


Commodity Futures Trading Commission Executives

PAS, Schedule C and Schedule A Listing

Last Name	First Name	Title	Department/Office	Type	Vacate Date
Behnam	Rostin	Chairman	Office of the Chairman	EX-3	
Mersinger	Summer	Commissioner	Office of Commissioner Mersinger	EX-4	
Goldsmith Romero	Christy	Commissioner	Office of Commissioner Goldsmith Romero	EX-4	
Johnson	Kristin	Commissioner	Office of Commissioner Johnson	EX-4	
Pham	Caroline	Commissioner	Office of Commissioner Pham	EX-4	
Adamske	Steven	Director, Office of Public Affairs, CT-17	Office of Public Affairs	Schedule C	
Hutchison	Clark (Malcolm)	Director, Division of Clearing and Risk, CT-16	Division of Clearing and Risk	Schedule C	
Ames	Patrick (Keaghan)	Senior Advisor, CT-301-15	Office of Commissioner Pham	Schedule C	1/13/2023
Stump	Dawn	Commissioner	Office of Commissioner Stump	EX-4	4/13/2022
Mersinger	Summer	Chief of Staff to Commissioner Stump, CT-15	Office of Commissioner Stump	Schedule C	3/31/2022
Berkovitz	Daniel	Commissioner	Office of Commissioner Berkovitz	EX-4	10/15/2021
Quintenz	Brian	Commissioner	Office of Commissioner Quintenz	EX-4	8/31/2021
Short	Michael	Director, Office of Public Affairs, CT-17	Office of Public Affairs	Schedule C	5/20/2021
Blakey	Darryl	Legislative and Policy Analyst, CT-16	Office of Legislative & Intergovernmental Affairs	Schedule C	4/9/2021
Benison	Thomas	Senior Advisor	Office of the Chairman	Schedule C	3/12/2021
Tarbert	Heath	Commissioner	Office of Commissioner Tarbert	EX-4	3/5/2021
Wilken	Mollie	Public Affairs & Digital Engagement Strategist	Office of Public Affairs	Schedule C	3/5/2021
Tarbert	Heath	Chairman	Office of the Chairman	EX-3	1/21/2021
Millard	Rachel	Deputy Director	Office of Public Affairs	Schedule C	1/19/2021

CERTIFICATION OF ETHICS AGREEMENT COMPLIANCE Senate Confirmed Presidential Appointee		
1. Appointee's Information	a. Appointee's Name:	<small>to be completed by OGL</small> Christy Goldsmith Romero
	b. Position Title:	<small>to be completed by OGL</small> Commissioner
	c. Agency:	<small>to be completed by OGL</small> Commodity Futures Trading Commission
	d. Date Ethics Agreement Signed:	<small>to be completed by OGL</small> September 14, 2021
	e. Date Confirmed:	<small>to be completed by OGL</small> March 28, 2022
	f. Due Date for Certification of Ethics Agreement Compliance:	<small>to be completed by OGL</small> July 5, 2022
2. Resignations	<i>I completed all of the resignations indicated in my ethics agreement before I assumed the duties of my current government position.</i>	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A
3. Divestitures	a. <i>I have completed all of the divestitures indicated in my ethics agreement. I also understand that I may not repurchase these assets during my appointment without OGE's prior approval.</i>	<input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> N/A
	b. <i>I have filed a periodic transaction report, or periodic transaction reports, (OGE Form-T) to disclose the completion of these agreed upon divestitures.</i>	<input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> N/A Filing Date(s) of OGE Form 278-T Report(s):
4. Managed Accounts	<i>If I have a managed account or use the services of an investment professional, I have notified the manager or professional of the limitations indicated in my ethics agreement. In addition, I am continuing to monitor purchases.</i>	<input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> N/A
5. Interim Recusals	<i>I complied with my interim recusal obligations pending the divestitures required by my ethics agreement.</i>	<input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> N/A

<p>6.</p> <p>Recusals</p> <p><i>(Note: These factual statements describe the appointee's current status. They are not intended to modify ethics agreement commitments or create new recusal obligations.)</i></p>	<p>a. <i>As required by 18 U.S.C. § 208, I will continue to recuse from particular matters in which I know I have a personal or imputed financial interest directly and predictably affected by the matter, unless I receive a waiver or qualify for a regulatory exemption.</i></p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No</p>
	<p>b. <i>I am recusing from particular matters in which any former employer or client I served in the past year is a party or represents a party, unless I have been authorized under 5 C.F.R. § 2635.502(d).</i></p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A</p>
	<p>c. <i>I am recusing from particular matters in which any former employer or client I served in the two years prior to my appointment is a party or represents a party, unless I have received a waiver under Exec. Order 13989.</i></p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A</p>
<p>7.</p> <p>Waivers and Authorizations</p> <p>(Consult with your agency's DAEO if uncertain under what authority a waiver or authorization was granted.)</p>	<p>a. <i>I received a waiver pursuant to 18 U.S.C. § 208.</i></p> <p>If yes, indicate the date of the waiver and indicate the financial interest covered by the waiver.</p>	<p><input type="radio"/> Yes <input checked="" type="radio"/> No</p> <p>Date:</p> <p>Financial interest:</p>
	<p>b. <i>I received a waiver pursuant to Executive Order 13989.</i></p> <p>If yes, indicate the date of the waiver and the subject of the waiver (i.e., applicable paragraphs of the ethics pledge, parties, particular matters, specific issue areas, as applicable).</p>	<p><input type="radio"/> Yes <input checked="" type="radio"/> No</p> <p>Date:</p> <p>Subject:</p>
	<p>c. <i>I received an authorization pursuant to 5 C.F.R. § 2635.502(d).</i></p> <p>If yes, indicate date of authorization and identify the covered person(s) as to whom you have been authorized (e.g., former employer, former client, spouse's employer, spouse's current client, etc.).</p>	<p><input type="radio"/> Yes <input checked="" type="radio"/> No</p> <p>Date:</p> <p>Covered person(s):</p>
	<p>d. <i>I received a waiver pursuant to 5 C.F.R. § 2635.503(c).</i></p> <p>If yes, indicate the date of the waiver and identify the former employer or payer.</p>	<p><input type="radio"/> Yes <input checked="" type="radio"/> No</p> <p>Date:</p> <p>Former employer or payer:</p>

<p>8. Payments, Accelerations, or Divestitures Required to be Completed Prior to Entering Government Service</p>	<p>Mark this box if not applicable: <input checked="" type="checkbox"/></p>	<p>a. If I committed that I would forfeit a financial interest or payment, unless it was received or accelerated prior to my assumption of the duties of the government position:</p>	<p><input type="radio"/> I received it (or it was accelerated) <u>prior to</u> my assumption of the duties of the position. <input type="radio"/> I received it (or if was accelerated <u>after</u> my assumption of the duties of the position. <input type="radio"/> I forfeited it.</p>
		<p>b. Financial interest or payment at issue:</p>	
<p>9. Requirements for Regular Appointees</p>	<p>I have completed my initial ethics briefing, pursuant to 5 C.F.R. § 2638.305.</p>		<p><input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A</p>
		<p>I have signed the ethics pledge pursuant to Executive Order 13989.</p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A</p>
<p>10. Additional Ethics Agreement Requirements</p>	<p>to be completed by OGE: I am recusing from particular matters involving Accenture and particular matters involving specific parties where Georgetown University is or represents a party.</p>		<p>to be completed by appointee: I am complying with these requirements as described in the adjacent box: <input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A</p>
<p>11. Comments of Appointee</p>			
<p>Any intentionally false or misleading statement or response provided in this certification is a violation of law punishable by a fine or imprisonment, or both, under 18 U.S.C. § 1001.</p>			
<p>I certify that the information I have provided is complete and accurate.</p>	<p>Appointee's Signature: </p>		<p>Date: 6/14/22</p>

<p>Privacy Act Statement</p>	<p>Section 110 of the Ethics in Government Act of 1978, as amended, requires the reporting of this information. The primary use of the information on this report is for review by Government officials to determine an appointee's compliance with applicable Federal laws and regulations, and the appointee's Ethics Agreement. Failure to provide the requested information may result in notification of lack of compliance to the Senate and the head of the appointee's agency, or the White House, and/or could result in OGE declining to certify the appointee's financial disclosure reports. The appointee could also be required to recuse from matters based on uncertainty as to whether they have divested or resigned from a matter determined to raise potential conflicts.</p> <p>This information will be publically posted to the OGE website at www.oge.gov in accordance with OGE/GOVT-1, Executive Branch Personnel Public Financial Disclosure Reports and Other Name-Retrieved Ethics Program Records (routine use "k."). Please see OGE/GOVT-1 for more information about the maintenance and disclosure of this information.</p>
<p>Filing the Certification of Ethics Agreement Compliance</p>	<p>Your position as one of our government's most senior leaders brings with it extraordinary responsibilities. One of those responsibilities is to serve as a role model for all executive branch employees by demonstrating a commitment to ethical principles and actively seeking to avoid conflicts of interest. This includes compliance with the ethics agreement you signed prior to and as a condition of your confirmation. By signing this Certification of Ethics Agreement Compliance (Certification) you certify that you have complied with the terms of your ethics agreement. The information below is intended to help you timely meet your obligation to complete and submit this form to the U.S. Office of Government Ethics (OGE).</p> <p>You are required to comply with the provisions of your ethics agreement within three months of the date of your confirmation, unless otherwise specified. Please:</p> <ul style="list-style-type: none"> • Review your ethics agreement carefully. • If your ethics agreement requires you to resign from an outside position, please note that resignations are generally required "upon confirmation." • Identify any provisions of your ethics agreement that may require coordination with an account manager or other third party. • Initiate any necessary action early enough to timely comply with your ethics agreement. • If you qualify for and wish to request a Certificate of Divestiture, please submit your request as soon as possible through your agency's Designated Agency Ethics Official (DAEO). <p>If your ethics agreement specifies that you have more than three months to comply with a particular provision, you must still comply with the remaining provisions within the standard three-month period and submit a Certification (through your agency's DAEO) within seven days thereafter. If you have not complied with a provision of your ethics agreement, please provide an explanation in Box 11, Comments of Appointee. You will be provided with an additional Certification to complete and submit to OGE to certify that you have complied with all provisions of your ethics agreement.</p> <p>Extensions: OGE may grant an extension of time for complying with a provision of your ethics agreement if, in its sole discretion, it determines that an unusual hardship has/will prevent you from complying timely. Generally, waiting for an account manager to sell an interest, not being able to locate records, or waiting for OGE to process a request for a Certificate of Divestiture are not considered unusual hardships. As noted in the Privacy Act Statement above, not submitting your Certification may result in notification of lack of compliance to the Senate, the head of your agency, or the White House. OGE may also decline to certify your financial disclosure reports. You may also be required to recuse from matters based on uncertainty as to whether you have completed required divestitures and resignations. OGE may also post a notice on its website, in place of your Certification, stating that you have not yet submitted the required certification.</p> <p>While it is your personal responsibility to take the steps necessary to comply with your ethics agreement, your agency's DAEO is available to assist you in completing this Certification and submitting it to OGE. Any questions you may have should be directed to your agency's DAEO.</p>

September 14, 2021

John Einstman
Designated Agency Ethics Official
Legal Division
U.S. Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, N.W.
Washington, DC 20581

Dear Mr. Einstman:

The purpose of this letter is to describe the steps that I will take to avoid any actual or apparent conflict of interest in the event that I am confirmed for the position of Commissioner for the U.S. Commodity Futures Trading Commission (“CFTC”). It is my responsibility to understand and comply with commitments outlined in this agreement.

SECTION 1 – GENERAL COMMITMENTS

As required by criminal conflicts of interest law 18 U.S.C. § 208(a), I will not participate personally and substantially in any particular matter in which I know that I have a financial interest directly and predictably affected by the matter, or in which I know that a person whose interests are imputed to me has a financial interest directly and predictably affected by the matter, 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.

In the event that an actual or potential conflict of interest arises during my appointment, I will consult with an agency ethics official and take the measures necessary to resolve the conflict, such as recusal from the particular matter or divestiture of an asset.

If I have a managed account or otherwise use the services of an investment professional during my appointment, then I will ensure that the account manager or investment professional obtains my prior approval on a case-by-case basis for the purchase of any assets other than cash, cash equivalents, investment funds that qualify for the exemption for diversified mutual funds and unit investment trusts at 5 C.F.R. § 2640.201(a), obligations of the United States, or municipal bonds.

I will receive a live ethics briefing from a member of the ethics office after my confirmation, but not later than 15 days after my appointment, pursuant to the ethics program regulation at 5 C.F.R. § 2638.305. Within 90 days of my confirmation, I will submit my Certification of Ethics Agreement Compliance which documents my compliance with this ethics agreement.

I understand that as an appointee I will be required to sign the Ethics Pledge (Exec. Order No. 13989) and that I will be bound by it. Among other obligations, I will be required to recuse myself from particular matters involving specific parties involving my former employer or former clients for a period of two years after I am appointed, with the exception of federal, state, and local government.

I will not modify this ethics agreement without your approval and the approval of the U.S. Office of Government Ethics pursuant to the ethics agreement requirements contained within the financial disclosure regulation at 5 C.F.R. § 2634.803(a)(4).

SECTION 2 RESIGNATIONS

Upon confirmation, I will resign from my positions with the following entities:

- Georgetown University
- University of Virginia

Pursuant to the impartiality regulation at 5 C.F.R. § 2635.502, for a period of one year after my resignation from each of these entities, I will not participate personally and substantially in any particular matter involving specific parties in which I know that entity is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

SECTION 3 – SPOUSAL EMPLOYMENT

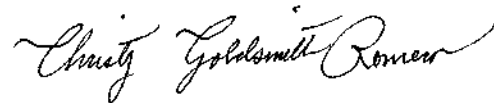
My spouse is an employee of Accenture, and she participates in the employee stock ownership plan. I will not participate personally and substantially in any particular matter that to my knowledge has a direct and predictable effect on the financial interests of Accenture, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1).

My spouse is employed by Georgetown University, in a position for which she receives a fixed salary. Pursuant to the impartiality regulation at 5 C.F.R. § 2635.502, for as long as my spouse continues to work for Georgetown University, I will not participate personally and substantially in any particular matter involving specific parties in which I know Georgetown University, is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

SECTION 4 – PUBLIC POSTING

I have been advised that this ethics agreement and the Certification of Ethics Agreement Compliance will be posted publicly, consistent with the public information law a 5 U.S.C. § 552, on the website of the U.S. Office of Government Ethics with ethics agreements of other Presidential nominees who file public financial disclosure reports.

Sincerely,

A handwritten signature in cursive script that reads "Christy Goldsmith Romero".

Christy Goldsmith Romero

CERTIFICATION OF ETHICS AGREEMENT COMPLIANCE Senate Confirmed Presidential Appointee		
1. Appointee's Information	a. Appointee's Name:	<small>to be completed by OGE:</small> Rostin Behnam
	b. Position Title:	<small>to be completed by OGE:</small> Commissioner & Chairman
	c. Agency:	<small>to be completed by OGE:</small> Commodity Futures Trading Commission
	d. Date Ethics Agreement Signed:	<small>to be completed by OGE:</small> June 28, 2021
	e. Date Confirmed:	<small>to be completed by OGE:</small> December 15, 2021
	f. Due Date for Certification of Ethics Agreement Compliance:	<small>to be completed by OGE:</small> March 22, 2022
2. Resignations	<i>I completed all of the resignations indicated in my ethics agreement before I assumed the duties of my current government position.</i>	<input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> N/A
3. Divestitures	a. <i>I have completed all of the divestitures indicated in my ethics agreement. I also understand that I may not repurchase these assets during my appointment without OGE's prior approval.</i>	<input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> N/A
	b. <i>I have filed a periodic transaction report, or periodic transaction reports, (OGE Form-T) to disclose the completion of these agreed upon divestitures.</i>	<input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> N/A Filing Date(s) of OGE Form 278-T Report(s):
4. Managed Accounts	<i>If I have a managed account or use the services of an investment professional, I have notified the manager or professional of the limitations indicated in my ethics agreement. In addition, I am continuing to monitor purchases.</i>	<input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> N/A
5. Interim Recusals	<i>I complied with my interim recusal obligations pending the divestitures required by my ethics agreement.</i>	<input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> N/A


<p>6. Recusals</p> <p><i>(Note: These factual statements describe the appointee's current status. They are not intended to modify ethics agreement commitments or create new recusal obligations.)</i></p>	<p>a. <i>As required by 18 U.S.C. § 208, I will continue to recuse from particular matters in which I know I have a <u>personal</u> or <u>imputed</u> financial interest directly and predictably affected by the matter, unless I receive a waiver or qualify for a regulatory exemption.</i></p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No</p>
	<p>b. <i>I am recusing from particular matters in which any former employer or client I served in the past year is a party or represents a party, unless I have been authorized under 5 C.F.R. § 2635.502(d).</i></p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A</p>
	<p>c. <i>I am recusing from particular matters in which any former employer or client I served in the two years prior to my appointment is a party or represents a party, unless I have received a waiver under Exec. Order 13989.</i></p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A</p>
<p>7. Waivers and Authorizations</p> <p>(Consult with your agency's DAEO if uncertain under what authority a waiver or authorization was granted.)</p>	<p>a. <i>I received a waiver pursuant to 18 U.S.C. § 208.</i></p> <p>If yes, indicate the date of the waiver and indicate the financial interest covered by the waiver.</p>	<p><input type="radio"/> Yes <input checked="" type="radio"/> No</p> <p>Date: N/A Financial interest: N/A</p>
	<p>b. <i>I received a waiver pursuant to Executive Order 13989.</i></p> <p>If yes, indicate the date of the waiver and the subject of the waiver (i.e., applicable paragraph of the ethics pledge, parties, particular matters, specific issue area(s), as applicable).</p>	<p><input type="radio"/> Yes <input checked="" type="radio"/> No</p> <p>Date: N/A Subject: N/A</p>
	<p>c. <i>I received an authorization pursuant to 5 C.F.R. § 2635.502(d).</i></p> <p>If yes, indicate date of authorization and identify the covered person(s) as to whom you have been authorized (e.g., former employer, former client, spouse's employer, spouse's current client, etc.).</p>	<p><input type="radio"/> Yes <input checked="" type="radio"/> No</p> <p>Date: N/A Covered person(s): N/A</p>
	<p>d. <i>I received a waiver pursuant to 5 C.F.R. § 2635.503(c).</i></p> <p>If yes, indicate the date of the waiver and identify the former employer or payer.</p>	<p><input type="radio"/> Yes <input checked="" type="radio"/> No</p> <p>Date: N/A Former employer or payer: N/A</p>

<p>8. Payments, Accelerations, or Divestitures Required to be Completed Prior to Entering Government Service</p>	<p>Mark this box if not applicable: <input checked="" type="checkbox"/></p>	<p>a. <i>If I committed that I would forfeit a financial interest or payment, unless it was received or accelerated prior to my assumption of the duties of the government position:</i></p>	<p><input type="radio"/> <i>I received it (or it was accelerated) <u>prior to</u> my assumption of the duties of the position.</i></p> <p><input type="radio"/> <i>I received it (or if was accelerated <u>after</u> my assumption of the duties of the position.</i></p> <p><input type="radio"/> <i>I forfeited it.</i></p>
		<p>b. Financial interest or payment at issue:</p>	<p>N/A</p>
<p>9. Requirements for Regular Appointees</p>	<p><i>I have completed my initial ethics briefing, pursuant to 5 C.F.R. § 2638.305.</i></p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A</p>	
<p>Requirements for Regular Appointees</p>	<p><i>I have signed the ethics pledge pursuant to Executive Order 13989.</i></p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A</p>	
<p>10. Additional Ethics Agreement Requirements</p>	<p>to be completed by OGI</p>	<p>to be completed by appointee <i>I am complying with these requirements as described in the adjacent box.</i></p> <p><input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> N/A</p>	
<p>11. Comments of Appointee</p>			
<p>Any intentionally false or misleading statement or response provided in this certification is a violation of law punishable by a fine or imprisonment, or both, under 18 U.S.C. § 1001.</p>			
<p><i>I certify that the information I have provided is complete and accurate.</i></p>	<p>Appointee's Signature: ROSTIN BEHNAM Digitally signed by ROSTIN BEHNAM Date: 2022.02.22 12:01:29 -05'00'</p>		<p>Date:</p>

