

July 11, 2025

The Honorable Jamieson Greer  
Acting Director  
U.S. Office of Government Ethics  
250 E Street SW, Suite 750  
Washington, DC 20024

Dear Ambassador Greer:

I am enclosing an amendment to William H. Long, II's nominee public financial disclosure report, signed on February 27, 2025, and an amendment to his ethics agreement, signed on April 2, 2025. Based on my review of this additional information, I continue to believe that Mr. Long is in compliance with applicable laws and regulations governing conflicts of interest.

Sincerely,

**Mark A.  
Vetter**

Mark A. Vetter

Alternate Designated Agency Ethics Official

Digitally signed by  
Mark A. Vetter  
Date: 2025.07.11  
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Enclosures

July 10, 2025

Mark A. Vetter  
Alternate Designated Agency Ethics Official  
Department of Treasury  
1500 Pennsylvania Ave., NW  
Washington, DC 20029

Dear Mr. Vetter:

The purpose of this letter is to amend my ethics agreement signed on April 2, 2025. In a separate document, I am amending Parts 1 and 6 of my financial disclosure report to correct an inadvertent error for the reporting of a trustee position with two family trusts. I should have reported only one trustee position because I have only one family trust. To clarify this in my ethics agreement, Section 6 is deleted and replaced with the following:

#### SECTION 6 – FAMILY TRUST

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 Commissioner. 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 Family Trust #1, 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 have been advised that amendment to my ethics agreement 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 blue ink, appearing to read "William H. Long, II", is written over a printed name.

William H. Long, II

April 2, 2025

Mr. Mark A. Vetter  
Alternate Designated Agency Ethics Official  
U.S. Department of the Treasury  
1500 Pennsylvania Ave., NW  
Washington., DC 20229

Dear Mr. Vetter:

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 Commissioner, Internal Revenue Service, Department of the Treasury. 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), 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 – BILLY LONG STRATEGIES, LLC, SERIES 1

I previously resigned from my position with Billy Long Strategies, LLC, Series 1. My spouse owns the firm. Upon confirmation, the consulting firm will cease engaging in any business, including the representation of clients. During my appointment to the position of Commissioner, the firm will remain dormant and will not advertise. 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 firm. 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 or until the client satisfies any outstanding bill, whichever is later, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

I have previously resigned from my positions with Capitol Edge Strategies, LLC and Commerce Terrace Consulting, LLC. I am owed referral fees from Commerce Terrace Consulting, LLC for work I previously completed. I will receive the fees before I assume the duties of the position of Commissioner, or I will forfeit them. 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 3 – MURNEY ASSOCIATES, LLC

Upon confirmation, I will resign from my position with Murney Associates, LLC. My spouse owns equity in Murney Associates, LLC through Billy Long, Inc. 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 Murney Associates, LLC or Billy Long, Inc. 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 or until the client satisfies any outstanding bill, whichever is later, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

## SECTION 4 – DIVESTITURES

I will divest my interests in the following entities as soon as practicable but not later than 90 days after my confirmation:

- Apple Inc.
- Beyond Meat Inc.
- Ford Motor Co.
- Southern Company

With regard to each of these entities, 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 entity until I have divested it, 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 have verified that I will be able to carry out the divestitures within the timeframe described above.

I will also divest my interest in the Invesco Oppenheimer SteelPath MLP Select 40 Fund as soon as practicable but not later than 90 days after my confirmation. Until I have completed this divestiture, 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 any holding of the Invesco Oppenheimer SteelPath MLP Select 40 Fund that is invested in the energy sector, 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 have verified that I will be able to carry out the divestiture within the timeframe described above.

I understand that I may be eligible to request a Certificate of Divestiture for qualifying assets and that a Certificate of Divestiture is effective only if obtained prior to divestiture. Regardless of whether I receive a Certificate of Divestiture, I will ensure that all divestitures discussed in this agreement occur within the agreed upon timeframes and that all proceeds are invested in non-conflicting assets. I understand that I must submit my request for a Certificate of Divestiture to allow for adequate time for OGE to process the Certificate of Divestiture, and in order to divest assets within the agreed upon timeframe.

I (including my spouse and minor children if applicable) will not repurchase any asset I was required to divest without my consultation with my agency ethics official and the U.S. Office of Government Ethics.

## SECTION 5 – OTHER INTERESTS

My spouse owns Professional Realty Referral. 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 Professional Realty Referral.

My spouse receives residual commissions for my former work from Bob Kollmeier Auctions and Keller Williams Realty, Inc. I also receive residual commissions for prior work with Keller Williams Realty, Inc. 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 either of these entities, to pay the residual commissions to me or my spouse, 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 as long as I or my spouse continues to receive these residual commissions, I will not participate personally and substantially in any particular matter involving specific parties in which I either entity is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

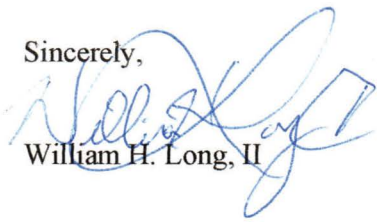
#### SECTION 6 – FAMILY TRUSTS

I will retain my position as a trustee of Family Trust #1 and Family Trust #2. I will not receive any fees for the services that I provide as a trustee during my appointment to the position of Commissioner. 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 either 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 7 – 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,

  
William H. Long, II