

September 22, 2025

Daniel S. Lee
Designated Agency Ethics Official
Office of the General Counsel
Federal Maritime Commission
800 North Capitol St., NW
Washington, D.C. 20573

Dear Mr. Lee:

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 of the Federal Maritime Commission. 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 pursuant to the ethics agreement requirements contained in the financial disclosure regulation at 5 C.F.R. § 2634.803(a)(4).

SECTION 2 – ADAMS AND REESE LLP

Upon confirmation, I will resign from my position with Adams and Reese LLP. 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 this firm is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d). 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).

SECTION 3 – CONSULTING CLIENTS

Upon confirmation, I will cease providing consulting services to Taylor County Development Authority. Any amounts owed to me by Taylor County Development Authority will be fixed before I assume the duties of position of Commissioner, 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 Taylor County Development Authority to pay the agreed upon amount. Pursuant to the impartiality regulation at 5 C.F.R. § 2635.502, for a period of one year after I cease providing services to this entity, or until it satisfies any outstanding bill, whichever is later, I will not participate personally and substantially in any particular matter involving specific parties in which I know it is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

I recently provided consulting services to LeverX. Pursuant to the impartiality regulation at 5 C.F.R. § 2635.502, for a period of one year after I ceased providing services to this entity, I will not participate personally and substantially in any particular matter involving specific parties in which I know it 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 – SOLE PROPRIETORSHIPS

I am the sole proprietor of these entities: LDB Marketing Inc.; CONN LLC; CONN Florida LLC dba Laura DiBella Real Estate; and Sweat Sisters, LLC. Upon confirmation, I will cease engaging in any business, including the representation of clients. All amounts owed to me

by my clients will be fixed before I assume the duties of the position of Commissioner, 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 amount. During my appointment to the position of Commissioner, the entities will remain dormant and will not advertise. I will not perform any services for the entities, except that I will comply with any court orders or subpoenas and any requirements involving legal filings, taxes, and fees that are necessary to maintain the entities while they are in a dormant status. As 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 any of these entities. 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 5 – CONFLICTS OF INTEREST

The statute at 46 U.S.C. § 46101(b)(4)(A) states that “[a] Commissioner may not have a pecuniary interest in, hold an official relation to, or own stocks or bonds of any entity the Commission regulates.” The section further states that “[a] Commissioner may not engage in another business, vocation, or employment.” 46 U.S.C. § 46101(b)(4)(B).

While in office, I will not have any pecuniary interest in, hold any official relations to, or own stocks or bonds of any entity the Commission regulates. In addition, I will not engage in another business, vocation, or employment during my tenure.

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,



Laura DiBella