

January 9, 2018

Susan F. Beard
Designated Agency Ethics Official
U.S. Department of Energy
1000 Independence Ave., S.W., Suite 6A-211
Washington, DC 20585

Dear Ms. Beard:

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 Assistant Secretary for Environmental Management of the U.S. Department of Energy.

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.

Upon confirmation, I will resign from my position with Atkins Energy, Inc. 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 Atkins Energy, Inc., is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d). In addition, 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).

I am the sole practitioner of my inactive consulting firm, Wolverine Nuclear Services, LLC. I am currently in the process of dissolving this firm. Until it is dissolved, 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 Wolverine Nuclear Services, LLC.

I am also the sole practitioner of my consulting firm, Bastet Technical Services, LLC. Upon confirmation, the firm will cease engaging in any business. All amounts owed to me by any of my clients will be fixed before I assume the duties of the position of Assistant Secretary, and I will not participate personally and substantially in any particular matter that to my knowledge has a direct and predictable effect on the ability or willingness of any of these clients to pay these amounts. In addition, 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).

After Bastet Technical Services, LLC, receives its final client payment, I will dissolve it. Until it is dissolved, 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 Bastet Technical Services, LLC.

One of my consulting clients is CH2M. For a period of one year after I last provide services to CH2M, I will have a "covered relationship" under 5 C.F.R. § 2635.502 with that entity. Pursuant to 5 C.F.R. § 2635.502(d), I will seek a written authorization to participate in particular matters involving specific parties in which CH2M is a party or represents a party. I also will seek a waiver of the provisions of paragraph 6 of the Ethics Pledge under Executive Order 13770 with regard to CH2M.¹ In addition, I will seek a waiver of the provisions of paragraph 6 of the Ethics Pledge under Executive Order 13770 with regard to Fluor, a former client to whom I last provided services in October 2016. I understand that any such authorization or waiver will not permit me to participate in any of the following:

- Fee determinations or awards to CH2M Hill-BWXT West Valley, LLC, or Fluor;
- Any contract or procurement involving the West Valley Demonstration Project; or
- Any contract or procurement involving the Los Alamos Legacy Cleanup Contract.

Upon confirmation, I will resign from my unpaid position with Imelda Properties, LLC. I will continue to have a financial interest in this entity, but I will not provide services material to the production of income. Instead, I will receive only passive investment income from it. 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 Imelda Properties, LLC, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1).

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), or obligations of the United States.

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.

¹ On August 2, 2017, Jacobs Engineering Group, Inc., entered into a definitive agreement to acquire CH2M. Once this acquisition occurs, pursuant to 5 C.F.R. § 2635.502(d), I will seek a written authorization to participate in particular matters involving specific parties in which Jacobs Engineering Group, Inc., is a party or represents a party. I will also seek a waiver of the provisions of paragraph 6 of the Ethics Pledge under Executive Order 13770 with regard to Jacobs Engineering Group, Inc.

I will meet in person with you during the first week of my service in the position of Assistant Secretary 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 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,

A handwritten signature in cursive script, appearing to read "Anne Marie White". The signature is written in dark ink and is positioned above the printed name.

Anne Marie White .