

JAN 10 2017

MEMORANDUM

TO: Linda M. Cruciani, Deputy General Counsel for Operations

FROM: Dr. Benjamin S. Carson, Designate for Secretary
U.S. Department of Housing and Urban Development

SUBJECT: Ethics Agreement

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 Secretary of the United States Department of Housing and Urban Development.

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.

Upon confirmation, I will resign from my positions with the Carson Scholars Fund, Inc., and Academy of Achievement. 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 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).

Upon confirmation, I will resign from my position as managing member of American Business Collaborative, LLC, and I will become a non-managing member of this entity. During my appointment, I will not manage this entity or provide any other services to it. Instead, it will receive royalties, and I will receive only passive investment income from it. As Secretary, 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 American Business Collaborative, LLC, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1).

Upon confirmation, I will resign from my position as managing member BenCan, LLC, and I will become a non-managing member of this entity. During my appointment, I will not manage this entity or provide any other services to it. Instead, I will receive only passive investment income from it. As Secretary, 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 BenCan, LLC, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1).

I receive royalties from Review & Herald Publishing Association for sales of my book, *Gifted Hands: The Ben Carson Story*. I will not participate personally and substantially in any particular matter involving specific parties in which I know Review & Herald Publishing Association, is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

I receive royalties from Tyndale House Publishers, Inc., for sales of my book, *One Vote: Make Your Voice Heard*. I will not participate personally and substantially in any particular matter involving specific parties in which I know Tyndale House Publishers, Inc., is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

I receive royalties from HarperCollins Christian Publishing, for sales of my books, *Think Big: Unleashing Your Potential for Excellence*; *The Big Picture*; *Take the Risk: Learning to Identify, Choose, and Live with Acceptable Risk*; *America The Beautiful: Rediscovering What Made This Nation Great*; and *You Have a Brain: A Teen's Guide to T.H.I.N.K. B.I.G.* I will not participate personally and substantially in any particular matter involving specific parties in which I know HarperCollins Christian Publishing, is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

I receive royalties from Penguin Group USA, for sales of my books, *One Nation: What We Can All Do to Save America's Future* and *A More Perfect Union: What We the People Can Do to Reclaim Our Constitutional Liberties*. I will not participate personally and substantially in any particular matter involving specific parties in which I know Penguin Group USA, is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

During my appointment to the position of Secretary, if I have a managed account, I will ensure that the account manager does not purchase any new assets other than cash, cash equivalents, obligations of the United States, and investment funds that qualify for the exemption at 5 C.F.R. § 2640.201(a).

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,



Dr. Benjamin S. Carson, Sr.

JAN 19 2017

Linda M. Cruciani
Deputy General Counsel for Operations
Office of General Counsel
U.S. Department of Housing and Urban Development
451 7th St., SW, Room 10240
Washington, DC 20410

Dear Ms. Cruciani:

The purpose of this letter is to supplement my public financial disclosure report signed on January 4, 2017, and my ethics agreement signed on January 10, 2017. The following information was inadvertently omitted from Part I of my report:

Organization Name	City, State of Entity	Organization Type	Position Held	From	To
My Faith Votes	Garland, TX	Non-profit organization	Honorary Chairman	March 2016	November 2016

I resigned from my position with My Faith Votes in November 2016. 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 My Faith Votes 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 been advised that this supplement to my 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. I understand that this letter will also be released as an attachment to my financial disclosure report.

Sincerely,



Dr. Benjamin S. Carson, Sr.

February 1, 2017

Linda M. Cruciani
Deputy General Counsel for Operations
Office of General Counsel
U.S. Department of Housing and Urban Development
451 7th St., SW, Room 10240
Washington, DC 20410

Dear Ms. Cruciani:

The purpose of this letter is to supplement my ethics agreement signed on January 10, 2017, and the January 19, 2017, supplement to the ethics agreement. The following information supplements my ethics agreement:

I understand that as an appointee I will be required to sign the Ethics Pledge required under the Executive Order dated January 28, 2017 (“Ethics Commitments by Executive Branch Appointees”) and that I will be bound by the requirements and restrictions therein in addition to the commitments I made in the ethics agreement I signed on January 10, 2017, and in the supplement that I signed on January 19, 2017.

I have been advised that this supplement to my 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, appearing to read 'B. Carson', with a stylized flourish at the end.

Dr. Benjamin S. Carson, Sr.