

March 26, 2025

Heather C. Gottry  
Designated Agency Ethics Official  
and Director, Departmental Ethics Office  
U.S. Department of the Interior  
1849 C Street, N.W.  
Washington, DC 20240

Dear Ms. Gottry:

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 Director, Bureau of Land Management of the U.S. Department of the Interior. 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 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), or obligations of the United

States.

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 pursuant to the ethics agreement requirements contained in the financial disclosure regulation at 5 C.F.R. § 2634.803(a)(4).

## SECTION 2 – WESTERN ENERGY ALLIANCE

Upon confirmation, I will resign from my position as President of the Western Energy Alliance. For a period of one year after my resignation, I will have a "covered relationship" under the impartiality regulation at 5 C.F.R. § 2635.502 with the Western Energy Alliance. Pursuant to 5 C.F.R. § 2635.502(d), I will seek written authorization to participate personally and substantially in certain particular matters involving specific parties in which I know the Western Energy Alliance is a party or represents a party. Specifically, I will seek an authorization to ensure my ability to participate in underlying decisions, actions, and determinations, including rulemaking and guidance, pending at the Bureau of Land Management which are the subject of litigation brought by the Western Energy Alliance. However, I understand that any authorization will not allow me to participate personally and substantially in any decisions about litigation in which the Western Energy Alliance is a party or represents a party.

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## SECTION 3 – AGENCY SPECIFIC REQUIREMENTS

If I am confirmed as Director, Bureau of Land Management of the U.S. Department of the Interior, I am aware that I am prohibited by 43 U.S.C. § 11 from directly or indirectly purchasing or becoming interested in the purchase of any public land and am also prohibited by 30 U.S.C. § 1211 (f) from holding a financial interest in any surface or underground coal mining operation. Additionally, I am aware that my position is subject to the prohibitions against holding any financial interest in federal lands or resources administered or controlled by the U.S. Department of the Interior extended to me by supplemental regulation, 5 C.F.R. § 3501.103(b). Therefore, I will not hold any such interests during my appointment to the position of Director, Bureau of Land Management.

## 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,

A handwritten signature in black ink, appearing to read 'Kathleen Sgamma', with a long horizontal flourish extending to the right.

Kathleen Sgamma