>
WANTS TO SEE YOU	<input type="checkbox"/>	URGENT	<input type="checkbox"/>

RETURNED YOUR CALL ☐

Message _____



Operator Dea

To LG
 Date _____ Time 335

WHILE YOU WERE OUT
 M Frank Lilly
 of _____
 Phone 523-7675
 Area Code Number Extension

TELEPHONED	<input checked="" type="checkbox"/>	PLEASE CALL	<input checked="" type="checkbox"/>
CALLED TO SEE YOU	<input type="checkbox"/>	WILL CALL AGAIN	<input type="checkbox"/>
WANTS TO SEE YOU	<input type="checkbox"/>	URGENT	<input type="checkbox"/>

RETURNED YOUR CALL ☐

Message _____

Operator X

• 6 Janz : won a couple.

• Terry Golden :

• They want to call the
IRS →

• They want his permission
to →

•

IRS : ① you permission
to visit agent

doesn't think there
any evil
intentions -
they have
no idea
of what
they're do. { ② all Partners by
project - location
and description of
project.
ownership by each partner.
③

• OBE letters —

To Larry
 Date 4/17 Time 9:07

WHILE YOU WERE OUT

M Hunter Haggie
 of _____
 Phone 65/756-2010

Area Code	Number	Extension
TELEPHONED	<input checked="" type="checkbox"/> PLEASE CALL	<input checked="" type="checkbox"/>
CALLED TO SEE YOU	<input type="checkbox"/> WILL CALL AGAIN	<input type="checkbox"/>
WANTS TO SEE YOU	<input type="checkbox"/> URGENT	<input type="checkbox"/>

RETURNED YOUR CALL ☐

Message _____

Operator Dea

AMPAD
EFFICIENCY®

23-020

To Larry
 Date 4/17 Time 10:10

WHILE YOU WERE OUT

M Hunter Haggie
 of _____
 Phone _____

Area Code	Number	Extension
TELEPHONED	<input checked="" type="checkbox"/> PLEASE CALL	<input type="checkbox"/>
CALLED TO SEE YOU	<input type="checkbox"/> WILL CALL AGAIN	<input type="checkbox"/>
WANTS TO SEE YOU	<input type="checkbox"/> URGENT	<input type="checkbox"/>

RETURNED YOUR CALL ☐

Message re: Amb. Brock
→ clearance on
last 3 trusts
Everything is
a go.

Operator Dea

AMPAD
EFFICIENCY®

23-020

To Larry
 Date 4/17 Time 11:10

WHILE YOU WERE OUT

M Frank Lilly
 of _____
 Phone 523-7675

Area Code	Number	Extension
TELEPHONED	<input checked="" type="checkbox"/> PLEASE CALL	<input checked="" type="checkbox"/>
CALLED TO SEE YOU	<input type="checkbox"/> WILL CALL AGAIN	<input type="checkbox"/>
WANTS TO SEE YOU	<input type="checkbox"/> URGENT	<input type="checkbox"/>

RETURNED YOUR CALL ☐

Message _____

Operator Dea

AMPAD
EFFICIENCY®

23-020