

September 26, 2017

Robert L. Gangwere, Esq.
Designated Agency Ethics Official
U.S. Small Business Administration
1000 Walnut Street, Suite 530
Kansas City, MO 64106

Dear Mr. Gangwere:

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 Inspector General of the U.S. Small Business Administration (SBA).

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.

Following my confirmation, I will serve in an unpaid capacity in my position as a varsity head coach with Fairfax County Public Schools. I will not at any time receive compensation for services that I perform during my government appointment. I am currently coaching volleyball for the 2017 fall season for Fairfax County Public Schools. Payment for this season is received in two installments. The first installment consists of one third of the total and was paid at the beginning of the season. The second installment consists of the remaining two thirds, and will be paid at the end of the season. If I begin my government service prior to receiving the second installment, I will accept compensation only for services rendered before I assume the duties of the position of Inspector General. Until I have received the final payment, 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 Fairfax County Public Schools, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1). In addition, for a period of one year after I receive the final payment or for as long as I retain the position, whichever is later, I will not participate personally and substantially in any particular matter involving specific parties in which I know Fairfax County Public Schools is a party or represents a party unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

My spouse is employed by Yount, Hyde, and Barbour, in a position for which she receives a fixed annual salary. For as long as my spouse continues to work for Yount, Hyde, and

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Barbour, I will not participate personally and substantially in any particular matter involving specific parties in which I know Yount, Hyde, and Barbour, is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

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 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 will meet live with you during the first week of my service in the position of Inspector General 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 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,



Hannibal M. Ware