<p>Privacy Act Statement</p>	<p>Section 110 of the Ethics in Government Act of 1978, as amended, requires the reporting of this information. The primary use of the information on this report is for review by Government officials to determine an appointee’s compliance with applicable Federal laws and regulations, and the appointee’s Ethics Agreement. Failure to provide the requested information may result in notification of lack of compliance to the Senate and the head of the appointee’s agency, or the White House, and/or could result in OGE declining to certify the appointee’s financial disclosure reports. The appointee could also be required to recuse from matters based on uncertainty as to whether they have divested or resigned from a matter determined to raise potential conflicts.</p> <p>This information will be publically posted to the OGE website at www.oge.gov in accordance with OGE/GOVT-1, Executive Branch Personnel Public Financial Disclosure Reports and Other Name-Retrieved Ethics Program Records (routine use “k.”). Please see OGE/GOVT-1 for more information about the maintenance and disclosure of this information.</p>
<p>Filing the Certification of Ethics Agreement Compliance</p>	<p>Your position as one of our government’s most senior leaders brings with it extraordinary responsibilities. One of those responsibilities is to serve as a role model for all executive branch employees by demonstrating a commitment to ethical principles and actively seeking to avoid conflicts of interest. This includes compliance with the ethics agreement you signed prior to and as a condition of your confirmation. By signing this Certification of Ethics Agreement Compliance (Certification) you certify that you have complied with the terms of your ethics agreement. The information below is intended to help you timely meet your obligation to complete and submit this form to the U.S. Office of Government Ethics (OGE).</p> <p>You are required to comply with the provisions of your ethics agreement within three months of the date of your confirmation, unless otherwise specified. Please:</p> <ul style="list-style-type: none"> • Review your ethics agreement carefully. • If your ethics agreement requires you to resign from an outside position, please note that resignations are generally required “upon confirmation.” • Identify any provisions of your ethics agreement that may require coordination with an account manager or other third party. • Initiate any necessary action early enough to timely comply with your ethics agreement. • If you qualify for and wish to request a Certificate of Divestiture, please submit your request as soon as possible through your agency’s Designated Agency Ethics Official (DAEO). <p>If your ethics agreement specifies that you have more than three months to comply with a particular provision, you must still comply with the remaining provisions within the standard three-month period and submit a Certification (through your agency’s DAEO) within seven days thereafter. If you have not complied with a provision of your ethics agreement, please provide an explanation in Box 11, Comments of Appointee. You will be provided with an additional Certification to complete and submit to OGE to certify that you have complied with all provisions of your ethics agreement.</p> <p>Extensions: OGE may grant an extension of time for complying with a provision of your ethics agreement if, in its sole discretion, it determines that an unusual hardship has/will prevent you from complying timely. Generally, waiting for an account manager to sell an interest, not being able to locate records, or waiting for OGE to process a request for a Certificate of Divestiture are not considered unusual hardships. As noted in the Privacy Act Statement above, not submitting your Certification may result in notification of lack of compliance to the Senate, the head of your agency, or the White House. OGE may also decline to certify your financial disclosure reports. You may also be required to recuse from matters based on uncertainty as to whether you have completed required divestitures and resignations. OGE may also post a notice on its website, in place of your Certification, stating that you have not yet submitted the required certification.</p> <p>While it is your personal responsibility to take the steps necessary to comply with your ethics agreement, your agency’s DAEO is available to assist you in completing this Certification and submitting it to OGE. Any questions you may have should be directed to your agency’s DAEO.</p>

CERTIFICATION OF ETHICS AGREEMENT COMPLIANCE Senate Confirmed Presidential Appointee		
1. Appointee's Information	a. Appointee's Name:	<small>not completed by OGE</small> Rostin Behnam
	b. Position Title:	<small>not completed by OGE</small> Commissioner
	c. Agency:	<small>not completed by OGE</small> Commodity Futures Trading Commission
	d. Date Ethics Agreement Signed:	<small>not completed by OGE</small> July 10, 2017
	e. Date Confirmed:	<small>not completed by OGE</small> August 3, 2017
	f. Due Date for Certification of Ethics Agreement Compliance:	<small>not completed by OGE</small> November 8, 2017
2. Resignations	<i>I completed all of the resignations indicated in my ethics agreement before I assumed the duties of my current government position.</i>	<input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> N/A
3. Divestitures	a. <i>I have completed all of the divestitures indicated in my ethics agreement. I also understand that I may not repurchase these assets during my appointment without OGE's prior approval.</i>	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A
	b. <i>I have filed a period transaction report, or periodic transaction reports, (OGE Form 278-T) to disclose the completion of these agreed upon divestitures.</i>	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A
		Filing Date(s) of OGE Form 278-T Report(s): October 10, 2017
4. Managed Accounts	<i>If I have a managed account or use the services of an investment professional, I have notified the manager or professional of the limitations indicated in my ethics agreement. In addition, I am continuing to monitor purchases.</i>	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A
5. Interim Recusals	<i>I complied with my interim recusal obligations pending the divestitures required by my ethics agreement.</i>	<input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> N/A

<p>6. Recusals</p> <p><i>(Note: These factual statements describe the appointee's current status. They are not intended to modify ethics agreement commitments or create new recusal obligations.)</i></p>	<p>a. I am recusing from particular matters in which I know I have a <u>personal</u> or <u>imputed</u> financial interest directly and predictably affected by the matter, unless I have received a waiver or qualify for a regulatory exemption.</p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No</p>
	<p>b. I am recusing from particular matters in which any former employer or client I served in the past year is a party or represents a party, unless I have been authorized under 5 C.F.R. § 2635.502(d).</p>	<p><input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> N/A</p>
	<p>c. I am recusing from particular matters in which any former employer or client I served in the two years prior to my appointment is a party or represents a party, unless I have received a waiver under Exec. Order 13770.</p>	<p><input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> N/A</p>
<p>7. Waivers and Authorizations</p>	<p>a. I received a waiver pursuant to 18 U.S.C. § 208.</p> <p>If yes, indicate the date of the waiver and indicate the financial interest covered by the waiver.</p>	<p><input type="radio"/> Yes <input checked="" type="radio"/> No</p> <p>Date: Financial interest:</p>
	<p>b. I received a waiver pursuant to Executive Order 13770.</p> <p>If yes, indicate the date of the waiver and the subject of the waiver (i.e., applicable paragraph of the ethics pledge, parties, particular matters, specific issue areas, as applicable).</p>	<p><input type="radio"/> Yes <input checked="" type="radio"/> No</p> <p>Date: Subject:</p>
	<p>c. I received an authorization pursuant to 5 C.F.R. § 2635.502(d).</p> <p>If yes, indicate date of authorization and identify the covered person(s) as to whom you have been authorized (e.g., former employer, former client, spouse's employer, spouse's current client, etc.).</p>	<p><input type="radio"/> Yes <input checked="" type="radio"/> No</p> <p>Date: Covered person(s):</p>
	<p>d. I received a waiver pursuant to 5 C.F.R. § 2635.503(c).</p> <p>If yes, indicate the date of the waiver and identify the former employer or payer.</p>	<p><input type="radio"/> Yes <input checked="" type="radio"/> No</p> <p>Date: Former employer or payer:</p>

<p>8. Payments, Accelerations, or Divestitures Required to be Completed Prior to Entering Government Service</p>	<p>Mark this box if not applicable: <input checked="" type="checkbox"/></p>	<p>a. <i>If I committed that I would forfeit a financial interest or payment, unless it was received or accelerated prior to my assumption of the duties of the government position:</i></p>	<p><input type="radio"/> <i>I received it (or it was accelerated) prior to my assumption of the duties of the position.</i></p> <p><input type="radio"/> <i>I received it (or it was accelerated) after my assumption of the duties of the position.</i></p> <p><input type="radio"/> <i>I forfeited it.</i></p>
<p>9. Requirements for Regular Appointees</p>	<p><i>I have completed my initial ethics briefing, pursuant to 5 C.F.R. § 2638.305.</i></p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A</p>	
	<p><i>I have signed the ethics pledge pursuant to Executive Order 13770.</i></p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A</p>	
<p>10. Additional Ethics Agreement Requirements</p>		<p><i>I am complying with these requirements as described in the adjacent box.</i></p> <p><input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> N/A</p>	
<p>11. Comments of Appointee</p>			
<p>Any intentionally false or misleading statement or response provided in this certification is a violation of law punishable by a fine or imprisonment, or both, under 18 U.S.C. § 1001.</p>			
<p><i>I certify that the information I have provided is complete and accurate.</i></p>	<p>Appointee's Signature: </p>	<p>Date: 10/25/17</p>	

June 28, 2021

John Einstman
Deputy General Counsel and
Designated Agency Ethics Official
Office of the General Counsel
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, N.W.
Washington, D.C. 20581

Dear Mr. Einstman:

The purpose of this letter is to describe the steps that I will take to avoid any actual or apparent conflict of interest in the event that I am confirmed for the position of Chairman and Commissioner for the Commodity Futures Trading Commission ("CFTC"). It is my responsibility to understand and comply with commitments outlined in this agreement.

SECTION 1 – GENERAL COMMITMENTS

As required by the criminal conflicts of interest law at 18 U.S.C. § 208(a), I will not participate personally and substantially in any particular matter in which I know that I have a financial interest directly and predictably affected by the matter, or in which I know that a person whose interests are imputed to me has a financial interest directly and predictably affected by the particular matter, 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 an officer, director, trustee, general partner, or employee; and
- Any person or organization with which I am negotiating or have an arrangement concerning prospective employment.

In the event that an actual or potential conflict of interest arises during my appointment, I will consult with an agency ethics official and take the measures necessary to resolve the conflict, such as recusal from the particular matter or divestiture of an asset.

As required by 7 U.S.C. § 2(a)(8), I understand that, when I am appointed as Chairman and Commissioner of the CFTC, I will be prohibited during my term from engaging in employment with any entity subject to regulation by the CFTC, and I will also be prohibited from participating, directly or indirectly, in any registered entity operations or transactions of a character subject to regulation by the CFTC. Further, I understand that, if I am confirmed as Chairman and Commissioner of the CFTC, I must comply with the requirements of 7 U.S.C. §§ 6, 13(c) and (d), 5 C.F.R. § 5101.102, 17 C.F.R. § 140.735-2, and 17 C.F.R. § 140.735-2a.

If I have a managed account or otherwise use the services of an investment professional during my appointment, I will ensure that the account manager or investment professional obtains my prior approval on a case-by-case basis for the purchase of any assets other than cash, cash equivalents, investment funds that qualify for the regulatory exemption for diversified mutual funds and unit investment trusts at 5 C.F.R. § 2640.201(a), obligations of the United States, or municipal bonds.

I will receive a live ethics briefing from a member of the ethics office after my confirmation but not later than 15 days after my appointment pursuant to the ethics program regulation at 5 C.F.R. § 2638.305. Within 90 days of my confirmation, I will submit my Certification of Ethics Agreement Compliance which documents my compliance with this ethics agreement.

I understand that as an appointee I will be required to sign the Ethics Pledge (Exec. Order No. 13989) and that I will be bound by it. Among other obligations, I will be required to recuse from particular matters involving specific parties involving my former employer or former clients for a period of two years after I am appointed, with the exception of federal, state and local government.

I will not modify this ethics agreement without your approval and the approval of the U.S. Office of Government Ethics pursuant to the ethics agreement requirements contained in the financial disclosure regulation at 5 C.F.R. § 2634.803(a)(4).

SECTION 2 – SPOUSE EMPLOYMENT

My spouse works as a consultant. For as long as my spouse continues to provide these services, I will not participate personally and substantially in any particular matter that to my knowledge has a direct and predictable effect on my spouse's compensation or contracts, unless I first obtain a written waiver, pursuant 18 U.S.C. § 208(b)(1). Pursuant to the impartiality regulation at 5 C.F.R. § 2635.502, I also will not participate personally and substantially in any particular matter involving specific parties in which I know a client of my spouse is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

My spouse has an equity interest in Pitango Gelato Franchise Co., LLC, an Italian-style eatery and cafe. I will not participate personally and substantially in any particular matter that to my knowledge has a direct and predictable effect on the financial interests of Pitango Gelato Franchise Co., LLC, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1).

SECTION 3 - PUBLIC POSTING

I have been advised that this ethics agreement and the Certification of Ethics Agreement Compliance will be posted publicly, consistent with the public information law at 5 U.S.C. § 552, on the website of the U.S. Office of Government Ethics with ethics agreements of other Presidential nominees who file public financial disclosure reports.

Sincerely,

A handwritten signature in black ink, appearing to read "R. Behnam". The signature is fluid and cursive, with a long horizontal stroke at the end.

Rostin Behnam

July 10, 2017

Daniel J. Davis
General Counsel and
Designated Agency Ethics Official
Office of the General Counsel
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, N.W.
Washington, D.C. 20581

Dear Mr. Davis:

The purpose of this letter is to describe the steps that I will take to avoid any actual or apparent conflict of interest in the event that I am confirmed for the position of Commissioner for the Commodity Futures Trading Commission (“CFTC”).

As required by 18 U.S.C. § 208(a), I will not participate personally and substantially in any particular matter in which I know that I have a financial interest directly and predictably affected by the matter, or in which I know that a person whose interests are imputed to me has a financial interest directly and predictably affected by the matter, 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.

As required by 7 U.S.C. § 2(a)(8), I understand that, when I am appointed a Commissioner of the CFTC, I will be prohibited during my term from employment with any entity subject to regulation by the CFTC, and I will also be prohibited from participating, directly or indirectly, in any registered entity operations or transactions of a character subject to regulation by the CFTC. Further, I understand that, if I am confirmed as Commissioner of the CFTC, I must comply with the requirements of 7 U.S.C. § 13(c) and (d), 5 C.F.R. § 5101.102, 17 C.F.R. § 140.735-2, and 17 C.F.R. § 140.735-2a.

My spouse is employed by PJPA, LLC, in a position for which she receives a fixed annual salary. For as long as my spouse continues to work for PJPA, LLC, I will not participate personally and substantially in any particular matter involving specific parties in which I know PJPA, LLC, is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

I will divest my interests in Chevron Corporation and ExxonMobil Corporation within 90 days of my confirmation. With regard to each of these entities, I will not participate personally and substantially in any particular matter that to my knowledge has a direct and predictable effect on the financial interests of the entity until I have divested it, 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 I may be eligible to request a Certificate of Divestiture for qualifying assets and that a Certificate of Divestiture is effective only if obtained prior to divestiture. Regardless of whether I receive a Certificate of Divestiture, I will ensure that all divestitures discussed in this agreement occur within the agreed upon timeframes and that all proceeds are invested in non-conflicting assets.

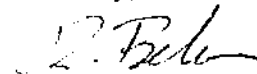
If I have a managed account or otherwise use the services of an investment professional during my appointment, I will ensure that the account manager or investment professional obtains my prior approval on a case-by-case basis for the purchase of any assets other than cash, cash equivalents, investment funds that qualify for the exemption at 5 C.F.R. § 2640.201(a), obligations of the United States, or municipal bonds.

I will meet in person with you during the first week of my service in the position of Commissioner in order to complete the initial ethics briefing required under 5 C.F.R. § 2638.305. Within 90 days of my confirmation, I will document my compliance with this ethics agreement by notifying you in writing when I have completed the steps described in this ethics agreement.

I understand that as an appointee I will be required to sign the Ethics Pledge (Exec. Order no. 13770) and that I will be bound by the requirements and restrictions therein in addition to the commitments I have made in this ethics agreement.

Finally, I have been advised that this ethics agreement will be posted publicly, consistent with 5 U.S.C. § 552, on the website of the U.S. Office of Government Ethics with ethics agreements of other Presidential nominees who file public financial disclosure reports.

Sincerely,



Rostin Behnam

From: [Adamske, Steven](#)
To: [Walsh, Frank](#)
Subject: RE: Authorization Under 5 C.F.R. § 2635.502(d) to Participate on FIA Matters
Date: Tuesday, March 29, 2022 5:23:23 PM
Attachments: image001.png
image002.png
image003.png
image004.png
image005.png

Frank, thank you for your thoughtful response. I appreciate the time and effort you put into this and for keeping me on the level.

From: Walsh, Frank
Sent: Tuesday, March 29, 2022 5:10 PM
To: Adamske, Steven <SAdamske@CFTC.gov>
Subject: Authorization Under 5 C.F.R. § 2635.502(d) to Participate on FIA Matters

Steve,

Following up on our conversation and emails on this topic, I write to document the formal waiver under 5 C.F.R. § 2635.502(d) to authorize you to participate on certain FIA particular matters consistent with the guidance below.

Factual Background. You formerly worked at the Futures Industry Association (“FIA”) prior to joining the CFTC. Consequently, you have a “covered relationship” with FIA and cannot participate on particular matters that would directly and predictably affect FIA’s financial interests for one year. With this in mind, you inquired about your ability to participate on several types of matters. First, you asked about checking with FIA to ensure that the CFTC has received the list of media attending a particular conference so we know who is there and meet with them. Second, you asked about approving requests for the Chairman, Commissioners and senior staff members to appear on FIA podcasts and events. Finally, you asked about whether you could provide guidance to FIA if they asked about panel participants at their conferences. You would not be affirmatively engaging with FIA to have CFTC people speak, but rather would only be answering their questions.

With an eye towards mitigating any ethics concerns, you affirmatively stated that you would recuse yourself if you received an email or call from FIA asking about a regulation, policy, or seeking intel on any substantive matter.

(b)(5)

(b)(5)

In sum, I believe that the Agency's interests in allowing you to coordinate the CFTC's

communications plan outweighs the impartiality concerns over your involvement on process or ministerial functions.

Please let me know if you have any questions.

Sincerely,

Frank



Frank M. Walsh
Associate General Counsel
Alternate Designated Agency Ethics Official (ADAEO)
Office of General Counsel
Commodity Futures Trading Commission
Cell: (202) 734-2783
fwalsh@cftc.gov



From: Adamske, Steven

Sent: Tuesday, February 8, 2022 9:14 AM

To: Walsh, Frank <FWalsh@CFTC.gov>

Subject: RE: Your Performance Bonus From Your Former Employer

Frank,

Thank you for your assistance here. I am just trying to draw within the lines even though the lines are not easily seen.

(b)(5)

Again, thanks for the help.

From: Walsh, Frank

Sent: Monday, February 7, 2022 1:54 PM

To: Adamske, Steven <SAdamske@CFTC.gov>

Subject: RE: Your Performance Bonus From Your Former Employer

Steve,

(b)(5)

Sincerely,

Frank

From: Adamske, Steven

Sent: Monday, January 31, 2022 2:28 PM

To: Walsh, Frank <FWalsh@CFTC.gov>

Subject: RE: Your Performance Bonus From Your Former Employer

Frank,

(b)(5)

From: Walsh, Frank

Sent: Monday, January 24, 2022 5:30 PM

To: Adamske, Steven <SAdamske@CFTC.gov>

Subject: Your Performance Bonus From Your Former Employer

Steve,

(b)(5)

Please let me know if you have any questions or if you would like to discuss this further.

Sincerely,

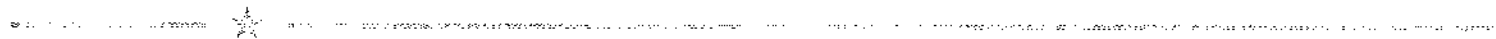
Frank



Frank M. Walsh
Associate General Counsel
Alternate Designated Agency Ethics Official (ADAEO)
Office of General Counsel
Commodity Futures Trading Commission
Cell: (202) 734-2783
fwalsh@cftc.gov



UNITED STATES OFFICE OF
GOVERNMENT ETHICS



January 22, 2021
LA-21-03

LEGAL ADVISORY

TO: Designated Agency Ethics Officials

FROM: Emory A. Rounds, III
Director

SUBJECT: Executive Orders on Ethics Commitments by Executive Branch Personnel

On January 20, 2021, President Biden signed an Executive Order titled “Executive Order on Ethics Commitments by Executive Branch Personnel.” Pursuant to section 4(e)(i) of the Executive Order, the U.S. Office of Government Ethics (OGE) is providing agency ethics officials with the attached copy of the Ethics Pledge and a [link](#) to the Executive Order.

