U.S. Department of Justice

Washington, D.C. 20530

Emory A. Rounds, III
Director
Office of Government Ethics
Suite 500
1201 New York Avenue, NW
Washington, DC 20005-3919

Dear Mr. Rounds:

In accordance with the provisions of Title I of the Ethics in Government Act of 1978 as amended, I am forwarding the financial disclosure report of Ms. Almo Jean Carter. President Biden has nominated Ms. Carter to serve as the Commissioner, United States Parole Commission, Department of Justice. We have conducted a thorough review of the nominee's report and have counseled her on the government ethics rules. The purpose of this letter is to describe the steps that Ms. Carter will take to avoid any actual or apparent conflict of interest in the event that she is confirmed for the aforementioned position. Ms. Carter understands that it is her responsibility to understand and comply with commitments outlined in this agreement.

Although it is not possible to provide for all of the specific circumstances which might give rise to a financial conflict of interest because the work of the Commissioner, U.S. Parole Commission, involves a wide variety of matters involving specific parties, and it is not possible to predict where conflicts will arise until specific parties are identified, we have counseled Ms. Carter on the applicable conflict of interest laws and regulations and, in particular, on the application of the criminal conflicts of interest law at 18 U.S.C. § 208.

SECTION 1 – GENERAL COMMITMENTS

As required by the criminal conflicts of interest law at 18 U.S.C. § 208(a), Ms. Carter will not participate personally and substantially in any particular matter in which she knows that she has a financial interest directly and predictably affected by the matter, or in which she knows that a person whose interests are imputed to her has a financial interest directly and predictably affected by the particular matter, unless she first obtains a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualifies for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2). She understands that the interests of the following persons are imputed to her:

- Her spouse or any minor child of hers;
- Any general partner of a partnership in which she is a limited or general partner;
- Any organization in which she serves as officer, director, trustee, general partner or employee; and

- Any person or organization with which she is negotiating or has an arrangement concerning prospective employment.

In determining whether a particular matter has a direct and predictable effect on her financial interests or on those of any other person whose interests are imputed to her, Ms. Carter will consult with Department of Justice ethics officials. As stated in the attachment to this Ethics Agreement, Ms. Carter understands and agrees to comply with the conflict of interest laws and regulations, and to follow the procedures set forth in this agreement.

If Ms. Carter has a managed account or otherwise uses the services of an investment professional during her appointment, she will ensure that the account manager or investment professional obtains her 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.

Ms. Carter will receive a live ethics briefing from Department ethics officials after her confirmation but not later than 15 days after her appointment pursuant to the ethics program regulation at 5 C.F.R. § 2638.305. Within 90 days of her confirmation, Ms. Carter will submit her Certification of Ethics Agreement Compliance, which documents her compliance with this ethics agreement, to Department ethics officials.

Ms. Carter understands that as an appointee she will be required to sign the Ethics Pledge (Exec. Order No. 13989) and that she will be bound by it. Among other obligations, she will be required to recuse from particular matters involving specific parties involving her former employer or former clients for a period of two years after she is appointed, with the exception of federal, state and local government.

Ms. Carter will not modify this ethics agreement without my 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 – PUBLIC DEFENDER SERVICE FOR THE DISTRICT OF COLUMBIA

Upon confirmation, Ms. Carter will resign from her position with the Public Defender Service for the District of Columbia (PDSDC). For a period of one year after her resignation, she will have a "covered relationship" under 5 C.F.R. § 2635.502 with the PDSDC. Pursuant to 5 C.F.R. § 2635.502(d), Ms. Carter will seek written authorization to participate in particular matters involving specific parties in which the PDSDC is a party or represents a party. She will not participate personally and substantially in any particular matter involving specific parties in which she knows a former client of hers is a party or represents a party, for a period of one year after she last provided service to that client, unless she is authorized to participate, pursuant to 5 C.F.R. § 2635.502(d). In addition, during her appointment to United States Parole Commission, Ms. Carter will not participate personally and substantially in any particular matter involving specific parties in which she previously participated while employed with the Public Defender Service for the District of Columbia.

SECTION 3 – OTHER RESIGNATIONS

Upon confirmation, Ms. Carter will resign from her position with the:

- District of Columbia Court of Appeals, Committee on Admissions

Pursuant to the impartiality regulation at 5 C.F.R. § 2635.502, for a period of one year after her resignation from this entity, she will not participate personally and substantially in any particular matter involving specific parties in which she knows this entity is a party or represents a party, unless she is first authorized to participate, pursuant to at 5 C.F.R. § 2635.502(d).

SECTION 4 – FAMILY TRUST #1

Ms. Carter will retain her position as trustee of the Revocable Family Trust she will not receive any fees for the services she provides as a trustee during her appointment to the position of Commissioner. She will not participate personally and substantially in any particular matter that to her knowledge has a direct and predictable effect on the financial interests of the Family Trust unless she first obtains a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualifies for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2).

SECTION 5 – PUBLIC POSTING

Ms. Carter has 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.

Based on the above agreements and counseling, she is satisfied that the enclosed report presents no conflicts of interest under applicable laws and regulations and that you may so certify to the Senate Judiciary Committee.

Sincerely,

ARTHUR GARY

Digitally signed by ARTHUR GARY
Date: 2022.08.08 12:08:10 -04'00'

Arthur E. Gary
Deputy Assistant Attorney General for
Policy, Management & Procurement and
Alternate Designated Agency Ethics Official

Enclosure

NOMINEE STATEMENT

I have read the Ethics Agreement signed by Arthur Gary, Deputy Assistant Attorney General for Administration and Alternate Designated Agency Ethics Official on August 8, 2022 and I agree to comply with the commitments outlined in this agreement. In addition, in the event that an actual or potential conflict of interest arises during my appointment, I will consult with the Department ethics officials and take the measures necessary to resolve the conflict, such as recusal from the particular matter or divestiture of an asset. 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). I (including my spouse and dependent children if applicable) also will not repurchase any asset I was required to divest without my consultation with the Department ethics officials and the U.S. Office of Government Ethics. Finally, I understand that as an appointee I will be required to sign the Ethics Pledge (Exec. Order No. 13989) and that I will be bound by it. Among other obligations, I will be required to recuse from particular matters involving specific parties involving my former employer or former clients for a period of two years after I am appointed, with the exception of federal, states and local governments.

Almo Jean Carter

Date: August 8, 2022