

May 12, 2025

Mr. Richard C. Visek
Principal Deputy Legal Adviser and
Designated Agency Ethics Official
Office of the Legal Adviser
U.S. Department of State
Washington, D.C. 20520

Re: Ethics Undertakings

Dear Mr. Visek:

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 Ambassador to the Hellenic Republic. 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, even if uncompensated; and
- Any person or organization with which I am negotiating or have an arrangement concerning prospective employment.

In addition, I will recuse myself from participation on a case-by-case basis in any particular matter involving specific parties in which I determine that a reasonable person with knowledge of the relevant facts would question my impartiality in that matter, unless I am first authorized to participate, pursuant to the impartiality regulations at 5 C.F.R. Part 2635, Subpart E.

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.

I understand that a heightened prospect of a conflict of interest could exist as to companies that maintain a presence in Greece, because they may be more likely than other companies to seek official assistance from or make contact with the Embassy or otherwise be affected by policies and engagement implemented by the Embassy. I will remain alert to the possible need for recusal where appropriate.

I have a managed account, and I will direct the account manager to obtain 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 monitor whether the account manager is following this direction regarding prior approval.

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

SECTION 2 – METROPOLITAN MEDSPA LLC AND POLISHED RICE, INC.

Upon confirmation, I will resign from my positions with Metropolitan Medspa LLC and Polished Rice, Inc. I will continue to have a financial interest in these entities, but I will not provide any services material to the production of income. Instead, I will receive only passive investment income from them. As Ambassador, 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 either of these entities, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1).

SECTION 3 – FOUR CORNERS FUNDRAISING LLC, KGT GLOBAL CONSULTING LLC, KGT PRODUCTIONS LLC, KGT VENTURES LLC, AND TRU MEDIA LLC

I am the sole proprietor of the following entities:

- Four Corners Fundraising LLC
- KGT Global Consulting LLC

- KGT Productions LLC
- KGT Ventures LLC
- Tru Media LLC

Upon confirmation, these entities will cease engaging in any business, including the representation of clients. During my appointment to the position of Ambassador, these entities will remain dormant and will not advertise. I will not perform any services for these entities, except that I will comply with any court orders or subpoenas and any requirements involving legal filings, taxes, and fees that are necessary to maintain the entities while they are in an inactive status. As Ambassador, 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 of these entities. In addition, 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 a former client of mine is a party or represents a party for a period of one year after I last provided service to that client, 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 equity interests in the following entities:

Airbnb Inc. Class A Common Stock
Alphabet Inc
Amazon.com, Inc.
Amgen Inc.
Analog Devices, Inc.
Apple, Inc.
AstraZeneca PLC American Depositary Shares
Bank of America Corp.
Boeing Co.
Broadcom, Inc.
Cheniere Energy, Inc.
CrowdStrike Holdings Inc.
Danaher Corp.
DexCom, Inc. Ecolab, Inc.
Edwards Lifesciences Corp.
Eli Lilly & Co.
Exxon Mobil Corp.
GE Aerospace
General Dynamics Corp.
Goldman Sachs Group Inc
Hilton Worldwide Holdings, Inc.

Honeywell International, Inc.
Intuitive Surgical, Inc.
JPMorgan Chase & Co
KKR & Co., Inc.
Lockheed Martin Corp.
Mastercard, Inc.
Medtronic Plc
Merck & Co., Inc.
Meta Platforms Inc.
Microsoft Corp.
Moderna Inc.
Moody's Corp.
Morgan Stanley
Nasdaq, Inc.
Netflix, Inc.
NextEra Energy, Inc.
Novo Nordisk A/S
NVIDIA Corp.
Oracle Corp.
Palo Alto Networks, Inc.
Procter & Gamble Co
RTX Corporation
salesforce.com, inc.
ServiceNow, Inc.
Taiwan Semiconductor Manufacturing Company Ltd.
Tesla, Inc.
Texas Instruments Incorporated
The Coca-Cola Co.
The Walt Disney Co.
Thermo Fisher Scientific, Inc.
Uber Technologies, Inc.
Vertex Pharmaceuticals, Inc.
Visa, Inc.
Warner Bros. Discovery Inc.

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 have verified that I will be able to carry out the divestitures within the timeframe described above.

I will also divest my interests in the First Trust Financials AlphaDEX Fund and First Trust NASDAQ Cybersecurity ETF as soon as practicable but not later than 90 days after my confirmation. Until

I have completed these divestitures, 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), 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 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 my agency ethics official and the U.S. Office of Government Ethics.

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 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,

Signed by:

Kimberly Guilfoyle

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Kimberly Guilfoyle