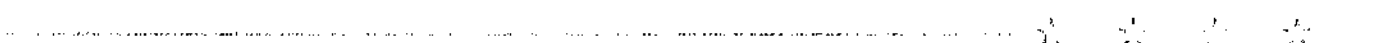
Among other things, this Executive Order requires every “appointee” in each executive agency appointed on or after January 20, 2021, to sign the Ethics Pledge established therein. The definition of “appointee” in the Executive Order covers “every full-time, non-career Presidential or Vice-Presidential appointee, non-career appointee in the Senior Executive Service (or other SES-type system), and appointee to a position that has been excepted from the competitive service by reason of being of a confidential or policymaking character (Schedule C and other positions excepted under comparable criteria) in an executive agency.” Executive Order, sec. 2(b). However, “[i]t does not include any person appointed as a member of the Senior Foreign Service or solely as a uniformed service commissioned officer.” *Id.*

With respect to this Executive Order, ethics officials and employees may continue to rely on OGE’s prior guidance regarding Executive Orders 13490 and 13770 to the extent that such guidance addresses language common to either of these Executive Orders and the new Executive Order. OGE will issue additional interpretive guidance as needed to address issues implicating new language that appears only in the new Executive Order.

Additionally, Executive Order 13770, which applied to appointees appointed on or after January 20, 2017, was revoked by an Executive Order signed by President Trump on January 20, 2021. The latter [Executive Order](#) states, in part, that “[e]mployees and former employees subject to the commitments in Executive Order 13770 will not be subject to those commitments after noon January 20, 2021.”

As always, agency ethics officials may contact their OGE Desk Officers for advice concerning the application of these Executive Orders in individual cases.

Attachment: Ethics Pledge Form

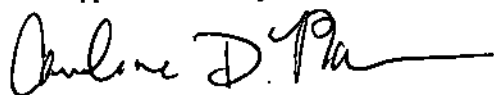


ETHICS PLEDGE

I recognize that this pledge is part of a broader ethics in government plan designed to restore and maintain public trust in government, and I commit myself to conduct consistent with that plan. I commit to decision-making on the merits and exclusively in the public interest, without regard to private gain or personal benefit. I commit to conduct that upholds the independence of law enforcement and precludes improper interference with investigative or prosecutorial decisions of the Department of Justice. I commit to ethical choices of post-Government employment that do not raise the appearance that I have used my Government service for private gain, including by using confidential information acquired and relationships established for the benefit of future clients.

Accordingly, as a condition, and in consideration, of my employment in the United States Government in a position invested with the public trust, I commit myself to the following obligations, which I understand are binding on me and are enforceable under law:

1. *Lobbyist Gift Ban.* I will not accept gifts from registered lobbyists or lobbying organizations for the duration of my service as an appointee.
2. *Revolving Door Ban — All Appointees Entering Government.* I will not for a period of 2 years from the date of my appointment participate in any particular matter involving specific parties that is directly and substantially related to my former employer or former clients, including regulations and contracts.
3. *Revolving Door Ban — Lobbyists and Registered Agents Entering Government.* If I was registered under the Lobbying Disclosure Act, 2 U.S.C. 1601 *et seq.*, or the Foreign Agents Registration Act (FARA), 22 U.S.C. 611 *et seq.*, within the 2 years before the date of my appointment, in addition to abiding by the limitations of paragraph 2, I will not for a period of 2 years after the date of my appointment:
 - (a) participate in any particular matter on which I lobbied, or engaged in registrable activity under FARA, within the 2 years before the date of my appointment;
 - (b) participate in the specific issue area in which that particular matter falls; or
 - (c) seek or accept employment with any executive agency with respect to which I lobbied, or engaged in registrable activity under FARA, within the 2 years before the date of my appointment.
4. *Revolving Door Ban — Appointees Leaving Government.* If, upon my departure from the Government, I am covered by the post-employment restrictions on communicating with employees of my former executive agency set forth in section 207(c) of title 18, United States Code, and its implementing regulations, I agree that I will abide by those restrictions for a period of 2 years following the end of my appointment. I will abide by these same restrictions with respect to communicating with the senior White House staff.
5. *Revolving Door Ban — Senior and Very Senior Appointees Leaving Government.* If, upon my departure from the Government, I am covered by the post-employment restrictions set forth in sections 207(c) or 207(d) of title 18, United States Code, and those sections' implementing regulations, I agree that, in addition, for a period of 1 year following the end of my appointment, I will not materially assist others in making communications or appearances that I am prohibited from undertaking myself by (a) holding myself out as being available to engage in lobbying activities in support of any such communications or appearances; or (b) engaging in any such lobbying activities.
6. *Revolving Door Ban — Appointees Leaving Government to Lobby.* In addition to abiding by the limitations of paragraph 4, I also agree, upon leaving Government service, not to lobby any covered executive branch official or non-career Senior Executive Service appointee, or engage in any activity on behalf of any foreign government or foreign political party which, were it undertaken on January 20, 2021, would require that I register under FARA, for the remainder of the Administration or 2 years following the end of my appointment, whichever is later.
7. *Golden Parachute Ban.* I have not accepted and will not accept, including after entering Government, any salary or other cash payment from my former employer the eligibility for and payment of which is limited to individuals accepting a position in the United States Government. I also have not accepted and will not accept any non-cash benefit from my former employer that is provided in lieu of such a prohibited cash payment.
8. *Employment Qualification Commitment.* I agree that any hiring or other employment decisions I make will be based on the candidate's qualifications, competence, and experience.
9. *Assent to Enforcement.* I acknowledge that the Executive Order entitled "Ethics Commitments by Executive Branch Personnel," issued by the President on January 20, 2021, which I have read before signing this document, defines certain of the terms applicable to the foregoing obligations and sets forth the methods for enforcing them. I expressly accept the provisions of that Executive Order as a part of this agreement and as binding on me. I understand that the terms of this pledge are in addition to any statutory or other legal restrictions applicable to me by virtue of Federal Government service.



Signature

May 18, 2022
Date


Name (Type or Print): Caroline D. Phem

ETHICS PLEDGE

I recognize that this pledge is part of a broader ethics in government plan designed to restore and maintain public trust in government, and I commit myself to conduct consistent with that plan. I commit to decision-making on the merits and exclusively in the public interest, without regard to private gain or personal benefit. I commit to conduct that upholds the independence of law enforcement and precludes improper interference with investigative or prosecutorial decisions of the Department of Justice. I commit to ethical choices of post-Government employment that do not raise the appearance that I have used my Government service for private gain, including by using confidential information acquired and relationships established for the benefit of future clients.

Accordingly, as a condition, and in consideration, of my employment in the United States Government in a position invested with the public trust, I commit myself to the following obligations, which I understand are binding on me and are enforceable under law:

1. *Lobbyist Gift Ban.* I will not accept gifts from registered lobbyists or lobbying organizations for the duration of my service as an appointee.
2. *Revolving Door Ban — All Appointees Entering Government.* I will not for a period of 2 years from the date of my appointment participate in any particular matter involving specific parties that is directly and substantially related to my former employer or former clients, including regulations and contracts.
3. *Revolving Door Ban — Lobbyists and Registered Agents Entering Government.* If I was registered under the Lobbying Disclosure Act, 2 U.S.C. 1601 *et seq.*, or the Foreign Agents Registration Act (FARA), 22 U.S.C. 611 *et seq.*, within the 2 years before the date of my appointment, in addition to abiding by the limitations of paragraph 2, I will not for a period of 2 years after the date of my appointment:
 - (a) participate in any particular matter on which I lobbied, or engaged in registrable activity under FARA, within the 2 years before the date of my appointment;
 - (b) participate in the specific issue area in which that particular matter falls; or
 - (c) seek or accept employment with any executive agency with respect to which I lobbied, or engaged in registrable activity under FARA, within the 2 years before the date of my appointment.
4. *Revolving Door Ban — Appointees Leaving Government.* If, upon my departure from the Government, I am covered by the post-employment restrictions on communicating with employees of my former executive agency set forth in section 207(c) of title 18, United States Code, and its implementing regulations, I agree that I will abide by those restrictions for a period of 2 years following the end of my appointment. I will abide by these same restrictions with respect to communicating with the senior White House staff.
5. *Revolving Door Ban — Senior and Very Senior Appointees Leaving Government.* If, upon my departure from the Government, I am covered by the post-employment restrictions set forth in sections 207(c) or 207(d) of title 18, United States Code, and those sections' implementing regulations, I agree that, in addition, for a period of 1 year following the end of my appointment, I will not materially assist others in making communications or appearances that I am prohibited from undertaking myself by (a) holding myself out as being available to engage in lobbying activities in support of any such communications or appearances; or (b) engaging in any such lobbying activities.
6. *Revolving Door Ban — Appointees Leaving Government to Lobby.* In addition to abiding by the limitations of paragraph 4, I also agree, upon leaving Government service, not to lobby any covered executive branch official or non-career Senior Executive Service appointee, or engage in any activity on behalf of any foreign government or foreign political party which, were it undertaken on January 20, 2021, would require that I register under FARA, for the remainder of the Administration or 2 years following the end of my appointment, whichever is later.
7. *Golden Parachute Ban.* I have not accepted and will not accept, including after entering Government, any salary or other cash payment from my former employer the eligibility for and payment of which is limited to individuals accepting a position in the United States Government. I also have not accepted and will not accept any non-cash benefit from my former employer that is provided in lieu of such a prohibited cash payment.
8. *Employment Qualification Commitment.* I agree that any hiring or other employment decisions I make will be based on the candidate's qualifications, competence, and experience.
9. *Assent to Enforcement.* I acknowledge that the Executive Order entitled "Ethics Commitments by Executive Branch Personnel," issued by the President on January 20, 2021, which I have read before signing this document, defines certain of the terms applicable to the foregoing obligations and sets forth the methods for enforcing them. I expressly accept the provisions of that Executive Order as a part of this agreement and as binding on me. I understand that the terms of this pledge are in addition to any statutory or other legal restrictions applicable to me by virtue of Federal Government service.



Signature

April 28, 2021

Date

Name (Type or Print): Summer Mersinger

ETHICS PLEDGE

As a condition, and in consideration, of my employment in the United States Government in an appointee position invested with the public trust, I commit myself to the following obligations, which I understand are binding on me and are enforceable under law:

1. I will not, within 5 years after the termination of my employment as an appointee in any executive agency in which I am appointed to serve, engage in lobbying activities with respect to that agency.
2. If, upon my departure from the Government, I am covered by the post-employment restrictions on communicating with employees of my former executive agency set forth in section 207(c) of title 18, United States Code, I agree that I will abide by those restrictions.
3. In addition to abiding by the limitations of paragraphs 1 and 2, I also agree, upon leaving Government service, not to engage in lobbying activities with respect to any covered executive branch official or non-career Senior Executive Service appointee for the remainder of the Administration.
4. I will not, at any time after the termination of my employment in the United States Government, engage in any activity on behalf of any foreign government or foreign political party which, were it undertaken on January 20, 2017, would require me to register under the Foreign Agents Registration Act of 1938, as amended.
5. I will not accept gifts from registered lobbyists or lobbying organizations for the duration of my service as an appointee.
6. I will not for a period of 2 years from the date of my appointment participate in any particular matter involving specific parties that is directly and substantially related to my former employer or former clients, including regulations and contracts.
7. If I was a registered lobbyist within the 2 years before the date of my appointment, in addition to abiding by the limitations of paragraph 6, I will not for a period of 2 years after the date of my appointment participate in any particular matter on which I lobbied within the 2 years before the date of my appointment or participate in the specific issue area in which that particular matter falls.
8. I agree that any hiring or other employment decisions I make will be based on the candidate's qualifications, competence, and experience.
9. I acknowledge that the Executive Order entitled "Ethics Commitments by Executive Branch Appointees," issued by the President on January 28, 2017, which I have read before signing this document, defines certain terms applicable to the foregoing obligations and sets forth the methods for enforcing them. I expressly accept the provisions of that Executive Order as a part of this agreement and as binding on me. I understand that the obligations of this pledge are in addition to any statutory or other legal restrictions applicable to me by virtue of Government service.

Signature

Summer Mersinger

Print or type your full name (last, first, middle)

Date

8/26, 2019

UNITED STATES OFFICE OF
GOVERNMENT ETHICS



January 22, 2021
LA-21-03

LEGAL ADVISORY

TO: Designated Agency Ethics Officials

FROM: Emory A. Rounds, III
Director

SUBJECT: Executive Orders on Ethics Commitments by Executive Branch Personnel

On January 20, 2021, President Biden signed an Executive Order titled “Executive Order on Ethics Commitments by Executive Branch Personnel.” Pursuant to section 4(c)(i) of the Executive Order, the U.S. Office of Government Ethics (OGE) is providing agency ethics officials with the attached copy of the Ethics Pledge and a [link](#) to the Executive Order.

Among other things, this Executive Order requires every “appointee” in each executive agency appointed on or after January 20, 2021, to sign the Ethics Pledge established therein. The definition of “appointee” in the Executive Order covers “every full-time, non-career Presidential or Vice-Presidential appointee, non-career appointee in the Senior Executive Service (or other SES-type system), and appointee to a position that has been excepted from the competitive service by reason of being of a confidential or policymaking character (Schedule C and other positions excepted under comparable criteria) in an executive agency.” Executive Order, sec. 2(b). However, “[i]t does not include any person appointed as a member of the Senior Foreign Service or solely as a uniformed service commissioned officer.” *Id.*

With respect to this Executive Order, ethics officials and employees may continue to rely on OGE’s prior guidance regarding Executive Orders 13490 and 13770 to the extent that such guidance addresses language common to either of these Executive Orders and the new Executive Order. OGE will issue additional interpretive guidance as needed to address issues implicating new language that appears only in the new Executive Order.

Additionally, Executive Order 13770, which applied to appointees appointed on or after January 20, 2017, was revoked by an Executive Order signed by President Trump on January 20, 2021. The latter [Executive Order](#) states, in part, that “[e]mployees and former employees subject to the commitments in Executive Order 13770 will not be subject to those commitments after noon January 20, 2021.”

As always, agency ethics officials may contact their OGE Desk Officers for advice concerning the application of these Executive Orders in individual cases.

Attachment: Ethics Pledge Form

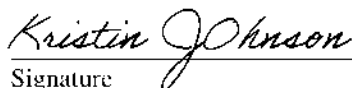


ETHICS PLEDGE

I recognize that this pledge is part of a broader ethics in government plan designed to restore and maintain public trust in government, and I commit myself to conduct consistent with that plan. I commit to decision-making on the merits and exclusively in the public interest, without regard to private gain or personal benefit. I commit to conduct that upholds the independence of law enforcement and precludes improper interference with investigative or prosecutorial decisions of the Department of Justice. I commit to ethical choices of post-Government employment that do not raise the appearance that I have used my Government service for private gain, including by using confidential information acquired and relationships established for the benefit of future clients.

Accordingly, as a condition, and in consideration, of my employment in the United States Government in a position invested with the public trust, I commit myself to the following obligations, which I understand are binding on me and are enforceable under law:

1. *Lobbyist Gift Ban.* I will not accept gifts from registered lobbyists or lobbying organizations for the duration of my service as an appointee.
2. *Revolving Door Ban — All Appointees Entering Government.* I will not for a period of 2 years from the date of my appointment participate in any particular matter involving specific parties that is directly and substantially related to my former employer or former clients, including regulations and contracts.
3. *Revolving Door Ban — Lobbyists and Registered Agents Entering Government.* If I was registered under the Lobbying Disclosure Act, 2 U.S.C. 1601 *et seq.*, or the Foreign Agents Registration Act (FARA), 22 U.S.C. 611 *et seq.*, within the 2 years before the date of my appointment, in addition to abiding by the limitations of paragraph 2, I will not for a period of 2 years after the date of my appointment:
 - (a) participate in any particular matter on which I lobbied, or engaged in registrable activity under FARA, within the 2 years before the date of my appointment;
 - (b) participate in the specific issue area in which that particular matter falls; or
 - (c) seek or accept employment with any executive agency with respect to which I lobbied, or engaged in registrable activity under FARA, within the 2 years before the date of my appointment.
4. *Revolving Door Ban — Appointees Leaving Government.* If, upon my departure from the Government, I am covered by the post-employment restrictions on communicating with employees of my former executive agency set forth in section 207(c) of title 18, United States Code, and its implementing regulations, I agree that I will abide by those restrictions for a period of 2 years following the end of my appointment. I will abide by these same restrictions with respect to communicating with the senior White House staff.
5. *Revolving Door Ban — Senior and Very Senior Appointees Leaving Government.* If, upon my departure from the Government, I am covered by the post-employment restrictions set forth in sections 207(c) or 207(d) of title 18, United States Code, and those sections' implementing regulations, I agree that, in addition, for a period of 1 year following the end of my appointment, I will not materially assist others in making communications or appearances that I am prohibited from undertaking myself by (a) holding myself out as being available to engage in lobbying activities in support of any such communications or appearances; or (b) engaging in any such lobbying activities.
6. *Revolving Door Ban — Appointees Leaving Government to Lobby.* In addition to abiding by the limitations of paragraph 4, I also agree, upon leaving Government service, not to lobby any covered executive branch official or non-career Senior Executive Service appointee, or engage in any activity on behalf of any foreign government or foreign political party which, were it undertaken on January 20, 2021, would require that I register under FARA, for the remainder of the Administration or 2 years following the end of my appointment, whichever is later.
7. *Golden Parachute Ban.* I have not accepted and will not accept, including after entering Government, any salary or other cash payment from my former employer the eligibility for and payment of which is limited to individuals accepting a position in the United States Government. I also have not accepted and will not accept any non-cash benefit from my former employer that is provided in lieu of such a prohibited cash payment.
8. *Employment Qualification Commitment.* I agree that any hiring or other employment decisions I make will be based on the candidate's qualifications, competence, and experience.
9. *Assent to Enforcement.* I acknowledge that the Executive Order entitled "Ethics Commitments by Executive Branch Personnel," issued by the President on January 20, 2021, which I have read before signing this document, defines certain of the terms applicable to the foregoing obligations and sets forth the methods for enforcing them. I expressly accept the provisions of that Executive Order as a part of this agreement and as binding on me. I understand that the terms of this pledge are in addition to any statutory or other legal restrictions applicable to me by virtue of Federal Government service.


Signature

April 12, 2022
Date

Name (Type or Print): Kristin Johnson

UNITED STATES OFFICE OF
GOVERNMENT ETHICS



January 22, 2021
LA-21-03

LEGAL ADVISORY

TO: Designated Agency Ethics Officials

FROM: Emory A. Rounds, III
Director

SUBJECT: Executive Orders on Ethics Commitments by Executive Branch Personnel

On January 20, 2021, President Biden signed an Executive Order titled “Executive Order on Ethics Commitments by Executive Branch Personnel.” Pursuant to section 4(c)(i) of the Executive Order, the U.S. Office of Government Ethics (OGE) is providing agency ethics officials with the attached copy of the Ethics Pledge and a [link](#) to the Executive Order.

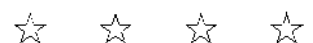
Among other things, this Executive Order requires every “appointee” in each executive agency appointed on or after January 20, 2021, to sign the Ethics Pledge established therein. The definition of “appointee” in the Executive Order covers “every full-time, non-career Presidential or Vice-Presidential appointee, non-career appointee in the Senior Executive Service (or other SES-type system), and appointee to a position that has been excepted from the competitive service by reason of being of a confidential or policymaking character (Schedule C and other positions excepted under comparable criteria) in an executive agency.” Executive Order, sec. 2(b). However, “[i]t does not include any person appointed as a member of the Senior Foreign Service or solely as a uniformed service commissioned officer.” *Id.*

With respect to this Executive Order, ethics officials and employees may continue to rely on OGE’s prior guidance regarding Executive Orders 13490 and 13770 to the extent that such guidance addresses language common to either of these Executive Orders and the new Executive Order. OGE will issue additional interpretive guidance as needed to address issues implicating new language that appears only in the new Executive Order.

