Date: June 16, 2026

Ms. Kateland Jackson
U.S. Department of Homeland Security
2707 Martin Luther King Jr. Ave., SE
Washington, DC 20528

Dear Ms. Jackson:

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 Administrator at the Transportation Security Administration (TSA). 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.

I have a managed account and I will direct the account manager to obtain 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 monitor whether the account manager is following this direction regarding prior approval.

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

SECTION 2 – RESIGNATIONS

Upon confirmation, I will resign from my position with the Valley Forge Military Academy. Pursuant to the impartiality regulation at 5 C.F.R. § 2635.502, for a period of one year after my resignation from this entity, I will not participate personally and substantially in any particular matter involving specific parties in which I know that Valley Forge Military Academy is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

SECTION 3 – SERCO

I previously resigned from my position with Serco, Inc. Following my separation from Serco, I received a severance-related cash payout due to the accelerated vesting of my unvested RSUs held through Serco's Long Term Investment Plan. Pursuant to the impartiality regulation at 5 C.F.R. § 2635.503, for a period of two years after my receipt of this payment, I will not participate personally and substantially in any particular matter involving specific parties in which Serco, is a party or represents a party, unless I first receive a written waiver, pursuant to 5 C.F.R. § 2635.503(c).

SECTION 4 – KARAMAZOV PROPERTIES, LLC and REVOCABLE AGENT TRUST #1

I will retain my position as Trustee of Revocable Agent Trust #1. I will not receive any fees for the services that I provide as a trustee during my appointment to the position of Administrator. The trust operates in relation to Karamazov Properties, LLC, a closely held corporation run solely by my wife, that my wife and I own. I do not hold a position with Karamazov Properties, LLC, but I will continue to have a financial interest in this entity. I will not provide services material to the production of income during my appointment. 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 Karamazov Properties, unless I first obtain a written waiver pursuant to 18 U.S.C. § 208(b)(1).

SECTION 5 – RAMSBURY REAL ESTATE GROUP, LLC, FERN GARDENS LLC, 1712 N STREET, LLC, AND 1724 TWENTY LLC

My spouse owns the following entities:

- Ramsbury Real Estate Group LLC
- Fern Gardens LLC
- 1712 N Street LLC
- 1724 Twenty LLC

which manage properties. Ramsbury Real Estate Group LLC is also a real estate broker. 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, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1). In addition, I will not participate personally and substantially in any particular matter involving specific parties in which one of my wife's real estate clients is a party or represents a party to the matter, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

SECTION 6 – DIVESTITURES DUE TO THE AVIATION TRANSPORTATION SECURITY ACT

I understand that the Aviation Transportation Security Act (ATSA) prohibits the Transportation Security Administrator from holding stock in or bonds of a transportation or security enterprise or an enterprise that makes equipment that could be used for security purposes. ATSA 49 USC § 114(c). I currently hold financial interests in the following prohibited entities:

- Berkshire Hathaway, Inc.
- Union Pacific Corp.

I will divest these assets after my appointment but before I assume the duties of the position of Administrator. I have verified that I will be able to carry out the divestitures within the timeframe described.

SECTION 7 – DIVESTITURES DUE TO 18 U.S.C. § 208

I will divest my interests in the entities listed on Attachment A as soon as practicable but not later than 90 days after my confirmation. With regard to 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 interest 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 have verified that I will be able to carry out the divestitures within the timeframe described above.

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. I understand that I must submit my request for a Certificate of Divestiture to allow for adequate time for OGE to process the Certificate of Divestiture and in order to divest assets within the agreed upon timeframe.

I (including my spouse and minor children if applicable) will not repurchase any asset I was required to divest without consulting with my agency ethics official and the U.S. Office of Government Ethics.

