

Jolene A. Lauria
Designated Agency Ethics Official
Department of Justice
950 Pennsylvania Ave., NW
Washington, DC 20530

Dear Ms. Lauria:

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 Attorney General, Civil Rights Division, Department of Justice. It is my responsibility to understand and comply with commitments outlined in this Ethics 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), obligations of the United States, or municipal bonds.

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 – DHILLON LAW GROUP

I am the managing partner of the Dhillon Law Group. Before I assume the duties of the position of Assistant Attorney General, I will divest my interest in Dhillon Law Group by selling my shares in the firm to my brother, a non-equity partner. My brother will pay me a fixed amount over a period of time with an interest rate automatically determined by prime rate pursuant to a promissory note. If my brother defaults on the promissory note, I will not receive equity in Dhillon Law Group to satisfy the outstanding amount owed to me. 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 my brother to make these payments, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1). Pursuant to the impartiality regulation at 5 C.F.R. § 2635.502, until all of the payments for the sale of the firm are made, I will not participate personally and substantially in any particular matter involving specific parties in which I know my brother is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d). I have verified that I will be able to carry out this divestiture within the timeframe described above.

I will receive a payment of my pro-rated 2025 salary before I sell the firm. Following my separation, I will receive a lump-sum distribution of my Dhillon Law Group cash balance pension plan. 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 the firm to pay this cash balance pension plan to me, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1).

Upon the sale of Dhillon Law Group, I will retain an interest in a portion of future recovery in 21 contingency fee cases based upon a fixed percentage of compensation. An agency ethics official has advised me that the Department of Justice and the U.S. Equal Employment Opportunity Commission have reviewed the cases and have determined that at this time the United States is not a party to the cases and does not have a direct and substantial interest in the cases. I will not participate personally and substantially in any particular matter that I know will have a direct and predictable effect on the ability or willingness of the firm or any other counsel for plaintiff in these cases, any of the clients involved in these cases, or any of the opposing parties in these cases to make any payments related to the cases, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1). Pursuant to the impartiality regulation at 5 C.F.R. § 2635.502, for a period of one year after my resignation or until any amounts owed by the firm have been paid, whichever is later, I will not participate personally and substantially in any particular matter involving specific parties in which I know the firm 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).

SECTION 3 – OTHER RESIGNATIONS

Upon confirmation, I will resign from my positions with the following entities:

- Center for American Liberty
- Dhillon Family Foundation Charitable Nonstock Corp.

Pursuant to the impartiality regulation at 5 C.F.R. § 2635.502, for a period of one year after my resignation from each of these entities, I will not participate personally and substantially in any particular matter involving specific parties in which I know that entity is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

SECTION 4 – SOCIAL MEDIA

Upon confirmation, I will cease creating content for compensation and will cease sharing in revenue for content creation.

SECTION 5 – RETAINED POSITION

I will retain my position as a trustee of Family Trust #1. I will not receive any fees for the services that I provide as a trustee during my appointment to the position of Assistant Attorney General. 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 trust, 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).

SECTION 6 – PUBLIC POSTING

I have been advised that this 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 that reads "HARMEET K. DHILLON". The signature is written in a cursive, slightly stylized font.

Harmeet K. Dhillon