Additionally, Executive Order 13770, which applied to appointees appointed on or after January 20, 2017, was revoked by an Executive Order signed by President Trump on January 20, 2021. The latter [Executive Order](#) states, in part, that “[e]mployees and former employees subject to the commitments in Executive Order 13770 will not be subject to those commitments after noon January 20, 2021.”

As always, agency ethics officials may contact their OGE Desk Officers for advice concerning the application of these Executive Orders in individual cases.

Attachment: Ethics Pledge Form



ETHICS PLEDGE

I recognize that this pledge is part of a broader ethics in government plan designed to restore and maintain public trust in government, and I commit myself to conduct consistent with that plan. I commit to decision-making on the merits and exclusively in the public interest, without regard to private gain or personal benefit. I commit to conduct that upholds the independence of law enforcement and precludes improper interference with investigative or prosecutorial decisions of the Department of Justice. I commit to ethical choices of post-Government employment that do not raise the appearance that I have used my Government service for private gain, including by using confidential information acquired and relationships established for the benefit of future clients.

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Christy Goldsmith Romero
Signature

April 1, 2022
Date

Name (Type or Print): Christy Goldsmith Romero

UNITED STATES OFFICE OF
GOVERNMENT ETHICS



January 22, 2021
LA-21-03

LEGAL ADVISORY

TO: Designated Agency Ethics Officials

FROM: Emory A. Rounds, III
Director

SUBJECT: Executive Orders on Ethics Commitments by Executive Branch Personnel

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As always, agency ethics officials may contact their OGE Desk Officers for advice concerning the application of these Executive Orders in individual cases.

Attachment: Ethics Pledge Form



ETHICS PLEDGE

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Accordingly, as a condition, and in consideration, of my employment in the United States Government in a position invested with the public trust, I commit myself to the following obligations, which I understand are binding on me and are enforceable under law:

1. *Lobbyist Gift Ban.* I will not accept gifts from registered lobbyists or lobbying organizations for the duration of my service as an appointee.
2. *Revolving Door Ban — All Appointees Entering Government.* I will not for a period of 2 years from the date of my appointment participate in any particular matter involving specific parties that is directly and substantially related to my former employer or former clients, including regulations and contracts.
3. *Revolving Door Ban — Lobbyists and Registered Agents Entering Government.* If I was registered under the Lobbying Disclosure Act, 2 U.S.C. 1601 *et seq.*, or the Foreign Agents Registration Act (FARA), 22 U.S.C. 611 *et seq.*, within the 2 years before the date of my appointment, in addition to abiding by the limitations of paragraph 2, I will not for a period of 2 years after the date of my appointment:
 - (a) participate in any particular matter on which I lobbied, or engaged in registrable activity under FARA, within the 2 years before the date of my appointment;
 - (b) participate in the specific issue area in which that particular matter falls; or
 - (c) seek or accept employment with any executive agency with respect to which I lobbied, or engaged in registrable activity under FARA, within the 2 years before the date of my appointment.
4. *Revolving Door Ban — Appointees Leaving Government.* If, upon my departure from the Government, I am covered by the post-employment restrictions on communicating with employees of my former executive agency set forth in section 207(c) of title 18, United States Code, and its implementing regulations, I agree that I will abide by those restrictions for a period of 2 years following the end of my appointment. I will abide by these same restrictions with respect to communicating with the senior White House staff.
5. *Revolving Door Ban — Senior and Very Senior Appointees Leaving Government.* If, upon my departure from the Government, I am covered by the post-employment restrictions set forth in sections 207(c) or 207(d) of title 18, United States Code, and those sections' implementing regulations, I agree that, in addition, for a period of 1 year following the end of my appointment, I will not materially assist others in making communications or appearances that I am prohibited from undertaking myself by (a) holding myself out as being available to engage in lobbying activities in support of any such communications or appearances; or (b) engaging in any such lobbying activities.
6. *Revolving Door Ban — Appointees Leaving Government to Lobby.* In addition to abiding by the limitations of paragraph 4, I also agree, upon leaving Government service, not to lobby any covered executive branch official or non-career Senior Executive Service appointee, or engage in any activity on behalf of any foreign government or foreign political party which, were it undertaken on January 20, 2021, would require that I register under FARA, for the remainder of the Administration or 2 years following the end of my appointment, whichever is later.
7. *Golden Parachute Ban.* I have not accepted and will not accept, including after entering Government, any salary or other cash payment from my former employer the eligibility for and payment of which is limited to individuals accepting a position in the United States Government. I also have not accepted and will not accept any non-cash benefit from my former employer that is provided in lieu of such a prohibited cash payment.
8. *Employment Qualification Commitment.* I agree that any hiring or other employment decisions I make will be based on the candidate's qualifications, competence, and experience.
9. *Assent to Enforcement.* I acknowledge that the Executive Order entitled "Ethics Commitments by Executive Branch Personnel," issued by the President on January 20, 2021, which I have read before signing this document, defines certain of the terms applicable to the foregoing obligations and sets forth the methods for enforcing them. I expressly accept the provisions of that Executive Order as a part of this agreement and as binding on me. I understand that the terms of this pledge are in addition to any statutory or other legal restrictions applicable to me by virtue of Federal Government service.

R. Behnam

Signature

December 21, 20 21

Date


Name (Type or Print):

Rostin Behnam

ETHICS PLEDGE

As a condition, and in consideration, of my employment in the United States Government in an appointee position invested with the public trust, I commit myself to the following obligations, which I understand are binding on me and are enforceable under law:

1. I will not, within 5 years after the termination of my employment as an appointee in any executive agency in which I am appointed to serve, engage in lobbying activities with respect to that agency.
2. If, upon my departure from the Government, I am covered by the post-employment restrictions on communicating with employees of my former executive agency set forth in section 207(c) of title 18, United States Code, I agree that I will abide by those restrictions.
3. In addition to abiding by the limitations of paragraphs 1 and 2, I also agree, upon leaving Government service, not to engage in lobbying activities with respect to any covered executive branch official or non-career Senior Executive Service appointee for the remainder of the Administration.
4. I will not, at any time after the termination of my employment in the United States Government, engage in any activity on behalf of any foreign government or foreign political party which, were it undertaken on January 20, 2017, would require me to register under the Foreign Agents Registration Act of 1938, as amended.
5. I will not accept gifts from registered lobbyists or lobbying organizations for the duration of my service as an appointee.
6. I will not for a period of 2 years from the date of my appointment participate in any particular matter involving specific parties that is directly and substantially related to my former employer or former clients, including regulations and contracts.
7. If I was a registered lobbyist within the 2 years before the date of my appointment, in addition to abiding by the limitations of paragraph 6, I will not for a period of 2 years after the date of my appointment participate in any particular matter on which I lobbied within the 2 years before the date of my appointment or participate in the specific issue area in which that particular matter falls.
8. I agree that any hiring or other employment decisions I make will be based on the candidate's qualifications, competence, and experience.
9. I acknowledge that the Executive Order entitled "Ethics Commitments by Executive Branch Appointees," issued by the President on January 28, 2017, which I have read before signing this document, defines certain terms applicable to the foregoing obligations and sets forth the methods for enforcing them. I expressly accept the provisions of that Executive Order as a part of this agreement and as binding on me. I understand that the obligations of this pledge are in addition to any statutory or other legal restrictions applicable to me by virtue of Government service.



Signature

9/12, 2017

Date

Rostin Behnam

Print or type your full name (last, first, middle)



Presidential Documents

Title 3—

Executive Order 13989 of January 20, 2021

The President

Ethics Commitments by Executive Branch Personnel

By the authority vested in me as President by the Constitution and the laws of the United States of America, including section 301 of title 3, United States Code, and sections 3301 and 7301 of title 5, United States Code, it is hereby ordered as follows:

Section 1. *Ethics Pledge.* Every appointee in every executive agency appointed on or after January 20, 2021, shall sign, and upon signing shall be contractually committed to, the following pledge upon becoming an appointee:

“I recognize that this pledge is part of a broader ethics in government plan designed to restore and maintain public trust in government, and I commit myself to conduct consistent with that plan. I commit to decision-making on the merits and exclusively in the public interest, without regard to private gain or personal benefit. I commit to conduct that upholds the independence of law enforcement and precludes improper interference with investigative or prosecutorial decisions of the Department of Justice. I commit to ethical choices of post-Government employment that do not raise the appearance that I have used my Government service for private gain, including by using confidential information acquired and relationships established for the benefit of future clients.

“Accordingly, as a condition, and in consideration, of my employment in the United States Government in a position invested with the public trust, I commit myself to the following obligations, which I understand are binding on me and are enforceable under law:

“1. *Lobbyist Gift Ban.* I will not accept gifts from registered lobbyists or lobbying organizations for the duration of my service as an appointee.

“2. *Revolving Door Ban—All Appointees Entering Government.* I will not for a period of 2 years from the date of my appointment participate in any particular matter involving specific parties that is directly and substantially related to my former employer or former clients, including regulations and contracts.

“3. *Revolving Door Ban—Lobbyists and Registered Agents Entering Government.* If I was registered under the Lobbying Disclosure Act, 2 U.S.C. 1601 *et seq.*, or the Foreign Agents Registration Act (FARA), 22 U.S.C. 611 *et seq.*, within the 2 years before the date of my appointment, in addition to abiding by the limitations of paragraph 2, I will not for a period of 2 years after the date of my appointment:

(a) participate in any particular matter on which I lobbied, or engaged in registrable activity under FARA, within the 2 years before the date of my appointment;

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(c) seek or accept employment with any executive agency with respect to which I lobbied, or engaged in registrable activity under FARA, within the 2 years before the date of my appointment.

“4. *Revolving Door Ban—Appointees Leaving Government.* If, upon my departure from the Government, I am covered by the post-employment restrictions on communicating with employees of my former executive agency set forth in section 207(c) of title 18, United States Code, and its implementing

regulations, I agree that I will abide by those restrictions for a period of 2 years following the end of my appointment. I will abide by these same restrictions with respect to communicating with the senior White House staff.

“5. Revolving Door Ban—Senior and Very Senior Appointees Leaving Government. If, upon my departure from the Government, I am covered by the post-employment restrictions set forth in sections 207(c) or 207(d) of title 18, United States Code, and those sections’ implementing regulations, I agree that, in addition, for a period of 1 year following the end of my appointment, I will not materially assist others in making communications or appearances that I am prohibited from undertaking myself by (a) holding myself out as being available to engage in lobbying activities in support of any such communications or appearances; or (b) engaging in any such lobbying activities.

“6. Revolving Door Ban—Appointees Leaving Government to Lobby. In addition to abiding by the limitations of paragraph 4, I also agree, upon leaving Government service, not to lobby any covered executive branch official or non-career Senior Executive Service appointee, or engage in any activity on behalf of any foreign government or foreign political party which, were it undertaken on January 20, 2021, would require that I register under FARA, for the remainder of the Administration or 2 years following the end of my appointment, whichever is later.

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“8. Employment Qualification Commitment. I agree that any hiring or other employment decisions I make will be based on the candidate’s qualifications, competence, and experience.

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Sec. 2. Definitions. For purposes of this order and the pledge set forth in section 1 of this order:

(a) “Executive agency” shall include each “executive agency” as defined by section 105 of title 5, United States Code, and shall include the Executive Office of the President; provided, however, that “executive agency” shall include the United States Postal Service and Postal Regulatory Commission, but shall exclude the Government Accountability Office.

(b) “Appointee” shall include every full-time, non-career Presidential or Vice-Presidential appointee, non-career appointee in the Senior Executive Service (or other SES-type system), and appointee to a position that has been excepted from the competitive service by reason of being of a confidential or policymaking character (Schedule C and other positions excepted under comparable criteria) in an executive agency. It does not include any person appointed as a member of the Senior Foreign Service or solely as a uniformed service commissioned officer.

(c) “Gift”:

(i) shall have the definition set forth in section 2635.203(b) of title 5, Code of Federal Regulations;

- (ii) shall include gifts that are solicited or accepted indirectly, as defined in section 2635.203(f) of title 5, Code of Federal Regulations; and
- (iii) shall exclude those items excluded by sections 2635.204(b), (c), (e)(1) and (3), and (j) through (l) of title 5, Code of Federal Regulations.
- (d) "Covered executive branch official" and "lobbyist" shall have the definitions set forth in section 1602 of title 2, United States Code.
- (e) "Registered lobbyist or lobbying organization" shall mean a lobbyist or an organization filing a registration pursuant to section 1603(a) of title 2, United States Code, and in the case of an organization filing such a registration, "registered lobbyist" shall include each of the lobbyists identified therein.
- (f) "Lobby" and "lobbied" shall mean to act or have acted as a registered lobbyist.
- (g) "Lobbying activities" shall have the definition set forth in section 1602 of title 2, United States Code.
- (h) "Materially assist" means to provide substantive assistance but does not include providing background or general education on a matter of law or policy based upon an individual's subject matter expertise, nor any conduct or assistance permitted under section 207(j) of title 18, United States Code.
- (i) "Particular matter" shall have the same meaning as set forth in section 207 of title 18, United States Code, and section 2635.402(b)(3) of title 5, Code of Federal Regulations.
- (j) "Particular matter involving specific parties" shall have the same meaning as set forth in section 2641.201(h) of title 5, Code of Federal Regulations, except that it shall also include any meeting or other communication relating to the performance of one's official duties with a former employer or former client, unless the communication applies to a particular matter of general applicability and participation in the meeting or other event is open to all interested parties.
- (k) "Former employer" is any person for whom the appointee has within the 2 years prior to the date of his or her appointment served as an employee, officer, director, trustee, or general partner, except that "former employer" does not include any executive agency or other entity of the Federal Government, State or local government, the District of Columbia, Native American tribe, any United States territory or possession, or any international organization in which the United States is a member state.
- (l) "Former client" is any person for whom the appointee served personally as agent, attorney, or consultant within the 2 years prior to the date of his or her appointment, but excluding instances where the service provided was limited to speeches or similar appearances. It does not include clients of the appointee's former employer to whom the appointee did not personally provide services.
- (m) "Directly and substantially related to my former employer or former clients" shall mean matters in which the appointee's former employer or a former client is a party or represents a party.
- (n) "Participate" means to participate personally and substantially.
- (o) "Government official" means any employee of the executive branch.
- (p) "Administration" means all terms of office of the incumbent President serving at the time of the appointment of an appointee covered by this order.
- (q) "Pledge" means the ethics pledge set forth in section 1 of this order.
- (r) "Senior White House staff" means any person appointed by the President to a position under sections 105(a)(2)(A) or (B) of title 3, United States Code, or by the Vice President to a position under sections 106(a)(1)(A) or (B) of title 3.

(s) All references to provisions of law and regulations shall refer to such provisions as are in effect on January 20, 2021.

Sec. 3. Waiver. (a) The Director of the Office of Management and Budget (OMB), in consultation with the Counsel to the President, may grant to any current or former appointee a written waiver of any restrictions contained in the pledge signed by such appointee if, and to the extent that, the Director of OMB certifies in writing:

(i) that the literal application of the restriction is inconsistent with the purposes of the restriction; or

(ii) that it is in the public interest to grant the waiver. Any such written waiver should reflect the basis for the waiver and, in the case of a waiver of the restrictions set forth in paragraphs 3(b) and (c) of the pledge, a discussion of the findings with respect to the factors set forth in subsection (b) of this section.

(b) A waiver shall take effect when the certification is signed by the Director of OMB and shall be made public within 10 days thereafter.

(c) The public interest shall include, but not be limited to, exigent circumstances relating to national security, the economy, public health, or the environment. In determining whether it is in the public interest to grant a waiver of the restrictions contained in paragraphs 3(b) and (c) of the pledge, the responsible official may consider the following factors:

(i) the government's need for the individual's services, including the existence of special circumstances related to national security, the economy, public health, or the environment;

(ii) the uniqueness of the individual's qualifications to meet the government's needs;

(iii) the scope and nature of the individual's prior lobbying activities, including whether such activities were *de minimis* or rendered on behalf of a nonprofit organization; and

(iv) the extent to which the purposes of the restriction may be satisfied through other limitations on the individual's services, such as those required by paragraph 3(a) of the pledge.

Sec. 4. Administration. (a) The head of every executive agency shall, in consultation with the Director of the Office of Government Ethics, establish such rules or procedures (conforming as nearly as practicable to the agency's general ethics rules and procedures, including those relating to designated agency ethics officers) as are necessary or appropriate to ensure:

(i) that every appointee in the agency signs the pledge upon assuming the appointed office or otherwise becoming an appointee;

(ii) that compliance with paragraph 3 of the pledge is addressed in a written ethics agreement with each appointee to whom it applies, which agreement shall also be approved by the Counsel to the President prior to the appointee commencing work;

(iii) that spousal employment issues and other conflicts not expressly addressed by the pledge are addressed in ethics agreements with appointees or, where no such agreements are required, through ethics counseling; and

(iv) that the agency generally complies with this order.

(b) With respect to the Executive Office of the President, the duties set forth in section 4(a) of this order shall be the responsibility of the Counsel to the President.

(c) The Director of the Office of Government Ethics shall:

(i) ensure that the pledge and a copy of this order are made available for use by agencies in fulfilling their duties under section 4(a) of this order;

(ii) in consultation with the Attorney General or the Counsel to the President, when appropriate, assist designated agency ethics officers in providing advice to current or former appointees regarding the application of the pledge; and

(iii) in consultation with the Attorney General and the Counsel to the President, adopt such rules or procedures as are necessary or appropriate:

(A) to carry out the foregoing responsibilities;

(B) to authorize limited exceptions to the lobbyist gift ban for circumstances that do not implicate the purposes of the ban;

(C) to make clear that no person shall have violated the lobbyist gift ban if the person properly disposes of a gift as provided by section 2635.206 of title 5, Code of Federal Regulations;

(D) to ensure that existing rules and procedures for Government employees engaged in negotiations for future employment with private businesses that are affected by the employees' official actions do not affect the integrity of the Government's programs and operations;

(E) to ensure, in consultation with the Director of the Office of Personnel Management, that the requirement set forth in paragraph 6 of the pledge is honored by every employee of the executive branch;

(iv) in consultation with the Director of OMB, report to the President on whether full compliance is being achieved with existing laws and regulations governing executive branch procurement lobbying disclosure. This report shall include recommendations on steps the executive branch can take to expand, to the fullest extent practicable, disclosure of both executive branch procurement lobbying and of lobbying for Presidential pardons. These recommendations shall include both immediate actions the executive branch can take and, if necessary, recommendations for legislation; and

(v) provide an annual public report on the administration of the pledge and this order.

(d) The Director of the Office of Government Ethics shall, in consultation with the Attorney General, the Counsel to the President, and the Director of the Office of Personnel Management, report to the President on steps the executive branch can take to expand to the fullest extent practicable the revolving door ban set forth in paragraph 5 of the pledge to all executive branch employees who are involved in the procurement process such that they may not for 2 years after leaving Government service lobby any Government official regarding a Government contract that was under their official responsibility in the last 2 years of their Government service. This report shall include both immediate actions the executive branch can take and, if necessary, recommendations for legislation.

(e) All pledges signed by appointees, and all waiver certifications with respect thereto, shall be filed with the head of the appointee's agency for permanent retention in the appointee's official personnel folder or equivalent folder.

Sec. 5. Enforcement. (a) The contractual, fiduciary, and ethical commitments in the pledge provided for herein are solely enforceable by the United States pursuant to this section by any legally available means, including debarment proceedings within any affected executive agency or judicial civil proceedings for declaratory, injunctive, or monetary relief.

(b) Any former appointee who is determined, after notice and hearing, by the duly designated authority within any agency, to have violated his or her pledge may be barred from lobbying any officer or employee of that agency for up to 5 years in addition to the time period covered by the pledge. The head of every executive agency shall, in consultation with the Director of the Office of Government Ethics, establish procedures to implement this subsection, which procedures shall include (but not be limited to) providing for fact-finding and investigation of possible violations

of this order and for referrals to the Attorney General for consideration pursuant to subsection (c) of this order.

