

April 22, 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 Solicitor 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 (OGE) pursuant to the ethics agreement requirements contained in the financial disclosure regulation at 5 C.F.R. § 2634.803(a)(4).

SECTION 2 – ENERGY TRANSFER

I resigned from my position with Energy Transfer in February 2025. 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 Energy Transfer 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 – OTHER RESIGNATIONS

I resigned from my position with the College Foundation of the University of Virginia in March 2025. 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 College Foundation of the University of Virginia 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 - RETAINED FINANCIAL INTERESTS

I have been advised that the duties of the position of Solicitor may involve particular matters affecting the financial interests of the entities identified on Attachment A. The agency has determined that it is not necessary at this time for me to divest my interests in these entities because my recusal from particular matters in which these interests pose a conflict of interest will not substantially limit my ability to perform the essential duties of the position of Solicitor.

Accordingly, with regard to the cryptocurrency entities listed on Attachment A, I will not participate personally and substantially in any particular matter that to my knowledge has a direct and predictable effect on my financial interests in the virtual currency for as long as I own 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)

With regard to the bonds listed on Attachment A, I will not participate personally and substantially in any particular matter that to my knowledge has a direct and predictable effect on

the marketability or market resale value of the bond or on the ability or willingness of the issuer to pay their debt obligations, 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 5 – AGENCY SPECIFIC REQUIREMENTS

If I am confirmed as Solicitor of the U.S. Department of the Interior, I am aware that I am 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 Solicitor. Finally, I understand that I, my spouse, and any minor children must also comply with the requirements in 5 C.F.R. § 3501.103(c).

SECTION 6 – 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 "Will Doffermyre", with a stylized flourish at the end.

William Doffermyre

ATTACHMENT A
Doffermyre, William
Ethics Agreement

- Ripple XRP (XRP)
- Stellar (XLM)
- Ethereum (ETH)
- Solana (SOL)
- fetch.ai (FET)
- Bitcoin (BTC)
- Hedera (HBAR)
- Litecoin (LTC)
- Alaska Housing Finance Corporation (AHFC) Mortgage Revenue General Bonds II 2020 Series B
- Alaska State Housing Finance Corporation (AHFC) Bonds State Capital Project II 2022 Series B
- Allen County Industrial Building Corporation Lease Rental Revenue Bonds 2024
- Arizona State Certificates of Participation (COPS) 2019A
- Austin, Texas Public Improvement Refunding Bonds 2024
- Connecticut State General Obligation Bonds 2018 Series C
- Denton, Texas Utility System Revenue Refunding Bonds 2017
- Florida State Municipal Power Agency Revenue Refunding Bonds
- Fort Bend County, Texas Unlimited Tax Road and Refunding Bonds Series B
- Grand Parkway Transportation Corporation, Texas System Toll Revenue Subordinate Tier Bonds 2018 Series A
- Harris County, Texas Toll Road Revenue First Lien Refunding Bonds 2023A
- Johnson City, Tennessee General Obligation Refunding Bonds 2019B
- Lake Worth Beach, Florida Consolidated Utility Revenue Bonds 2020
- Lansing, Michigan Board of Water & Light Utility System Revenue Refunding Bonds 2024 Series A
- Louisiana State General Obligation Bonds 2017-B
- Mississippi State General Obligation Bonds 2021C
- Noblesville, Indiana Community Development Corporation Lease Rental Revenue Bonds Event Center Project 2024 Series B
- Salt Lake City Utah Sales Tax Revenue Bonds 2017
- San Antonio, Texas Electric & Gas Revenue System Refunding Bonds 2024E
- South Carolina State Housing Finance & Development Authority Mortgage Revenue Bonds 2025A
- Texas State General Obligation Mobility Fund Refunding Bonds Series B
- Texas State University System Financing Revenue and Refunding Bonds 2017 Series A