

OCT 17 2017

Ms. Ruth Vetter
Alternate Designated Agency Ethics Official
Office of the General Counsel
Department of Defense
Washington DC 20310

Dear Ms. 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 Assistant Secretary of the Army for Installations, Energy & Environment.

As required by 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 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 officer, director, trustee, general partner or employee; and any person or organization with which I am negotiating or have an arrangement concerning prospective employment.

I am the sole proprietor of Alex A. Beehler & Co., LLC. During my appointment to the position of Assistant Secretary of the Army for Installations, Energy & Environment, Alex A. Beehler & Co, LLC (Beehler) will cease engaging in any business, including providing consulting services to clients. During my appointment, Beehler will remain dormant and will not advertise. I will not perform any services for Beehler, except that I will comply with any requirements involving legal filings, taxes and fees that are necessary to maintain Beehler while it is in an inactive status. Any amounts owed to me by my clients will be fixed before I assume the duties of the position of the Assistant Secretary of the Army for Installations, Energy & Environment, and 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 any client to pay the agreed upon amounts. As Assistant Secretary of the Army for Installations, Energy & Environment, 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 Beehler. 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).

Upon confirmation, I will resign from my position as a board member of TechLaw Holdings. I have no equity interest in this entity and have only received director fees as

compensation. I will not receive any deferred fees or a severance payment upon resigning from this entity. I will also resign from my uncompensated board member positions with LandCAN and Imagine Schools. 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).

My spouse is employed by and owns Stephanie Kenyon and Associates (Kenyon) where she receives a salary and collects appraisal fees for this fine arts auction gallery. For as long as my spouse continues to work for Kenyon, I will not participate personally and substantially in any particular matter involving specific parties in which I know Kenyon is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

My mother is a beneficiary of an irrevocable residuary trust. I serve as the trustee and have a beneficial interest in the trust. Upon confirmation, I will continue to serve as a trustee but I will not receive any compensation from the trust for my services. Upon confirmation, I will divest my beneficial interests in Dominion Energy, Duke Energy, Ecolab, and Exxon Mobil within 90 days of my confirmation. 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 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.

If I rely on a *de minimis* exemption under 5 C.F.R. § 2640.201(b) with regard to any of my financial interests in sector mutual funds, I will monitor the value of those interests. If the aggregate value of my interests in sector mutual funds that concentrate in any one sector exceeds \$50,000, 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 holdings of the funds that are in the specific sector in which the funds concentrate, 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).

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 exemption at 5 C.F.R. § 2640.201(a), obligations of the United States, or municipal bonds.

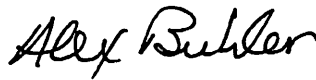
I will meet in person with a senior ethics official in the Department of the Army during the first week of my service in the position of Assistant Secretary of the Army for Installations,

Energy & Environment in order to complete the initial ethics briefing required under 5 C.F.R. § 2638.305. Within 90 days of my confirmation, I will document my compliance with this ethics agreement by notifying you in writing when I have completed the steps described in this ethics agreement.

I understand that as an appointee I will be required to sign the Ethics Pledge (Exec. Order No. 13770) and that I will be bound by the requirements and restrictions therein in addition to the commitments I have made in this ethics agreement.

I have been advised that this ethics agreement will be posted publicly, consistent with 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 "Alex Beehler". The signature is written in a cursive, flowing style.

Alex Beehler