(c) The Attorney General is authorized:

(i) upon receiving information regarding the possible breach of any commitment in a signed pledge, to request any appropriate Federal investigative authority to conduct such investigations as may be appropriate; and

(ii) upon determining that there is a reasonable basis to believe that a breach of a commitment has occurred or will occur or continue, if not enjoined, to commence a civil action against the former employee in any United States District Court with jurisdiction to consider the matter.

(d) In any such civil action, the Attorney General is authorized to request any and all relief authorized by law, including but not limited to:

(i) such temporary restraining orders and preliminary and permanent injunctions as may be appropriate to restrain future, recurring, or continuing conduct by the former employee in breach of the commitments in the pledge he or she signed; and

(ii) establishment of a constructive trust for the benefit of the United States, requiring an accounting and payment to the United States Treasury of all money and other things of value received by, or payable to, the former employee arising out of any breach or attempted breach of the pledge signed by the former employee.

Sec. 6. General Provisions. (a) If any provision of this order or the application of such provision is held to be invalid, the remainder of this order and other dissimilar applications of such provision shall not be affected.

(b) Nothing in this order shall be construed to impair or otherwise affect:

(i) the authority granted by law to an executive department or agency, or the head thereof; or

(ii) the functions of the Director of the Office of Management and Budget relating to budgetary, administrative, or legislative proposals.

(c) This order shall be implemented consistent with applicable law and subject to the availability of appropriations.

(d) This order is not intended to, and does not, create any right or benefit, substantive or procedural, enforceable at law or in equity by any party against the United States, its departments, agencies, or entities, its officers, employees, or agents, or any other person.

A large, stylized handwritten signature in black ink, appearing to read "R. B. Seal, Jr." with a long horizontal stroke extending to the right.

5/26/2022

THE WHITE HOUSE,
January 20, 2021.

UNITED STATES OFFICE OF
GOVERNMENT ETHICS



January 22, 2021
LA-21-03

LEGAL ADVISORY

TO: Designated Agency Ethics Officials

FROM: Emory A. Rounds, III
Director

SUBJECT: Executive Orders on Ethics Commitments by Executive Branch Personnel

On January 20, 2021, President Biden signed an Executive Order titled “Executive Order on Ethics Commitments by Executive Branch Personnel.” Pursuant to section 4(c)(i) of the Executive Order, the U.S. Office of Government Ethics (OGE) is providing agency ethics officials with the attached copy of the Ethics Pledge and a [link](#) to the Executive Order.

Among other things, this Executive Order requires every “appointee” in each executive agency appointed on or after January 20, 2021, to sign the Ethics Pledge established therein. The definition of “appointee” in the Executive Order covers “every full-time, non-career Presidential or Vice-Presidential appointee, non-career appointee in the Senior Executive Service (or other SES-type system), and appointee to a position that has been excepted from the competitive service by reason of being of a confidential or policymaking character (Schedule C and other positions excepted under comparable criteria) in an executive agency.” Executive Order, sec. 2(b). However, “[i]t does not include any person appointed as a member of the Senior Foreign Service or solely as a uniformed service commissioned officer.” *Id.*

With respect to this Executive Order, ethics officials and employees may continue to rely on OGE’s prior guidance regarding Executive Orders 13490 and 13770 to the extent that such guidance addresses language common to either of these Executive Orders and the new Executive Order. OGE will issue additional interpretive guidance as needed to address issues implicating new language that appears only in the new Executive Order.

Additionally, Executive Order 13770, which applied to appointees appointed on or after January 20, 2017, was revoked by an Executive Order signed by President Trump on January 20, 2021. The latter [Executive Order](#) states, in part, that “[e]mployees and former employees subject to the commitments in Executive Order 13770 will not be subject to those commitments after noon January 20, 2021.”

As always, agency ethics officials may contact their OGE Desk Officers for advice concerning the application of these Executive Orders in individual cases.

Attachment: Ethics Pledge Form

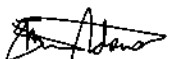


ETHICS PLEDGE

I recognize that this pledge is part of a broader ethics in government plan designed to restore and maintain public trust in government, and I commit myself to conduct consistent with that plan. I commit to decision-making on the merits and exclusively in the public interest, without regard to private gain or personal benefit. I commit to conduct that upholds the independence of law enforcement and precludes improper interference with investigative or prosecutorial decisions of the Department of Justice. I commit to ethical choices of post-Government employment that do not raise the appearance that I have used my Government service for private gain, including by using confidential information acquired and relationships established for the benefit of future clients.

Accordingly, as a condition, and in consideration, of my employment in the United States Government in a position invested with the public trust, I commit myself to the following obligations, which I understand are binding on me and are enforceable under law:

1. *Lobbyist Gift Ban.* I will not accept gifts from registered lobbyists or lobbying organizations for the duration of my service as an appointee.
2. *Revolving Door Ban — All Appointees Entering Government.* I will not for a period of 2 years from the date of my appointment participate in any particular matter involving specific parties that is directly and substantially related to my former employer or former clients, including regulations and contracts.
3. *Revolving Door Ban — Lobbyists and Registered Agents Entering Government.* If I was registered under the Lobbying Disclosure Act, 2 U.S.C. 1601 *et seq.*, or the Foreign Agents Registration Act (FARA), 22 U.S.C. 611 *et seq.*, within the 2 years before the date of my appointment, in addition to abiding by the limitations of paragraph 2, I will not for a period of 2 years after the date of my appointment:
 - (a) participate in any particular matter on which I lobbied, or engaged in registrable activity under FARA, within the 2 years before the date of my appointment;
 - (b) participate in the specific issue area in which that particular matter falls; or
 - (c) seek or accept employment with any executive agency with respect to which I lobbied, or engaged in registrable activity under FARA, within the 2 years before the date of my appointment.
4. *Revolving Door Ban — Appointees Leaving Government.* If, upon my departure from the Government, I am covered by the post-employment restrictions on communicating with employees of my former executive agency set forth in section 207(c) of title 18, United States Code, and its implementing regulations, I agree that I will abide by those restrictions for a period of 2 years following the end of my appointment. I will abide by these same restrictions with respect to communicating with the senior White House staff.
5. *Revolving Door Ban — Senior and Very Senior Appointees Leaving Government.* If, upon my departure from the Government, I am covered by the post-employment restrictions set forth in sections 207(c) or 207(d) of title 18, United States Code, and those sections' implementing regulations, I agree that, in addition, for a period of 1 year following the end of my appointment, I will not materially assist others in making communications or appearances that I am prohibited from undertaking myself by (a) holding myself out as being available to engage in lobbying activities in support of any such communications or appearances; or (b) engaging in any such lobbying activities.
6. *Revolving Door Ban — Appointees Leaving Government to Lobby.* In addition to abiding by the limitations of paragraph 4, I also agree, upon leaving Government service, not to lobby any covered executive branch official or non-career Senior Executive Service appointee, or engage in any activity on behalf of any foreign government or foreign political party which, were it undertaken on January 20, 2021, would require that I register under FARA, for the remainder of the Administration or 2 years following the end of my appointment, whichever is later.
7. *Golden Parachute Ban.* I have not accepted and will not accept, including after entering Government, any salary or other cash payment from my former employer the eligibility for and payment of which is limited to individuals accepting a position in the United States Government. I also have not accepted and will not accept any non-cash benefit from my former employer that is provided in lieu of such a prohibited cash payment.
8. *Employment Qualification Commitment.* I agree that any hiring or other employment decisions I make will be based on the candidate's qualifications, competence, and experience.
9. *Assent to Enforcement.* I acknowledge that the Executive Order entitled "Ethics Commitments by Executive Branch Personnel," issued by the President on January 20, 2021, which I have read before signing this document, defines certain of the terms applicable to the foregoing obligations and sets forth the methods for enforcing them. I expressly accept the provisions of that Executive Order as a part of this agreement and as binding on me. I understand that the terms of this pledge are in addition to any statutory or other legal restrictions applicable to me by virtue of Federal Government service.



Signature

January 13, 2022

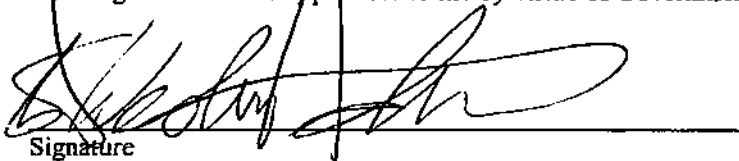
Date

Name (Type or Print): Steven Adamske

ETHICS PLEDGE

As a condition, and in consideration, of my employment in the United States Government in an appointee position invested with the public trust, I commit myself to the following obligations, which I understand are binding on me and are enforceable under law:

1. I will not, within 5 years after the termination of my employment as an appointee in any executive agency in which I am appointed to serve, engage in lobbying activities with respect to that agency.
2. If, upon my departure from the Government, I am covered by the post-employment restrictions on communicating with employees of my former executive agency set forth in section 207(c) of title 18, United States Code, I agree that I will abide by those restrictions.
3. In addition to abiding by the limitations of paragraphs 1 and 2, I also agree, upon leaving Government service, not to engage in lobbying activities with respect to any covered executive branch official or non-career Senior Executive Service appointee for the remainder of the Administration.
4. I will not, at any time after the termination of my employment in the United States Government, engage in any activity on behalf of any foreign government or foreign political party which, were it undertaken on January 20, 2017, would require me to register under the Foreign Agents Registration Act of 1938, as amended.
5. I will not accept gifts from registered lobbyists or lobbying organizations for the duration of my service as an appointee.
6. I will not for a period of 2 years from the date of my appointment participate in any particular matter involving specific parties that is directly and substantially related to my former employer or former clients, including regulations and contracts.
7. If I was a registered lobbyist within the 2 years before the date of my appointment, in addition to abiding by the limitations of paragraph 6, I will not for a period of 2 years after the date of my appointment participate in any particular matter on which I lobbied within the 2 years before the date of my appointment or participate in the specific issue area in which that particular matter falls.
8. I agree that any hiring or other employment decisions I make will be based on the candidate's qualifications, competence, and experience.
9. I acknowledge that the Executive Order entitled "Ethics Commitments by Executive Branch Appointees," issued by the President on January 28, 2017, which I have read before signing this document, defines certain terms applicable to the foregoing obligations and sets forth the methods for enforcing them. I expressly accept the provisions of that Executive Order as a part of this agreement and as binding on me. I understand that the obligations of this pledge are in addition to any statutory or other legal restrictions applicable to me by virtue of Government service.


Signature

April 29, 2017
Date

STEVEN WESLEY ADAMSKE
Print or type your full name (last, first, middle)

From: [Tente, Meghan](#)
To: [Walsh, Frank](#)
Subject: RE: FOR ETHICS SCREENING - FW: Request for Seriatim Concurrence - Citibank, N.A. et al. (Off-line Comms)
Date: Thursday, September 15, 2022 10:46:05 AM
Attachments: image001.png
image002.png
image003.png
image004.png
image005.png
image006.png

Thank you! I just let the Secretariat know.

From: Walsh, Frank <FWalsh@CFTC.gov>
Sent: Thursday, September 15, 2022 10:22 AM
To: Tente, Meghan <MTente@CFTC.gov>
Subject: RE: FOR ETHICS SCREENING - FW: Request for Seriatim Concurrence - Citibank, N.A. et al. (Off-line Comms)

Meghan,

Great catch and you are absolutely correct. Commissioner Pham must recuse from Citi particular matters for two years, and we are within that timeframe.

Thanks,

Frank

From: Tente, Meghan <MTente@CFTC.gov>
Sent: Thursday, September 15, 2022 9:30 AM
To: Walsh, Frank <FWalsh@CFTC.gov>
Subject: FW: FOR ETHICS SCREENING - FW: Request for Seriatim Concurrence - Citibank, N.A. et al. (Off-line Comms)

Hi Frank,

Am I right that Comm. Pham is recused from this case? I'd just appreciate the double-check.

Meghan

From: Kirkpatrick, Chris <CKirkpatrick@CFTC.gov>
Sent: Wednesday, September 14, 2022 6:34 PM
To: Rowland, Matthew <MRowland@CFTC.gov>; Flood, Nora <NFlood@CFTC.gov>; Mastrogiacomo, Elizabeth <EMastrogiacomo@CFTC.gov>; Tente, Meghan <MTente@CFTC.gov>
Cc: Charley, Willie <WCharley@CFTC.gov>; Sidman, Robert <RSidman@CFTC.gov>; Kirkpatrick, Chris <CKirkpatrick@CFTC.gov>
Subject: FOR ETHICS SCREENING - FW: Request for Seriatim Concurrence - Citibank, N.A. et al. (Off-

line Comms)

Good evening,

The attached DOE matter (**Citibank, N.A. et al. (Off-line Comms)**) has been approved by the Chairman's Office for seriatim circulation. Would you please conduct an ethics screening on behalf of your respective Commissioners, and let us know if your Commissioner is cleared to participate in this matter?

Please feel free to contact me with any questions. Thank you.

Chris



Christopher Kirkpatrick
Secretary of the Commission
Office of the General Counsel
Commodity Futures Trading Commission
O: 202-418-5964 | C: 202-378-7405
CKirkpatrick@cftc.gov



From: Wedewer, Harry E <HWedewer@CFTC.gov>

Sent: Tuesday, September 13, 2022 6:53 PM

To: Inbox – Secretariat <InboxSecretariat@CFTC.gov>

Cc: Faulk-White, Donna <DFaulk-White@CFTC.gov>; Smalls, Nisha <NSmalls@CFTC.gov>; OCC Circulation <OCCcirculation@CFTC.gov>; Cantley, Brent <BCantley@CFTC.gov>

Subject: Request for Seriatim Concurrence - Citibank, N.A. et al. (Off-line Comms)

(b)(5)

Thanks so much.

Harry



Harry E. Wedewer
Assistant Chief Counsel
Division of Enforcement
Commodity Futures Trading Commission
202-418-5189 (Desk)
202-641-5822 (Cell)
hwedewer@cftc.gov



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CERTIFICATION OF ETHICS AGREEMENT COMPLIANCE Senate Confirmed Presidential Appointee		
1. Appointee's Information	a. Appointee's Name:	<small>to be completed by OGE:</small> Caroline Pham
	b. Position Title:	<small>to be completed by OGE:</small> Commissioner
	c. Agency:	<small>to be completed by OGE:</small> Commodity Futures Trading Commission
	d. Date Ethics Agreement Signed:	<small>to be completed by OGE:</small> December 20, 2021
	e. Date Confirmed:	<small>to be completed by OGE:</small> March 28, 2022
	f. Due Date for Certification of Ethics Agreement Compliance:	<small>to be completed by OGE:</small> July 5, 2022
2. Resignations	<i>I completed all of the resignations indicated in my ethics agreement before I assumed the duties of my current government position.</i>	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A
3. Divestitures	a. <i>I have completed all of the divestitures indicated in my ethics agreement. I also understand that I may not repurchase these assets during my appointment without OGE's prior approval.</i>	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A
	b. <i>I have filed a periodic transaction report, or periodic transaction reports, (OGE Form-T) to disclose the completion of these agreed upon divestitures.</i>	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A Filing Date(s) of OGE Form 278-T Report(s): June 14, 2022
4. Managed Accounts	<i>If I have a managed account or use the services of an investment professional, I have notified the manager or professional of the limitations indicated in my ethics agreement. In addition, I am continuing to monitor purchases.</i>	<input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> N/A
5. Interim Recusals	<i>I complied with my interim recusal obligations pending the divestitures required by my ethics agreement.</i>	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A

<p>6. Recusals</p> <p><i>(Note: These factual statements describe the appointee's current status. They are not intended to modify ethics agreement commitments or create new recusal obligations.)</i></p>	<p>a. <i>As required by 18 U.S.C. § 208, I will continue to recuse from particular matters in which I know I have a <u>personal</u> or <u>imputed</u> financial interest directly and predictably affected by the matter, unless I receive a waiver or qualify for a regulatory exemption.</i></p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No</p>
	<p>b. <i>I am recusing from particular matters in which any former employer or client I served in the past year is a party or represents a party, unless I have been authorized under 5 C.F.R. § 2635.502(d).</i></p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A</p>
	<p>c. <i>I am recusing from particular matters in which any former employer or client I served in the two years prior to my appointment is a party or represents a party, unless I have received a waiver under Exec. Order 13989.</i></p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A</p>
<p>7. Waivers and Authorizations</p> <p>(Consult with your agency's DAEO if uncertain under what authority a waiver or authorization was granted.)</p>	<p>a. <i>I received a waiver pursuant to 18 U.S.C. § 208.</i></p> <p>If yes, indicate the date of the waiver and indicate the financial interest covered by the waiver.</p>	<p><input type="radio"/> Yes <input checked="" type="radio"/> No</p> <p>Date: Financial interest:</p>
	<p>b. <i>I received a waiver pursuant to Executive Order 13989.</i></p> <p>If yes, indicate the date of the waiver and the subject of the waiver (i.e., applicable paragraph of the ethics pledge, parties, particular matters, specific issue areas, as applicable).</p>	<p><input type="radio"/> Yes <input checked="" type="radio"/> No</p> <p>Date: Subject:</p>
	<p>c. <i>I received an authorization pursuant to 5 C.F.R. § 2635.502(d).</i></p> <p>If yes, indicate date of authorization and identify the covered person(s) as to whom you have been authorized (e.g., former employer, former client, spouse's employer, spouse's current client, etc.).</p>	<p><input type="radio"/> Yes <input checked="" type="radio"/> No</p> <p>Date: Covered person(s):</p>
	<p>d. <i>I received a waiver pursuant to 5 C.F.R. § 2635.503(c).</i></p> <p>If yes, indicate the date of the waiver and identify the former employer or payer.</p>	<p><input type="radio"/> Yes <input checked="" type="radio"/> No</p> <p>Date: Former employer or payer:</p>

<p>8. Payments, Accelerations, or Divestitures Required to be Completed Prior to Entering Government Service</p>	<p>Mark this box if not applicable: <input checked="" type="checkbox"/></p>	<p>a. <i>If I committed that I would forfeit a financial interest or payment, unless it was received or accelerated prior to my assumption of the duties of the government position:</i></p>	<p><input type="radio"/> <i>I received it (or it was accelerated) <u>prior to</u> my assumption of the duties of the position.</i></p> <p><input type="radio"/> <i>I received it (or if was accelerated <u>after</u> my assumption of the duties of the position.</i></p> <p><input type="radio"/> <i>I forfeited it.</i></p>
		<p>b. Financial interest or payment at issue:</p>	
<p>9. Requirements for Regular Appointees</p>	<p><i>I have completed my initial ethics briefing, pursuant to 5 C.F.R. § 2638.305.</i></p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A</p>	
<p>Requirements for Regular Appointees</p>	<p><i>I have signed the ethics pledge pursuant to Executive Order 13989.</i></p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A</p>	
<p>10. Additional Ethics Agreement Requirements</p>	<p style="text-align: center;">to be completed by OGI</p> <p>I am recusing from particular matters that will have a direct and predictable effect on the financial interests of my family trust.</p>	<p style="text-align: center;">to be completed by appointee</p> <p><i>I am complying with these requirements as described in the adjacent box.</i></p> <p><input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A</p>	
<p>11. Comments of Appointee</p>			
<p>Any intentionally false or misleading statement or response provided in this certification is a violation of law punishable by a fine or imprisonment, or both, under 18 U.S.C. § 1001.</p>			
<p><i>I certify that the information I have provided is complete and accurate.</i></p>	<p>Appointee's Signature: CAROLINE PHAM Digitally signed by CAROLINE PHAM Date: 2022.07.01 12:39:38 -04'00'</p>		<p>Date:</p>

