



U.S. Department of Justice

Washington, D.C. 20530

5/27/2022

The Honorable Emory A. Rounds, III
Director
Office of Government Ethics
Suite 500
1201 New York Avenue, NW
Washington, DC 20005-3919

Dear Mr. Rounds:

In accordance with the provisions of Title I of the Ethics in Government Act of 1978 as amended, I am forwarding the financial disclosure report of Amy Solomon. President Biden has nominated Ms. Solomon to serve as Assistant Attorney General, Office of Justice Programs, U.S. Department of Justice. We have conducted a thorough review of the nominee's report and have counseled her on the government ethics rules. The purpose of this letter is to describe the steps that Ms. Solomon will take to avoid any actual or apparent conflict of interest in the event that she is confirmed for the aforementioned position. Ms. Solomon understands that it is her responsibility to understand and comply with commitments outlined in this agreement.

Although it is not possible to provide for all of the specific circumstances which might give rise to a financial conflict of interest because the work of the Assistant Attorney General, Office of Justice Programs, U.S. Department Justice, involves a wide variety of matters involving specific parties, and it is not possible to predict where conflicts will arise until specific parties are identified, we have counseled Ms. Solomon on the applicable conflict of interest laws and regulations and, in particular, on the application of the criminal conflicts of interest law at 18 U.S.C. § 208.

SECTION 1 – GENERAL COMMITMENTS

As required by the criminal conflicts of interest law at 18 U.S.C. § 208(a), Ms. Solomon will not participate personally and substantially in any particular matter in which she knows that she has a financial interest directly and predictably affected by the matter, or in which she knows that a person whose interests are imputed to her has a financial interest directly and predictably affected by the particular matter, unless she first obtains a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualifies for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2). She understands that the interests of the following persons are imputed to her:

- Any spouse or minor child of hers;
- Any general partner of a partnership in which she is a limited or general partner;

- Any organization in which she serves as officer, director, trustee, general partner or employee; and
- Any person or organization with which she is negotiating or has an arrangement concerning prospective employment.

In determining whether a particular matter has a direct and predictable effect on her financial interests or on those of any other person whose interests are imputed to her, Ms. Solomon will consult with Department of Justice ethics officials. As stated in the attachment to this ethics agreement, Ms. Solomon understands and agrees to comply with the conflict of interest laws and regulations, and to follow the procedures set forth in this agreement.

If Ms. Solomon has a managed account or otherwise uses the services of an investment professional during her appointment, she will ensure that the account manager or investment professional obtains her 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), or obligations of the United States.

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

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

Ms. Solomon will not modify this ethics agreement without my 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

Ms. Solomon's spouse is employed by Privia Medical Group, an entity in which her spouse has an equity interest through Privia Health Group, Inc. Ms. Solomon will not participate personally and substantially in any particular matter that to her knowledge has a direct and predictable effect on the financial interests of Privia Medical Group or Privia Health Group, Inc., unless she first obtains a written waiver, pursuant to 18 U.S.C. § 208(b)(1). Pursuant to the impartiality regulation at 5 C.F.R. § 2635.502, Ms. Solomon also will not participate personally and substantially in any particular matter involving specific parties in which she knows a client of her spouse is a party or represents a party, unless she is first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

Ms. Solomon's spouse is also employed by Chevy Chase Pulmonary Associates, an entity in which her spouse has an equity interest through Drs. Langevin, Larsen, Hamm, and Cohen, P.C.,

Inc. Ms. Solomon will not participate personally and substantially in any particular matter that to her knowledge has a direct and predictable effect on the financial interests of Chevy Chase Pulmonary Associates or Drs. Langevin, Larsen, Hamm, and Cohen, P.C., Inc., unless she first obtains a written waiver, pursuant to 18 U.S.C. § 208(b)(1). Pursuant to the impartiality regulation at 5 C.F.R. § 2635.502, Ms. Solomon also will not participate personally and substantially in any particular matter involving specific parties in which she knows a client of her spouse is a party or represents a party, unless she is first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

SECTION 3 – PUBLIC POSTING

Ms. Solomon has 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.

Based on the above agreements and counseling, I am satisfied that the enclosed report presents no conflicts of interest under applicable laws and regulations and that you may so certify to the Senate Judiciary Committee.

Sincerely,

ARTHUR
GARY

Digitally signed by
ARTHUR GARY
Date: 2022.05.27
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Arthur E. Gary
Deputy Assistant Attorney General for
Policy, Management & Procurement
Alternate Designated Agency Ethics Official

Enclosure

NOMINEE STATEMENT

I have read the Ethics Agreement signed by Arthur E. Gary, Deputy Assistant Attorney General for Policy, Management & Procurement and Alternate Designated Agency Ethics Official on May 27, 2022, and I agree to comply with the commitments outlined in this agreement. In addition, in the event that an actual or potential conflict of interest arises during my appointment, I will consult with the Department ethics officials and take the measures necessary to resolve the conflict, such as recusal from the particular matter or divestiture of an asset. 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). Finally, 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 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.



Amy Solomon

Date: May 27, 2022