

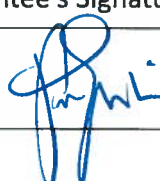
ETHICS AGREEMENT COMPLIANCE CERTIFICATION

Senate Confirmed Presidential Appointee

1. Appointee's Information	
a. Appointee's Name:	Pierre M. Gentin
b. Position Title:	General Counsel
c. Agency:	Commerce
d. Date Ethics Agreement Signed:	4/17/25
e. Date Confirmed:	10/7/25
f. Due Date for Submission of Certification of Ethics Agreement Compliance to OGE:	
2. Resignations	
I completed all of the resignations indicated in my ethics agreement before I assumed the duties of my current government position.	☒ Yes ☐ No ☐ N/A
3. Divestitures	
a. I completed all of the divestitures indicated in my ethics agreement within the time period specified. I understand that I may not reacquire these assets during my appointment without OGE's prior approval.	☒ Yes ☐ No ☐ N/A
b. I have filed a periodic transaction report, or periodic transaction reports (OGE Form 278-T) to disclose the completion of these agreed upon divestitures.	☒ Yes ☐ No ☐ N/A Filing Date(s) of OGE Form 278-T Report (s): 7/28/25, 8/22/25, 10/16/25
c. I completed the divestiture through a means not requiring a periodic transaction report (OGE Form 278-T).	☐ Yes ☐ No ☒ N/A

4. Managed Accounts	
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 to ensure compliance with these limitations.	☒ Yes ☐ No ☐ N/A
5. Interim Recusals	
I have complied with my interim recusal obligations pending the divestitures required by my ethics agreement.	☒ Yes ☐ No ☐ N/A
6. Recusals (Note: These factual statements describe the appointee's current status. They are not intended to modify ethics agreement commitments or create new recusal obligations.)	
a. 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.	☒ Yes ☐ No
b. I am recusing from particular matters in which any former employer or client of mine for whom I provided services to in the past year, or in which my spouse's employer, or a current client is a party or represents a party, unless I have been authorized under 5 C.F.R. § 2635.502(d).	☒ Yes ☐ No ☐ N/A

7. Waivers and Authorizations (Consult with your agency's DAEO if uncertain under what authority a waiver or authorization was granted.)		
a. I received a waiver pursuant to 18 U.S.C. § 208.	☐ Yes ☒ No	
If yes, indicate the date of the waiver and indicate the financial interest covered by the waiver.	Date: Financial Interest:	
b. I received an authorization pursuant to 5 C.F.R. § 2635.502(d).	☐ Yes ☒ No	
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.).	Date: Covered person(s):	
c. I received a waiver pursuant to 5 C.F.R. § 2635.503(c).	☐ Yes ☒ No	
If yes, indicate the date of the waiver and identify the former employer or payer.	Date: Former employer or payer:	
8. Payments, Accelerations, or Divestitures Required to be Completed Prior to Entering Government Service		
☒ Mark this box if not applicable	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:	☐ I received it (or it was accelerated) <u>prior</u> to my assumption of the duties of the position. ☐ I received it (or it was accelerated) <u>after</u> my assumption of the duties of the position. ☐ I forfeited it.
	b. Financial interest or payment at issue:	

9. Requirements for Regular Appointees	
I have completed my initial ethics briefing, pursuant to 5 C.F.R. § 2638.305. If you are a Special Government Employee (SGE) or career Foreign Service Officer (FSO), select N/A.	☒ Yes ☐ No ☐ N/A
10. Additional Ethics Agreement Requirements	
	I am complying with these requirements as described in the adjacent box. ☐ Yes ☐ No ☒ N/A
11. Comments of Appointee	
I have worked with my Commerce ethics colleagues (Monica Trucco, Kenneth Hagans, Mindy Brown, Brenna Doherty-Lopes) throughout this process, including today in filling out this form. I will continue to seek their guidance on any issues that arise.	
12. Certification-	
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.	
I certify that the information I have provided is complete and accurate.	
Appointee's Signature:	Date:
	November 3, 2025