<p>Privacy Act Statement</p>	<p>Section 110 of the Ethics in Government Act of 1978, as amended, requires the reporting of this information. The primary use of the information on this report is for review by Government officials to determine an appointee’s compliance with applicable Federal laws and regulations, and the appointee’s Ethics Agreement. Failure to provide the requested information may result in notification of lack of compliance to the Senate and the head of the appointee’s agency, or the White House, and/or could result in OGE declining to certify the appointee’s financial disclosure reports. The appointee could also be required to recuse from matters based on uncertainty as to whether they have divested or resigned from a matter determined to raise potential conflicts.</p> <p>This information will be publically posted to the OGE website at www.oge.gov in accordance with OGE/GOVT-1, Executive Branch Personnel Public Financial Disclosure Reports and Other Name-Retrieved Ethics Program Records (routine use “k.”). Please see OGE/GOVT-1 for more information about the maintenance and disclosure of this information.</p>
<p>Filing the Certification of Ethics Agreement Compliance</p>	<p>Your position as one of our government’s most senior leaders brings with it extraordinary responsibilities. One of those responsibilities is to serve as a role model for all executive branch employees by demonstrating a commitment to ethical principles and actively seeking to avoid conflicts of interest. This includes compliance with the ethics agreement you signed prior to and as a condition of your confirmation. By signing this Certification of Ethics Agreement Compliance (Certification) you certify that you have complied with the terms of your ethics agreement. The information below is intended to help you timely meet your obligation to complete and submit this form to the U.S. Office of Government Ethics (OGE).</p> <p>You are required to comply with the provisions of your ethics agreement within three months of the date of your confirmation, unless otherwise specified. Please:</p> <ul style="list-style-type: none"> • Review your ethics agreement carefully. • If your ethics agreement requires you to resign from an outside position, please note that resignations are generally required “upon confirmation.” • Identify any provisions of your ethics agreement that may require coordination with an account manager or other third party. • Initiate any necessary action early enough to timely comply with your ethics agreement. • If you qualify for and wish to request a Certificate of Divestiture, please submit your request as soon as possible through your agency’s Designated Agency Ethics Official (DAEO). <p>If your ethics agreement specifies that you have more than three months to comply with a particular provision, you must still comply with the remaining provisions within the standard three-month period and submit a Certification (through your agency’s DAEO) within seven days thereafter. If you have not complied with a provision of your ethics agreement, please provide an explanation in Box 11, Comments of Appointee. You will be provided with an additional Certification to complete and submit to OGE to certify that you have complied with all provisions of your ethics agreement.</p> <p>Extensions: OGE may grant an extension of time for complying with a provision of your ethics agreement if, in its sole discretion, it determines that an unusual hardship has/will prevent you from complying timely. Generally, waiting for an account manager to sell an interest, not being able to locate records, or waiting for OGE to process a request for a Certificate of Divestiture are not considered unusual hardships. As noted in the Privacy Act Statement above, not submitting your Certification may result in notification of lack of compliance to the Senate, the head of your agency, or the White House. OGE may also decline to certify your financial disclosure reports. You may also be required to recuse from matters based on uncertainty as to whether you have completed required divestitures and resignations. OGE may also post a notice on its website, in place of your Certification, stating that you have not yet submitted the required certification.</p> <p>While it is your personal responsibility to take the steps necessary to comply with your ethics agreement, your agency’s DAEO is available to assist you in completing this Certification and submitting it to OGE. Any questions you may have should be directed to your agency’s DAEO.</p>

December 20, 2021

John Einstman
Designated Agency Ethics Official
Legal Division
U.S. Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, N.W.
Washington, DC 20581

Dear Mr. Einstman:

The purpose of this letter is to describe the steps that I will take to avoid any actual or apparent conflict of interest in the event that I am confirmed for the position of Commissioner for the U.S. Commodity Futures Trading Commission ("CFTC"). It is my responsibility to understand and comply with commitments outlined in this agreement.

SECTION 1 – GENERAL COMMITMENTS

As required by criminal conflicts of interest law 18 U.S.C. § 208(a), I will not participate personally and substantially in any particular matter in which I know that I have a financial interest directly and predictably affected by the matter, or in which I know that a person whose interests are imputed to me has a financial interest directly and predictably affected by the matter, 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 an officer, director, trustee, general partner or employee; and
- Any person or organization with which I am negotiating or have an arrangement concerning prospective employment.

In the event that an actual or potential conflict of interest arises during my appointment, I will consult with an agency ethics official and take the measures necessary to resolve the conflict, such as recusal from the particular matter or divestiture of an asset.

If I have a managed account or otherwise use the services of an investment professional during my appointment, then I will ensure that the account manager or investment professional obtains my prior approval on a case-by-case basis for the purchase of any assets other than cash, cash equivalents, investment funds that qualify for the exemption for diversified mutual funds and unit investment trusts at 5 C.F.R. § 2640.201(a), obligations of the United States, or municipal bonds.

I will receive a live ethics briefing from a member of the ethics office after my confirmation, but not later than 15 days after my appointment, pursuant to the ethics program regulation at 5 C.F.R. § 2638.305. Within 90 days of my confirmation, I will submit my Certification of Ethics Agreement Compliance which documents my compliance with this ethics agreement.

I understand that as an appointee I will be required to sign the Ethics Pledge (Exec. Order No. 13989) and that I will be bound by it. Among other obligations, I will be required to recuse myself from particular matters involving specific parties involving my former employer or former clients for a period of two years after I am appointed, with the exception of federal, state, and local government.

I will not modify this ethics agreement without your approval and the approval of the U.S. Office of Government Ethics pursuant to the ethics agreement requirements contained within the financial disclosure regulation at 5 C.F.R. § 2634.803(a)(4).

SECTION 2 – CITI

Upon confirmation, I will resign from my position with Citigroup Global Markets Inc. (“Citi”). I hold unvested deferred stock. Citi has informed me that, consistent with internal policy, they will (1) cancel 25% of my unvested deferred stock, and (2) distribute the remaining unvested deferred stock as soon as administratively practicable thereafter. I will divest or forfeit all of my interests in Citi as soon as practicable but not later than 90 days after my confirmation. I will not participate personally and substantially in any particular matter that to my knowledge has a direct and predictable effect on the financial interests of Citi until I have divested it, 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 have verified that I will be able to carry out the divestitures within the timeframe described above. In addition, if Citi decides to pay me a bonus for work I performed during 2021, I will not accept the bonus and will forfeit it, unless I receive the bonus before I assume the duties of the position of Commissioner. Pursuant to the impartiality regulation at 5 C.F.R. § 2635.503, if I receive the bonus, I will not participate personally and substantially in any particular matter involving specific parties in which Citi is a party or represents a party for a period of two years from the date on which I receive the bonus, unless I first receive a written waiver pursuant to 5 C.F.R. § 2635.503(e). Pursuant to the impartiality regulation at 5 C.F.R. § 2635.502, if I do not receive the bonus, I will not participate personally and substantially in any particular matter involving specific parties in which I know Citi is a party or represents a party for a period of one year from the date of my resignation, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

SECTION 3 – DIVESTITURES

As soon as practicable, but not later than 90 days after my confirmation, I will divest my interests in the following:

- Ethereum (Coinbase account)

With regard to this virtual currency, I will not participate personally and substantially in any particular matter that, to my knowledge, has a direct and predictable effect on the financial interests of the virtual currency until I have divested it, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1). I have verified that I will be able to carry out the divestitures within the timeframe described above.

I understand that I may be eligible to request a Certificate of Divestiture for qualifying assets and that a Certificate of Divestiture is effective only if obtained prior to divestiture. Regardless of whether I receive a Certificate of Divestiture, I will ensure that all divestitures discussed in this agreement occur within the agreed upon timeframes and that all proceeds are invested in non-conflicting assets. I understand that I must submit in a timely fashion my request for a Certificate of Divestiture to allow for adequate time for OGE to process the Certificate of Divestiture, and in order to divest assets within the agreed upon timeframe.

I (including my spouse and dependent children if applicable) will not repurchase any asset I was required to divest without consulting with an agency ethics official and the U.S. Office of Government Ethics.

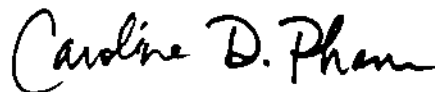
SECTION 4 – OUTSIDE POSITIONS

I will retain my position as a trustee of the Family Revocable Trust #1. I will not receive any fees for the services that I provide as a trustee during my appointment to the position of Commissioner. I will not participate personally and substantially in any particular matter that to my knowledge has a direct and predictable effect on the financial interests of the Family Revocable Trust #1, 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).

SECTION 5 – PUBLIC POSTING

I have been advised that this ethics agreement and the Certification of Ethics Agreement Compliance will be posted publicly, consistent with the public information law a 5 U.S.C. § 552, on the website of the U.S. Office of Government Ethics with ethics agreements of other Presidential nominees who file public financial disclosure reports.

Sincerely,



Caroline Pham

CERTIFICATION OF ETHICS AGREEMENT COMPLIANCE Senate Confirmed Presidential Appointee		
1. Appointee's Information	a. Appointee's Name:	to be completed by OGE: Summer Mersinger
	b. Position Title:	to be completed by OGE: Commissioner
	c. Agency:	to be completed by OGE: Commodity Futures Trading Commission
	d. Date Ethics Agreement Signed:	to be completed by OGE: January 13, 2022
	e. Date Confirmed:	to be completed by OGE: March 28, 2022
	f. Due Date for Certification of Ethics Agreement Compliance:	to be completed by OGE: July 5, 2022
2. Resignations	<i>I completed all of the resignations indicated in my ethics agreement before I assumed the duties of my current government position.</i>	<input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> N/A
3. Divestitures	a. <i>I have completed all of the divestitures indicated in my ethics agreement. I also understand that I may not repurchase these assets during my appointment without OGE's prior approval.</i>	<input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> N/A
	b. <i>I have filed a periodic transaction report, or periodic transaction reports, (OGE Form-T) to disclose the completion of these agreed upon divestitures.</i>	<input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> N/A Filing Date(s) of OGE Form 278-T Report(s):
4. Managed Accounts	<i>If I have a managed account or use the services of an investment professional, I have notified the manager or professional of the limitations indicated in my ethics agreement. In addition, I am continuing to monitor purchases.</i>	<input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> N/A
5. Interim Recusals	<i>I complied with my interim recusal obligations pending the divestitures required by my ethics agreement.</i>	<input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> N/A

<p>6. Recusals</p> <p><i>(Note: These factual statements describe the appointee's current status. They are not intended to modify ethics agreement commitments or create new recusal obligations.)</i></p>	<p>a. <i>As required by 18 U.S.C. § 208, I will continue to recuse from particular matters in which I know I have a <u>personal</u> or <u>imputed</u> financial interest directly and predictably affected by the matter, unless I receive a waiver or qualify for a regulatory exemption.</i></p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No</p>
	<p>b. <i>I am recusing from particular matters in which any former employer or client I served in the past year is a party or represents a party, unless I have been authorized under 5 C.F.R. § 2635.502(d).</i></p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A</p>
	<p>c. <i>I am recusing from particular matters in which any former employer or client I served in the two years prior to my appointment is a party or represents a party, unless I have received a waiver under Exec. Order 13989.</i></p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A</p>
<p>7. Waivers and Authorizations</p> <p>(Consult with your agency's DAEO if uncertain under what authority a waiver or authorization was granted.)</p>	<p>a. <i>I received a waiver pursuant to 18 U.S.C. § 208.</i></p> <p>If yes, indicate the date of the waiver and indicate the financial interest covered by the waiver.</p>	<p><input type="radio"/> Yes <input checked="" type="radio"/> No</p> <p>Date: Financial interest:</p>
	<p>b. <i>I received a waiver pursuant to Executive Order 13989.</i></p> <p>If yes, indicate the date of the waiver and the subject of the waiver (i.e., applicable paragraph of the ethics pledge, parties, particular matters, specific issue areas, as applicable).</p>	<p><input type="radio"/> Yes <input checked="" type="radio"/> No</p> <p>Date: Subject:</p>
	<p>c. <i>I received an authorization pursuant to 5 C.F.R. § 2635.502(d).</i></p> <p>If yes, indicate date of authorization and identify the covered person(s) as to whom you have been authorized (e.g., former employer, former client, spouse's employer, spouse's current client, etc.).</p>	<p><input type="radio"/> Yes <input checked="" type="radio"/> No</p> <p>Date: Covered person(s):</p>
	<p>d. <i>I received a waiver pursuant to 5 C.F.R. § 2635.503(c).</i></p> <p>If yes, indicate the date of the waiver and identify the former employer or payer.</p>	<p><input type="radio"/> Yes <input checked="" type="radio"/> No</p> <p>Date: Former employer or payer:</p>

<p>8. Payments, Accelerations, or Divestitures Required to be Completed Prior to Entering Government Service</p>	<p>Mark this box if not applicable: <input checked="" type="checkbox"/></p>	<p>a. If I committed that I would forfeit a financial interest or payment, unless it was received or accelerated prior to my assumption of the duties of the government position:</p>	<p><input type="radio"/> I received it (or it was accelerated) <u>prior to</u> my assumption of the duties of the position.</p> <p><input type="radio"/> I received it (or if was accelerated <u>after</u> my assumption of the duties of the position.</p> <p><input type="radio"/> I forfeited it.</p>
	<p>b. Financial interest or payment at issue:</p>		
<p>9. Requirements for Regular Appointees</p>	<p>I have completed my initial ethics briefing, pursuant to 5 C.F.R. § 2638.305.</p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A</p>	
<p>Requirements for Regular Appointees</p>	<p>I have signed the ethics pledge pursuant to Executive Order 13989.</p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A</p>	
<p>10. Additional Ethics Agreement Requirements</p>	<p style="text-align: center;">to be completed by OGI</p> <p>I am recusing from particular matters involving specific parties in which I know a client of my spouse is a party or represents a party.</p>	<p style="text-align: center;">to be completed by appointee</p> <p>I am complying with these requirements as described in the adjacent box.</p> <p><input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A</p>	
<p>11. Comments of Appointee</p>			
<p>Any intentionally false or misleading statement or response provided in this certification is a violation of law punishable by a fine or imprisonment, or both, under 18 U.S.C. § 1001.</p>			
<p><i>I certify that the information I have provided is complete and accurate.</i></p>	<p>Appointee's Signature: SUMMER MERSINGER <small>Digitally signed by SUMMER MERSINGER Date: 2022.06.15 16:50:07 -04'00'</small></p>	<p>Date:</p>	

<p>Privacy Act Statement</p>	<p>Section 110 of the Ethics in Government Act of 1978, as amended, requires the reporting of this information. The primary use of the information on this report is for review by Government officials to determine an appointee’s compliance with applicable Federal laws and regulations, and the appointee’s Ethics Agreement. Failure to provide the requested information may result in notification of lack of compliance to the Senate and the head of the appointee’s agency, or the White House, and/or could result in OGE declining to certify the appointee’s financial disclosure reports. The appointee could also be required to recuse from matters based on uncertainty as to whether they have divested or resigned from a matter determined to raise potential conflicts.</p> <p>This information will be publically posted to the OGE website at www.oge.gov in accordance with OGE/GOVT-1, Executive Branch Personnel Public Financial Disclosure Reports and Other Name-Retrieved Ethics Program Records (routine use “k.”). Please see OGE/GOVT-1 for more information about the maintenance and disclosure of this information.</p>
<p>Filing the Certification of Ethics Agreement Compliance</p>	<p>Your position as one of our government’s most senior leaders brings with it extraordinary responsibilities. One of those responsibilities is to serve as a role model for all executive branch employees by demonstrating a commitment to ethical principles and actively seeking to avoid conflicts of interest. This includes compliance with the ethics agreement you signed prior to and as a condition of your confirmation. By signing this Certification of Ethics Agreement Compliance (Certification) you certify that you have complied with the terms of your ethics agreement. The information below is intended to help you timely meet your obligation to complete and submit this form to the U.S. Office of Government Ethics (OGE).</p> <p>You are required to comply with the provisions of your ethics agreement within three months of the date of your confirmation, unless otherwise specified. Please:</p> <ul style="list-style-type: none"> • Review your ethics agreement carefully. • If your ethics agreement requires you to resign from an outside position, please note that resignations are generally required “upon confirmation.” • Identify any provisions of your ethics agreement that may require coordination with an account manager or other third party. • Initiate any necessary action early enough to timely comply with your ethics agreement. • If you qualify for and wish to request a Certificate of Divestiture, please submit your request as soon as possible through your agency’s Designated Agency Ethics Official (DAEO). <p>If your ethics agreement specifies that you have more than three months to comply with a particular provision, you must still comply with the remaining provisions within the standard three-month period and submit a Certification (through your agency’s DAEO) within seven days thereafter. If you have not complied with a provision of your ethics agreement, please provide an explanation in Box 11, Comments of Appointee. You will be provided with an additional Certification to complete and submit to OGE to certify that you have complied with all provisions of your ethics agreement.</p> <p>Extensions: OGE may grant an extension of time for complying with a provision of your ethics agreement if, in its sole discretion, it determines that an unusual hardship has/will prevent you from complying timely. Generally, waiting for an account manager to sell an interest, not being able to locate records, or waiting for OGE to process a request for a Certificate of Divestiture are not considered unusual hardships. As noted in the Privacy Act Statement above, not submitting your Certification may result in notification of lack of compliance to the Senate, the head of your agency, or the White House. OGE may also decline to certify your financial disclosure reports. You may also be required to recuse from matters based on uncertainty as to whether you have completed required divestitures and resignations. OGE may also post a notice on its website, in place of your Certification, stating that you have not yet submitted the required certification.</p> <p>While it is your personal responsibility to take the steps necessary to comply with your ethics agreement, your agency’s DAEO is available to assist you in completing this Certification and submitting it to OGE. Any questions you may have should be directed to your agency’s DAEO.</p>

January 13, 2022

John Einstman
Designated Agency Ethics Official
Legal Division
U.S. Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, N.W.
Washington, DC 20581

Dear Mr. Einstman:

The purpose of this letter is to describe the steps that I will take to avoid any actual or apparent conflict of interest in the event that I am confirmed for the position of Commissioner for the U.S. Commodity Futures Trading Commission ("CFTC"). It is my responsibility to understand and comply with commitments outlined in this agreement.

SECTION 1 - GENERAL COMMITMENTS

As required by the criminal conflicts of interest law at 18 U.S.C. § 208(a), I will not participate personally and substantially in any particular matter in which I know that I have a financial interest directly and predictably affected by the matter, or in which I know that a person whose interests are imputed to me has a financial interest directly and predictably affected by the particular matter, 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 an officer, director, trustee, general partner, or employee; and
- Any person or organization with which I am negotiating or have an arrangement concerning prospective employment.

In the event that an actual or potential conflict of interest arises during my appointment, I will consult with an agency ethics official and take the measures necessary to resolve the conflict, such as recusal from the particular matter or divestiture of an asset.

If I have a managed account or otherwise use the services of an investment professional during my appointment, then I will ensure that the account manager or investment professional obtains my prior approval on a case-by-case basis for the purchase of any assets other than cash, cash equivalents, investment funds that qualify for the regulatory exemption for diversified

mutual funds and unit investment trusts at 5 C.F.R. § 2640.201(a), obligations of the United States, or municipal bonds.

I will receive a live ethics briefing from a member of the ethics office after my confirmation, but not later than 15 days after my appointment, pursuant to the ethics program regulation at 5 C.F.R. § 2638.305. Within 90 days of my confirmation, I will submit my Certification of Ethics Agreement Compliance which documents my compliance with this ethics agreement.

I understand that as an appointee I must continue to abide by the Ethics Pledge (Exec. Order No. 13989) that I previously signed and that I will continue to be bound by it. Among other obligations, I will be required to recuse myself from particular matters involving specific parties involving my former employer or former clients for a period of two years after I am appointed, with the exception of federal, state, and local government.

I will not modify this ethics agreement without your approval and the approval of the U.S. Office of Government Ethics pursuant to the ethics agreement requirements contained in the financial disclosure regulation at 5 C.F.R. § 2634.803(a)(4).

SECTION 2 – SPOUSE EMPLOYMENT

My spouse is the sole proprietor of his consulting firm, which does business as The Red-to-Black Group. I will not participate personally and substantially in any particular matter that to my knowledge has a direct and predictable effect on the financial interests of The Red-to-Black Group, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1). Pursuant to the impartiality regulation at 5 C.F.R. § 2635.502, I also will not participate personally and substantially in any particular matter involving specific parties in which I know a client of my spouse is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

SECTION 3 – PUBLIC POSTING

I have been advised that this ethics agreement and the Certification of Ethics Agreement Compliance will be posted publicly, consistent with the public information law at 5 U.S.C. § 552, on the website of the U.S. Office of Government Ethics with ethics agreements of other Presidential nominees who file public financial disclosure reports.

