OCT 0 6 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 Air Force for Manpower and Reserve Affairs.

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 McNay Art Museum and Haven for Hope. 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).

I am a co-founder and co-owner of Innovative Breakthroughs, LLC, a product design and manufacturing company. Upon confirmation, I will resign from my position with Innovative Breakthroughs, LLC. I will continue to have a financial interest in this entity, but I will not provide services material to the production of income. Instead, I will receive only passive investment income from it. 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 Innovative Breakthroughs, LLC, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1).

I will divest my interests in defense contractor stocks listed in the attachment within 90 days of my confirmation. With regard to each of the entities listed in the attachment, 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 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 Air Force during the first week of my service in the position of Assistant Secretary of the Air Force for Manpower and Reserve Affairs 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,

Shon Manasco

Attachment

Attachment

1. 3M Company
2. Abbot Laboratories
3. Abbvie
4. Accenture
5. Advisory Board Corporation
6. Albemarle Corp
7. Allergan
8. Amazon
9. Ameren Corporation
10. American Electric Power
11. American Tower Corporation
12. American Water Works
13. Amerisourcebergen Corp.
14. Ametek, Inc
15. Amphenol Corp
16. Anadarko Petroleum
17. Analog Devices
18. AT&T
19. Bank of America
20. Baxter International
21. Becton Dickinson
22. Berkshire Hathaway
23. Boeing
24. Boston Scientific Corp.
25. Cardinal Health
26. Caterpillar
27. Chevron
28. Cintas Corporation
29. Cisco Systems, Inc.
30. Citigroup
31. Coca Cola Company
32. Colgate-Palmolive
33. Comcast
34. Cooper Companies
35. Corelogic
36. Cummins Inc
37. Danaher Corporation
38. Deere & Company
39. Delta Air Lines
40. Digital Globe
41. Dover Corporation
42. Dr. Pepper Snapple Group
43. Duke Energy Corporation
44. Eaton Corp.

45. Ecolab
46. Edison International
47. Edwards Lifesciences
48. Emerson Electric
49. Equifax Inc
50. Esco Technologies
51. Essilor International
52. Exelon Corporation
53. Express Scripts Holdings
54. Exxon Mobil
55. Fastenal
56. Fedex
57. Foot Locker
58. Fresenius Medical Care
59. Gartner
60. General Dynamics
61. General Electric
62. General Motors
63. Harris Corp
64. Heico Corporation
65. Hess Corporation
66. Hewlett Packard Company
67. Hewlett Packard Enterprise
68. Hexcel Corporation
69. Hilton Worldwide Holdings
70. Hologic Incorporated
71. Home Depot
72. Honeywell
73. Host Hotels & Resorts
74. Hostess Brands
75. Humana
76. IDEX Corporation
77. Idexx Laboratories
78. Illinois Tool Works
79. Ingersoll-Rand
80. Intuitive Surgical
81. Iron Mountain, Inc.
82. Johnson & Johnson
83. Johnson Controls International
84. Kaman Corp
85. KEYW Holding Corp
86. Komatsu
87. Laboratory Corporation of America
88. LKQ Corporation
89. Lockheed Martin
90. McKesson Corporation

91. Medtronic
92. Merck
93. MGM Resorts International
94. Micron
95. Microsoft
96. Motorola
97. Nextera Energy
98. Nisource
99. Northrop Grumman
100. O'Reilly Automotive
101. Omnicom Group
102. Oracle
103. Parker-Hannifin
104. Pepsico
105. Pfizer
106. PG&E
107. Praxair
108. Procter & Gamble
109. Proofpoint
110. Qualcomm
111. Quest Diagnostics
112. Raytheon
113. Republic Services
114. Roche Holding
115. Rockwell Automation
116. Rockwell Collins
117. Scana Corp
118. Secom
119. Sempra Energy
120. Sherwin-Williams
121. Southern Co
122. Southwest Airlines
123. Stanley Black & Decker
124. Staples
125. Stryker
126. Synopsys
127. Sysco Corporation
128. TE Connectivity
129. Teledyne Technologies
130. Teleflex Inc.
131. Teradyne
132. Textron
133. Thermo Fisher Scientific Inc.
134. Time Warner
135. Total SA
136. Total Systems Services

137. Tyson Foods
138. United Continental Holdings
139. United Parcel Service
140. United Rentals
141. United Technologies
142. Unitedhealth Group
143. Valero Energy Corporation
144. Verizon Communications
145. Walt Disney Company
146. Waste Connections, Inc.
147. Waste Management
148. Wyndham Worldwide
149. XCEL Energy