

Exhibit 14



COUNCIL OF THE DISTRICT OF COLUMBIA
1350 PENNSYLVANIA AVENUE, SUITE 106
WASHINGTON, DC 20004

JACK EVANS
Councilmember, Ward 2
Chair, Committee on Finance and Revenue

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September 21, 2016

Ellen Efros, Esquire
General Counsel
Office of the General Counsel
John A. Wilson Building, Suite 4
1350 Pennsylvania Avenue, NW
Washington, DC 20004

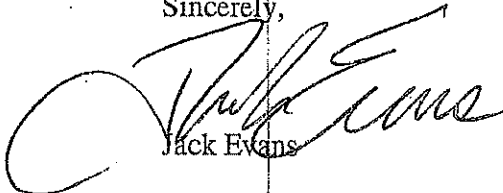
Dear Ellen,

For many years, as a function of my employment outside of my duties as the Councilmember for Ward 2, I have rendered counsel to private-sector clients, but always through my associations with various law firms. There has never been a prohibition against my engagement in this activity nor has there ever been any other issue with my outside employment.

I am now preparing to form my own consulting entity, through which I intend to provide the same kinds of consulting services to private-sector clients that I have been providing for years. However, instead of providing these services through a law firm, I will provide the services on my own. I am fully aware that the BEGA regulations and prohibitions, and the Council's own conflict of interest rules, will continue apply to me (as these regulations always have) and to my new entity. As I have in the past, I will remain fully compliant with all BEGA regulations and prohibitions and with all of the Council's rules. While there is no real distinction or difference between me providing services to private-sector clients through a law firm and me providing such services through my own consulting firm, nevertheless I wanted to bring this matter to your direct attention and get assurance from the Office of the General Counsel that there will be no problems with this new arrangement.

Please confirm that my understandings as detailed above are accurate and that I may proceed as planned, or please let me know what the issues might be with this arrangement. Thank you in advance.

Sincerely,



Jack Evans

JE-SPE-000205



OFFICE OF THE GENERAL COUNSEL
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September 22, 2016

***CONFIDENTIAL AND PRIVILEGED
ATTORNEY-CLIENT COMMUNICATIONS***

The Honorable Jack Evans
Councilmember, Ward 2
1350 Pennsylvania Avenue, NW
Washington, DC 20004

Dear Councilmember Evans,

This letter responds to your letter of September 21, 2016, inquiring of the Office of the General Counsel to the Council of the District of Columbia as to whether your intention to form your own consulting entity and to render consulting services to private-sector clients through such entity is permissible.

As you indicate in your inquiry letter, if you engage in any outside employment, you nevertheless must adhere to the applicable policies and regulations of the DC Board of Ethics and Government Accountability ("BEGA") and to the applicable rules set forth in the Office Code of Conduct for the Council of the District of Columbia with regard to conflicts of interest. Provided that you are in compliance with those policies, rules and regulations, there is no prohibition to you forming a consulting entity through which you will provide consulting services to private sector clients. If you have questions about specific representations as your practice evolves, please feel free to discuss such matters with us on a case by case basis.

Sincerely,

[Redacted Signature]

General Counsel

JE-SPE-000206