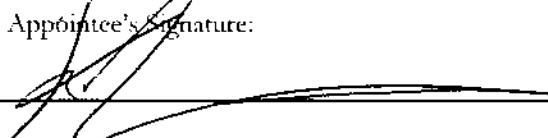
Sincerely,



Summer Mersinger

CERTIFICATION OF ETHICS AGREEMENT COMPLIANCE Senate Confirmed Presidential Appointee		
1. Appointee's Information	a. Appointee's Name:	to be completed by OGE
	b. Position Title:	to be completed by OGE
	c. Agency:	to be completed by OGE
	d. Date Ethics Agreement Signed:	to be completed by OGE
	e. Date Confirmed:	to be completed by OGE
	f. Due Date for Certification of Ethics Agreement Compliance:	to be completed by OGE
2. Resignations	<i>I completed all of the resignations indicated in my ethics agreement before I assumed the duties of my current government position.</i>	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A
3. Divestitures	a. <i>I have completed all of the divestitures indicated in my ethics agreement. I also understand that I may not repurchase these assets during my appointment without OGE's prior approval.</i>	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A
	b. <i>I have filed a periodic transaction report, or periodic transaction reports, (OGE Form T) to disclose the completion of these agreed upon divestitures.</i>	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A Filing Date(s) of OGE Form 278-T Report(s):
4. Managed Accounts	<i>If I have a managed account or use the services of an investment professional, I have notified the manager or professional of the limitations indicated in my ethics agreement. In addition, I am continuing to monitor purchases.</i>	<input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> N/A
5. Interim Recusals	<i>I complied with my interim recusal obligations pending the divestitures required by my ethics agreement.</i>	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A

<p>6.</p> <p>Recusals</p> <p><i>(Note: These factual statements describe the appointee's current status. They are not intended to modify ethics agreement commitments or create new recusal obligations.)</i></p>	<p>a. <i>As required by 18 U.S.C. § 208, I will continue to recuse from particular matters in which I know I have a personal or imputed financial interest directly and predictably affected by the matter, unless I receive a waiver or qualify for a regulatory exemption.</i></p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No</p>
	<p>b. <i>I am recusing from particular matters in which any former employer or client I served in the past year is a party or represents a party, unless I have been authorized under 5 C.F.R. § 2635.502(d).</i></p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A</p>
	<p>c. <i>I am recusing from particular matters in which any former employer or client I served in the two years prior to my appointment is a party or represents a party, unless I have received a waiver under Exec. Order 13989.</i></p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A</p>
<p>7.</p> <p>Waivers and Authorizations</p> <p>(Consult with your agency's DAEO if uncertain under what authority a waiver or authorization was granted.)</p>	<p>a. <i>I received a waiver pursuant to 18 U.S.C. § 208.</i></p> <p>If yes, indicate the date of the waiver and indicate the financial interest covered by the waiver.</p>	<p><input type="radio"/> Yes <input checked="" type="radio"/> No</p> <p>Date:</p> <p>Financial interest:</p>
	<p>b. <i>I received a waiver pursuant to Executive Order 13989.</i></p> <p>If yes, indicate the date of the waiver and the subject of the waiver (i.e., applicable paragraph of the ethics pledge, parties, particular matters, specific issue areas, as applicable).</p>	<p><input type="radio"/> Yes <input checked="" type="radio"/> No</p> <p>Date:</p> <p>Subject:</p>
	<p>c. <i>I received an authorization pursuant to 5 C.F.R. § 2635.502(d).</i></p> <p>If yes, indicate date of authorization and identify the covered person(s) as to whom you have been authorized (e.g., former employer, former client, spouse's employer, spouse's current client, etc.).</p>	<p><input type="radio"/> Yes <input checked="" type="radio"/> No</p> <p>Date:</p> <p>Covered person(s):</p>
	<p>d. <i>I received a waiver pursuant to 5 C.F.R. § 2635.503(c).</i></p> <p>If yes, indicate the date of the waiver and identify the former employer or payer.</p>	<p><input type="radio"/> Yes <input checked="" type="radio"/> No</p> <p>Date:</p> <p>Former employer or payer:</p>

<p>8. Payments, Accelerations, or Divestitures Required to be Completed Prior to Entering Government Service</p>	<p>Mark this box if not applicable:</p> <p><input checked="" type="checkbox"/></p>	<p>a. If I committed that I would forfeit a financial interest or payment, unless it was received or accelerated prior to my assumption of the duties of the government position:</p>	<p><input type="radio"/> I received it (or it was accelerated) <u>prior to</u> my assumption of the duties of the position.</p> <p><input type="radio"/> I received it (or if was accelerated <u>after</u> my assumption of the duties of the position.</p> <p><input type="radio"/> I forfeited it.</p>
<p>9. Requirements for Regular Appointees</p>	<p>I have completed my initial ethics briefing pursuant to 5 C.F.R. § 2638.305.</p> <p><small>If you are a special Government employee, you must also complete a briefing pursuant to 5 C.F.R. § 2635.107.</small></p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A</p>	
	<p>I have signed the ethics pledge pursuant to Executive Order 13989.</p> <p><small>If you are a special Government employee, you must also sign the pledge pursuant to 5 C.F.R. § 2635.107.</small></p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A</p>	
<p>10. Additional Ethics Agreement Requirements</p>	<p><small>to be completed by OGE</small></p> <p>I am recusing from engaging in any work related to the contracts I have signed with respect to future writing.</p>	<p><small>to be completed by appointee</small></p> <p>I am complying with these requirements as described in the adjacent box.</p> <p><input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A</p>	
<p>11. Comments of Appointee</p>			
<p>Any intentionally false or misleading statement or response provided in this certification is a violation of law punishable by a fine or imprisonment, or both, under 18 U.S.C. § 1001.</p>			
<p>I certify that the information I have provided is complete and accurate.</p>	<p>Appointee's Signature:</p> 	<p>Date:</p> <p>6/29/2022</p>	

<p>Privacy Act Statement</p>	<p>Section 110 of the Ethics in Government Act of 1978, as amended, requires the reporting of this information. The primary use of the information on this report is for review by Government officials to determine an appointee's compliance with applicable Federal laws and regulations, and the appointee's Ethics Agreement. Failure to provide the requested information may result in notification of lack of compliance to the Senate and the head of the appointee's agency, or the White House, and/or could result in OGE declining to certify the appointee's financial disclosure reports. The appointee could also be required to recuse from matters based on uncertainty as to whether they have divested or resigned from a matter determined to raise potential conflicts.</p> <p>This information will be publically posted to the OGE website at www.oge.gov in accordance with OGE/GOVT-1, Executive Branch Personnel Public Financial Disclosure Reports and Other Name-Retrieved Ethics Program Records (routine use "k."). Please see OGE/GOVT-1 for more information about the maintenance and disclosure of this information.</p>
<p>Filing the Certification of Ethics Agreement Compliance</p>	<p>Your position as one of our government's most senior leaders brings with it extraordinary responsibilities. One of those responsibilities is to serve as a role model for all executive branch employees by demonstrating a commitment to ethical principles and actively seeking to avoid conflicts of interest. This includes compliance with the ethics agreement you signed prior to and as a condition of your confirmation. By signing this Certification of Ethics Agreement Compliance (Certification) you certify that you have complied with the terms of your ethics agreement. The information below is intended to help you timely meet your obligation to complete and submit this form to the U.S. Office of Government Ethics (OGE).</p> <p>You are required to comply with the provisions of your ethics agreement within three months of the date of your confirmation, unless otherwise specified. Please:</p> <ul style="list-style-type: none"> • Review your ethics agreement carefully. • If your ethics agreement requires you to resign from an outside position, please note that resignations are generally required "upon confirmation." • Identify any provisions of your ethics agreement that may require coordination with an account manager or other third party. • Initiate any necessary action early enough to timely comply with your ethics agreement. • If you qualify for and wish to request a Certificate of Divestiture, please submit your request as soon as possible through your agency's Designated Agency Ethics Official (DAEO). <p>If your ethics agreement specifies that you have more than three months to comply with a particular provision, you must still comply with the remaining provisions within the standard three-month period and submit a Certification (through your agency's DAEO) within seven days thereafter. If you have not complied with a provision of your ethics agreement, please provide an explanation in Box 11, Comments of Appointee. You will be provided with an additional Certification to complete and submit to OGE to certify that you have complied with all provisions of your ethics agreement.</p> <p>Extensions: OGE may grant an extension of time for complying with a provision of your ethics agreement if, in its sole discretion, it determines that an unusual hardship has/will prevent you from complying timely. Generally, waiting for an account manager to sell an interest, not being able to locate records, or waiting for OGE to process a request for a Certificate of Divestiture are not considered unusual hardships. As noted in the Privacy Act Statement above, not submitting your Certification may result in notification of lack of compliance to the Senate, the head of your agency, or the White House. OGE may also decline to certify your financial disclosure reports. You may also be required to recuse from matters based on uncertainty as to whether you have completed required divestitures and resignations. OGE may also post a notice on its website, in place of your Certification, stating that you have not yet submitted the required certification.</p> <p>While it is your personal responsibility to take the steps necessary to comply with your ethics agreement, your agency's DAEO is available to assist you in completing this Certification and submitting it to OGE. Any questions you may have should be directed to your agency's DAEO.</p>

CONTROLLED

August 18, 2021

John Einstman
Designated Agency Ethics Official
Legal Division
U.S. Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, N.W.
Washington, DC 20581

Dear Mr. Einstman:

The purpose of this letter is to describe the steps that I will take to avoid any actual or apparent conflict of interest in the event that I am confirmed for the position of Commissioner for the U.S. Commodity Futures Trading Commission ("CFTC"). It is my responsibility to understand and comply with commitments outlined in this agreement.

SECTION 1 – GENERAL COMMITMENTS

As required by criminal conflicts of interest law 18 U.S.C. § 208(a), I will not participate personally and substantially in any particular matter in which I know that I have a financial interest directly and predictably affected by the matter, or in which I know that a person whose interests are imputed to me has a financial interest directly and predictably affected by the matter, 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.

In the event that an actual or potential conflict of interest arises during my appointment, I will consult with an agency ethics official and take the measures necessary to resolve the conflict, such as recusal from the particular matter or divestiture of an asset.

If I have a managed account or otherwise use the services of an investment professional during my appointment, then I will ensure that the account manager or investment professional obtains my prior approval on a case-by-case basis for the purchase of any assets other than cash, cash equivalents, investment funds that qualify for the exemption for diversified mutual funds and unit investment trusts at 5 C.F.R. § 2640.201(a), obligations of the United States, or municipal bonds.

I will receive a live ethics briefing from a member of the ethics office after my confirmation, but not later than 15 days after my appointment, pursuant to the ethics program regulation at 5 C.F.R. § 2638.305. Within 90 days of my confirmation, I will submit my Certification of Ethics Agreement Compliance which documents my compliance with this ethics agreement.

I understand that as an appointee I will be required to sign the Ethics Pledge (Exec. Order No. 13989) and that I will be bound by it. Among other obligations, I will be required to recuse myself from particular matters involving specific parties involving my former employer or former clients for a period of two years after I am appointed, with the exception of federal, state, and local government.

I will not modify this ethics agreement without your approval and the approval of the U.S. Office of Government Ethics pursuant to the ethics agreement requirements contained within the financial disclosure regulation at 5 C.F.R. § 2634.803(a)(4).

SECTION 2- EMORY UNIVERSITY SCHOOL OF LAW

Upon confirmation, I will resign from my position as Senior Associate Dean of Faculty and Academics, however I will take an unpaid leave of absence from my position as Professor of Law at Emory University School of Law. I will not participate personally and substantially in any particular matter that, to my knowledge, has a direct and predictable effect upon the financial interests of Emory University, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualify for either the exemption for employees on leave from institutions of higher learning allowing participation in certain particular matters of general applicability at 5 C.F.R. § 2640.203(b), or another regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2).

SECTION 3- OTHER RESIGNATIONS

Upon confirmation, I will resign from my position with the:

- Association for the Promotion of Political Economy.

Additionally, in December 2020, I resigned from my position with Tulane University. Pursuant to the impartiality regulation at 5 C.F.R. § 2635.502, for a period of one year after my resignation from each of these entities, I will not participate personally and substantially in any particular matter involving specific parties in which I know that entity is a party or represents a party, unless I am first authorized to participate pursuant to 5 C.F.R. § 2635.502(d).

SECTION 4 – DIVESTITURES

As soon as practicable, but not later than 90 days after my confirmation, I will divest my interests in the following:

- Bitcoin (Coinbase account)

- The Goldman Sachs Group, Inc.
- JPMorgan Chase & Co.

With regard to each of these entities and virtual currency, I will not participate personally and substantially in any particular matter that, to my knowledge, has a direct and predictable effect on the financial interests of the entities or virtual currency until I have divested it, 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 have verified that I will be able to carry out the divestitures within the timeframe described above.

I understand that I may be eligible to request a Certificate of Divestiture for qualifying assets and that a Certificate of Divestiture is effective only if obtained prior to divestiture. Regardless of whether I receive a Certificate of Divestiture, I will ensure that all divestitures discussed in this agreement occur within the agreed upon timeframes and that all proceeds are invested in non-conflicting assets. I understand that I must submit in a timely fashion my request for a Certificate of Divestiture to allow for adequate time for OGE to process the Certificate of Divestiture, and in order to divest assets within the agreed upon timeframe.

I (including my spouse and dependent children if applicable) will not repurchase any asset I was required to divest without consulting with an agency ethics official and the U.S. Office of Government Ethics.

SECTION 5 - INTELLECTUAL PROPERTY

Before learning of my consideration for a possible nomination to a position at the CFTC, I completed work on a handbook on the subject of artificial intelligence and the law for Cambridge University Press. I may receive future royalties from Cambridge University Press for sales for the print or audio edition of the handbook. I understand that I may not work on this book or perform any other services for compensation during my appointment to the position of Commissioner. Pursuant to the impartiality regulation at 5 C.F.R. § 2635.502, I will not participate personally and substantially in any particular matter involving specific parties in which I know Cambridge University Press is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

SECTION 6 – PUBLIC POSTING

I have been advised that this ethics agreement and the Certification of Ethics Agreement Compliance will be posted publicly, consistent with the public information law a 5 U.S.C. § 552, on the website of the U.S. Office of Government Ethics with ethics agreements of other Presidential nominees who file public financial disclosure reports.

Sincerely,

A handwritten signature in black ink, appearing to read 'K. Johnson', with a long horizontal line extending to the right.

Kristin N. Johnson

NOTIFICATION OF PERSONNEL ACTION

1. Name (Last, First, Middle) MERSINGER, SUMMER K				2. Social Security Number (b) (6)		3. Date of Birth		4. Effective Date 04/09/2023			
FIRST ACTION						SECOND ACTION					
5-A. Code 571		5-B. Nature of Action CONV TO EXC APPT NTE 06/12/23				6-A. Code		6-B. Nature of Action			
5-C. Code ZNM		5-D. Legal Authority P L 93 463				6-C. Code		6-D. Legal Authority			
5-E. Code		5-F. Legal Authority				6-E. Code		6-F. Legal Authority			
7. FROM: Position Title and Number						15. TO: Position Title and Number COMMISSIONER 01009006 010090					
8. Pay Plan EX		9. Occ. Code 0301		10. Grade or Level 04		11. Step or Rate 00		12. Total Salary/Award 158,500.00		13. Pay Basis PA	
12A. Basic Pay .00		12B. Locality Adj.		12C. Adj. Basic Pay		12D. Other Pay .00		20A. Basic Pay 158,500.00		20D. Other Pay .00	
14. Name and Location of Position's Organization						22. Name and Location of Position's Organization COMMODITY FUTURES TRADING COMMISSION OFFICE OF THE COMMISSIONER CT CF0300000000000000 PP 08 2023					
EMPLOYEE DATA											
23. Veterans Preference 1 1 - None 3 - 10-Point/Disability 5 - 10-Point/Other 2 - 5-Point 4 - 10-Point/Compensable 6 - 10-Point/Compensable/50%						24. Tenure 0 0 - None 2 - Conditional 1 - Permanent 3 - Indefinite		25. Agency Use		26. Veterans Preference for RIF <input type="checkbox"/> YES <input checked="" type="checkbox"/> X <input type="checkbox"/> NO	
27. FEGLI B0 WAIVED						28. Annuitant Indicator 9 NOT APPLICABLE		29. Pay Rate Determinant T BELOW THE MINIMUM I			
30. Retirement Plan K FERS AND FICA				31. Service Comp. Date (Leave) 08/19/2005		32. Work Schedule F FULL TIME		33. Part-Time Hours Per Biweekly Pay Period			
POSITION DATA											
34. Position Occupied 2 1 - Competitive Service 3 - SES General 2 - Excepted Service 4 - SES Career Reserved				35. FLSA Category E E - Exempt N - Nonexempt		36. Appropriation Code				37. Bargaining Unit Status 8888	
38. Duty Station Code 11-0010-001				39. Duty Station (City - County - State or Overseas Location) WASHINGTON DIST OF COLUMBIA DC							
40. Agency Data		41.		42.		43.		44.			
45. Remarks REASON FOR TEMPORARY APPOINTMENT: TEMPORARY NEED.											
46. Employing Department or Agency COMMODITY FUTURES TRADING COMMISSION						50. Signature/Authentication and Title of Approving Official ELECTRONICALLY SIGNED BY:					
47. Agency Code CT00		48. Personnel Office ID 4173		49. Approval Date 04/09/2023		TONIA PATTERSON CHIEF, TALENT MANAGEMENT					

NOTIFICATION OF PERSONNEL ACTION

1. Name (Last, First, Middle) JOHNSON, KRISTIN N				2. Social Security Number (b) (6)		3. Date of Birth		4. Effective Date 03/30/2022						
FIRST ACTION					SECOND ACTION									
5-A. Code 171		5-B. Nature of Action EXC APPT NTE 04/13/25			6-A. Code		6-B. Nature of Action							
5-C. Code ZNM		5-D. Legal Authority P L 93 463			6-C. Code		6-D. Legal Authority							
5-E. Code		5-F. Legal Authority			6-E. Code		6-F. Legal Authority							
7. FROM: Position Title and Number					15. TO: Position Title and Number COMMISSIONER 01009002 010090									
8. Pay Plan EX		9. Occ. Code 0301	10. Grade or Level 04	11. Step or Rate 00	12. Total Salary 158,500.00		13. Pay Basis PA		16. Pay Plan EX	17. Occ. Code 0301	18. Grade or Level 04	19. Step or Rate 00	20. Total Salary/Award 158,500.00	21. Pay Basis PA
12A. Basic Pay .00		12B. Locality Adj.		12C. Adj. Basic Pay		12D. Other Pay .00		20A. Basic Pay 158,500.00		20B. Locality Adj.		20C. Adj. Basic Pay 158,500.00		20D. Other Pay .00
14. Name and Location of Position's Organization					22. Name and Location of Position's Organization COMMODITY FUTURES TRADING COMMISSION OFC OF THE COMMISSIONER CT CF0200000000000000 PP 07 2022									
EMPLOYEE DATA														
23. Veterans Preference 1 1 - None 2 - 5-Point 3 - 10-Point/Disability 4 - 10-Point/Compensable 5 - 10-Point/Other 6 - 10-Point/Compensable/30%				24. Tenure 0 0 - None 1 - Permanent 2 - Conditional 3 - Indefinite			25. Agency Use		26. Veterans Preference for RIF X YES X NO					
27. FEGLI C0 BASIC				28. Annuitant Indicator 9 NOT APPLICABLE			29. Pay Rate Determinant T BELOW THE MINIMUM							
30. Retirement Plan KF FERS (FRAE)			31. Service Comp. Date (Leave) 03/30/2022		32. Work Schedule F FULL TIME		33. Part-Time Hours Per Biweekly Pay Period							
POSITION DATA														
34. Position Occupied 2 1 - Competitive Service 2 - Excepted Service 3 - SES General 4 - SES Career Reserved			35. FLSA Category E E - Exempt N - Nonexempt		36. Appropriation Code			37. Bargaining Unit Status 8888						
38. Duty Station Code 11-0010-001			39. Duty Station (City - County - State or Overseas Location) WASHINGTON DIST OF COLUMBIA DC											
40. Agency Data		41.		42.		43.		44.						
45. Remarks INELIGIBLE FOR LEAVE. APPOINTMENT AFFIDAVIT EXECUTED 03/30/2022. REASON FOR TEMPORARY APPOINTMENT: APPOINTMENT AS COMMISSIONER FOR A TERM EXPIRING 04/30/2025. APPOINTMENT IS MADE ACCORDING TO PROVISIONS OF P L 93-463. FROZEN SERVICE: 00 YRS. 00 MOS. CREDITABLE MILITARY SERVICE: 00 YRS. 00 MOS. PREVIOUS RETIREMENT COVERAGE: PREVIOUSLY COVERED. EMPLOYEE IS AUTOMATICALLY COVERED UNDER FERS, FERS-RAE OR FERS - FRAE.														
46. Employing Department or Agency COMMODITY FUTURES TRADING COMMISSION					50. Signature/Authentication and Title of Approving Official ELECTRONICALLY SIGNED BY: TONIA PATTERSON CHIEF, TALENT MANAGEMENT									
47. Agency Code CT00		48. Personnel Office ID 4173		49. Approval Date 03/31/2022										