SECTION 8 – 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,

David P. Cummins

ATTACHMENT

ATTACHMENT A

ABBOTT LABORATORIES (ABT)
ABBVIE INC. (ABBV)
ALPHABET INC. CMN CLASS A (GOOGL)
ALPHABET INC. CMN CLASS C (GOOG)
AMAZON.COM INC CMN (AMZN)
AMEREN CORPORATION CMN (AEE)
AMERICAN EXPRESS CO. CMN (AXP)
AON PUBLIC LIMITED COMPANY CMN CLASS A (AON)
APPLE INC. CMN (AAPL)
AT&T INC. CMN (T)
ATMOS ENERGY CORP. (ATO)
BERKSHIRE HATHAWAY INC. CLASS B (BRKB)
BOEING COMPANY CMN (BA)
CATERPILLAR INC (DELAWARE) CMN (CAT)
CHEVRON CORP. (CVX)
CINTAS CORPORATION CMN (CTAS)
CISCO SYSTEMS, INC. CMN (CSCO)
CITIGROUP INC. CMN (C)
COCA-COLA COMPANY (THE) CMN (KO)
COMCAST CORPORATION CMN CLASS A VOTING (CMCSA)
CONSTELLATION ENERGY CORP CMN (CEG)
COSTCO WHOLESALE CORP. (COST)
CROWDSTRIKE HOLDINGS (CRWD)
DELL TECHNOLOGIES INC. CMN CLASS C (DELL)
DIAMONDBACK ENERGY INC CMN (FANG)
DOMINION ENERGY INC CMN (D)
EATON CORP PLC CMN (ETN)
ECOLAB, INC. (ECL)
ELI LILLY & COMPANY (LLY)
EVERGY, INC. CMN (EVRG)
EVERSOURCE ENERGY CMN (ES)
EXXON MOBIL CORPORATION CMN (XOM)
FEDEX CORPORATION CMN (FDX)
GENERAL DYNAMICS CORP. (GD)
GENERAL ELECTRIC CO. (GE)
HILTON WORLDWIDE HOLDINGS INC. (HLT)
HONEYWELL INTL INC CMN (HON)
IDEXX LABORATORIES CMN (IDXX)

INTEL CORPORATION CMN (INTC)
INTL BUSINESS MACHINES CORP CMN (IBM)
JOHNSON & JOHNSON CMN (JNJ)
JOHNSON CONTROLS INTERNATIONAL CMN (JCI)
JPMORGAN CHASE & CO CMN (JPM)
LOCKHEED MARTIN CORPORATION CMN (LMT)
LOWE'S COMPANIES, INC. (LOW)
MARATHON PETROLEUM CORPORATION CMN (MPC)
MARRIOTT INTERNATIONAL, INC CMN CLASS A (MAR)
MASTERCARD INC. (MA)
MC DONALDS CORP CMN (MCD)
MERCK & CO., INC. (MRK)
META PLATFORMS INC. (META)
MICROSOFT (MSFT)
MOTOROLA SOLUTIONS, INC. (MSI)
NEXTERA ENERGY, INC. CMN (NEE)
ORACLE CORP. (ORCL)
O'REILLY AUTOMOTIVE, NC. (ORLY)
PALANTIR TECHNOLOGIES INC. (PLTR)
PARKER-HANNIFIN CORP. (PH)
PEPSICO, INC. CMN (PEP)
PFIZER INC. CMN (PFE)
PHILLIPS 66 CMN (PSX)
PROCTER & GAMBLE CO. (PG)
RTX CORP. (RTX)
SALESFORCE INC CMN (CRM)
SERVICENOW INC CMN (NOW)
SHERWIN-WILLIAMS CO CMN (SHW)
STARBUCKS CORP. CMN (SBUX)
TELEDYNE TECHNOLOGIES, INC. (TDY)
THE HOME DEPOT, INC. CMN (HD)
THERMO FISHER SCIENTIFIC INC CMN (TMO)
T-MOBILE US, INC. CMN (TMUS)
UNION PACIFIC CORP. (UNP)
UNITED PARCEL SERVICE, INC. CLASS B COMMON STOCK (UPS)
UNITED RENTALS, INC. CMN (URI)
UNITEDHEALTH GROUP INCORPORATE CMN (UNH)
VALERO ENERGY CORPORATION CMN (VLO)
VERIZON COMMUNICATIONS INC. CMN (VZ)
VISA INC. CMN CLASS A (V)
W.W. GRAINGER INC CMN (GWW)

WALMART INC CMN (WMT)
WALT DISNEY COMPANY (THE) CMN (DIS)
WASTE MANAGEMENT INC CMN (WM)
XCEL ENERGY INC. CMN (XEL)