David Apol
General Counsel
U.S. Office of Government Ethics
1201 New York Ave., NW, Suite 500
Washington, DC 20005

Dear Mr. Apol:

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 Federal Co-Chair of the Southeast Crescent Regional Commission. 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.

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 an ethics official 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 the approval of the designated agency ethics official of the Southeast Crescent Regional Commission 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 – NON-FEDERAL POSITIONS

My spouse and I own 49 Magnolia Blossom, LLC. Upon confirmation, I will resign from my position as Chief Operations Officer of 49 Magnolia Blossom, LLC. I will continue to have a financial interest in this entity, but, during my appointment to the position of Federal Co-Chair, I will not provide services material to the production of income. Instead, I will receive only passive investment income from the entity. 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 49 Magnolia Blossom, LLC, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1).

My spouse and I own Palmetto Issues Conference, LLC. Upon confirmation, I will resign from my position as Chief Executive Officer of Palmetto Issues Conference, LLC. I will continue to have a financial interest in this entity, but, during my appointment to the position of Federal Co-Chair, I will not provide services material to the production of income. Instead, I will receive only passive investment income from the entity. 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 Palmetto Issues Conference, LLC, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1). 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).

I am the Chief Executive Officer of Beyond Limits, LLC, an inactive, single-member LLC. During my appointment to the position of Federal Co-Chair, this LLC will remain dormant and will not advertise. I will not perform any services for the entity, except that I will comply with any requirements involving legal filings, taxes and fees that are necessary to maintain the entity while it is in an inactive status. 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 Beyond Limits, LLC, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1).

In addition, upon confirmation, I will resign from my position with Magnolia Blossom SC. 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 that Magnolia Blossom SC is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

I previously provided services to the Friends of Jim Clyburn. Pursuant to the impartiality regulation at 5 C.F.R. § 2635.502, for a period of one year after I last provided services, I will not participate personally and substantially in any particular matter involving specific parties in which I know that the Friends of Jim Clyburn is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

Before learning of my consideration for a possible nomination to the position of Federal Co-Chair, I began work on a collection of essays to be contributed by myself and others. At present, I do not have a publishing agreement or any other contributors. I understand that I may not work on this book or perform any other services for compensation during my appointment to the position of Federal Co-Chair if the Senate confirms my nomination. If a publishing agreement is signed or other contributors complete the book in the absence of my services, I will not, pursuant to the impartiality regulation at 5 C.F.R. § 2635.502, participate personally and substantially in any particular matter involving specific parties in which I know the publisher or a book contributor is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502.

SECTION 3 – 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,

Jennifer Clyburn Reed 7-29-21

Jennifer Clyburn Reed