



Office of
General
Counsel

August 10, 2022

Emory A. Rounds, III
Director
U.S. Office of Government Ethics
1201 New York Avenue, N.W., Suite 500
Washington DC 20005-3917

Dear Mr. Rounds:

I am enclosing an amendment to Colleen Shogan's nominee public financial disclosure report, signed on July 6, 2022, and a supplement to her ethics agreement, signed on July 28, 2022. Based on my review of this additional information, I continue to believe that Ms. Shogan is in compliance with applicable laws and regulations governing conflicts of interest.

Sincerely,

Christopher M. Runkel Digitally signed by Christopher M. Runkel
Date: 2022.08.10 13:05:40 -04'00'

CHRISTOPHER M. RUNKEL
Designated Agency Ethics Official

Enclosures

August 10, 2022

Christopher M. Runkel
Designated Agency Ethics Official
National Archives and Records Administration
8601 Adelphi Road, Suite 3110
College Park, MD 20740-6001

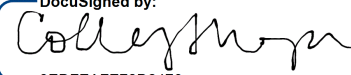
Dear Mr. Runkel:

The purpose of this letter is to supplement my ethics agreement signed on July 28, 2022. In a separate document, I am amending my financial disclosure report by correcting Part 1 of the report, Filer's Positions Held Outside United States Government, to add my position on the Council of the National Capital Area Political Science Association.

Upon confirmation, I will resign from my position with the National Capital Area Political Science Association. Pursuant to the impartiality regulation at 5 C.F.R. § 2635.502, for a period of one year after my resignation, I will not participate personally and substantially in any particular matter involving specific parties in which I know the National Capital Area Political Science Association is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

I have been advised that this supplement to my ethics agreement 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,

DocuSigned by:

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Colleen Shogan

July 28, 2022

Christopher M. Runkel
Designated Agency Ethics Official
National Archives and Records Administration
8601 Adelphi Road, Suite 3110
College Park, MD 20740-6001

Dear Mr. Runkel:

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 Archivist of the United States. 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.

If I rely on a *de minimis* exemption under 5 C.F.R. § 2640.201(b) with regard to any of my financial interests in sector mutual funds, I will monitor the value of those interests. If the aggregate value of my interests in sector mutual funds that concentrate in any one sector exceeds \$50,000, 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 any holdings of the funds that are in the specific sector in which the funds concentrate, unless I first obtain a written waiver pursuant to 18 U.S.C. § 208(b)(1).

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, 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 – THE WHITE HOUSE HISTORICAL ASSOCIATION

Upon confirmation, I will resign from my position with the White House Historical Association. I will receive an annual bonus for fiscal year 2022, and I will receive the payment prior to assuming the duties of the position of Archivist. Pursuant to the impartiality regulation at 5 C.F.R. § 2635.502, for a period of one year after my resignation, I will not participate personally and substantially in any particular matter involving specific parties in which I know the White House Historical Association, 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 – RESIGNATIONS

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

- Georgetown University
- The Women's Suffrage National Monument Foundation

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- The Aspen Institute
- The Georgetown Sands Homeowners Association

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 – BOOKS

Before learning of my consideration for a possible nomination to a position at the National Archives and Records Administration, I wrote a book to be published by Camel Press: *Lethal Legacies*. I understand that I may not work on this book or perform any other services for compensation during my appointment to the position of Archivist of the United States if the Senate confirms my nomination. In addition, I receive royalties from Camel Press for sales of the following books: *Stabbing in the Senate*; *Homicide in the House*; *Calamity at the Continental Club*; *K Street Killing*; *Gore in the Garden*; *Larceny at the Library*; and *Dead as a Duck*. 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 Camel Press is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

I may receive royalties from Texas A&M University Press for sales of my book, *The Moral Rhetoric of American Presidents*. 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 Texas A&M 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 5 – SPOUSE EMPLOYMENT

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

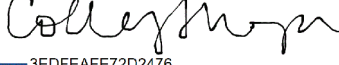
SECTION 6 – PUBLIC POSTING

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 at 5 U.S.C.

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§ 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,

DocuSigned by:

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Colleen Shogan