



UNITED STATES OF AMERICA
FEDERAL TRADE COMMISSION
WASHINGTON, D.C. 20580

October 4, 2022

Andrea Beaty
Revolving Door Project
1611 Connecticut Avenue, NW #400,
Washington, DC 20009

Re: FOIA-2022-01578

Dear Ms. Beaty:

This is in response to your request dated September 22, 2022, under the Freedom of Information Act seeking access to an electronic copy of Commissioner Noah Phillips' Signed Notification Statement, including but not limited to, a Notification of Post-Employment Negotiation or Agreement And Recusal Statement. In accordance with the FOIA and agency policy, we have searched our records on September 30, 2022.

The Commission's fee regulations specify that fees less than \$25 will be waived. *See* 16 C.F.R. § 4.8(b)(4). Because the fees associated with the processing of your request did not exceed \$25, we have processed your request free of charge.

We have located 1 page of responsive records. Under the FOIA foreseeable harm standard, we reasonably foresee that full disclosure of the responsive records would harm an interest protected by one or more of the FOIA exemptions applied. 5 U.S.C. 552(a)(8)(A)(i). Therefore, we are partially releasing the responsive record and withholding portions of the records based on the reasons explained below.

I am denying access to any other identifying information found in the record. This information is exempt from release under FOIA Exemption 6, 5 U.S.C. § 552(b)(6), because individuals' right to privacy outweighs the general public's interest in seeing personal identifying information. *See The Lakin Law Firm v. FTC*, 352 F.3d 1122 (7th Cir. 2003).

If you have any questions about the way we handled your request or about the FOIA regulations or procedures, please contact Anthony Ellis at 202-326-3680.

If you are not satisfied with this response to your request, you may appeal by writing to Freedom of Information Act Appeal, Office of the General Counsel, Federal Trade Commission, 600 Pennsylvania Avenue, N.W., Washington, D.C. 20580, or via email at FOIAAppeal@ftc.gov, within 90 days of the date of this letter. Please enclose a copy of your original request and a copy of this response.

You also may seek dispute resolution services from the FTC FOIA Public Liaison Richard Gold via telephone at 202-326-3355 or via e-mail at rgold@ftc.gov; or from the Office of Government Information Services via email at ogis@nara.gov, via fax at 202-741-5769, or via mail at Office of Government Information Services (OGIS), National Archives and Records Administration, 8601 Adelphi Road, College Park, MD 20740. Please note that the FOIA Public Liaison's role relates to comments, questions or concerns that a FOIA Requester may have with or about the FOIA Response. The FOIA Public Liaison's role does not relate to taking action in matters of private controversy nor can he resolve individual complaints.

Sincerely,

/s/ Kamay Lafalaise

Kamay Lafalaise
Acting Assistant General Counsel

NOTIFICATION OF POST-EMPLOYMENT NEGOTIATION OR AGREEMENT AND RECUSAL STATEMENT



Section 17 of the Stop Trading on Congressional Knowledge Act of 2012 (STOCK Act) requires certain employees to file a statement notifying their agency ethics official of any negotiation for or agreement of future employment or compensation with a non-federal entity within three business days after commencement of the negotiation or agreement. Employees who file this notification statement also must file with their agency ethics official a recusal statement whenever there is a conflict of interest or appearance of a conflict of interest with the entity. In any such case, the employee must recuse, unless the employee has first obtained a written waiver or authorization as discussed in 5 C.F.R. § 2635.605, or qualifies for a regulatory exemption pursuant to 18 U.S.C. § 208(b)(2).

NOTIFICATION OF POST-EMPLOYMENT NEGOTIATION OR AGREEMENT

Name of Employee	Noah Phillips
Agency/Office	Federal Trade Commission
Date Negotiation or Agreement Commenced	September 14, 2022
Name(s) of Non-Federal Entity or Entities Disclose each non-federal entity with which you are negotiating for or have an agreement of future employment or compensation.	(b)(6)

RECUSAL STATEMENT

For as long as I am negotiating for or have an agreement of employment or compensation with any entity listed above, I will not participate personally and substantially in any particular matter that has a direct and predictable effect on the financial interests of that entity, unless I first obtain a written waiver or authorization consistent with 5 C.F.R. § 2635.605, or qualify for a regulatory exemption pursuant to 18 U.S.C. § 208(b)(2).

Employee Signature	Date Submitted
 <small>Digitally signed by NOAH PHILLIPS Date: 2022.09.14 09:26:21 -04'00'</small>	9/14/2022
Agency Ethics Official Signature	Date Received
 <small>Digitally signed by LORIELLE PANKEY Date: 2022.09.15 09:49:36 -04'00'</small>	9/15/2022