NOTIFICATION OF PERSONNEL ACTION

1. Name (Last, First, Middle) PHAM, CAROLINE D		2. Social Security Number (b) (6)	3. Date of Birth	4. Effective Date 04/14/2022
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FIRST ACTION		SECOND ACTION	
5-A. Code 171	5-B. Nature of Action EXC APPT NTE 04/13/27	6-A. Code	6-B. Nature of Action
5-C. Code ZNM	5-D. Legal Authority P L 93 463	6-C. Code	6-D. Legal Authority
5-E. Code	5-F. Legal Authority	6-E. Code	6-F. Legal Authority

7. FROM: Position Title and Number					15. TO: Position Title and Number COMMISSIONER 01009003 010090				
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8. Pay Plan EX	9. Occ. Code 0301	10. Grade or Level 04	11. Step or Rate 00	12. Total Salary 158,500.00	13. Pay Basis PA	16. Pay Plan	17. Occ. Code	18. Grade or Level	19. Step or Rate	20. Total Salary/Award	21. Pay Basis
12A. Basic Pay	12B. Locality Adj. .00	12C. Adj. Basic Pay	12D. Other Pay .00	20A. Basic Pay 158,500.00	20B. Locality Adj. .00	20C. Adj. Basic Pay 158,500.00	20D. Other Pay .00				

14. Name and Location of Position's Organization	22. Name and Location of Position's Organization COMMODITY FUTURES TRADING COMMISSION OFFICE OF THE COMMISSIONER CT CF0500000000000000 PP 08 2022
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EMPLOYEE DATA

23. Veterans Preference 1 1 - None 3 - 10-Point/Disability 5 - 10-Point/Other 2 - 5-Point 4 - 10-Point/Compensable 6 - 10-Point/Compensable/50%			24. Tenure 0 0 - None 2 - Conditional 1 - Permanent 3 - Indefinite		25. Agency Use	26. Veterans Preference for RIF <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
27. FEGLI C0 BASIC			28. Annuitant Indicator 9 NOT APPLICABLE		29. Pay Rate Determinant T BELOW THE MINIMUM I		
30. Retirement Plan KR FERS (RAE)		31. Service Comp. Date (Leave) 10/12/2020	32. Work Schedule F FULL TIME		33. Part-Time Hours Per Biweekly Pay Period		

POSITION DATA

34. Position Occupied 2 1 - Competitive Service 3 - SES General 2 - Excepted Service 4 - SES Career Reserved		35. FLSA Category E E - Exempt N - Nonexempt	36. Appropriation Code	37. Bargaining Unit Status 8888
38. Duty Station Code 11-0010-001		39. Duty Station (City - County - State or Overseas Location) WASHINGTON DIST OF COLUMBIA DC		

40. Agency Data	41.	42.	43.	44.
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45. Remarks
 INELIGIBLE FOR LEAVE.
 APPOINTMENT AFFIDAVIT EXECUTED 04/14/2022.
 REASON FOR TEMPORARY APPOINTMENT: APPOINTMENT AS COMMISSIONER FOR A TERM EXPIRING 04/13/2027. APPOINTMENT IS MADE ACCORDING TO PROVISIONS OF P L 93 463.
 FROZEN SERVICE: 00 YRS. 00 MOS.
 CREDITABLE MILITARY SERVICE: 00 YRS. 00 MOS.
 PREVIOUS RETIREMENT COVERAGE: PREVIOUSLY COVERED.
 EMPLOYEE IS AUTOMATICALLY COVERED UNDER FERS, FERS-RAE OR FERS - FRAE.

46. Employing Department or Agency COMMODITY FUTURES TRADING COMMISSION			50. Signature/Authentication and Title of Approving Official ELECTRONICALLY SIGNED BY: TONIA PATTERSON CHIEF, TALENT MANAGEMENT	
47. Agency Code CT00	48. Personnel Office ID 4173	49. Approval Date 04/14/2022		

NOTIFICATION OF PERSONNEL ACTION

1. Name (Last, First, Middle) ADAMSKE, STEVEN W	2. Social Security Number (b) (6)	3. Date of Birth	4. Effective Date 01/02/2022
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FIRST ACTION		SECOND ACTION	
5-A. Code 170	5-B. Nature of Action EXC APPT	6-A. Code	6-B. Nature of Action
5-C. Code Y7M	5-D. Legal Authority SCH C 213 3379	6-C. Code	6-D. Legal Authority
5-E. Code	5-F. Legal Authority	6-E. Code	6-F. Legal Authority

7. FROM: Position Title and Number	15. TO: Position Title and Number DIR, OFC OF PUBLIC AFFAIRS 01026701 010267
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8. Pay Plan	9. Occ. Code	10. Grade or Level	11. Step or Rate	12. Total Salary	13. Pay Basis	16. Pay Plan	17. Occ. Code	18. Grade or Level	19. Step or Rate	20. Total Salary/Award	21. Pay Basis				
						CT	0301	17	00	230,000.00	PA				
12A. Basic Pay		12B. Locality Adj.		12C. Adj. Basic Pay		12D. Other Pay		20A. Basic Pay		20B. Locality Adj.		20C. Adj. Basic Pay		20D. Other Pay	
		.00				.00		230,000.00		.00		230,000.00		.00	

14. Name and Location of Position's Organization	22. Name and Location of Position's Organization COMMODITY FUTURES TRADING COMMISSION OFFICE OF THE CHAIRMAN OFFICE OF PUBLIC AFFAIRS CT CF0120000000000000 PP 01 2022
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EMPLOYEE DATA

23. Veterans Preference				24. Tenure				25. Agency Use		26. Veterans Preference for RIF					
1	1 - None	3 - 10-Point/Disability	5 - 10-Point/Other	3	0 - None	1 - Conditional	2 - Permanent	3 - Indefinite							
	2 - 5-Point	4 - 10-Point/Compensable	6 - 10-Point/Compensable/30%								YES	X	NO		
27. FEGLI				28. Annuitant Indicator				29. Pay Rate Determinant							
B0 WAIVED				A				T BELOW THE MINIMUM I							
30. Retirement Plan				31. Service Comp. Date (Leave)				32. Work Schedule				33. Part-Time Hours Per Biweekly Pay Period			
K FERS AND FICA				09/19/1997				F FULL TIME							

POSITION DATA

34. Position Occupied				35. FLSA Category				36. Appropriation Code				37. Bargaining Unit Status			
2	1 - Competitive Service	3 - SES General	4 - SES Career Reserved	E	E - Exempt	N - Nonexempt									
38. Duty Station Code 11-0010-001				39. Duty Station (City - County - State or Overseas Location) WASHINGTON DIST OF COLUMBIA DC											

40. Agency Data	41.	42.	43.	44.
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45. Remarks
AS A REEMPLOYED ANNUITANT, YOU SERVE AT THE WILL OF THE APPOINTING OFFICER.
APPOINTMENT AFFIDAVIT EXECUTED 01/03/2022.
FROZEN SERVICE: 00 YRS. 00 MOS.
CREDITABLE MILITARY SERVICE: 00 YRS. 00 MOS.
PREVIOUS RETIREMENT COVERAGE: PREVIOUSLY COVERED.
EMPLOYEE IS AUTOMATICALLY COVERED UNDER FERS, FERS-RAE OR FERS - FRAE.

46. Employing Department or Agency COMMODITY FUTURES TRADING COMMISSION			50. Signature/Authentication and Title of Approving Official ELECTRONICALLY SIGNED BY: TONIA PATTERSON CHIEF, TALENT MANAGEMENT		
47. Agency Code CT00	48. Personnel Office ID 4173	49. Approval Date 01/02/2022			

STEVEN W. ADAMSKE

Senior Communications and Public Policy Professional

- **Public Affairs Strategist** with over 25 years of communications, media, policy, and campaign experience with a proven track record of delivering high-level communications strategies and media exposure at all levels of government and industry.
- **Crisis Manager** with a tested ability to calmly respond to crises by developing clear and targeted communications strategies for rapid deployment.
- **Influential Policy Advisor** with significant influence in developing and implementing banking, housing, and derivatives policies.
- **Experienced Media Spokesperson** with experience under pressure working with the press on a series of complex economic, financial, and reputational issues.
- **Team Leader** with proven experience in motivating, guiding, and managing employees.

Selected Accomplishments

- **Designed and implemented successful messaging and press strategies** in both industry and government to carry out the organization's strategic goals.
 - **Fostered trusting bipartisan working relationships** with principals and staff on both sides of the political aisle, the financial industry, banking and securities regulators, and Capitol Hill.
 - **Orchestrated rapid response and crisis communications strategies** to limit exposure to outside controversies such as the MF Global collapse, the fall of Fannie Mae and Freddie Mac, and the fallout from the broader 2008 financial and economic crisis.
 - **Built an extensive network of media contacts** with influential financial reporters representing broadcast, print, wire, and opinion in Washington, DC, New York, London, Brussels, and Asia.
-

COMMUNICATIONS EXPERIENCE

FIA

February 2018 – Present

Vice President, Head of Communications and Public Affairs

- Head of communications for the global organization whose mission is to advocate for open, transparent, and competitive markets for the futures, options, and centrally cleared derivatives industry.
- Responsible for all strategy, messaging, and execution of communications plans designed to promote FIA's advocacy and other strategic goals.
- Obtained positive media coverage for major initiatives by developing and maintaining extensive media relationships. Secured numerous interviews for the CEO and other senior staff.
- Created and worked as executive producer of FIA's podcast, FIA Speaks.
- Developed the strategy and directed FIA's social media presence.
- Worked as a member of the team that redesigned FIA's website and online presence.
- Responsible for writing the CEO's speeches, statements, and other public remarks.

Commodity Futures Trading Commission

June 2011 – October 2017

Senior Policy Advisor and Director of Public Affairs

- Held two senior roles: Director of Public Affairs and Senior Policy Advisor to Commissioner Sharon Y. Bowen.
- Served for six years as the agency's Director of Public Affairs and senior advisor to four Chairmen with specific responsibility for strategically planning the Chairman's message to implement the derivatives reforms included in the Dodd-Frank Wall Street Reform and Consumer Protection Act and other initiatives.
- Successfully implemented press strategy on Chairman Giancarlo's initial proposals to create a new FinTech initiative, Market Intelligence Branch, and Project KISS designed to simplify and streamline the Commission's rules.
- Responsible for the rollout of major enforcement actions such as benchmark manipulation actions that garnered worldwide attention.
- Directed crisis communications responses to the collapse of MF Global and Peregrine Financial, the criticism of the agency and the agency's rules from the financial industry and Congress, and reputational issues related to the Chairman.
- Directed the agency's social media presence on Facebook and Twitter. Interacted daily with reporters and other interested parties on Twitter and other social media platforms.

Department of Treasury

July 2010 – June 2011

Deputy Assistant Secretary for Public Affairs

- Served as strategic public affairs advisor to Secretary Geithner and other senior Treasury officials to assist Secretary Geithner, Treasury, and the Administration to communicate its efforts to reform the financial system.
- Worked as Treasury's chief spokesman with on the record responsibility for Secretary Geithner, Office of Domestic Finance, and the Office of Financial Stability, which implemented the Troubled Asset Relief Program.
- Led efforts to strategically roll out the communications efforts for the Treasury's role in implementing the Dodd-Frank Act, the Administration's housing finance reforms, efforts to raise the debt limit, foreign exchange derivatives exemption, and the G20 Finance Minister's meeting in Gyeongju, South Korea.
- Handled complex media inquiries such as criticism of TARP and the housing foreclosure avoidance programs, reports by oversight bodies, Geithner's role as President of the New York Federal Reserve Bank, and criticism from Congress.
- Filtered the numerous television, radio, and print interview requests for Secretary Geithner and other senior Treasury officials.
- Managed a staff of five direct reports and helped oversee the 20-person Public Affairs staff.

House Financial Services Committee Communications Director

June 2005-August 2010

- Responsible for the entire communications and press operation for Chairman Barney Frank and on the record spokesperson for the House Committee on Financial Services.
- Served as a member of the Committee's senior staff involved in crafting policy, messaging, and political strategy surrounding the Wall Street Reform and Consumer Protection Act, the 2008 financial and subprime crisis, the development and implementation of TARP, the coordination of federal housing policy and affordable housing, and the automotive industry rescue legislation.
- Successfully crafted and implemented a messaging strategy to push the Chairmen and the Democratic agenda.
- Managed the committee's rapid response and crisis communications that included responding to criticism that federal housing policy caused the financial crisis.
- Managed press staff and digital media personnel.
- Developed and maintain working relationships with major daily news reporters, columnists, producers, and editorial writers.
- Garnered significant media coverage for the Committee and Chairman Frank including front-page stories in U.S. and international dailies, editorials, op-eds, profile pieces, national and regional radio, and television including Sunday news shows.

Corzine for Governor and Office of U.S. Senator Jon S. Corzine

June 2004-March 2005

Press Secretary

- Served as on-the-record spokesperson for Corzine for Governor and responsible for the day-to-day press operation of the DC Senate office. Aggressively pitched TV appearances; print and magazine interviews and editorial board meetings; successfully obtained coverage in the New York Times, Washington Post, and L.A. Times and on CNN, Fox, and MSNBC.

Congresswoman Zoe Lofgren

June 2002-May 2003

Communications Director

- Responsible for all aspects of the Congresswoman's press and media operation. Developed event ideas, turned legislative ideas into press stories, extensively pitched national and local TV, print, and radio outlets, wrote and pitched op-eds, and created newsletters. Completely rebuilt the Congresswoman's press operation and website that was left in neglect by a predecessor.

Congresswoman Louise Slaughter

June 2001-June 2002

Press Secretary

- Responsible for all media and press strategy including message development, the timing of releases, event idea and execution, and turning legislative ideas into media events. Wrote press releases, advisories, op-eds, newsletters, briefings, and talking points. Pitched stories to both local and national press, handled media requests and interviews, and redesigned the website.

Federal Communications Commission

February 2000-July 2000

Assistant Director of Media Relations

- Managed press coverage and message implementation for the Chairman of the FCC; successfully obtained positive coverage in major national dailies, wire services, TV, and regional outlets.
- Implemented communications plans and press strategy for various FCC initiatives; developed relationships and worked daily with reporters and producers who cover the FCC beat.
- Pitched feature stories, editorials, and interviews with the chairman, commissioners, and other senior FCC officials.

Department of Interior

August 1999-February 2000

Bureau of Reclamation

Director of Communications

- Served as primary spokesperson for Secretary Babbitt on western water and related issues.
- Developed and implemented press and communications plans for the Secretary's initiatives such as Bay-Delta, Platte River, and the Florida Everglades restoration programs.
- Supervised and managed the Bureau of Reclamation's public affairs staff and regional public affairs offices.

Special Assistant for Outreach and Communications

June 1993 – August 1999

- Developed and implemented outreach plans for the Everglades and Bay-Delta restoration programs. Outreach efforts focused on local media, Congress, stakeholders, and state, county, and local officials.
- Identified and resolved problematic and politically contentious issues for Deputy Secretary John Garamendi.
- Concentrated on policy development, issue management, political oversight, congressional and constituency outreach, and communications strategy.

Department of State – NATO 50th Anniversary Summit

January 1999 - May 1999

Deputy Director for Communications

- Directed and managed the media relations and the media operations teams.
- Implemented a communications plan that included a ramp-up of activities to raise awareness of NATO's importance to America; local interest and behind-the-scenes stories; and extensive use of radio and satellite time to communicate a message and special announcements.
- Oversaw the development and design of the \$3 million International Media Center.

CAMPAIGN AND POLITICAL EXPERIENCE

Joe Lieberman for President

May 2003-February 2004

Director of Advance and Trip Director

- Responsible for visually communicating the Senator's message by developing and implementing event ideas, finding event participants and locations, and designing and utilizing backdrops, venues and music.
- Built an advance operation from the ground up. Hired, trained, and managed advance and press advance staff, managed budgets, and handled travel logistics for the candidate, staff, and traveling press.
- Worked as a member of the campaign's senior staff and communications team, and traveled extensively with Senator Lieberman and traveling press corps.

Gore/Lieberman 2000 and Gore 2000

July 2000-

November 2000

Scheduler

- Managed and scheduled campaign trips for Vice President Al Gore and Senator Joe Lieberman; Supervised and managed the travel planning process which comprised of successfully executing consistent and specific message goals, policy direction, and political needs; directed and supervised advance teams and managed budgets.

Office of Vice President Al Gore

June 1997 – June 1998

Scheduler

- Served as one of three schedulers who managed and produced the Vice President's daily schedule. Specific duties included message implementation, event management, advance, and political oversight.

Agency Representative: White House Council of Environmental Quality

- Developed and coordinated the President's and Vice President's Earth Day event; organized cabinet and sub-cabinet Earth Day plans, which included developing overall message and theme.

Clinton/Gore '92 and '96

April 1992-November 1992

Lead Advance

August 1996 - November

1996

- Produced and managed campaign appearances for Vice President Gore. Responsible for overall visit coordination and event production including and design, budget management, and supervising advance staff.

The White House - Health Care Task Force

February 1993 - June 1993

Congressional Relations Team

Congressman Pete Stark

September 1989 - May 1992

Legislative Assistant and District Aide

EDUCATION

- B.A., Psychology; June 1989 University of California, Irvine

Request for Schedule C Appointing Authority

Agency Name: COMMODITY FUTURES TRADING COMMISSION **Print Date:** 12/08/2021
POC: SELINA SWALES **Phone:** (202) 418-5803 **Fax:** (202) 418-5803
Request No: CT220001 **Request Type:** APPOINTMENT **Position:** REGULAR C
Candidate: STEVEN ADAMSKE **Grade/Step:** / **Salary:** \$230,000
Position No: CTOT00060 **Title:** DIRECTOR
Series: 00301 **Desc:** MISCELLANEOUS ADMINISTRATION AND PROGRAM
Date PD certified as Schedule C per 5 CFR 213.3301(a): 12/05/2021
Organization ID: 100 **Org. Name:** OFFICE OF PUBLIC AFFAIRS
Supervisor No: CTEX00171 **Supv. Title:** CHAIRPERSON ACTING
Supervisor Name: BEHNAM, ROSTIN **Supv. Position Type:** PRESIDENTIAL WITH SENATE
GEO Location: DISTRICT OF COLUMBIA

Schedule C Certification Statement

Under 5 CFR 213.3301(a), the position listed above is excepted from the competitive service because of its confidential or policy-determining character. Per 5 CFR 213.3301(b), I certify that the Schedule C appointment for this position, was not created solely or primarily for the purpose of detailing the appointee to the White House.

Department / Agency Head or Designee:

Signature: DAVID GILLERS Digitally signed by DAVID GILLERS
Date: 2021.12.08 14:50:28 -05'00' Date Signed: _____

Agency White House Liaison

Name: _____ Phone: _____

Signature: _____ Date Signed: _____

OPM USE ONLY

Approved Disapproved Return without Action

OPM Approving Official: Torlanda Young Date Signed: 12/09/2021

Email to: Senior Executive Resource Services at SERS@OPM.GOV

Source: Office of Personnel Management

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