

February 26, 2009

Robert E. Coyle
Designated Agency Ethics Official
Department of Homeland Security
Washington, DC 20528-3650

Dear Mr. Coyle:

The purpose of this letter is to describe the steps I will take to avoid any actual or apparent conflict of interests in the event that I am confirmed for the position of Deputy Secretary, Department of Homeland Security.

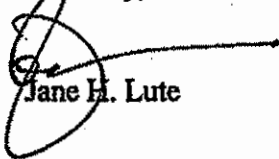
As required by 18 U.S.C. § 208(a), I will not participate personally and substantially in any particular matter that has a direct and predictable effect on my financial interests or those of any other person whose interests are imputed to me, unless I first obtain a written waiver, pursuant to section 208(b)(1), or qualify for a regulatory exemption, pursuant to section 208(b)(2). I understand that the interests of the following persons are imputed to me: my spouse, minor children, or any 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 the United Nations. Because I will continue to participate in this entity's defined benefit pension plan, I will not participate personally and substantially in any particular matter that has a direct and predictable effect on the ability or willingness of the United Nations to provide this contractual benefit, 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). For a period of one year after my resignation, I also will not participate personally and substantially in any particular matter involving specific parties in which the United Nations is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

Upon confirmation, I will resign my position of Trustee for Norwich University and Director for Hunt Alternatives. For a period of one year after my resignations, I will not participate personally and substantially in any particular matter involving specific parties

in which Norwich University or Hunt Alternatives is a party or represents a party , unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

Sincerely,

A handwritten signature in black ink, consisting of a large, stylized loop that encircles the text 'Jane H. Lute'. A horizontal line extends to the right from the top of the loop.

Jane H. Lute